Data Privacy Management System.

Systematic Compliance.

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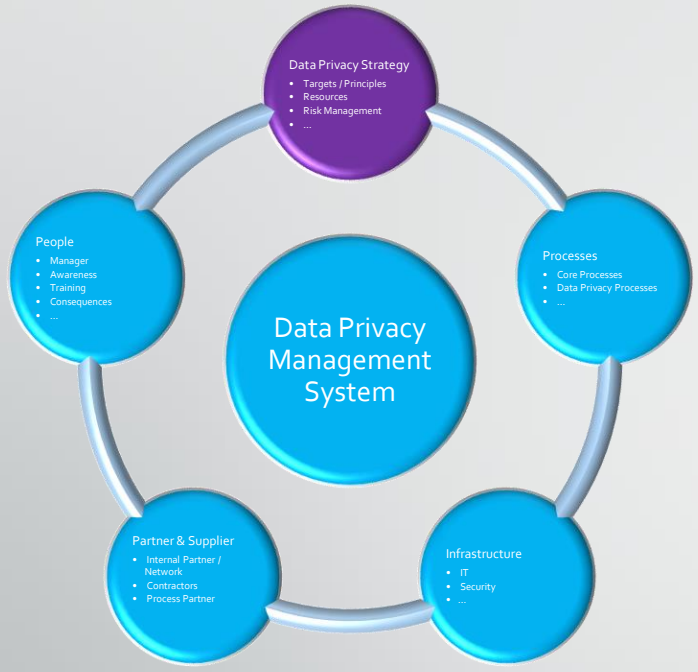
"My experience shows: Data Privacy is a basic requirement for new business models - and pays off in the end. The foundation is a Privacy Management System."

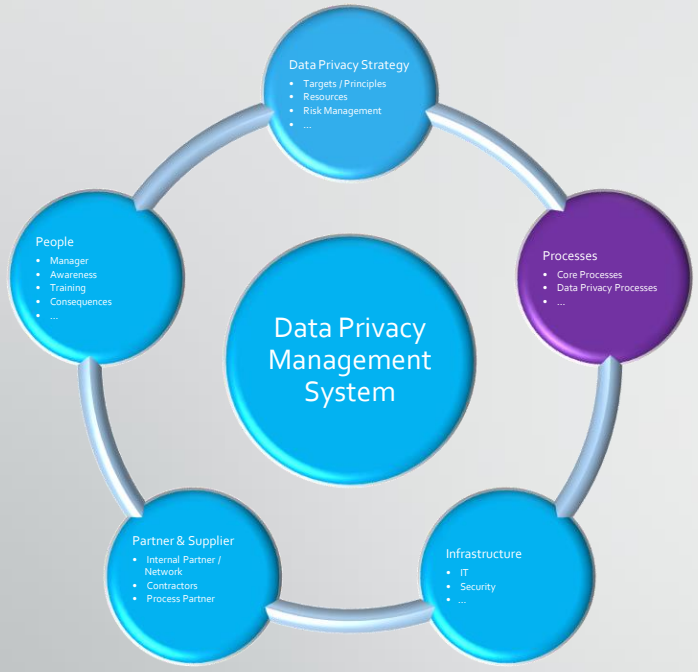
Data Privacy Strategy
• Targets / Principles
• Resources
• Risk Management
• …
Processes
• Core Processes
• Data Privacy Processes
• …
Infrastructure
• IT
• Security
• …
Partner & Supplier
• Internal Partner / Network
• Contractors
• Process Partner
People
• Manager
• Awareness
• Training
• Consequences
• …
Data Privacy Management System

