



Operationalising GDPR Compliance

Autumn 2018

Data and privacy legislation compliance has become a top strategic issue for organisations across the world. After the initial scramble up to the May 2018 introduction of the EU's General Data Protection Regulation (GDPR), implemented in the UK by The Data Protection Act 2018, the challenge is now “How do we effectively operationalise ongoing GDPR compliance?”

THE CHALLENGES

Data capture and use is growing exponentially. Large organisations have a significant and growing data inventory (we use the term ‘dataset’). While new and exciting ways of leveraging this data are emerging, GDPR now puts significant demands on organisations to demonstrate appropriate and lawful use of such data. The consequences of a failure to comply are well known. GDPR breaches do not only carry substantial reputational risks but also potentially very significant penalties of up to 4% of global turnover.

News headlines regarding data protection and largescale data breaches or theft of data (British Airways, being a good example) have made the general public much more aware of the risks. The Information Commissioner in the UK (and reflected elsewhere in Europe) is reporting a rapid growth in complaints. In fact, complaints filed with the Information Commissioner’s Office between May 25, when the new GDPR rules went into effect, and July 3, were more than double the number received during the same period a year earlier.

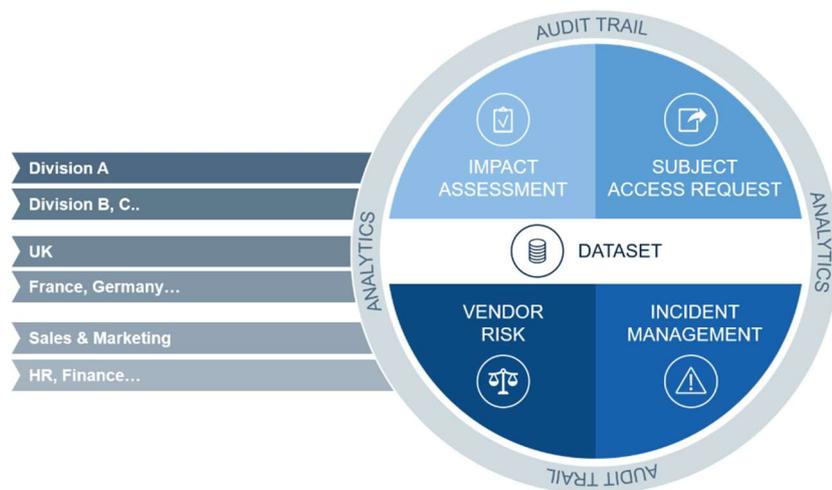
As the value of data is better understood and reports of record-breaking fines hit the media, individuals are likely to increasingly use their newfound rights. At the same time, expect to continue to see the phenomenon of the GDPR activists. There is even an app that simplifies – for the consumer – the exercise of subject access rights.

The challenge of the explosive growth in data and its uses is compounded for organisations by their data sitting in different systems (from large ERP systems to excel); different organisational units and regions holding, and using, data differently; and, much of this data sitting with various data processes, such as vendors of cloud software or other outsourcing arrangements.

360° HOLISTIC APPROACH

GDPR compliance is a complex multi-dimensional challenge. At the heart is your Dataset of Personal Data which (i) drives various activities including Impact Assessment, Subject Access Requests, Incident Reporting and Vendor Management and (ii) requires planning, execution and monitoring across complex organisational structures of various Divisions, Regions and Functional areas.

So how do you ensure compliance? How do you try to guarantee that the expensive work on policies is actually put in to real life? We think a 360° holistic approach is required to ensure all areas are covered and no effort is duplicated.



C-360° COMPLIANCE PLATFORM

C-360° is a unique software platform designed to help you solve your privacy and GDPR compliance needs more effectively:

- Flexibility: C-360° is not an off-the-shelf product. Our job is to adapt it to work with your existing processes and organisational structure. C-360° can be tailored according to your key priorities.
- Start small: When we implement C-360° with you and your team, we begin with the most immediate priority – maybe its Impact Assessment or Subject Access Requests. Our approach and the underlying architecture allow C-360° to grow organically; for example, you may build out the Dataset as you respond to incoming SARs or you may choose to first build the Dataset, including DPIA and policies which can then drive more automated responses to SARs.
- Future proof: Since you are fully in control of C-360°'s configuration, you can expand it to cover new compliance related requirements as these emerge. Our job is to help you operationalise compliance for today and the future.

C-360° is designed to automate as many activities as possible and ensure coordination across large organisations – key functionality includes:

1. Auto capture of requests from email, web form or print (using OCR); AI is helping us structure incoming requests to reduce manual work and errors.
2. Policy Engine: A sophisticated rules engine that links your dataset and the associated policies to increase automation when responding to Subject Access Requests (SAR). This reduces cost, but more importantly ensures that you are executing SARs consistently.
3. Case Management & Workflow: Enable coordination and collaboration across complex organisations, including delegation of tasks, measurement of SLAs, etc.

CONTACT US

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