# Our GDPR Health Check for start-ups and scale-ups



Demonstrating compliance is fundamental to fulfilling the GDPR's accountability requirements.

Our GDPR Health Check assesses your organisation's data protection documentation suite and determines whether appropriate organisational and technical measures have been implemented – so that you are in compliance with both the letter of the law (and it is law) along with current best practice.



#### Step 1

#### Documentation

Ensuring vital documentation, policies and procedures are in place and that these are being followed.



#### Step 2

#### **Roles & Responsibilities**

Checking the adequacy of the roles and responsibilities you have in place for data protection.



#### Step 3

#### **Risk Mitigation**

Detecting potential breaches of data protection compliance and recommending risk treatments.



#### Step 4

#### **Future Proofing**

Assessing data protection awareness and Privacy by Design principles, then providing a roadmap and resources to address inadequacies (see <u>Trace Academy</u>).

#### WHY CHOOSE TRACE®?

- Delivered by <u>qualified compliance experts</u>.
- We take a holistic approach: Privacy by Design as part of your culture, tech team, marketing/sales, data strategy and operations.
- We get tech: specialists in supporting responsible innovators from start up to scale.
- We understand business: we ensure compliance supports commercial success.
- Rapid, focused and efficient support and delivery.



# How your organisation benefits



Our GDPR Health Check is a rapid, highly focused exercise, but one which can deliver huge value by helping your organisation to:



# Adopt a robust compliance posture

Evidence good governance and accountability in your data processing activities.



#### Reduce risk

Identify data protection risks and obtain pragmatic recommendations specific to your organisation that address your whole data processing chain.



#### **Build trust**

Demonstrate commitment to upholding data subjects' rights and high compliance standards across the data processing chain.



#### **Get confidence**

Obtain independent, expert assurance your data protection policies and practices are up to scratch.



#### Stay future-fit

Deepen data protection and broader information security awareness across the organisation to embed Privacy by Design in all your current and future activities.



# Accountability measures



"Accountability is one of the key principles in data protection law – it makes you responsible for complying with the legislation and says that you must be able to demonstrate your compliance" – Information Commissioner's Office

Accountability can feel hard to pin down. Our GDPR Health Check will have you doing everything regulators, partners and customers expect:



## Policy implementation

Formulating, implementing and continually improving vital data protection policies.



# Documenting processing

Documenting your processing activities and safeguarding measures.



### Protecting personal data

Implementing appropriate technical and organisational measures to protect personal data.



# Privacy by Design and by Default

Observing "data protection by design and default" principles for all data processing activities and technologies.



# Partnering responsibly

Correctly contracting with all parties involved in your processing activities to cascade obligations through the data processing chain.



# Dealing properly with breaches

Recording data breaches and reporting them to regulators (and data subjects) where necessary.



# Baseline documentation



Regulations require organisations to have a documentation suite in place, but their substance is left for organisations to determine, which can be difficult for non-specialists in data protection.

Dependant on your model and activities, the baseline we recommend will include:



Records of Processing Activity (RoPA)
Mandatory, with narrow exemptions



**Privacy Policy/Notice**Mandatory



**Data Processing Agreements**Mandatory



Data Protection Impact Assessment(s)
Mandatory for many activities; best practice generally



Legitimate Interests Assessment(s)
Mandatory in practice if your lawful basis for processing



Territory Impact Assessment(s) and Supplementary Measures Mandatory if transferring data to an "inadequate" jurisdiction



**Cookie Policy**Mandatory



**Data Retention Policy** Mandatory in practice



**Data Breach Management Policy**Mandatory in practice



**Data Protection Policy**Mandatory in practice