Data Privacy Strategy



Data Privacy Strategy

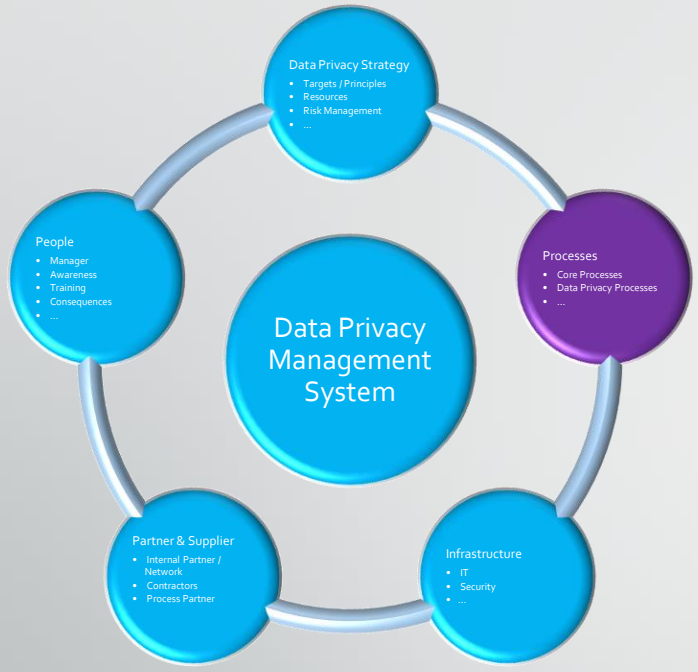
- Buy-in Top Management
- Defining Data Privacy Level: Minimum vs. Premium
- Assigning Resources (Capacity / Budgets)
- Data Privacy Risk Management
- Reporting to Top Management



Processes

Integration Data Privacy in Core Processes

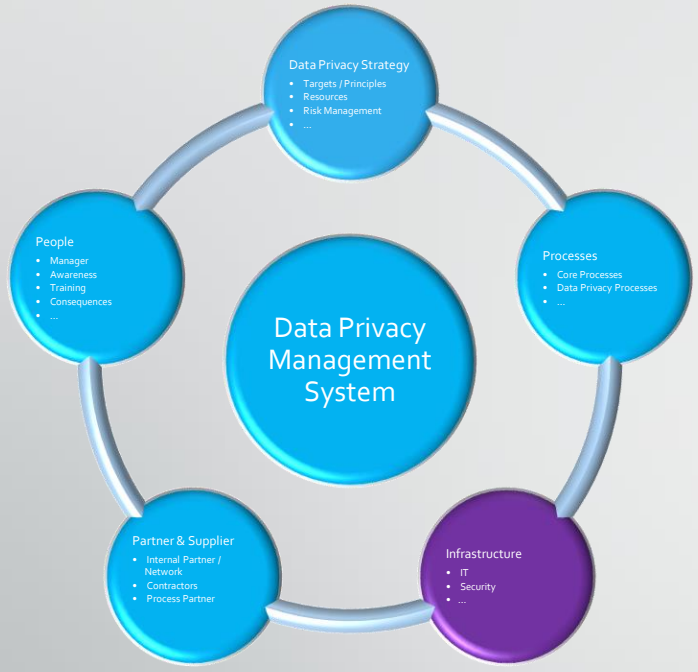
- Development: Privacy by Design / Default
- Marketing: Legal Basics, Privacy Processes
- Purchasing: Supplier selection, supplier contracts
- HR: Onboarding, Training, Privacy Processes
- Compliance, Legal advice, Audit
- Organization: Register of processing
- Organization: Mergers / Acquisitions
- …



Processes

Data Privacy Processes

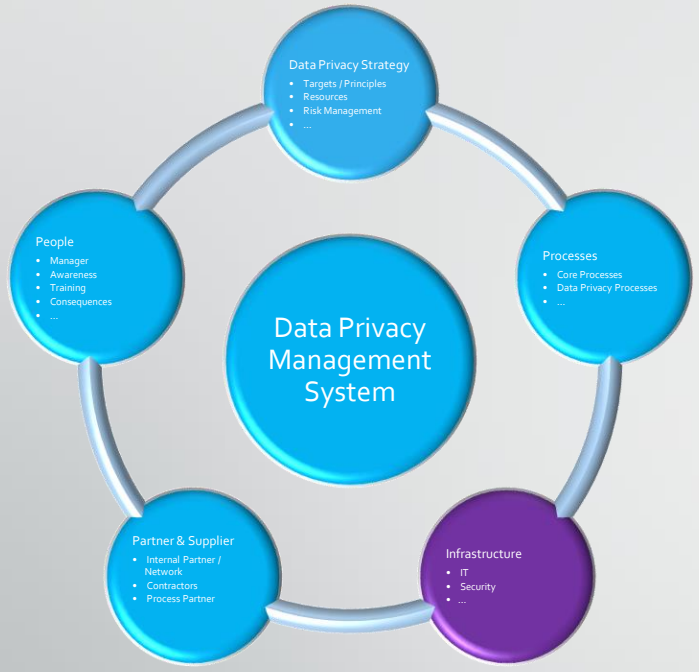
- Transparency / Collection of Data / Consent
- Disclosure / appeal / correction / deletion
- Violation / Breach
- Register of Processing (creation / maintenance)
- Data Privacy Officer
- Certification
- Data Privacy Audit



