



# Preparing for the GDPR – BI & Analytics

John Thompson

# Compliance Motivators

## Risk

- Damage Reputation
- Market Hit
- Administrative Fines
- Legal Claims
- Opportunity Loss

## Reward

- Enhance Reputation
- Market Boost
- Selling point
- Customer satisfaction
- Opportunity Gain

## Efficiency

- Better Governance
- Reduce costs
- Streamlined Development
- Expedited due diligence



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# 7 Fundamental Principles of Data Protection

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1. Lawfulness, **fairness and transparency**
2. Purpose Limitation
3. Data Minimisation
4. Accuracy
5. Storage Limitation
6. Integrity and Confidentiality
7. **Accountability**



# Documentation

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- Data Protection Policy
- PI Inventory
- Process Maps
- Training Material
- Breach Logs
- Design Documentation
- Information Notices
- Impact Assessments
- Controller–Processor Agreements
- Binding Corporate Rules
- Model Contract Clauses
- Security Specifications
- Access Logs
- Data Quality Audits

*Etc...*



# Justification for Analytics

1. Legal Obligation

2. Vital Interest

3. Public Interest



Limited Circumstances

4. To fulfil a contract, or take prior steps

5. Consent - informed, specific and freely given



Weak for BI&A

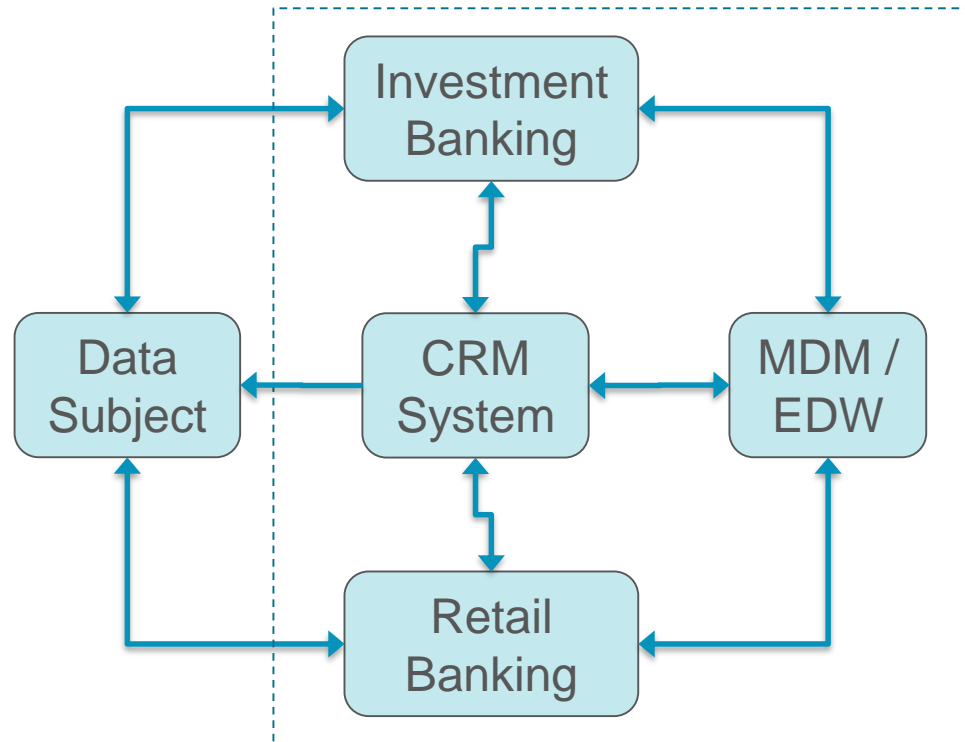
**6. Legitimate Interest**

- Balance interests of controller and data subject
- Privacy by Default - rethink of PI projects?



