Global Data Protection Day

by Copenhagen Compliance®

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Minimising Privacy Risk

from a global DPO perspective

The risk of poor accountability

Accountability for risks

Compliance

Data subject

Illegal process

Data breach

Data integrity

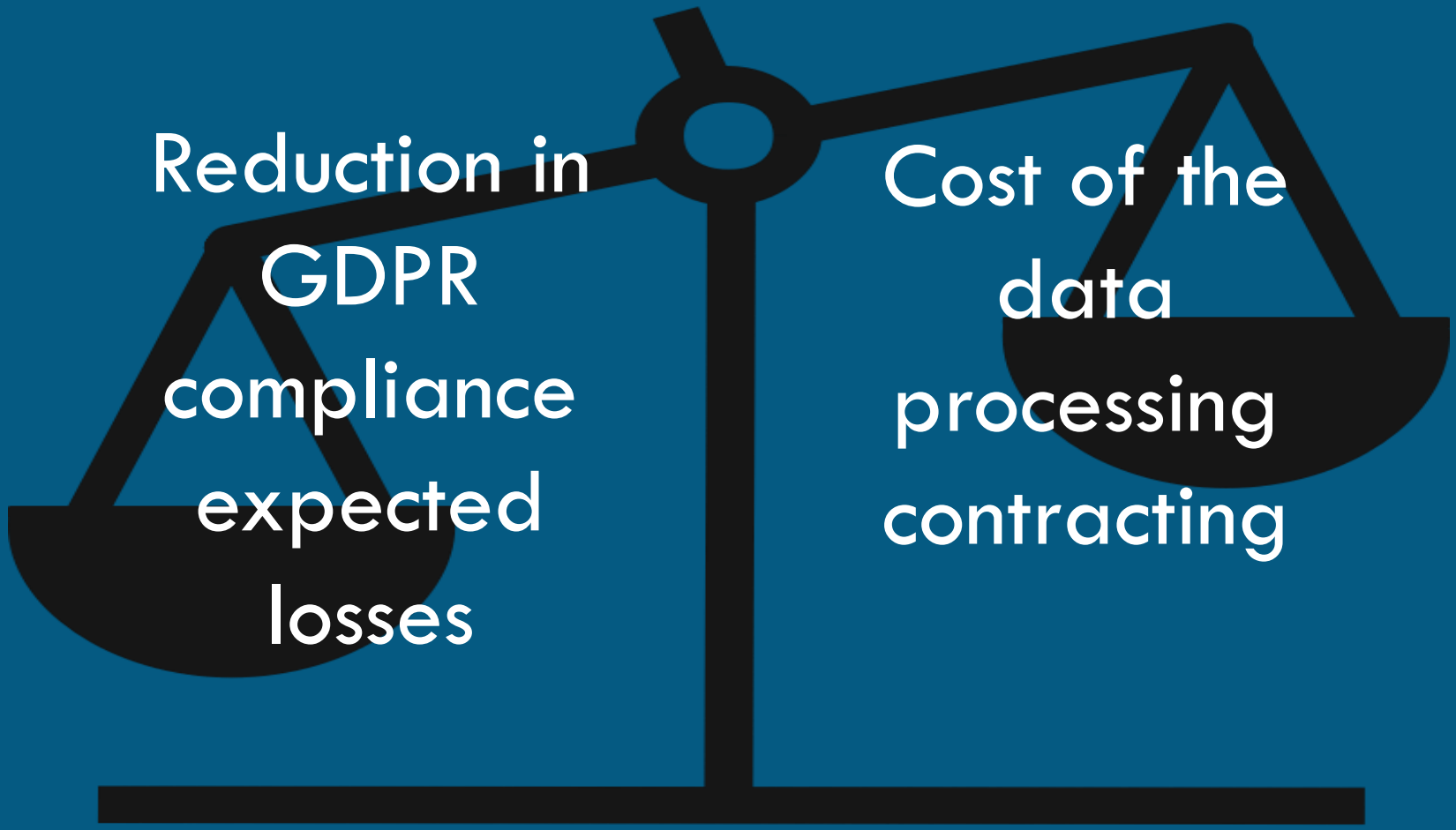
Continuity

Accountability for risks

Illegal instructions
Wrong selection
Lack of audit

Deviation from instructions
Insufficient controls

When to outsource?



