IRON MOUNTAIN®

GDPR:
RECIPES FOR GOOD INFORMATION MANAGEMENT

Physical Meets Digital
Best Practice Guide

APPETISERS

Enter a rapidly evolving world of information governance ..... p. 2

MAINS

The essentials for creating a GDPR compliance policy ..... p. 3

The GDPR's tasks in combatting poor information management ..... p. 4

SPICES

GDPR as a guide to unravel data protection ..... p. 5

The centre of GDPR: privacy and security ..... p. 6

SERVING

Data affected by GDPR ..... p. 7

Responsibilities of data processing controller ..... p. 8

Rights of data subjects ..... p. 9

TECHNIQUES

Possible sanctions ..... p. 10

Establishing an information governance strategy ..... p. 11

DESSERTS

GDPR: Indulge yourself in the opportunities it creates ..... p. 12

ENTER A RAPIDLY EVOLVING WORLD OF INFORMATION GOVERNANCE

The feeling is unanimous. We're living in a constantly changing world. Businesses of the 21st century agree that paper is on its way out. So how will we guarantee standardised document processes?

Every organisation wants ever more widely available data, and ever faster access. But this idea doesn't only affect businesses. In the wake of GDPR, it is time to analyse data flows and set up a framework that guarantees data reliability and accessibility, while adhering strictly to regulations.

This recipe book aims to share the GDPR best practices. There are two important points we have to consider - shelf life and data confidentiality.

In this recipe book, you'll find factsheets and tips that will allow you to implement a GDPR-compliant information management strategy.

THE ESSENTIAL INGREDIENTS TO CREATING A GDPR COMPLIANCE POLICY

Sometimes, creating a great menu can prove more complex than we first imagined. Gastronomy has its codes that have to be respected. Do we have the right utensils? Does the kitchen conform to the safety rules? What protocol do we have to follow to ensure a successful implementation? Let's look together at the essentials.

Fitting and equipping the kitchen are both priority considerations. You can't cook without a pristine work surface.

We have to clean up our digital messes, our exposure of information, in the midst of an increasingly strict legal environment.

> "Gastronomy aims to ensure man's longevity with the best possible food" - Jean Vitaux

Evolving work methods
Essential tools

- Outsource non-strategic processes
- Automate visibility and decision-making of key business processes.

Risk management
Basic security rules

- Define and implement a universal information governance strategy
- Handle audits and checks
- Avoid security vulnerabilities

Extract the value of information
Successful presentation

- Manage the information lifecycle
- Ensure data restoration and recovery
- Evaluate the data

GDPR'S ROLE IN COMBATTING POOR INFORMATION MANAGEMENT

51% of companies have reported incidents in the first 12 months since 25 May 2018.

Complying with GDPR

Simple, quick and easy to implement, the suggested recipes will help you change your compliance habits.

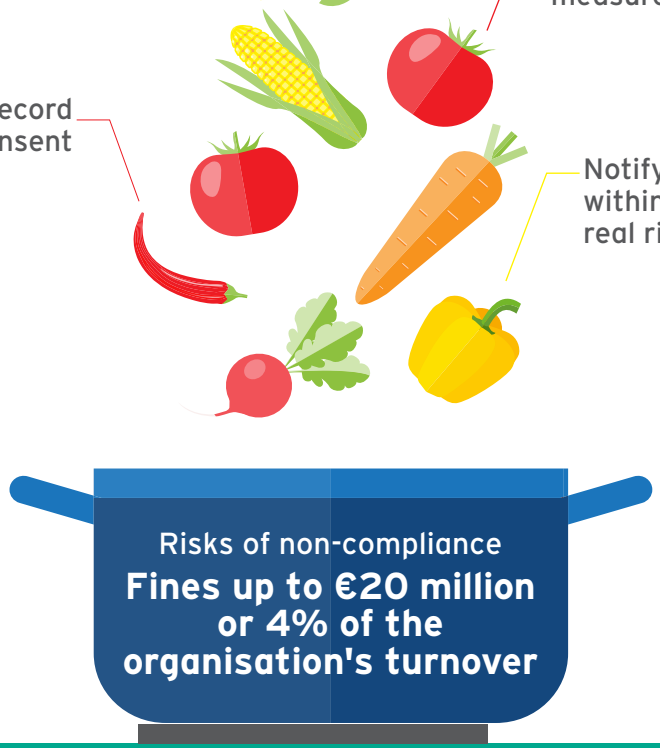
Guarantee the security of all collected, processed and stored data against the risks of loss, theft or disclosure.