Infrastructure

IT

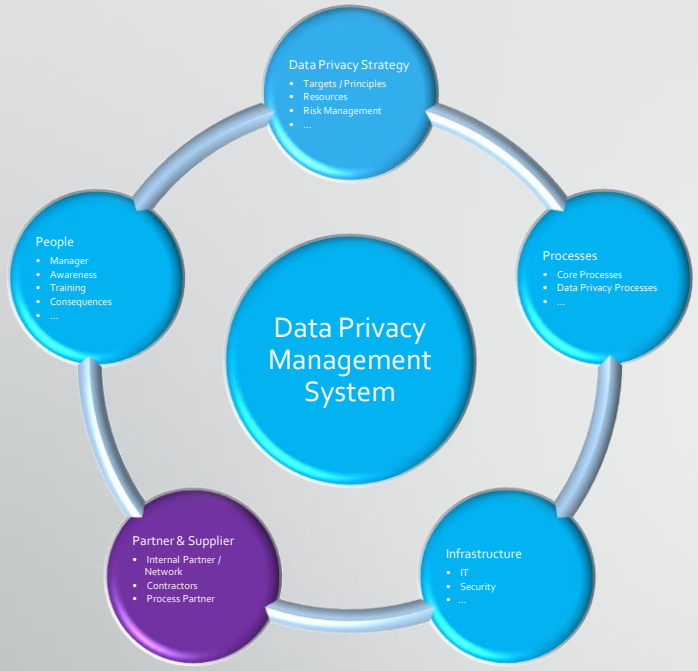
- IT Security (transfer / storage)
- IT System development
- Data Privacy Impact Analysis
- Privacy by Design / Default
- Disclosure
- Deletion
  - …
- Integration in IT Emergency Management
- IT Access Management
- Deletion of Media



