Minimizing privacy risks

From the DPO perspective

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Global Data Protection Day
by Copenhagen Compliance

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The compliance think tank in the Nordics and beyond

Certifications Compliance Privacy InfoSec Risk

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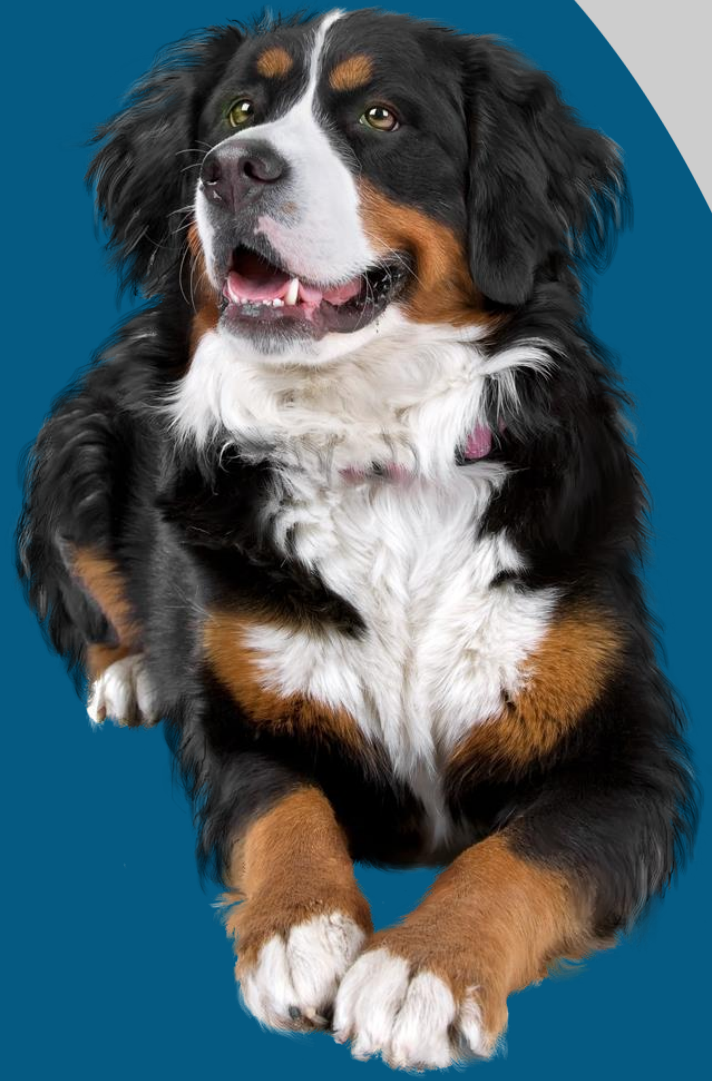
The unclear ownership of privacy risks is still a major issue for GDPR compliance



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DPO, CISO, CIO, CPO, COO and legal advisors

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The roles to control privacy risks become uncoordinated when the GDPR implementation committees ended

Gaps in roles prevent a cost-efficient allocation of resources and creates blind spots

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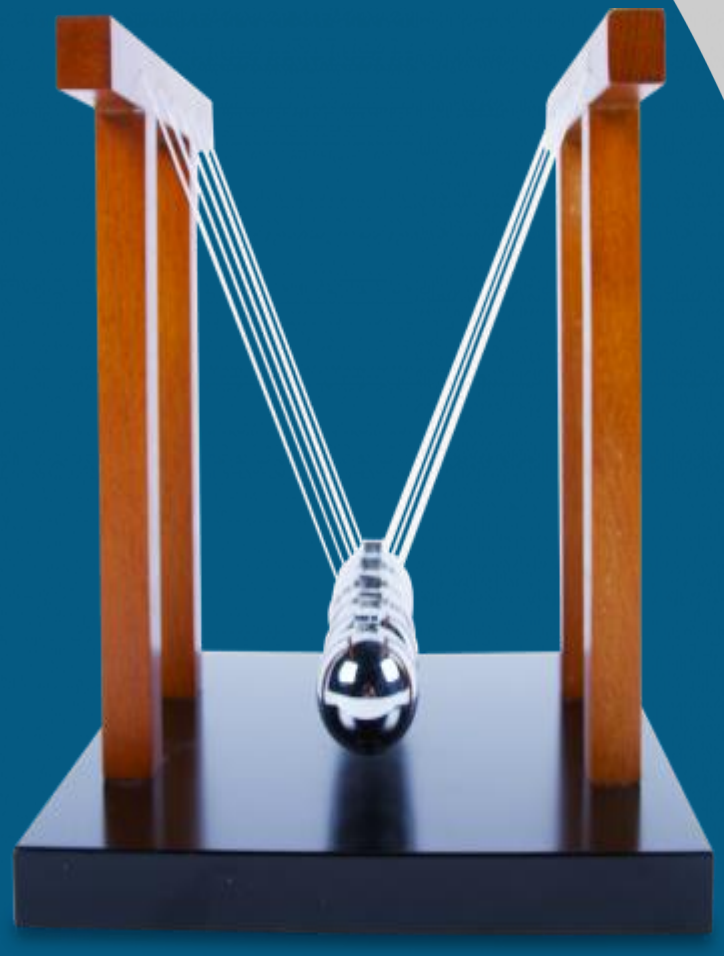
Unclear internal roles affect the efficiency of instructions, contractual requirements and due diligence of processors