Guarantee subject access request (SAR) process for individuals toaccess,modify, restore and delete their data.

Implement document protection measures and procedures.

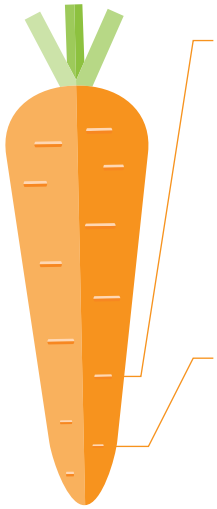
Collect and record the informed consent of individuals.

Notify the regulatory body within 72 hours if there is a real risk of data breach.



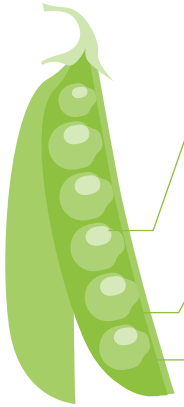
Risks of non-compliance

Fines up to €20 million or 4% of the organisation's turnover



39% of companies describe their e-mail management as "chaotic." In 55% of them, e-mail is considered unlabelled, undirected and high-risk data. Only 10% selectively archive their e-mails.

20% of mistakes that result in data loss are caused by employee negligence or poor practices.



47% of companies have a policy that defines data retention schedules, but 51% rely on manual removal of stored content.

15% of companies use automated or assisted classification.

Only **7%** of companies use analytics tools for data cleansing.

Take advantage of GDPR - roll up your sleeves and try something new!

GDPR is a master chef

Throughout the years, master chefs around the world have developed the concept of a kitchen brigade, by distributing tasks among the team and monitoring the behaviour of cooks.

Just like a master chef, GDPR imposes new rules, sets real penalties and in the end, shapes a new way of handling personal data.

It is inherited from the French Freedom of Information law of 1978.

DATA PROTECTION IN THE UK AND IRELAND

In the UK, Northern Ireland and Wales, the role of the ICO (Information Commissioner's Office) is to uphold information rights in the public interest covering Data Protection Act, Freedom of Information Act, Environmental Information Regulations, Privacy and Electronic Communications Regulations.

The ICO is the UK's independent body, under the responsibility of the Parliament. Her Information Commissioner is named by the Queen.

Data Protection Act should integrate GDPR in the future.

THE CENTRE OF GDPR: PRIVACY AND SECURITY

In the same way that maintaining a clean kitchen is every cook's responsibility, in every organisation data security and compliance are everyone's responsibility.

Collect only what you need!

Obviously, GDPR does not prohibit collecting personal information. But it must be relevant to your business needs.

GDPR imposes a higher level of privacy protection for data collected from anyone residing in the EU.

As a result, responsibility for non-compliance can go all the way up to the board room.

The security risk touches all levels of the company. Watch out for the hackers, who are becoming more sophisticated.

PAY ATTENTION TO SHELF LIFE AND RETENTION POLICIES !

The real challenge: getting over the fear of destroying the data you don't need.

ADDING FLAVOUR TO YOUR DISH.

Two key ingredients: PRIVACY and SECURITY.

- Comply with data conservation and privacy policies.
- Do not store information longer than necessary (at the risk of incurring unnecessary costs).
- Be able to easily retrace policy changes.
- Prove to auditors that your organisation is compliant.

