

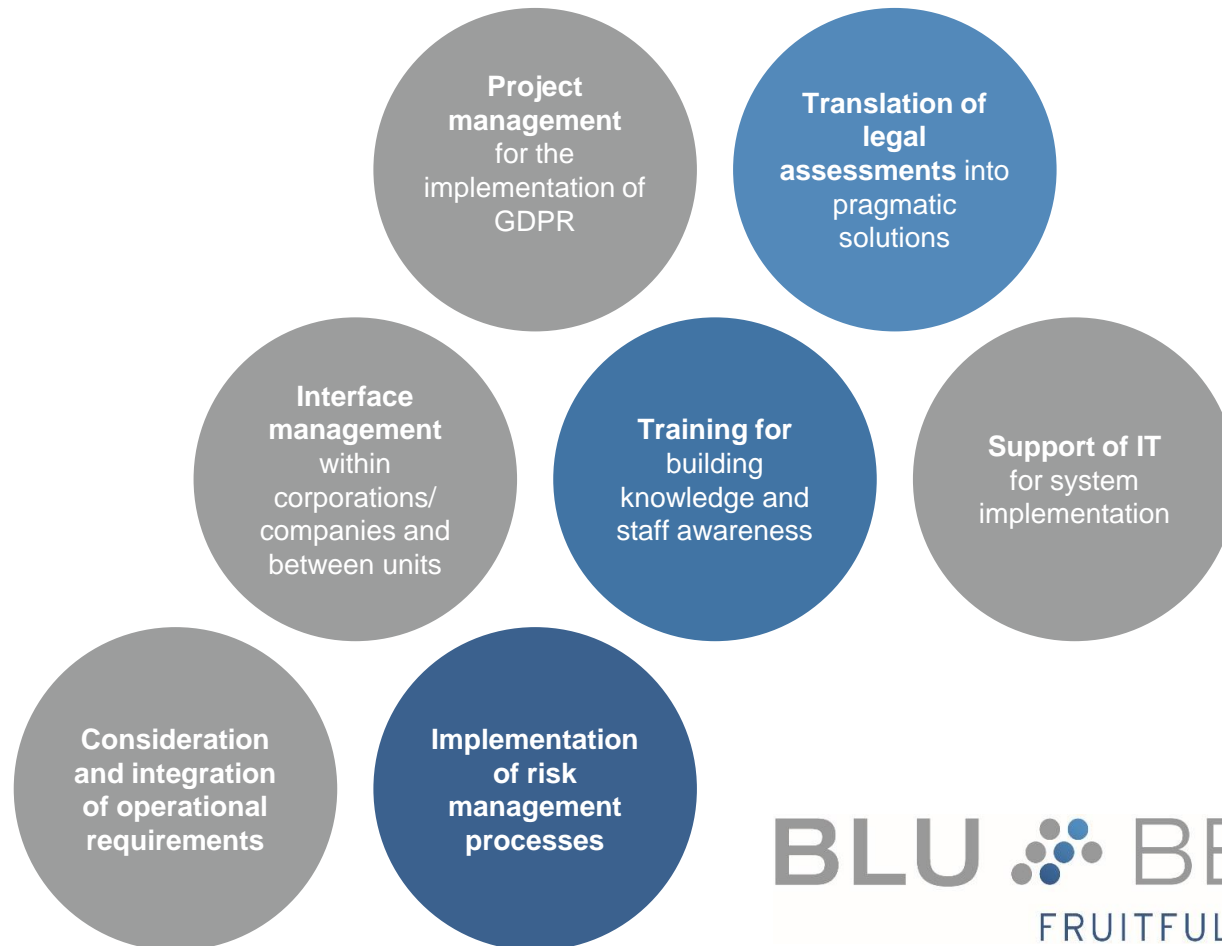


**BLU**  **BERRIES**  
FRUITFULLY YOURS

# Overview of BLUBERRIES' Quick Check for GDPR compliance

Munich • February 2019

Important tasks for the sustainable implementation of the GDPR:  
we have successfully supported more than 30 companies with this approach



# Typical problems and key issues in the implementation of GDPR threaten the compliant handling of personal data

**Lack of implementation of a data protection management system**

with continuous improvement processes following PDCA cycle

**Necessary data protection coordination across company organisation** to support the data protection officer

**Monitoring of the introduced GDPR processes** to ensure a long-term data protection compliant organization



Typical problems and key issues in GDPR implementation

**Regular maintenance of processing directories**

with risk assessments for recorded and new processing directories

**Lengthy implementation of local locking and deletion concepts** due to problems with IT-technical requirements and manual deletion

**Time-consuming training of new and existing employees** to safeguard the proper handling of personal data

# Within the open landscape of various requirements and actions of the GDPR we are your competent partner for determining open and important issues

**Checklist "Data protection management"**

- Defining the procedure for...
- Define privacy requirement
- Create awareness (training)
- Determine and publish co...
- Implement risk manage...
- Defining information and s...
- Control and monitor proce...
- Cooperation with the supe...