Infrastructure

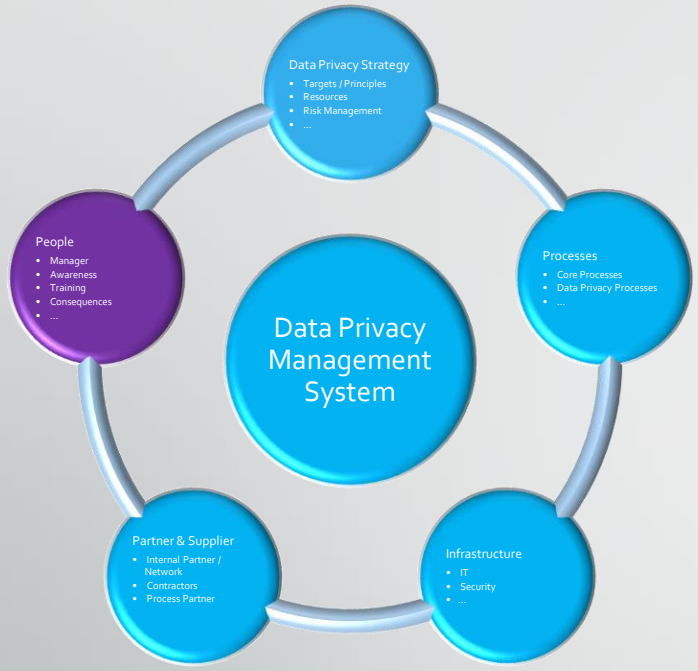
Security

- Access Protection Concepts
- Entry Protection Concepts
- Deletion of documents



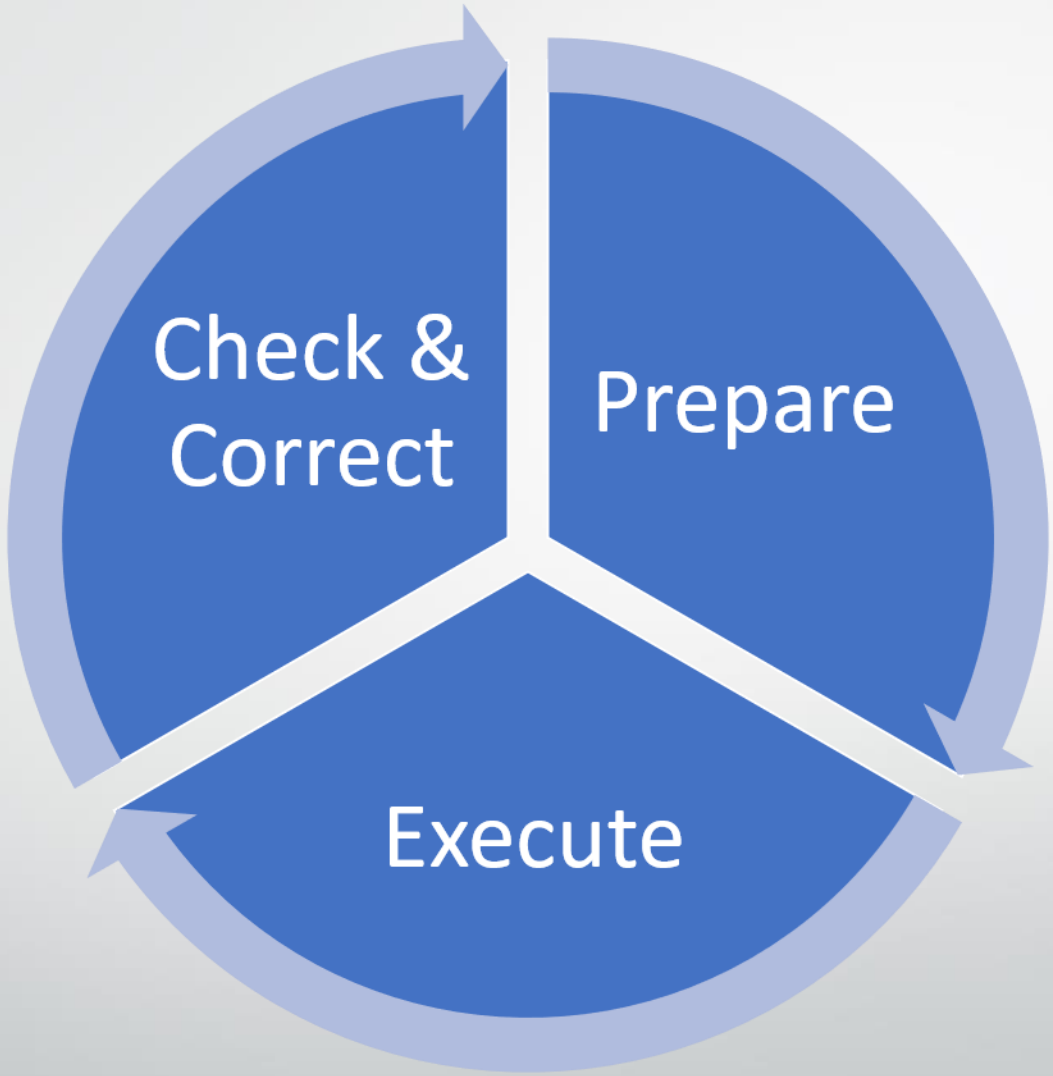
Partner and Supplier

- Internal Partner / Network
  - Councils
  - Group wide guidelines
  - Group wide network
  - Group wide information (e.g. breaches)
- Contractors
  - Order Processes / Contracts
  - Contract Monitoring
  - Information Processes
- Process Partner
  - Definition joined responsibility
  - Contract Monitoring
  - Information Processes

