

The long-awaited General Data Protection Regulation (GDPR) will come into effect on 25 May 2018.

The GDPR constitutes the biggest change to the data protection regime in the EU since the 1995 Data Protection Directive, and introduces fundamental changes, including:

- harmonisation and further development of data protection regimes across the EU;
- extension of the regime to apply to non-EU businesses that operate in the EU (in line with EU e-commerce and consumer laws); and
- potential for businesses to be fined EUR 20 million or up to 4% of their worldwide turnover for serious violations of the GDPR.

What are the challenges of implementing GDPR compliance?

As things stand, there are a number of uncertainties around the potential impact of the GDPR on the current legal regimes of EU Member States. Knowing where to start can, therefore, seem overwhelming. Even once you have a plan in place, or have identified areas of weakness, knowing which areas to focus on and prioritise can be difficult. Once that is sorted out, actually finding the time and resource to carry out the plan (while continuing business as usual) can seem like a gargantuan task.

In practice, there is no one-size-fits-all GDPR project plan, and the amount of work required will vary depending on a number of factors, including:

- existing obligations set out in each relevant EU Member State's local data protection laws;
- the extent to which you are compliant with the data protection laws currently in force and how sophisticated your business is with respect to data protection;
- how much personal data you process and for which purposes, and how much of that falls into special categories of personal data;
- whether you are a data processor or a data controller;
- what policies and procedures you already have in place and how you document your data processing practices; and
- how straightforward your data processing activities are (for example, do you involve data processors? Do you export personal data outside of the EU?).

Our advice is to take stock first and then to take it step-by-step, biting off one manageable-sized chunk of the GDPR pie at a time, so that you are ready for compliance on (or before) 25 May 2018.

How we can help?

For those that have not already started a GDPR compliance project, the message is: don't panic yet, but the sooner you can start, the better. Our six step guide has been developed to help you kick off your GDPR compliance project, and to show you how we can help (as much or as little as you like) along the way.

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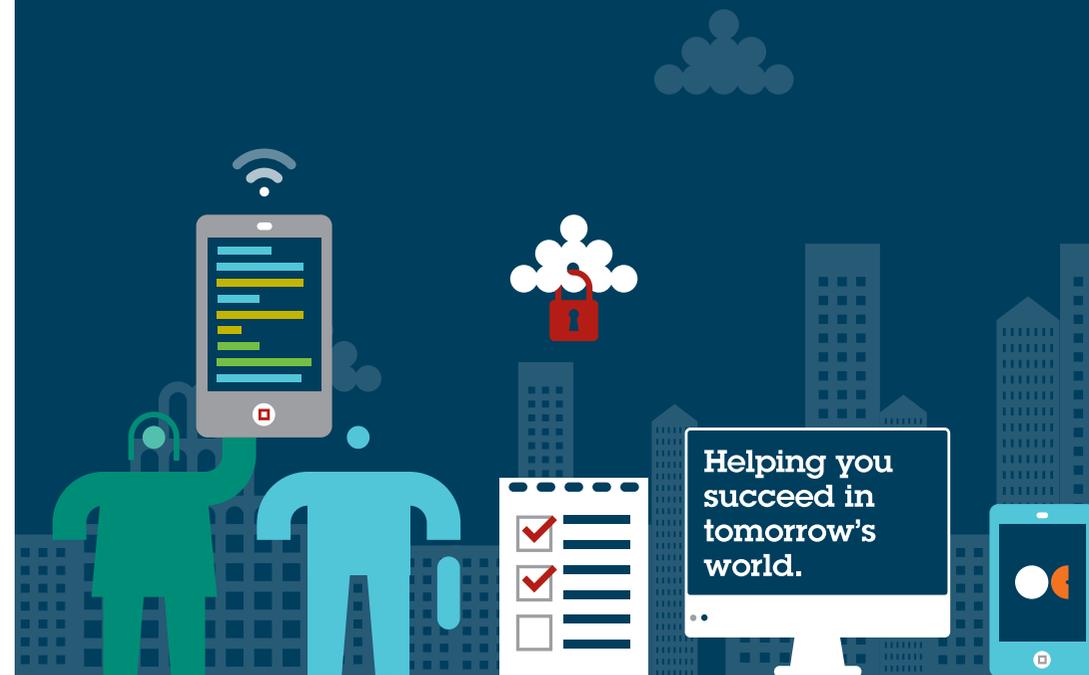


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Are you ready for GDPR compliance? A guide to what you need to do and when



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All companies doing business in the EU need to implement these changes. We have developed this guide to help you make your GDPR compliance project a success.

1. Lay the foundations →

- Raise awareness and obtain senior level buy-in
- Review GDPR guidance and factor in updates
- Identify your priority areas of focus for compliance
- Allocate resource and budget
- Implement internal governance procedures
- Hold kick-off meetings

2. Take stock and gather information →

- Assess data processing activities
- Identify current compliance measures
- Evaluate current compliance and procedures
- Track any changes to data processing activities
- Don't rush this exercise

3. Pause, review and assess →

- Review information gathered in step 2
- Perform 'gap analysis' to identify GDPR compliance steps
- Build on any existing compliance frameworks
- Identify benefits where GDPR is less strict than current laws
- Create your compliance 'roadmap'

4. Implementation →

- Implement new policies and governance procedures
- Implement necessary technical changes
- (Re)allocate internal responsibilities
- Put in place processes for procedural compliance
- Train your teams
- Review contracts and consents

5. Finishing touches →

- Take remedial steps identified as low risk
- Plan response to any future changes in data processing activities

6. Monitoring and maintenance

- Continue to monitor compliance
- Embed on-going training programmes
- Provide regular updates to key stakeholders
- Assess impact of new guidance and industry practice
- Monitor local laws derogations, and assess impact on your business

