

GDPR PROJECT

WHAT IS REQUIRED

- Compliance with the General Data Protection Regulations (GDPR)

Means:

- Identification and documentation of all data record types in the CU
- If within scope
 - Show how they are managed from
 - Creation to destruction

WHAT HAVE WE DONE

- Drafted process flow diagrams for CU activities
- Put in place a framework

WHAT DO WE NEED TO DO

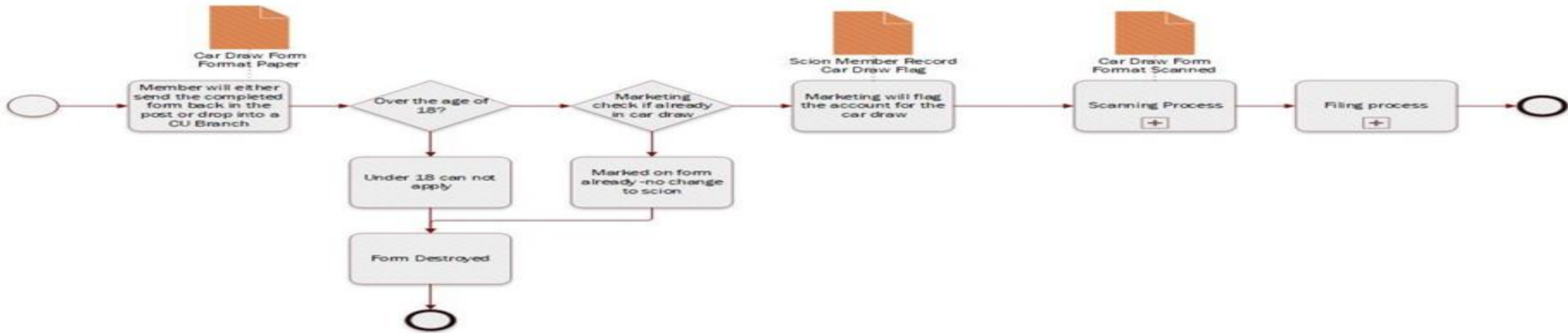
- Populate the framework
 1. Classify the data (type, lawfulness of processing, register of activities)
 2. Document the rules for managing it
 3. Put the framework into action

Examples

- Car Draw Form Process
- Outsourced Statement Issuance

EXAMPLE

Marketing & Business Development (MKT)
Car-draw form Process



New Records (Unique)
3

Standard Records (Multiuse)



All Items Basis_for_processing **General_Background** ...

✓ Data_Record_Title ▼	ProcessFlowDiagram ▼	Date_entered_on_register	Person_responsible
Car Draw Form Format Paper	... MKT Car draw form Process	9/19/2018	<input type="checkbox"/> Joe Bloggs
Car Draw Form Format Scanned	... MKT Car draw form Process	9/19/2018	<input type="checkbox"/> L Preamble
Scion Member Record Car Draw Flag	... MKT Car draw form Process	9/19/2018	<input type="checkbox"/> V Black

