

# Data Protection Program Creation in the era of GDPR

## Challenges & Opportunities

BIG DATA IS  
WATCHING YOU



Dimitra Xintara, CIPP/E, CIPM, CISM  
Data Protection Officer, Eurolife ERB Insurance Group  
25/06/2019

**Eurolife** ERB  
INSURANCE GROUP

A FAIRFAX Company

# The unsung hero of the GDPR

Dear data protection officer (or chief privacy officer, privacy counsel, privacy director, etcetera — however your organization calls you):



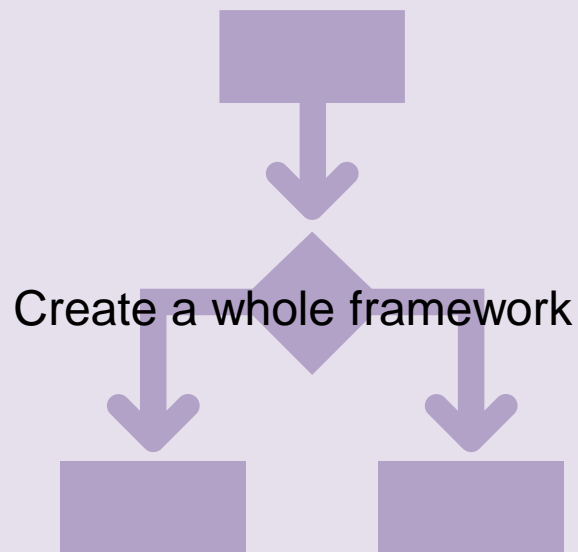
Very few people fully understand what it takes to get your organization in compliance with the GDPR (and all the other global privacy laws you are subject to) and how many sleepless nights you have had thinking about it.

# Statement: Define Policies, Procedures & Privacy Notices

- Not too much detail... but full
- Not too much information ....but demonstrates compliance
- Clear, simple steps
- Cover special business areas
- Get Management Commitment

“DON'T CAUGHT IN AN ANALYSIS PARALYSIS”

## OPPORTUNITY



# Statement: We need to have Privacy by Design and by Default

- Identify sponsors and champions
- Positive sum no zero sum
- Not to do unnecessary trade offs
- To have the whole picture in mind
- To be always two steps ahead

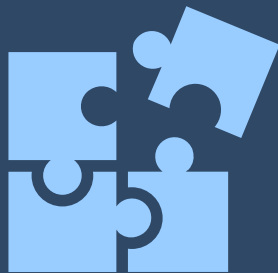
**HARD**

**EXTREME**

**SPECIAL**

## OPPORTUNITY

To understand the importance of your role

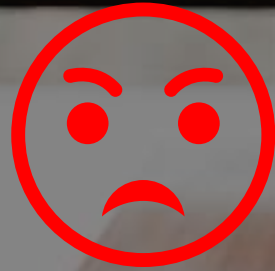


To understand that you are not the problem, you are part of the solution



To be there from the start

# Statement: We need to do DPIAs

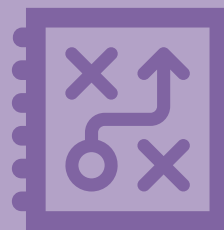


They don't like them

- Data subject's privacy risks
- Organization's risks
- Find the method, find the tool
- Retrieve DPIA lists for countries in scope
- Find the right time

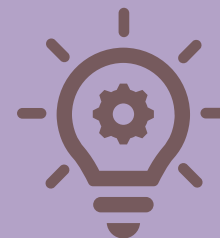
## OPPORTUNITY

Additional Controls



Risk Management

Hidden points



# Statement: We need to have our roles in partnerships defined

- Responsibilities must be clear
- Not so easy to define “on behalf”
- Need to consider the partner’s location
- To have clear view on what it can and cannot be done

Need to agree!!!!

## OPPORTUNITY

Better Contracts



Better view on partners

Assess partners

# Statement: Data Subjects have additional rights

Right to be forgotten

the existence of the right and the ability to

- Explain legal interest and
- Too much data too many places

***They think they know!!!!***

## OPPORTUNITY

Chance to gain their trust



To understand you respect them



To be transparent

★ DATA ★  
SECURITY

IN THIS CORNER, WE HAVE  
FIREWALLS, ENCRYPTION,  
ANTIVIRUS SOFTWARE, ETC.  
AND IN THIS CORNER,





# Statement: Awareness must be implemented to the whole organization

- Engage the whole organization
- Explain the basic principles
- Understand how important they are
- Not just one more procedural burden

## OPPORTUNITY

Everyone is important for the program



Chance to create data protection mentality

You can gain their trust

# Concluding: Who are you, today?

Project  
Manager

Consultant

Information  
Security  
Specialist

Trainer

IT  
Engineer

Auditor

Legal

PR

Business  
Analyst

Negotiator