Risk factors in outsourcing

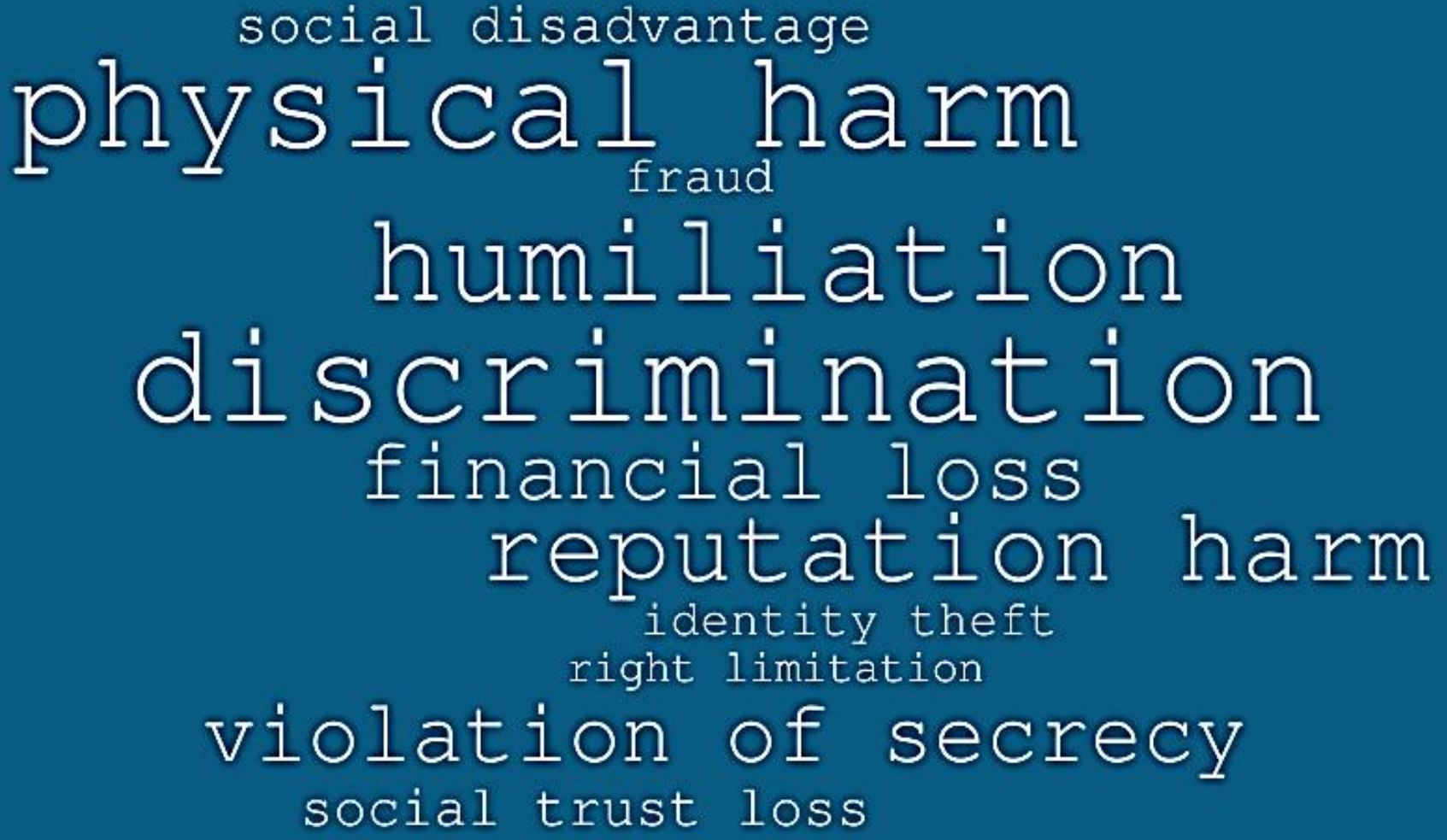
Scale and duration of processing

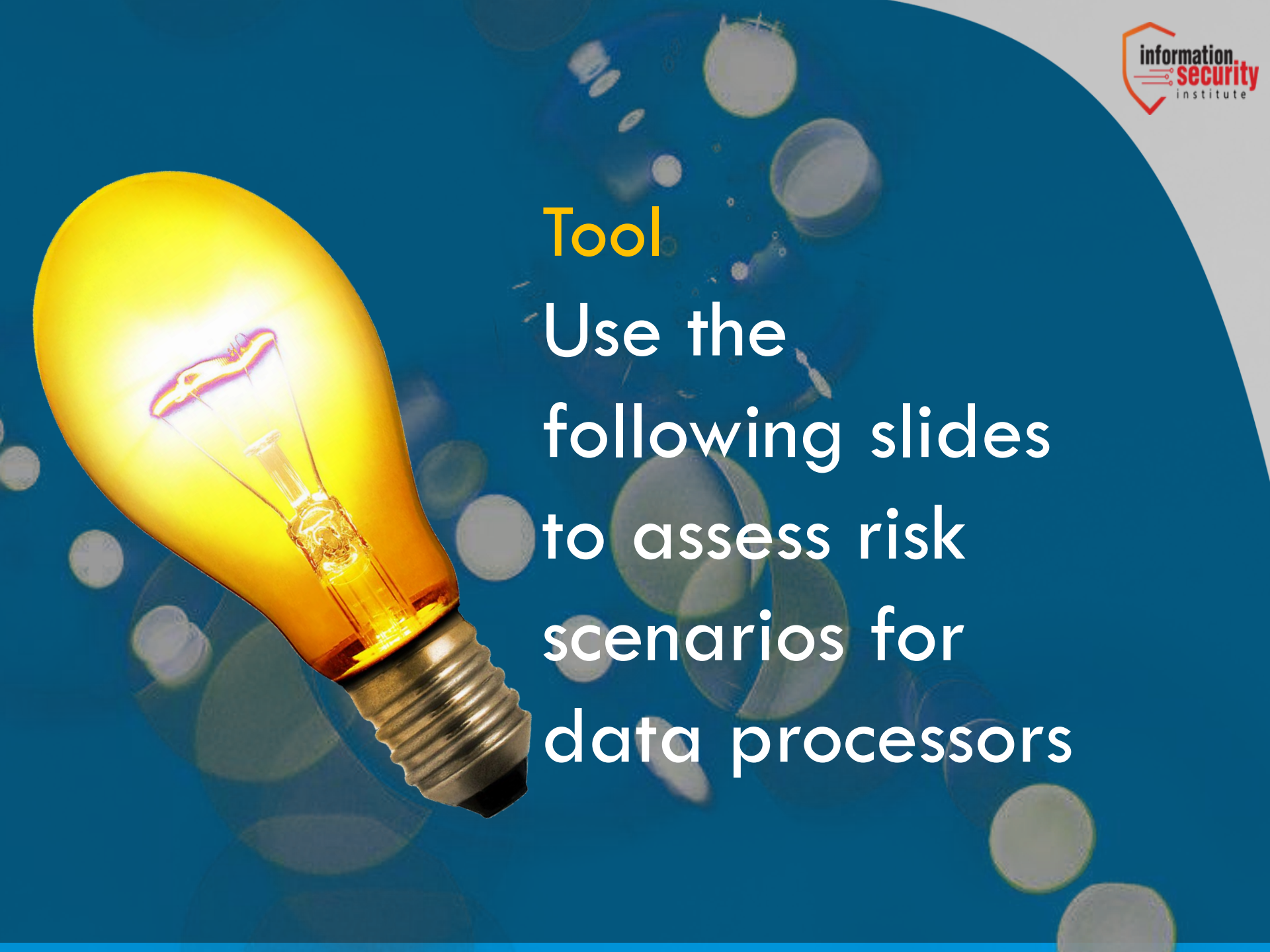
Bargain power

Nature and complexity of the processing

Sensitivity for subjects

Sensitivity for subjects




Tool
Use the following slides to assess risk scenarios for data processors

Risks of data processors

Over processing of personal data

- Deviation from instructions
- Poor stipulations in contract
- Illegal data transfers
- Disclose w/o need-to-know/share

Risks of data processors

Non-compliances

- Missing controller´s documentation
- Missing or delayed breach notification
- Data subject access requests discoordination
- Incomplete data deletion

Risks of data processors

Data confidentiality and integrity loss

- Failure to encrypt or anonymize
- Reverse pseudonymisation
- Interface errors
- Lack of data quality and logs
- Failure of data validation controls