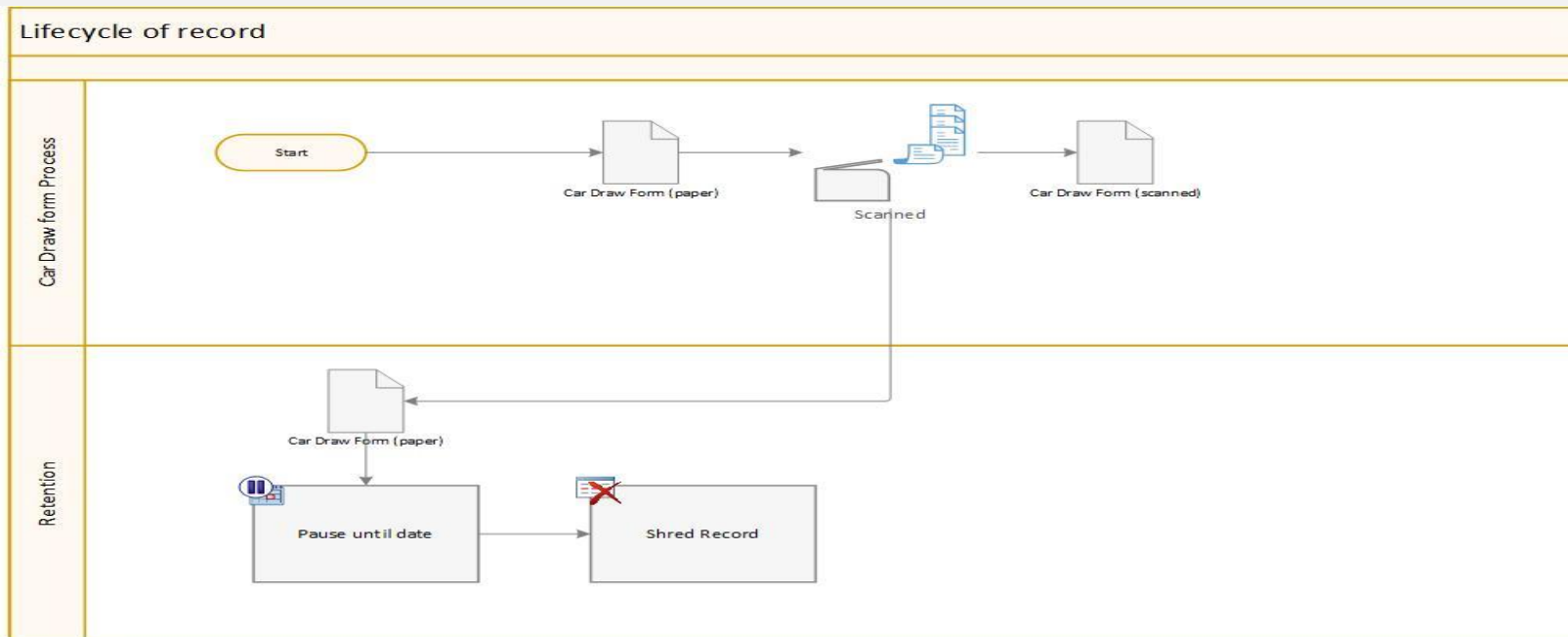
WHAT DO WE NEED TO MANAGE

1. Car Draw Form (Paper)
2. Car Draw Form (Scanned)
3. Scion Member Record (Car Draw Flag)

QUICK QUESTIONS

- Are they under GDPR?
 - Forms – can identify and individual data subject so YES
 - Personal Data
 - Lawfulness of processing (article 6)
 - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
 - Shared? – No
 - Retention

