

A dark grey, pixelated map of Europe is centered on the page. The background of the entire page is a dark blue with a wavy, textured pattern. In the bottom right corner, there are several parallel, diagonal lines in a lighter blue color.

# GDPR Compliance Checklist

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## WORKSHEET

### Introduction

The General Data Protection Regulation (GDPR) establishes new data privacy rights for European Data Subjects, requiring businesses conducting business in European Union/EEA to implement structural changes to their privacy programs.

The following checklist includes recommended actions to help businesses working towards GDPR compliance. Use this checklist to identify compliance gaps in your privacy program.

### STEP 1: Information Audit And Mapping Data - *Understand what information is being processed and who has access to it.*

- Conduct an Information Audit And Map Data Flows

**How Privacy Hub Helps:** Privacy Hub uses technology by Indica to enable data discovery (both structured and unstructured) and then maps that data onto your core business processes and assets. Privacy Hub also facilitates the capturing of this data manually where automation cannot be employed.



### STEP 2: Legal Basis For Processing Personal Data - *(Art. 6) All data controllers and processors must document the legal basis for processing and retain these records.*

- Identify (and document) the Legal Basis For Processing Personal Data

**How Privacy Hub Helps:** Privacy Hub captures the legal basis for processing personal data.



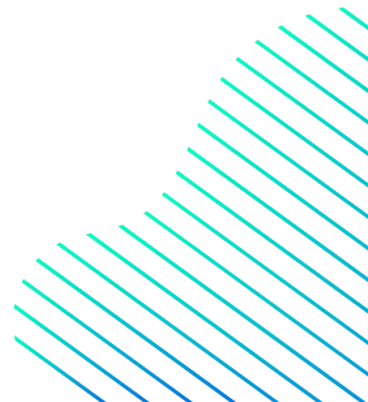
### STEP 3: Update Privacy Policies And Keep Records of Processing Activity (ROPA)

- Capture all data sets as specified by Article 30;
- Capture the lawful basis for processing personal data;
- Maintain ROPA records to support auditing and complaints management activities;
- Automatically indicate what rights data subjects can exercise against data collected including the ability to correct or revoke processing



**How Privacy Hub Helps:** Privacy Hub automates the process of establishing a current ROPA and actively signals when it may need to be reviewed due to changes in activity.

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**STEP 4: Respond to Data Subject Rights Requests (DSR)** - (Art. 12-13) Include the required disclosures to meet the transparency requirement.

- Capture DSR request details;
- Verify identity and the nature of the request;
- Manage 1-month response timeline;
- Dynamically create task notification to third parties when fulfilling a request to correct or delete data

**How Privacy Hub Helps:** Privacy Hub automates the process of Data Subject Requests, driving the process from start to finish and within SLAs. This is important to keep in mind as the required response time is different depending on which regulation applies.

**STEP 5: Implement Principles of Data Protection By Design And By Default** - (Art. 5, 25) Implement "appropriate technical and organisational measures, such as pseudonymisation" or encryption, "which are designed to implement data protection principles, such as data minimisation, in an effective manner and to integrate necessary safeguards." These measures must be implemented by default.

- Perform an initial screening to determine if processing is likely to result in a high risk

**How Privacy Hub Helps:** Privacy Hub automates an initial Assessment allowing you to identify whether a full DPIA is needed. Privacy Hub also facilitates embedding of the DPIA process within the project management process to ensure DPIA is taken into consideration especially for large or complex projects.

**STEP 6: GDPR requires the designation of a DPO in most circumstances** (Art. 37).

- Appoint a Data Protection Officer (DPO)

**How Privacy Hub Helps:** Provides the ability to define and store details of your DPO(s) as well as other key contact details such as your representatives, joint controllers etc.



**STEP 7: Perform a Data Impact Assessment (DPIA)** - (Art. 35) The GDPR requires organisations carry out a DPIA prior to processing whenever they plan to use data in a way that is "likely to result in a high risk to the rights and freedoms of natural persons."

- Use Privacy Hub's DPIA module to perform an initial screening to determine if processing is likely to result in a high risk
- If required, conduct a full assessment adhering to the privacy principles of GDPR

**How Privacy Hub Helps:** Privacy Hub automates all Privacy Assessments (including PIAs, DPIAs & Initial Assessments), as and when needed, in real-time and with true transparency. Privacy Hub enables the participation of your wider stakeholders, sharing the burden with the DPO and their team.

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**STEP 8: Processing outside of EU.** – (Art. 27) If Your Organisation Is Outside The EU But You Process Data On EU Individuals, appoint A Representative In That Country.

- Appoint A Representative In That Country

**How Privacy Hub Helps:** This can be documented in Privacy Hub.



**STEP 9: Implement A Data Breach Reporting Module.** – (Art. 33) The organisation must communicate to the supervisory authority no later than 72 hours after they discover the data breach.

- Implement processes to support data gathering and determine if personal data breach is likely to result in a risk to individual's rights
- Automate and ensure regulatory reporting timelines are monitored and complied with
- Generate and assign dynamic tasks to relevant third parties in addressing data breach-reporting requirements
- Support report creation for notification to the supervisory authority

**How Privacy Hub Helps:** Privacy Hub drives the collection of the required information to be submitted to regulators as well as guiding the triage process.



**STEP 10: Comply With Cross-Border Data Transfer Requirements.** – ([Schrems II](#))

- Map data flows for audit purposes and assess and document laws where the data is transferred
- If transferring data abroad consider if the country where the data is transferred meets the acceptable determination providing “adequate” data protection
- Without an adequacy determination consider legal mechanisms like standard contractual clauses (SCCs) or binding corporate rules (BCRs)

**How Privacy Hub Helps:** Privacy Hub captures all third party sharing of data at individual data field level, as well as the legal mechanism put in place with the third parties (SCCs, BCRs, etc).



**STEP 11: Conduct On-Going Monitoring.**

- Learn about Wrangu's [solution for GDPR Compliance](#).



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