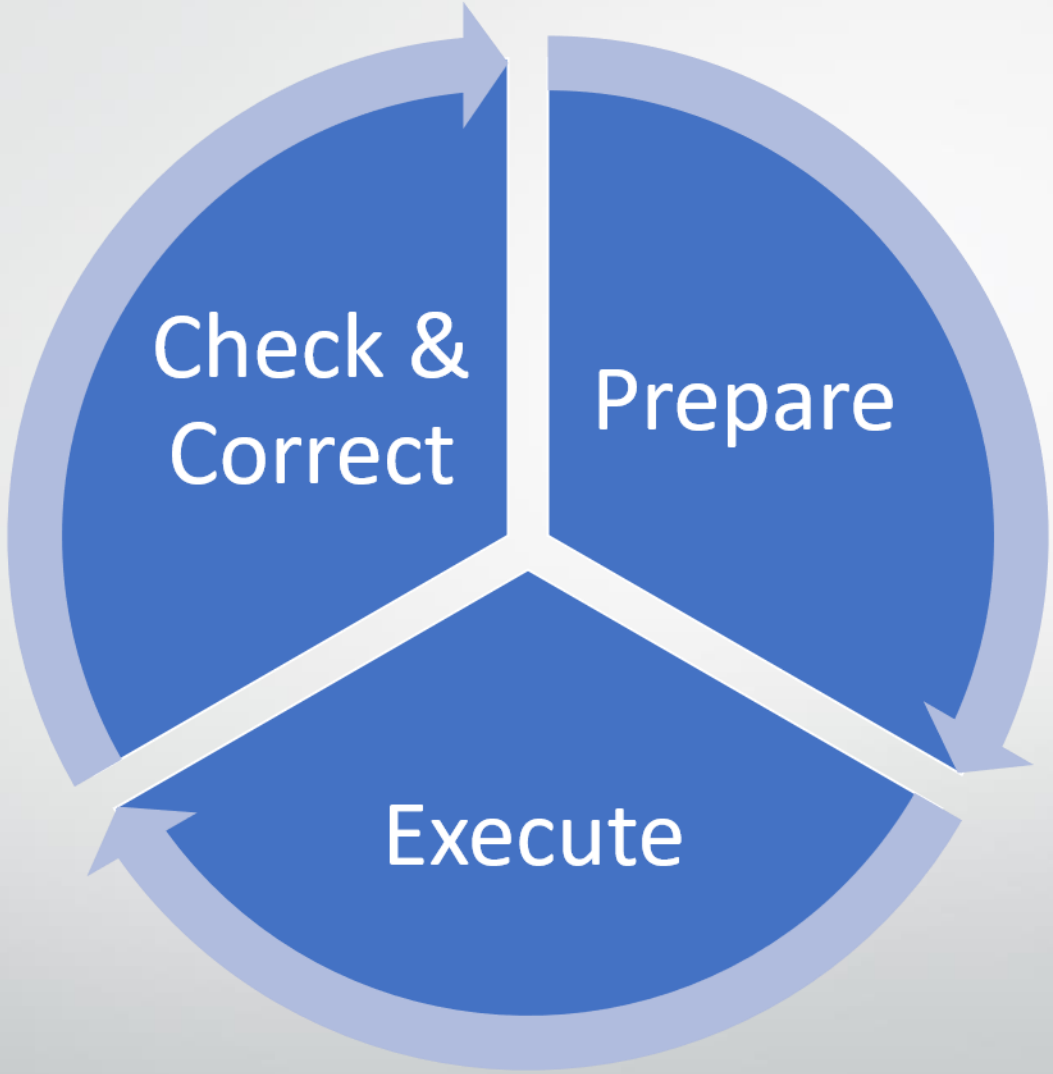


People

- Manager
  - Personal Responsibility and liability
  - Role Model
- Customers and Employees
  - Explain the rights
  - Obligation for DP for employees
- Awareness
  - Importance Data Privacy / Tone from the top
- Training
  - Risk based training concepts
  - Onsite Training
  - WBT
- Consequences
  - Pointing out and penalizing of breaches


Check &
Correct
Prepare
Execute

Evaluation
Spot Checks
Audits



Training
Analysis of the current situation
Action plan

Implementation Project