DATA AFFECTED BY GDPR

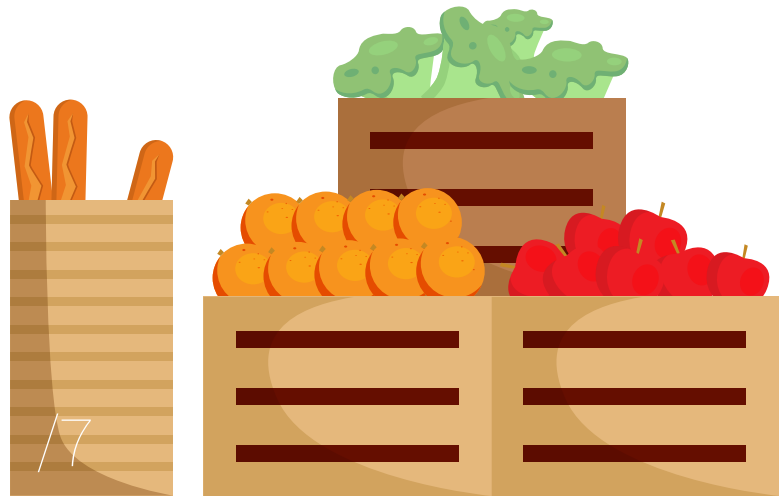
How can you see clearly what's in a kitchen if you don't track inventories ? You cannot guarantee security if you don't know what data you have. You wouldn't go to the market without a shopping list !

Consent must be intentional

You need to identify where your data resides, what data you have and why you have it. Then define whether you need consent to process that data, and if so, whether you have it and where it is recorded.

Any software functionality, software package, application or programme that processes personal data within the framework of a company located in the EU and/or processes data about persons residing in the EU, falls under the GDPR.

YOU CANNOT SECURE YOUR DATA IF YOU DO NOT KNOW WHERE IT IS



RESPONSIBILITIES OF THE DATA PROCESSING CONTROLLER

If anything happens, the company is represented in the criminal case by the CEO.
Whether it is an SME or a large firm: the CEO is always the legal entity responsible before the law.

1. Change all contracts (clients and suppliers) and HR documents to comply with the GDPR.
2. Keep a record of processing activities.
3. Designate a Data Protection Officer (DPO) when data processing requires regular monitoring or when processing big data. Consider appointing an external DPO (lawyers, etc...).
4. Privacy by Design - take GDPR into account when approaching any new software or application. Check what data will be collected and processed, record why it needs to be kept and when it needs to be destroyed.
5. Document all procedures and contractual collaboration with third parties to show compliance with GDPR in case of an audit.
6. Ensure that information security procedures are reinforced. In the case of a security breach, notify the regulatory body within 72 hours, and the individuals concerned as appropriate.
7. Stay informed on data and legal security requirements if you transfer data outside the European Union.

POTENTIAL COSTS OF DATA BREACHES

- Fines and penalties
- Loss of client loyalty
- Damage to the company's reputation
- Loss of revenue
- Increased operating costs
- Drop in share prices
- Negative publicity