RETENTION CAR DRAW FORM PAPER



RETENTION MANAGEMENT

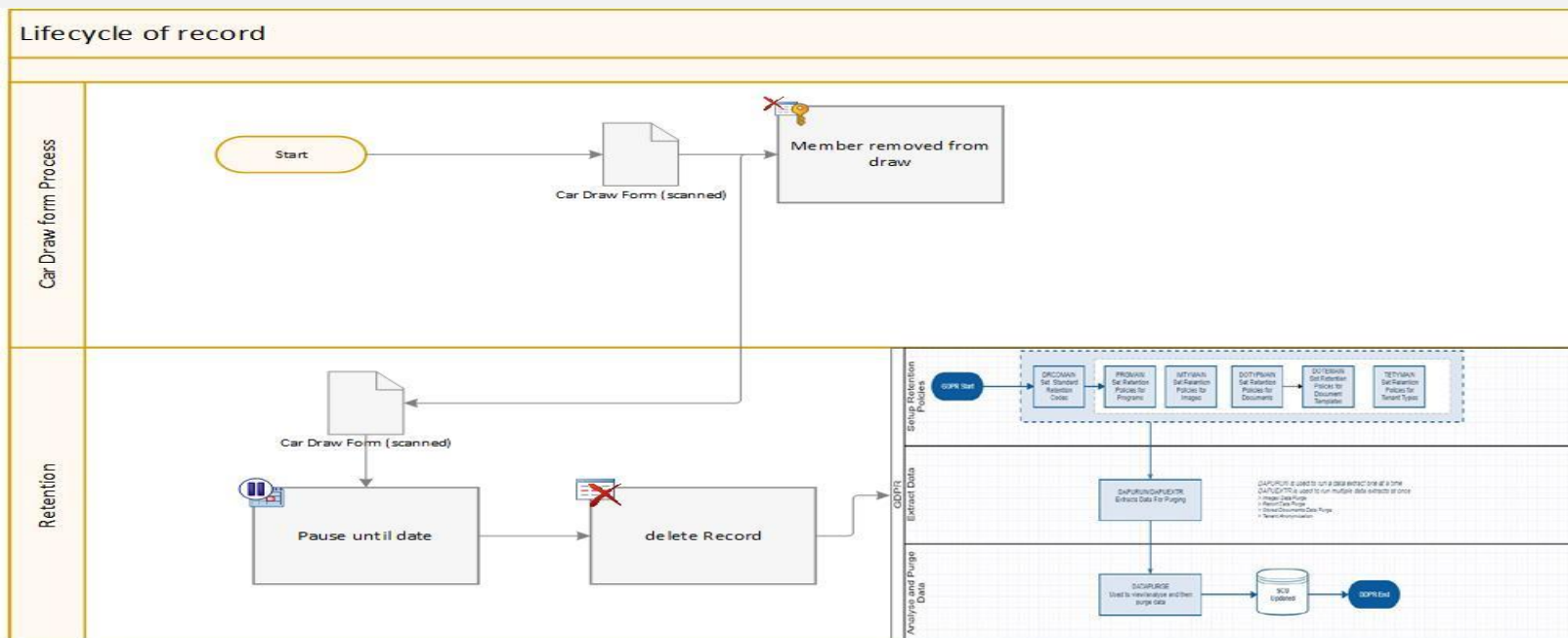
TRIGGER

- Form is scanned

PERIOD

- 0 days – do not retain
- Place in confidential scanning bin
- Wait for scheduled shredding
- Retain receipt as proof for audit

RETENTION CAR DRAW FORM PAPER



RETENTION MANAGEMENT

TRIGGER

- Form is overwritten
 - Car Draw withdrawal form
 - Scion Flag set to N
 - Tenant account closed

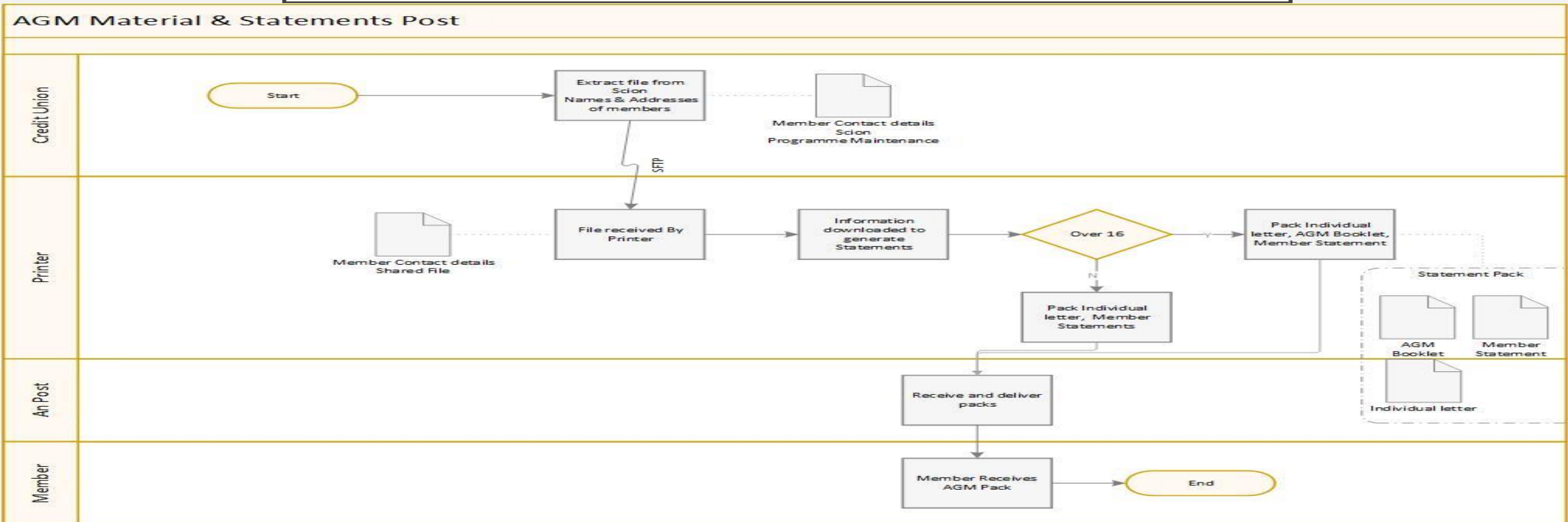
PERIOD

- Withdrawal
 - Annual Audit Cycle
- Scion Coding
- Tenant Closure
 - 6 Years

DOCUMENT THE RULES & APPLY THEM

- Retention Triggers
 - What triggers each record type
- Retention Periods
 - How long do we retain once we are no longer using it
- Retention Management & Audit
 - In Scion – codes & triggers
 - Outside of Scion (retention schedules and audit trail)

