

GDPR COMPLIANCE CHECK (GDPRCC)

frequently asked questions

WHAT IS A GDPRCC?

GDPRcc stands for General Data Protection Regulation Compliance Check. The GDPRcc process consists of one of the GDPR.ie's data protection consultants to first undertake a high-level check of your organisation's data protection compliance and thereafter provide a report covering your organisation's data protection compliance.

- provide a structured report highlighting compliance requirements
- identify the level of any non-compliance with the requirements
- provide high-level recommendations to remediate any compliance gaps
- identify where the principles of the GDPR are not being fulfilled and the level of risk that may be present
- host an optional run-through of the report findings with a qualified data protection consultant

WHY DO WE NEED A GDPRCC?

- removes your obligations to provide ongoing training and resources to an internal DPO, such as the requirements for a DPO's ongoing development and training, etc., which can be time-consuming and expensive
- reduces exposure to employee flight. Companies can incur significant amounts of financial and time investment in establishing and maintaining an internal DPO employee, who may leave the company after training
- provides you with access to scalable data protection expertise as well as additional multi-sector expertise and services provided by Blackfoot more generally
- provides an independent, trusted and ongoing consistent view of your data protection position, communicated to senior leadership/board via quarterly reporting
- removes the possibility of a perceived or actual conflict of interest occurring
- provides a focal point for data protection issues
- allows ongoing understanding of your data protection compliance position, assisted by quarterly reporting to the board



WHAT OUTPUTS CAN WE EXPECT?

We will undertake a GDPRcc and provide a high-level report of our findings. We can also provide an optional run-through of the findings with the project sponsor.

We can extend the service to provide follow-up quarterly compliance reports (based on action points from the GDPRcc report).

WHAT DOCUMENTATION WOULD YOU NEED ACCESS TO UNDERTAKE THE GDPRCC SERVICE?

No documentation is required in advance; however, as part of the GDPRcc, which will likely require review of your privacy documentation. Documentation required for review will be communicated as the GDPRcc progresses. Following the GDPRcc, if you decide to instruct us further, we can review specific data protection-related documentation, such as your Data Protection Policy, your Privacy Notices, etc. You could also instruct us to review any documentation if that is required, or amend or create relevant documentation based on the output of the GDPRcc.

WHAT IS THE ANTICIPATED TIMELINE FOR COMMENCING THE GDPRCC SERVICE?

When we are engaged to provide the GDPRcc service, we will undertake a GDPRcc. This generally takes approximately two working weeks to undertake the initial information gathering and then one further working week to draft and agree the report. Once the report has been released to you, we can also provide an optional run-through of the findings of report with the project sponsor.

WHO NEEDS TO BE INVOLVED TO COMPLETE THE GDPRCC?

We will require the involvement of some of your staff members to complete the GDPRcc. We generally require involvement from:

- ✓ the project sponsor
- ✓ representatives from key functional departments, such as HR, Marketing, IT, etc, who will know how to answer our questions.

WHAT DOES THE GDPRCC CONSIST OF?

- ✓ **Phase 1 – Project Planning & Preparation**
Conduct an initial project kick-off call with the project sponsor and key stakeholders to set the scene, agree on pre-requisites and the involvement of all parties.
- ✓ **Phase 2 – Discovery Exercises**
Undertake a preliminary review that will focus on establishing a high-level understanding of the organisational structure and the presence and use of policies, processes and technology for the in-scope areas.

✓ **Phase 3 – Data Protection Regulatory Compliance Check**

Conduct a high-level company review of the current level of data protection compliance. Check the current data protection documentation.

✓ **Phase 4 – Findings Reporting**

Produce an assessment report including the identification of gaps and prioritised recommendations for remedial actions to establish and improve your data protection compliance.

✓ **Phase 5 – Continuing Support**

Quarterly reporting and attendance at governance meetings with senior management.

DOES THE GDPRCC SERVICE TAKE ACCOUNT OF THE GDPR, AND ADVISE ON COMPLIANCE WITH THIS LEGISLATION?

We use the principles of the GDPR and relevant crucial requirements as the foundation for the GDPRcc service, along with OECD principles. This means that the recommendations set out in the GDPRcc report, if implemented, would provide a robust position to demonstrate compliance against the GDPR.

N.B. It should be noted that the GDPR has variations in each EU member state via local legislation that cannot be covered in this report; however, for the elements that may differ in your jurisdiction, we could, of course, provide additional guidance or direct you to areas of resources to allow you to make these adjustments.

This FAQ highlights that data protection is multi-faceted, and a framework will need to be created and maintained.



Should you have any further queries, please do not hesitate to contact us.