

CREATE BUSINESS BENEFITS THROUGH GDPR COMPLIANCE PROJECTS

The new EU General Data Protection Regulation (GDPR), which applies from the 25th of May 2018, requires Danish public and private sector enterprises to act. But what business benefits should every compliance implementation project aim for?

Good data processing practice is not new in Denmark, which has adopted various forms of legislation regarding personal data processing for many years. However, the EU's new General Data Protection Regulation introduces a number of changes. For example, enterprises are now required to appoint a Data Protection Officer (DPO) and must have a good grasp of what their data processing operations are meant to achieve as well as be fully acquainted with the requirement to establish and maintain a record of processing activities.

The challenge for Danish enterprises is not the extent to which they must comply, or the unexpected appearance of legislation in the field of personal data processing, but rather which approach to implementing and executing

compliance measures they want to take.

Ramboll recommends that enterprises reflect upon and decide on the extent to which they will adopt a minimum implementation approach or a business-oriented approach that also focuses on identifying and realising achievable business benefits.

Many organisations whose core activity is not personal data processing opt to implement minimum data protection measures, because they do not expect to realise many potential, achievable business benefits. This is essentially a sound point of view.

A business-oriented approach is usually preferred by organisations

whose core business includes personal data processing. In these organisations, the number of activities involving personal data processing and the volume of such data will be higher. Accordingly, the GDPR will have a greater impact on this type of enterprise, which will therefore identify a range of business benefits during the implementation of measures to ensure GDPR compliance.

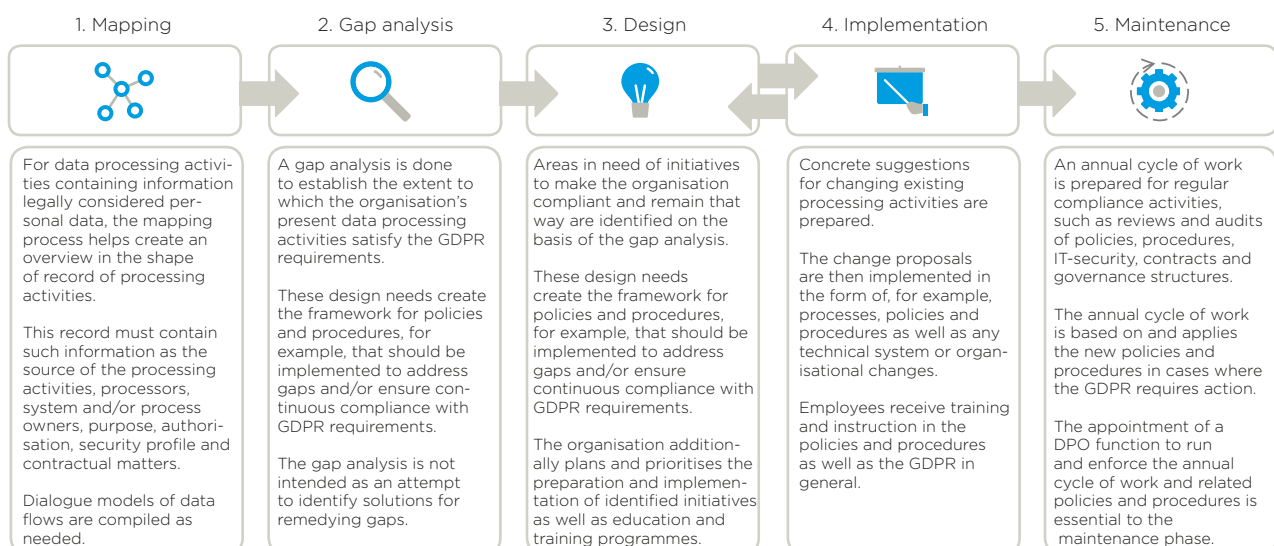
The following is a brief review of Ramboll's five-phase approach to compliance implementation.

Mapping

The purpose of the mapping phase is to identify where and how the organisation processes personal data.

RAMBOLL'S APPROACH TO ENSURING COMPLIANCE WITH THE GENERAL DATA PROTECTION REGULATION

Enterprises striving to achieve successful, continuous compliance with the EU's General Data Protection Regulations, should follow Ramboll's five-phase approach to implementing measures that ensure such compliance



all activities involving the processing of personal data, as well as other relevant, associated details, eg. the purpose of the data processing, category of personal data, category of data subject, deletion procedures, source, processing system and owners, security profile, data processors and sub-processors.

Gap analysis

The purpose of a gap analysis is to establish the extent to which the identified processing activities comply with the GDPR, a process that entails checking, for example, that the necessary contractual terms are in place, the data processing objectives are satisfactory, system security is acceptable, and that the requisite procedures for deletion, etc, exist. The result of the gap analysis is a summary of areas where and the extent to which the enterprise fails to meet the GDPR requirements.

Design

The aim of the design phase is to use the gap analysis as a framework for the requirements concerning formulating and prioritising implementation initiatives, such as drawing up new or revisiting existing policies and procedures. The design phase is a crucial part of the compliance implementation process, as the gap analysis results are

formulated as design requirements that govern which areas are the focus of the implementation phase.

Implementation

The implementation phase aims to prepare specific initiatives identified in the design phase. Against this background, the organisation implements the new policies, processes, procedures, education and training activities as well as any system or organisational changes needed to ensure the organisation becomes compliant.

Maintenance

The purpose of the maintenance phase is to ensure the enterprise complies with the GDPR requirements once the compliance implementation project has ended. Ramboll recommends setting up an annual cycle of work containing ongoing compliance activities, such as reviews and audits of policies, procedures, contracts and governance structures.

In all five phases enterprises can seek a range of business benefits that go beyond the scope of the GDPR. This is particularly relevant during the mapping phase, which, among other things, generates insight into and an overview of processes, systems, system contracts and system integrations. If an organisation has

not already started documenting these matters, a compliance project provides a strong springboard for doing so. Establishing a good practice for how to map the organisation can provide a firm basis for mapping other relevant organisational areas.

Organisations can actively select specific areas besides the GDPR to focus on during the mapping phase. This creates an opportunity to conduct gap analyses that can help identify other action areas that can generate business benefits. Examples in point could be routines, the distribution of system responsibility and ownership, system integrations and architecture.

Enterprises may identify gaps where the subsequent design and implementation phases would best be executed by creating new projects that focus more specifically on the gap in question.

Ramboll recommends that enterprises always attempt to identify and realise further business benefits in connection with GDPR compliance.

ACTION ITEMS



Decide which approach best suits the organisation, according to how great a role personal data processing plays in its core activities



Set up a good mapping practice that can be used throughout the organisation



Plan which areas besides the GDPR are desirable to focus on



If relevant, initiate separate projects for the design and implementation phases of specific action areas identified by the gap analysis