**Checklist "Employee data protection"**

- Obtain informational letter...
- Review and adjust employ...
- Grant victims rights for en...
- Ensure data security of e...
- Determine blocking and d...
- Implementation in the IT s...

**Checklist "Technical and organizational measures"**

- Ensure process stability o...
- Check inventory systems m...
- Deletion of old and/or illeg...
- Create Privacy Impact As...
- Implementation in IT syst...
- Introduce access controls...
- authorization concepts

**Checklist "GDPR requirements in the IT area"**

- Privacy IT strat
- Checkir
- Implem
- Implem
- technic
- Ensure informat

**Checklist "Records of processing activities"**

**Core elements**

- Ensure documentation of processing activities
- Carry out risk assessments and attach to processing activities
- Edit processing activities and advisory opinions
- Implement control process
- Initiation of the regular process review
- Establish processes in IT-systems (e.g. tool for process recording)

**Implementation progress**

- Identify processing activities
- Document processing activities
- Quality check and coordination with legal support
- Conduct risk assessments
- Implement an update process

**Checklist "Data privacy statements"**

- List websites
- Implement process for se...
- Implement process in cat...
- Ensure that websites alw...
- Develop a sample newsle...

**Checklist "Data subject rights"**

- To provide information
- Planning and controlling t...
- Notification system (for in...
- develop
- Create data correction ca...
- Implementation in IT syst...
- Ensure linkage with an int...

**Checklist "Consent"**

- Check existing opt-ins
- Use consents and update

**Checklist "Data processing"**

**Core elements**

- tegrate all service providers
- ection system to all providers, who process
- as for contracts and warranties
- ; documentation of contracts
- esses for handling, order processing contracts
- ; technical and organizational measures (TOM)
- e risk category of the AV contract

**Implementation progress**

- Ensure completeness of the service list
- Classify contractual relationships
- Dispatch additional agreements (Data processing contracts must be attached to the service contracts)
- Ensure the updating of contract templates
- Implement service provider control processes



















**Description of the measures**

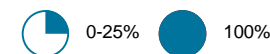
There is a requirement for written documentation and an overview of procedures for processing personal data

**Practical tip from the BLUBERRIES experience**

When defining the procedures, it is crucial to review the effort and the "depth" – cooperation of the individual departments is very important

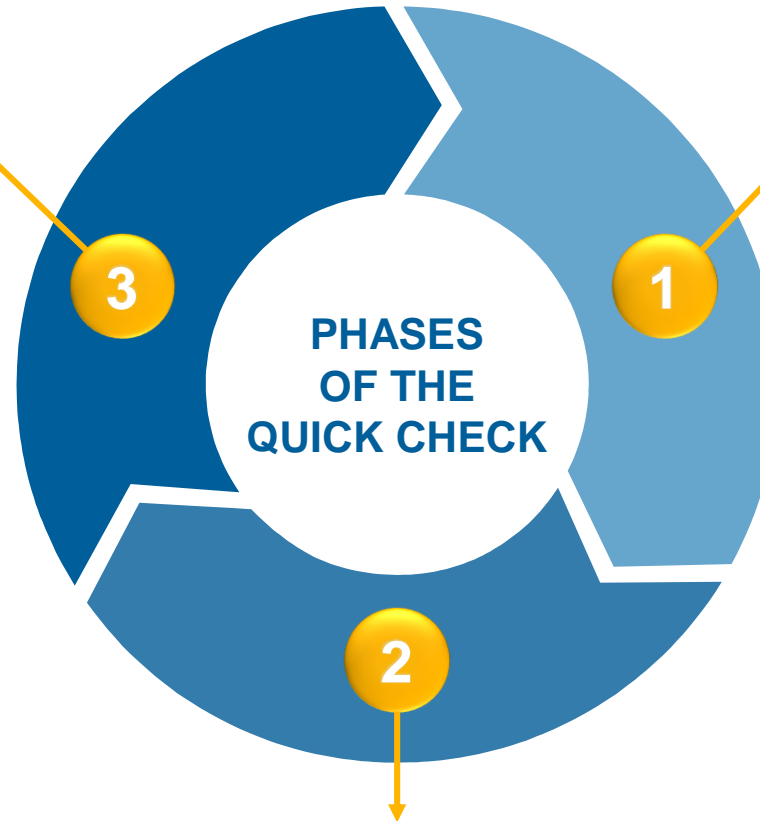
The Quick Check GDPR gives your company a quick overview of the progress and risk involved in implementing the GDPR

