

## **GDPR: The Year After**

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#### **DISCUSSION TOPICS**

Experts in Compliance and Technology will share their experiences in the General Data Protection Regulation. This session will cover experiences from each of the participants in preparation for GDPR, as well as lessons learned post May 25 2108, the effective date.

The material discussed during this discussion should not be construed as legal advice or a legal opinion on any specific facts or circumstances. The content is intended for general information purposes only, and you are urged to consult a lawyer concerning your own situation and any specific legal questions you may have.



GDPR: General Data Protection Regulation

#### **Preparation**

- Privacy Impact Assessment/DPO
- Roles and Responsibilities
  - Controller
  - Processor
  - Sub-Processor
- Legal
- Compliance
- Operations
- Technology and Infrastructure

#### **Implementation**

- Revised Policies
- Procedural Changes
- Updated Agreements
  - Controller
  - Sub Processor
- Revised Data Retention
- Model Program Support

#### **Continuous Process Improvement**

- New Global Data Retention Strategy
- Model Program Changes for International
- Updates to all In-Country Assessments
- Best Practice Guidance/Industry Standards
- Regulatory Guidance
- Enforcement Guidance
- Customer Experience
- Data Subject Engagement



Data Subject Requests

Data

**Processing** 

Agreements

Sensitive Personal Data



### **GDPR Starting Point**

#### Before May 2018

- We have our own data protection officer since 7 years
- We are ISO 27001 certified since 2014
- Data protection and security by design are two of our development principals



#### GDPR Effort until May 2018

Product management effort: approx. 250 hours

Legal department expenditure: approx. 80 hours

Product development effort, product configuration: approx. 600 hours

Effort for documentation : approx. 80 hours

New contracts with every customer (ongoing)

Training for customer support (information about data, deleting records)



## GDPR Example Concept for Deleting and Anonymize

Original documentation 15 pages

New documentation 60 pages

Rethink the complete process



#### **GDPR So Far!**

GOOGLE | POLICY | US & WORLD |

## Google fined €50 million for GDPR violation in France

The CNIL said Google's data consent policies aren't easily accessible or transparent

By Jon Porter | @JonPorty | Jan 21, 2019, 11:16am EST

STRAFE

#### Bislang vier Strafen wegen DSGVO-Verstößen seit Mai

Bisher nur illegale Videoüberwachung geahndet – 59 Prozent der heimischen Unternehmen hinken hinterher

Muzayen Al-Youssef 23. November 2018, 17:18 🖂 362 Postings

DATENSCHUTZGRUNDVERORDNUNG

# Behörden verhängen erste Bußgelder wegen Verstößen gegen DSGVO

Bundesweit ergingen bisher in 41 Fällen Bußgeldbescheide wegen DSGVO-Verstößen. Vor allem kleine Unternehmen sind auf die neuen Regeln offenbar nicht vorbereitet.



## Thank you!



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