Risks of data processors

Discontinuity of services

- Poor response protocols
- Unstable infrastructure
- Physical hazards
- Poor backup restoration

Modular DPIA

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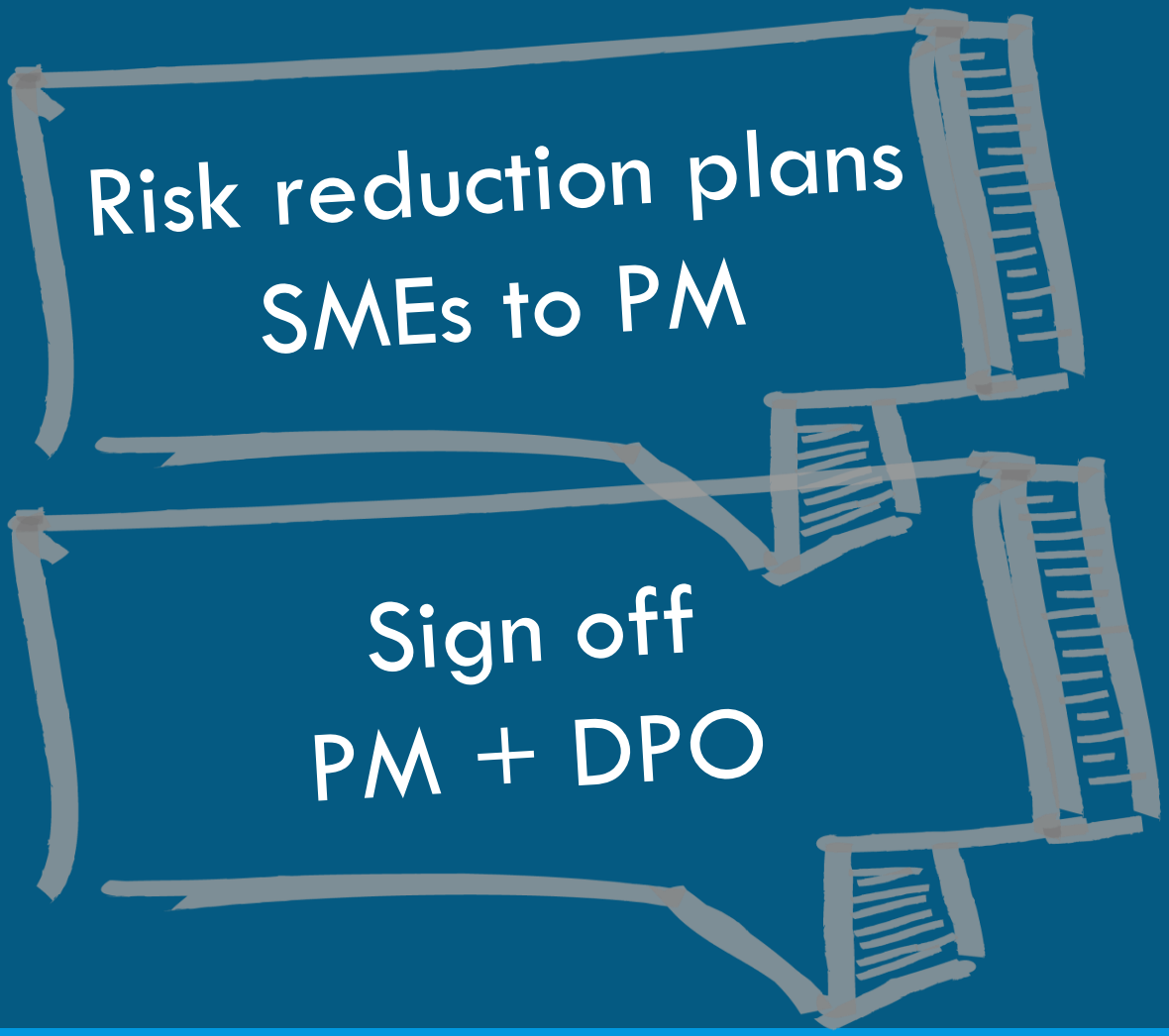

Binding corporate rules

Processors should notify controllers when using or changing companies in the same business group covered by BCRs as sub-processors

18/EN WP 256

Binding corporate rules

Processors should monitor that sub-processors under BCR-P put effective data security and compliance controls in place throughout the employees of the group in third countries

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