

# Fast Track to GDPR



## What is the GDPR?

The world has changed significantly since the Data Protection Act was enforced in the UK in 1998. Today, more personal data is collected than ever – from names and addresses, to detailed shopping habits profiling customers for marketing through to medical information for insurance or other purposes. Many organisations consider personal data to be a key asset that they could not operate without.

As of the 25th May 2018 the General Data Protection Regulation (GDPR) will replace the Data Protection Act. The GDPR brings improved rights for individuals and greater enforcement powers for regulators. Fines of up to 4% of global turnover or 20 million Euros (whichever is higher) could be issued to organisations that do not comply. As a result, where data protection might have been a ‘side of desk’ activity for some in the past, it is likely to become an area of significant risk for many organisations in the future.



**Fines of up to 4% of global turnover or €20m (whichever is greater) could be issued”**



**It is important for organisations to have started preparations and be in a defensible position”**

## What have you done to prepare for the GDPR?

At KPMG we recognise that not all organisations will be fully compliant with the GDPR by 25th May 2018. We also believe however that preparations should have begun to achieve a defensible position in the eyes of the regulator.

In order to be in a defensible position come the 25th May you need to understand your current state and where there are gaps against the requirements of the GDPR. This will allow you to create a prioritised plan to fix these gaps to evidence you are taking it seriously, even if you won't be fully compliant by 25th May. This is the first step on the path to compliance.

We understand that prioritising the gaps to fix can be difficult. Below we have provided a list of tasks which could be considered to be priority. **How many of these tasks have you done already?**

### Inventory

- Do you understand what personal information you collect and how you use it?
- Do you know where it is stored and how long you keep it for?
- Do you know which third parties have access to it and how they protect it?

### Accountability

- Do you need to appoint a Data Protection Officer?
- Are roles and responsibilities defined for data protection?
- Does your data protection team report to the right level?

### Transparency

- Do you tell people what you plan to do with their data when you collect it?
- Are you relying on the correct legal basis for processing personal data?
- Are the statements your customers sign up to GDPR compliant?

### Incident Response

- Do you know how to identify a personal data breach?
- Could you report a breach to the regulator within 72 hours?

### Processes

- Is all business change impacting personal data assessed for GDPR compliance?
- Can you respond to customer or former staff asking you to delete their data? Could you tell them what data you hold on them?

### Training

- Do your employees understand their responsibilities under the GDPR?
- Do your employees in sensitive roles understand their additional responsibilities under the GDPR?

**If you answered no to some or all of the above there is no need to panic. KPMG can help to Fast Track you to GDPR to get you in a defensible position. Turn over for more information on our Fast Track services.**

## What fast track services can KPMG offer you?

You might be feeling the pressure – there is a lot to do pre and post 25th May – but at KPMG the Fast Track process can help to get you in a defensible position quickly.

Below we outline the fast track services that we can provide individually or as a package.

Following a rapid self assessment, the high level tasks will be defined a roadmap with a priority risk rating for each task. If not already completed, the first task will be to populate an inventory.

The Fast Track computer based training module is ready for your employees to complete on day one and includes a short test to assess their understanding. Another option is customised classroom based training for employees in high risk roles such as Marketing or HR.

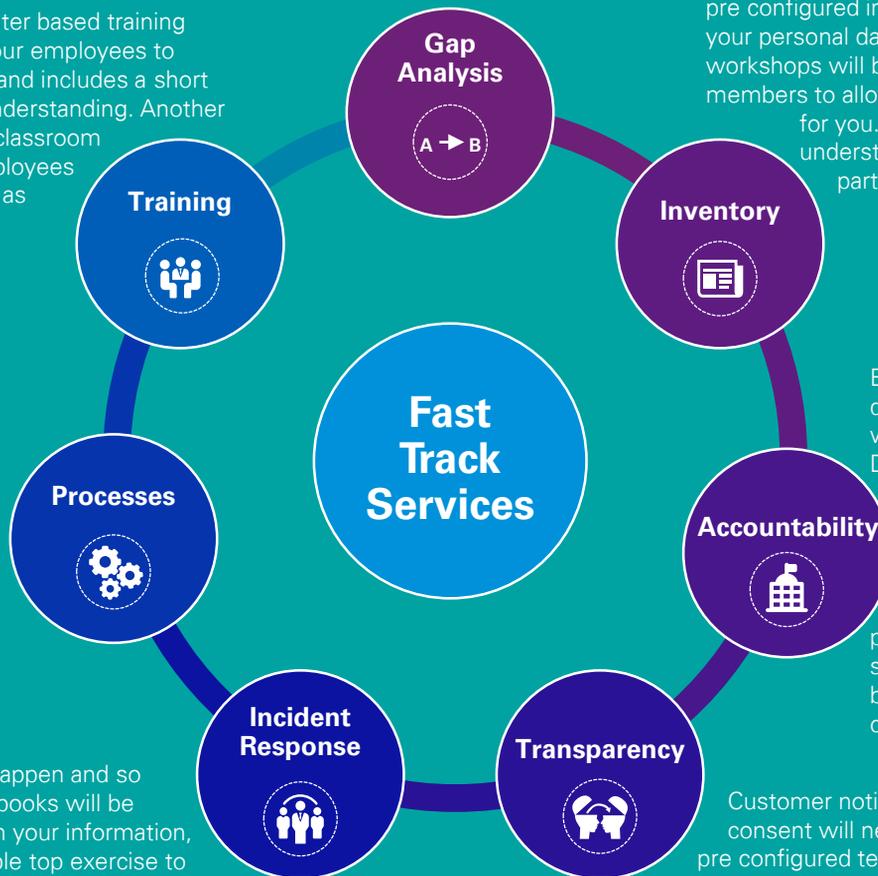
The Fast Track approach includes fully populated templates and processes for Privacy Impact Assessments and Subject Access Requests (SAR). Tailored to your organisation, the Fast Track approach can be used to train your employees how to follow the processes and use the templates.

Incidents will happen and so templated run-books will be completed with your information, followed by table top exercise to stress test real world scenarios and develop muscle memory for when that day occurs.

Your team will be trained to quickly populate a pre configured inventory template to complete your personal data inventory. Alternatively, workshops will be held with core team members to allow us to populate the inventory for you. The inventory will help you to understand your risk, including third party supply chain risk.

Based on the inventory, a decision will be made as to whether you need to appoint a Data Protection Officer (DPO). The fast track approach has a set of pre-defined roles and responsibilities for data protection, including the DPO role. You will be provided with options for team structures and reporting lines based on the standard and common practice.

Customer notice, permissions and consent will need to change – pre configured template communications by industry type can be used as a basis to inform customers and employees of how you plan to use their data and to request their consent where necessary.



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