# Rights Mechanisms

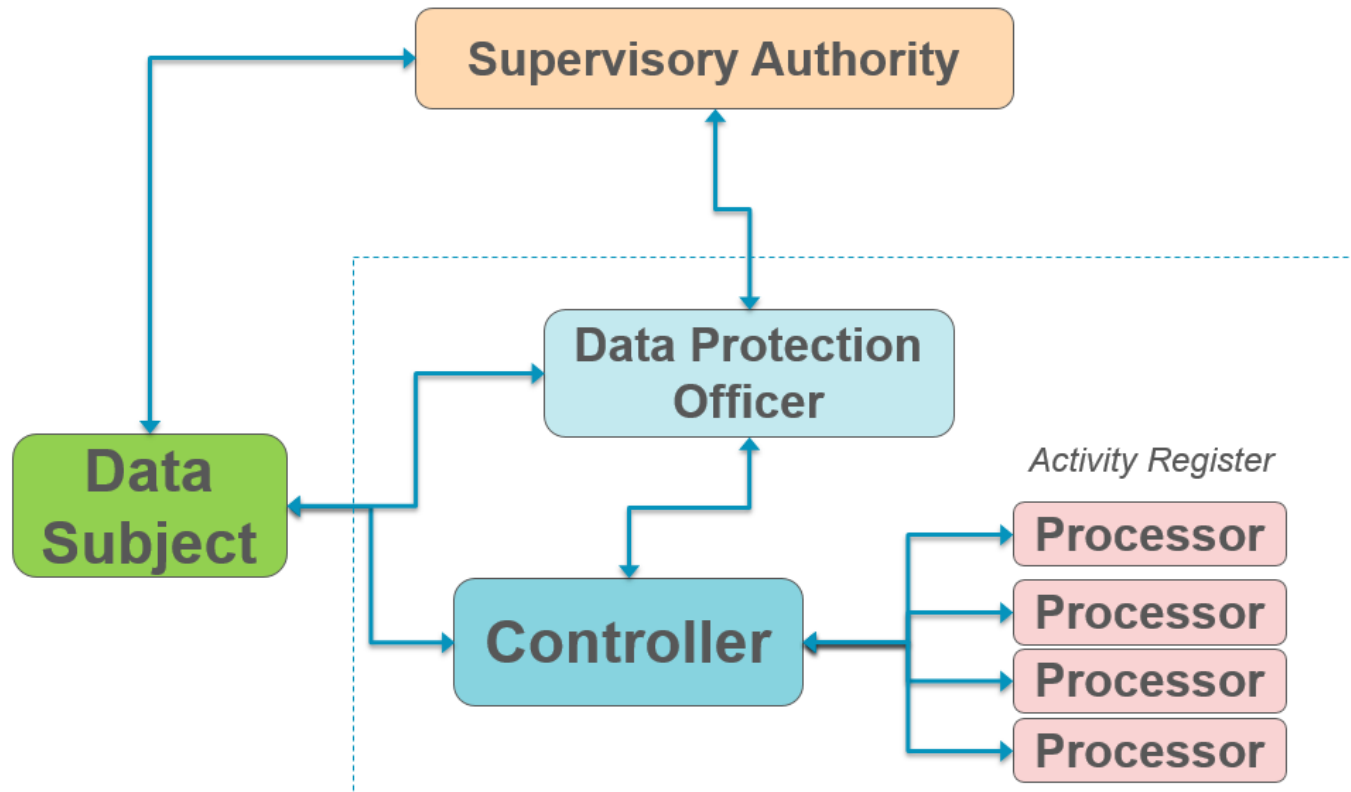
1. Access
2. Correction
3. Portability
4. Objection
5. Restriction
6. Erasure
7. Explanation
8. Profiling Opt Out



Receive, register, process & close requests



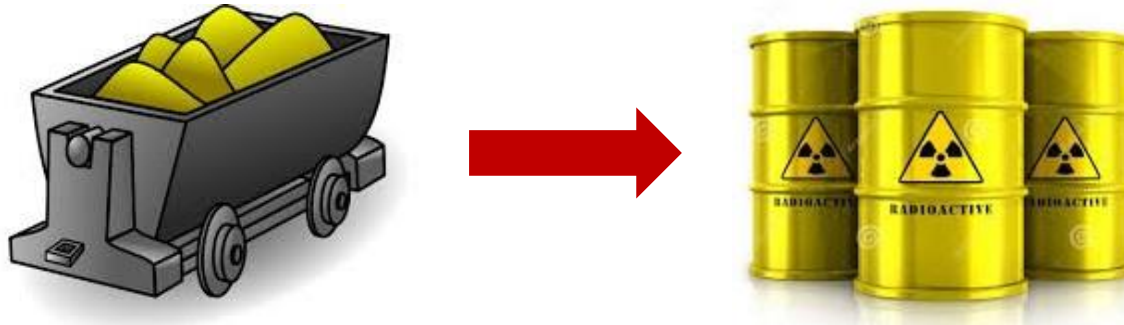
# Processor Agreements



- Contractors, consultants
- Transfers/Remote Access outside the Union



# Data Governance



- Clean up of ROT (redundant, old, trivial) data
- Master Data Management
- Data Quality
- Consolidation
- Stewardship
- Security






# Thank You

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