



ExpertDPO®

Outsourced Data Protection Officer

RELEVANT EU GDPR ARTICLES

Article 37	Mandated appointment of DPO.
Article 39 1 (a)	Employee and Partner training and awareness on the GDPR compliance requirements.
Article 39 1 (a)	GDPR Help Desk for remote support regarding GDPR issues.
Article 39 1 (d)	Designated point of contact for the supervisory authority.
Article 39 1 (c)	Data Protection Impact Assessment.
Article 30 and Article 39 2	Identify, Record, and Maintain "Records of Processing Activities" ROPA .
Article 39 1 (b)	Centralisation of data protection policies.
Article 39 2	Risk Assessment of all processing activities.
Article 39 1 (b)	Monitoring and reporting on compliance with GDPR via audit regime.

INTRODUCING ExpertDPO®

WHAT IS ExpertDPO®?

The General Data Protection Regulation (EU) 2016/679 commonly referred to as GDPR, is one of the most significant changes to business law in decades. Comprising 99 articles, the law mandates supervisory authorities and organisations who process personal data, to behave in a very specific way.

One such mandatory requirement is the need to appoint a Data Protection Officer(DPO). (Section 4 Article 37),. This appointment includes a range of mandatory tasks for the DPO to perform in order to position the business as meeting their legal requirements.

INTRODUCING ExpertDPO®

ExpertDPO® is a service provided by DPG to achieve two core objectives; Firstly, to help fulfil mandatory requirements but secondly, and arguably more importantly, to afford organisations access to a pool of data protection expertise to help them progress towards a robust and resilient data protection position.

DPG offer two levels to the ExpertDPO® service; passive and active. Each offers a different set of deliverables and therefore value to organisations.

PASSIVE

Passive DPO's core objective is to enable the organisation to meet the mandated regulatory requirements and provide a central point within the organisation to act as the focus for data protection. Starting with a GAP Analysis against EU GDPR, delivered via our bespoke Pathfinder® Software, included within the service, passive ExpertDPO® provides the organisation with a roadmap outlining where remediation needs to take place. ExpertDPO® then moves to its official capacity operating as the designated Data Protection Officer and as such the mandated tasks as defined in GDPR Article 39 are covered.

ACTIVE

Active ExpertDPO® includes passive but extends the scope away from GDPR and into broader Data Protection areas. Following on from the initial GDPR assessment and remediation, Active ExpertDPO® conducts an in-depth assessment of data breach risk analysis across all aspects of the business. This is delivered via our bespoke Pathfinder™ Software, which brings into scope over 80 business processes and helps you to understand where operational and technical vulnerabilities may exist in all business areas.



More than tick box compliance

TYPICAL ENGAGEMENT PROFILE FOR A PASSIVE ExpertDPO®

Month	Activity	Benefit	Deliverable	Est. Days on Site
1	Scope	Understand the organisational structure and key personnel.		5
1	Intelligence	Configure the GDPR Pathfinder™ Software and Deploy	GDPR Compliance Assessment.	
1	Support	Project Manage the Completion of the GDPR Pathfinder™ Software. (Named person identified as your PM for this stage)		
2	GDPR GAP Analysis Report	Using the Analysis output ExpertDPO® will create a GAP Report to identify operational variation from core GDPR requirements.	A defensible position against regulatory action.	3-5
2	Skills	Using the Analysis output, ExpertDPO® will create a list of skills needed for further assessment and delivery of remediation.	Resource planning.	3-5
“Go Live” with Data Protection Officer Issuing and distribution of dedicated email address and help desk number to be used for all Data Protection Escalations				
3-11	Core DPO Activities	<p>DPO Task 1: Issue method, template and training for performing Data Protection Impact Assessments.</p> <p>DPO Task 2: Centralise key data protection policies to include clear definitions of core DP activities.</p> <p>DPO Task 3: Create Monitoring Report based on Analysis Output to assist internal audit / compliance to assess data protection objectives.</p> <p>DPO Task 4: Identify, record and maintain Records of Processing Activities (ROPA)</p> <p>DPO Task 5: To be designated point of contact for the supervisory authority.</p> <p>DPO Task 6: Risk assessing all new Processing Activities.</p>	<p>Mandatory Requirement (article 39 1 (c))</p> <p>Mandatory Requirement (article 39 1 (b))</p> <p>Article 30 requirement.</p> <p>Mandatory Requirement (article 39 1 (e))</p> <p>Mandatory Requirement (article 39 (2))</p>	1 day per week
3-11	Optional DPO Activities	<p>DPO Task 7: Incident Management and Investigation</p> <p>DPO Task 8: Internal Audit.</p> <p>DPO Task 9: Staff training and awareness.</p> <p>DPO Task 10: Data Processor assessment and audit.</p>		
12	Reporting	<p>Review activities over previous 11 months and create the annual “Data Protection Report”. In year 1 this will include identification of where the business was in terms of GDPR compliance and what remediation actions have taken place.</p> <p>In addition, it will propose the plan for the next 12 months in order to continue to close the GAP.</p>		5 days

DELIVERABLES WITHIN ExpertDPO®

Feature	Passive	Active
Mandated appointment of DPO – Article 37	✓	✓
Employee and Partner training and awareness on the GDPR compliance requirements. – Article 39 1 (a)	✓	✓
GDPR Help Desk for remote support regarding GDPR issues. – Article 39 1 (a)	✓	✓
Designated point of contact for the supervisory authority – Article 39 1 (d)	✓	✓
Data Protection Impact Assessment – Article 39 1 (c)	✓	✓
Identify, Record, and Maintain “Records of Processing Activities” ROPA – Article 30 and Article 39 2.	✓	✓
Centralisation of data protection policies. - Article 39 1 (b)	✓	✓
Risk Assessment of all processing activities – Article 39 2	✓	✓
Assessment of compliance with GDPR (Using Pathfinder™ GDPR) – Article 39 1 (a)	✓	✓
Creation of GAP Analysis against all GDPR compliance needs. – Article 39 1 (a)	✓	✓
Monitoring and reporting on compliance with GDPR via audit regime. – Article 39 1 (b)	✓	✓
Remediation plan put in place for identified GDPR non-conformance.		✓
Roadmap for improvement.		✓
Dedicated head on site to project manage the Data Protection Strategy, act as DPO and integrate required capabilities into the business.		✓
Access to dedicated team of experts to help deliver on the Data Protection Report, help with system architecture, IT Forensics and any other identified need.		✓
Incident Management.		✓
Internal Auditing of core data protection functions.		✓
External auditing of data processing partners.		✓
Creation of Annual Data Protection Management Report.		✓

FIND OUT MORE

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