

# GDPR implementation

Project outline



# Phase one

## Familiarisation with your organisation and ancillary processes

### Service overview

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introduction meeting and identification of individuals within the organisation that shall represent separate key interests or service lines within the organisation to create a 'GDPR Project Team'

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active interaction with the said individuals in order to have an initial understanding of the organisation and generally identify elements of concern with respect to GDPR

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The meeting shall help us tailor the GDPR audit plan. We require that all relevant documentation, such as agreements with employees and with third parties, terms and conditions for customers are made available together with all policies and procedures. The idea of creating a GDPR Project Team

is useful in order for the organisation and Grant Thornton to have a point of contact and facilitate the job reciprocally. After completion of the meeting sessions and general review of the documents required we shall provide management with a written indication of a structured GDPR audit plan.

## Providing your team with awareness sessions

### Service overview

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delivery of training sessions and workshops tailored for specific lines of services or specific groups within the organisation with an aim to understand the effective impact of the GDPR in practical terms, increase awareness within the organisation, help identifying the requirements and obligations pertaining to each line of business

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We recommend that these sessions are held at an early stage to raise the team's awareness and be the catalyst to identify

pockets of data capture which may not be documented but which the team would be aware of as part of its day to day operations.

# Phase two

## initial GDPR audit

### Service overview

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review of current policies, procedures and processes within the organisation

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assessment of your organisation's current data architecture, processes, risk and compliance control

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identification of current data risks in your business

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GAP analysis and review of the readiness of your business for GDPR

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identification of an implementation plan suitable for your organisation

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During this phase it is envisaged that Grant Thornton shall carry out:

- a review of policies, procedures and processes that will be made available
- fieldwork by making the appropriate checks and tests required for the fulfilment of the GDPR audit and identification of risks. The GDPR Project

Team should provide to us all the documentation required and guide us through the physical and virtual files. We should also be able to obtain samples of documents in order to conclude our gap analysis and build our recommendations in a complete way.

# Phase three

## Project consulting

### Service overview

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compilation of a report containing recommendations based on the outcome of our GDPR audit work analysis of findings. Such recommendations may include specimen clauses in policies and procedures

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Our report shall contain recommendations that shall be categorised as follows:

#### **Fundamental**

Strategic level risk including exposure to high penalties and potential threats to reputation.

#### **Significant**

Key issues - immediate to medium term action required to address risk exposure.

#### **Merits attention**

Medium to long term action required to improve processes and policies.

#### **Best practice**

Advise on how to improve existing procedures and policies, as well as recommendations on alternative methods based on our experience and similar solutions adopted elsewhere.

# Phase four

## Mapping

### Service required

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identification of tools and templates for mapping the data

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provision of assistance to the organisation in mapping the data

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Data shall be mapped on the basis of the hereunder:

- what type of data is being collected in each process and for each service line
- which of such data is relevant for GDPR
- how is the data processed
- where is the data stored (physically and virtually)
- how can data be retrieved in an easy and as much exhaustive way possible
- collecting consent and identifying areas where consent is not required
- identifying clearly the purposes for data processing
- how to input alerts for the deletion of data when unnecessary or when consent is withdrawn.



# Phase five

## Ongoing ad hoc assistance to ensure compliance

### Service overview

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regular GDPR audits and Data Privacy Impact Assessments (DPIAs) as may be required by the client

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tailored workshops to cover the above mentioned task of GDPR audits and Data Privacy Impact Assessments

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assistance as may be required in queries on privacy and data protection

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undertaking of gap analysis in order to assess the effectiveness of your GDPR efforts and compliance

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delivery of regular training and organisation of workshops in accordance with the needs of the organisation, as may be required

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## Provision for a Data Protection Officer

### Service overview

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the appointment of a DPO can facilitate compliance through the implementation of accountability tools (such as facilitating data protection impact assessments and carrying out or facilitating audits)

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acting as an intermediary between relevant stakeholders (e.g. supervisory authorities, data subjects and business units within an organisation)

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The legal landscape of data protection is evolving rapidly and presenting challenges for businesses, government and public authorities. With the deadline growing closer you will need to scrutinise the regulatory changes and understand how they will affect your business operations. Our GDPR experts can help identify the impact of the GDPR on your organisation and shape, mobilise and assist in delivering transformation programmes to achieve compliance and embed privacy within your organisation.

**Get in touch to find out more.**



Further audits and GAP analysis may be connected with our services of Internal Audit.



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