

Automotive Live Conference | 9 November 2017 GDPR in the Automotive Industry

Top 5 Key Changes: Step 1 – Processing Personal Data

Step 1 – Review your personal data so you understand how it is being collected and used:

- 1. What *personal data* is being *processed* and why is the personal data being processed?
- 2. Who collected the personal data and for what purposes?
- 3. What information (privacy notices) have you or any third parties provided to individuals about the processing to ensure it is transparent?
- 4. Do you have a *legal basis* for processing the personal data?
- 5. Is the personal data being used for marketing?

Top 5 Key Changes: Step 2 – Sharing Personal Data

Step 2 – Review how and why you share personal data with third parties and why and how third parties share personal data with you:

- 1. What personal data do you **share** with **third parties** and why?
- 2. What personal data do third parties share with you and what do they ask you to do with it?
- 3. What contracts do you have in place with third parties and are the contracts compliant with the GDPR?
- 4. Have you ensured that you or the third party have told individuals how the personal data will be shared?
- 5. Do you assess third parties for compliance with the GDPR before engaging them and monitor data sharing activities with them?

Top 5 Key Changes: Step 3 – Data Subject Rights

Step 3 – Review rights individuals have under the GDPR and what you need to do to comply with these:

- 1. Do you have processes in place to comply with the new data subject rights and can you identify when you receive a request?
- 2. Have you considered what system changes will be required, if any, and how you can approach data subject requests?
- 3. Do you need to update existing or create new data subject rights' policies and procedures?
- 4. Do you need to implement training and awareness to ensure individuals can identify data subject requests?
- Can you demonstrate how you are complying with data subject requests?

Top 5 Key Changes: Step 4 – Personal Data Breaches

Step 4 – Review how you deal with personal data breaches and ensure you meet the new GDPR requirements:

- 1. Can you identify what a personal data breach is and do you have processes and controls in place to spot potential issues?
- 2. Do you know what to do if a personal data breach happens and do you log all personal data breaches?
- 3. How engaged are senior management with personal data breaches?
- 4. Do you have processes in place to manage and report personal data breaches, for example to the Financial Conduct Authority?
- 5. How do you manage your third parties to ensure that <u>all</u> personal data breaches are reported to you?

Top 5 Key Changes: Step 5 – Accountability

Step 5 – Review data protection policies and procedures and documents in place to evidence compliance:

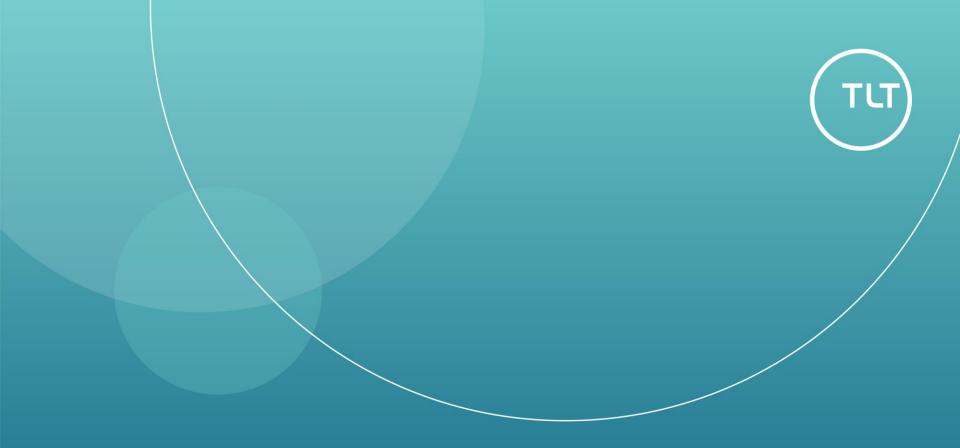
- 1. Do you need to appoint a data protection officer, if not, who will be (or is) responsible for data protection compliance?
- 2. What data protection policies, procedures and/or documents do you have in place and how often are these updated?
- 3. Do you have processes for undertaking privacy impact assessments?
- 4. Do all members of staff and other individuals responsible for processing personal data have adequate data protection training?
- 5. Do you document key decisions taken in relation to data processing to demonstrate compliance?

This presentation is a summary only. It is not intended to constitute advice and may not be relied upon as such.

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Thank you