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The CISO monitors the risks on the confidentiality, integrity and availability of personal data

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The DPO monitors the risks on the lack of GDPR compliance triggered by cyber and legal threats

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Policy ownership

CISO	DPO
Security policy	Privacy policy
Acceptable use	Subject requests
Data classification	ROPA inventory
Access control	Consents
Loss prevention	Breach response

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Desperate need for doers able to translate legal requirements into cyber controls, SOPs and technology

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Joint and several liability

Each joined controller is liable for the full GDPR requirements of a contract with the same data subject

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Joint and several liability

All privacy risks are assessed by each joined controller, even for the processing done by the partner

Solution

Flow managers allow modular DPIAs to accelerate the completion

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Solution

Cyber security, business and legal experts complete different risk modules

Solution

The approval flows are escalated to the DPO, the CRO and the contract owner

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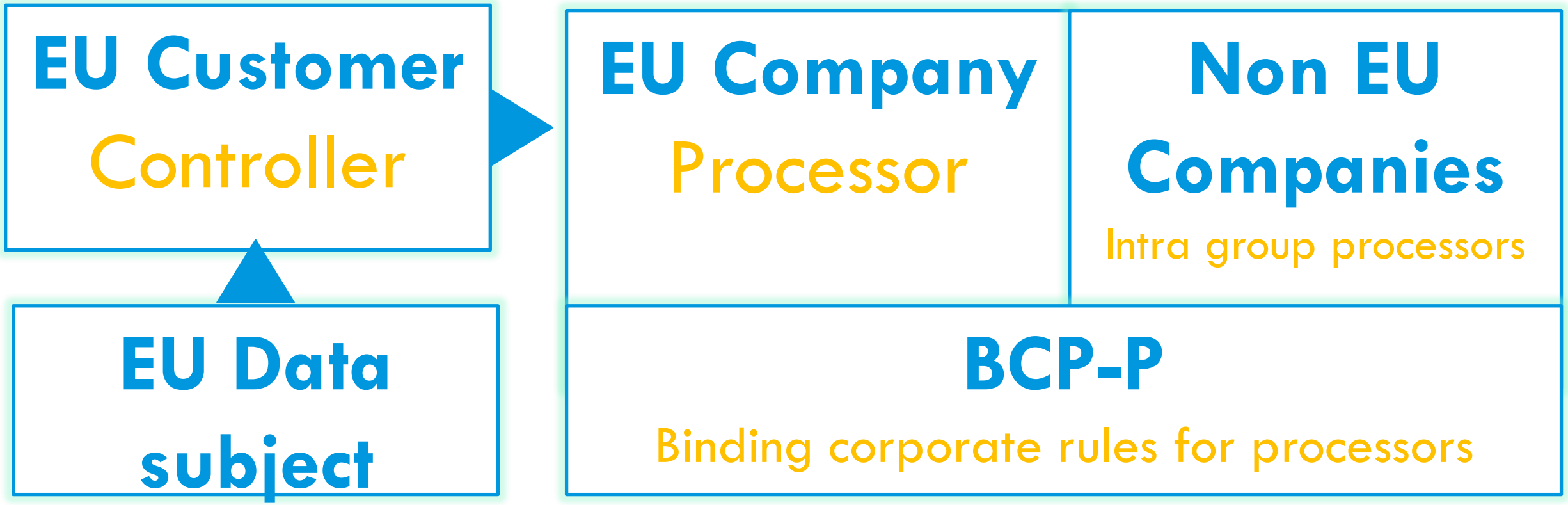
The binding corporate rules should cover the requirements, transfers and controls of data processing contracts

Transfer scheme



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Non-EU intra-group processors should standardize and coordinate the execution of controls and access requests

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