EXAMPLE



WHAT DO WE NEED TO MANAGE

1. Member Contact details (Scion)
2. Member Contact Details (Electronic)
3. AGM Booklet
4. Member Statements (Electronic)
5. Member Statements (Paper)
6. Member Letter (electronic)
7. Member Letter (Paper)

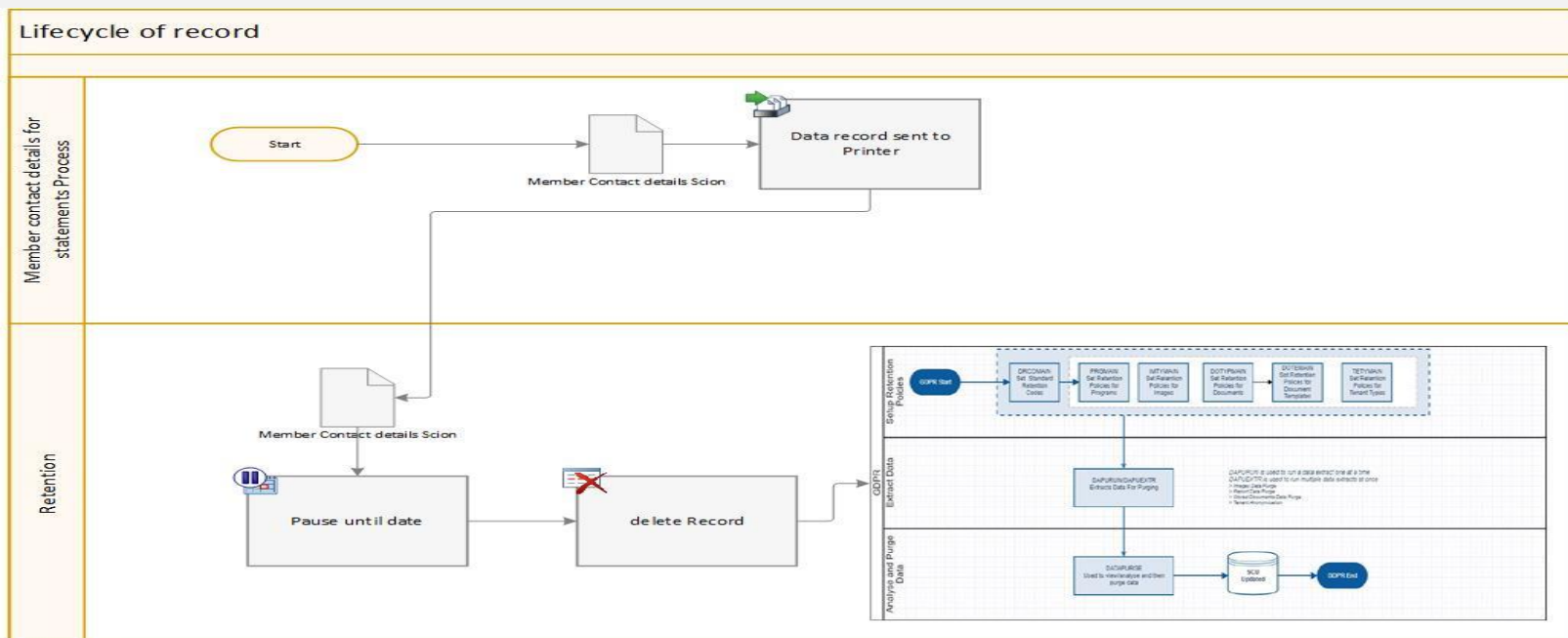
QUICK QUESTIONS

- Are they under GDPR?
 - All bar 1 – can identify and individual data subject so YES
 - Personal Data
 - AGM Booklet (public)
 - Lawfulness of processing (article 6)
 - processing is necessary for compliance with a legal obligation to which the controller is subject;
 - Shared? – Yes – with printer – need Privacy Impact Assessment & Outsourcing Docs
 - Retention