RIGHTS OF DATA SUBJECTS

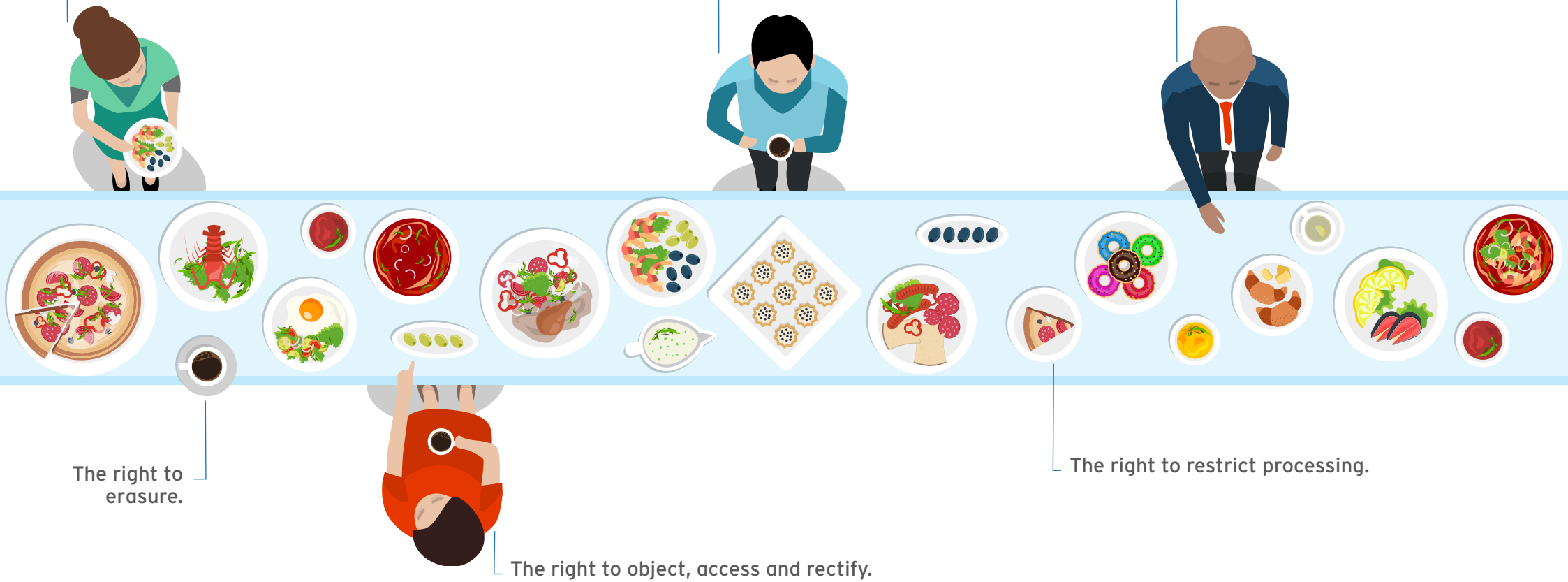
Vitamin-packed rights for boosting the immune system! We often forget, but GDPR's main goal is to protect European citizens ; much more than putting constraints on companies. Let's look at the essential GDPR ingredients that protect you as an individual.

GDPR guarantees:

The right to be informed (fair collection) about the data being collected, the nature of processing, recipients, possible transfers outside the EU, the data subject's rights, etc.

The right to data portability on personal information to be transferred elsewhere.

The right to automated decision making and profiling.



The right to erasure.

The right to object, access and rectify.

The right to restrict processing.

POSSIBLE SANCTIONS

GDPR clearly specifies that each controller is responsible for proving their compliance with regulations and providing the mandatory documentation.

Tips for coming to the privacy table with confidence

Stay informed about new non-compliance cases.
Keeping up to date makes it easier to prepare for upcoming changes and transformations.

Learn from other's mistakes.
Exploring available GDPR resources enables you to prepare your business.

Visit the websites of regulatory bodies in each country to stay updated.

3 types of sanctions have been laid out

Financial sanctions
Up to €20 M or 4% of your annual turnover

Criminal sanctions
Imprisonment for up to 5 years and a €300,000 fine

Negative media exposure

ESTABLISHING AN INFORMATION GOVERNANCE STRATEGY

Every restaurant's kitchen has to maintain hygiene and safety. These things require implementation of a rigorous strategy.

1

Formalise management's commitment

2

Communicate information about regulations

3

Set up a data backup plan

4

Keep a record of data processing activities

5

Train and monitor third parties

6

Evaluate and establish contracts with strategic suppliers

12

Ensure implementation of the full policy

11

Respect the rights of data subjects

10

Follow a procedure for reporting data breaches

9

Lay out a data audit plan

8

Carry out a Privacy Impact Assessment

7

Respect Privacy By Design

GDPR: INDULGE YOURSELF IN OPPORTUNITIES IT CREATES

GDPR should be seen as an opportunity to expand you' company's information governance strategy, not as a set of sanctions. Start organising your desserts and arrange them by order of shelf life. Then, mix the concepts to create your own frame of reference.