ID	Title	Progress	Risk
1	Data privacy statements		 <i>Example</i>
2	Contract Data processing		
3	User's data rights		
4	Employee data protection		
5	Data protection management		
6	Consent		
7	Technical and organizational measures		
8	Records of processing activities		
9	IT-Department		



## Project phases for our Quick Check in your company

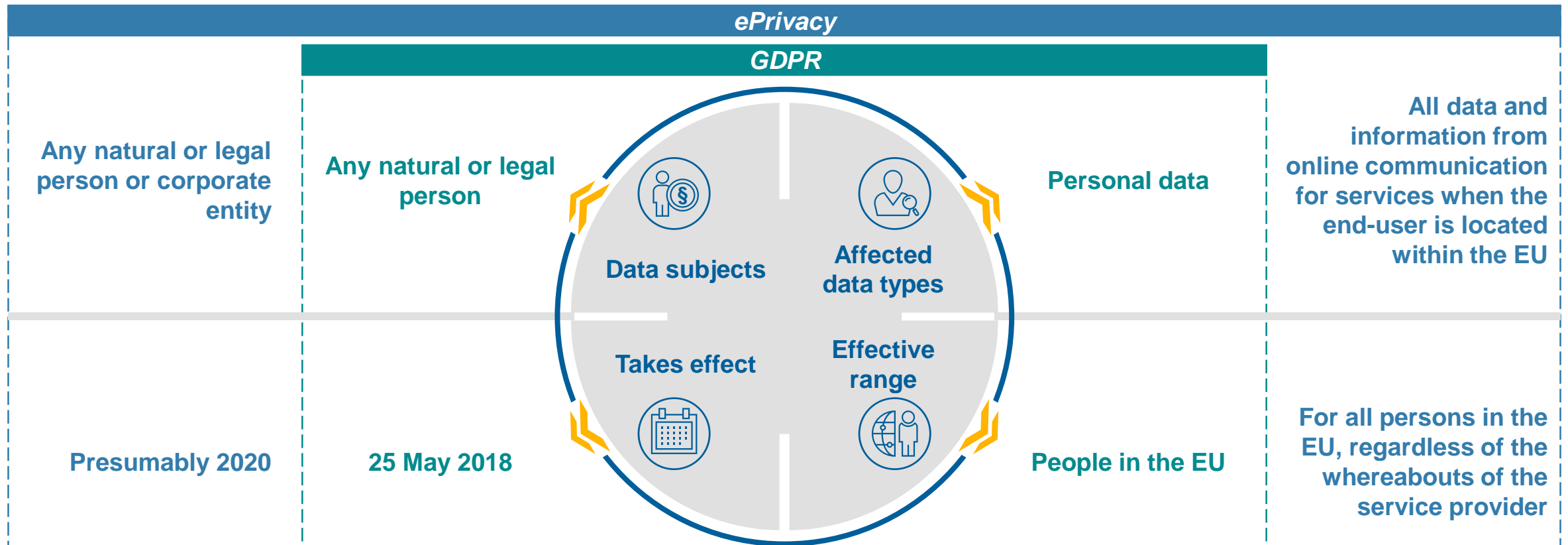
**Workshops** to convey the guidelines/steps for implementation  
(Duration: approximately two days)



**Kick-off meeting**  
(Duration: approximately two hours)

**Interviews** across a wide range of the units to comprehensively assess necessary adjustments  
(Duration: approximately two days)

# A successful implementation of the GDPR is a prerequisite of the upcoming European Commission's proposal for ePrivacy regulation



» ePrivacy encompasses GDPR in the specific area of digital communication and often its impact is more wide reaching than that of the GDPR



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