DATA PROCESSOR PRIVACY IMPACT ASSESSMENT

- Need to show that we are confident that the printer can manage the data in line with GDPR
 - Data Protection
 - Records Management
 - Information Security
 - Data Sharing
- Privacy Impact Assessment Doc
 - We have assessed the risks and are able to stand over what is being done to address them

RETENTION CAR DRAW FORM PAPER



RETENTION MANAGEMENT

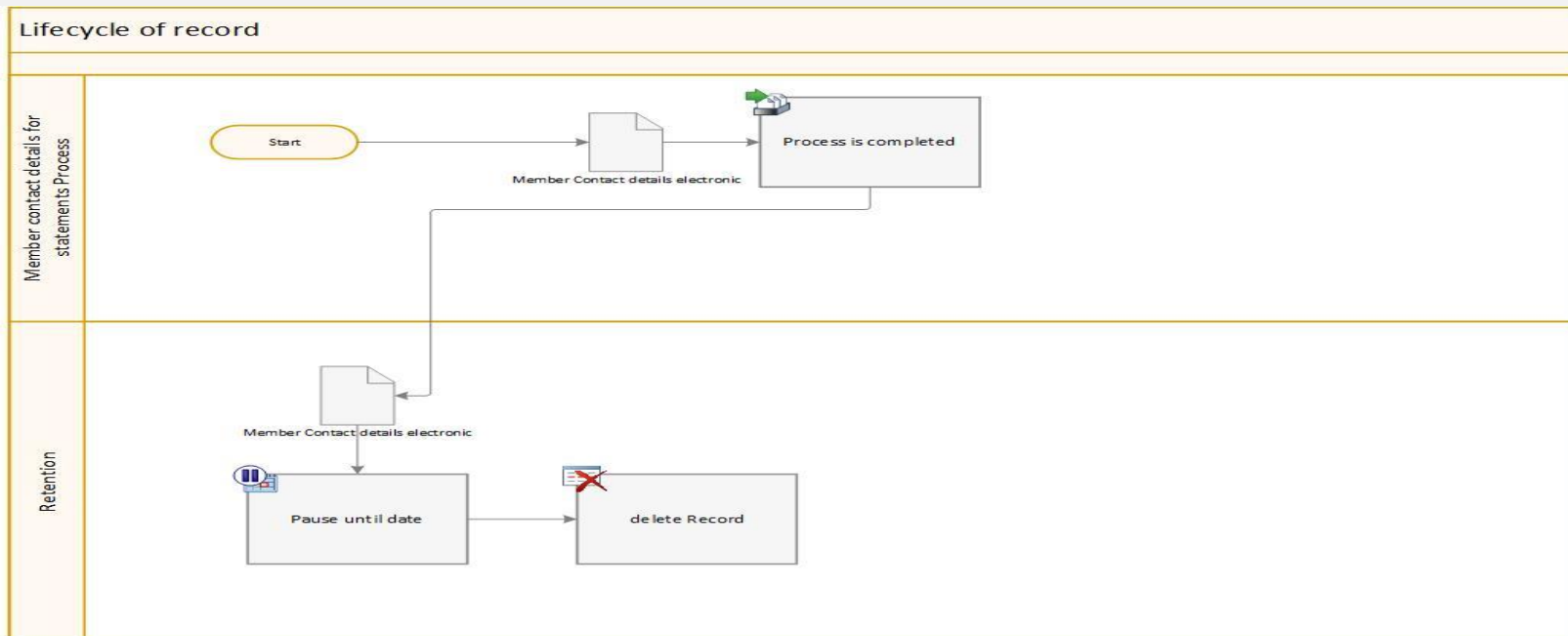
TRIGGER

- Details are sent to Printer

PERIOD

- 0 days – do not retain
- Scion GDPR
 - Programme Maintenance
 - Code

RETENTION CAR DRAW FORM PAPER



RETENTION MANAGEMENT

TRIGGER

- Statements Issued & Process Complete

PERIOD

- 30 days
- SLA clause re retention
 - Documented in PIA
 - Proof of disposal from printer