Implementing a GDPR management plan is like baking, you have to be precise when weighing ingredients ! The trick is to follow a methodology, and respect procedures.

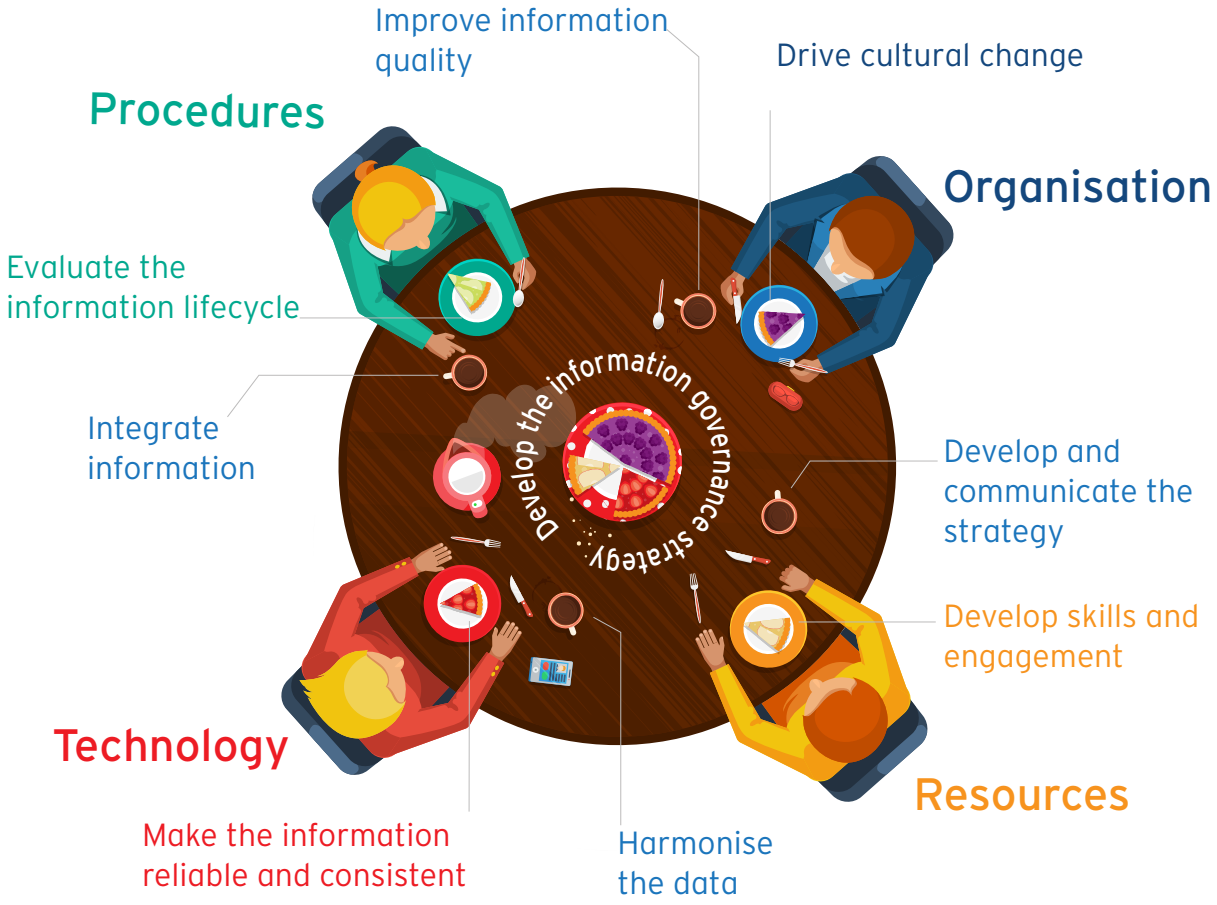
And now?

Gather the necessary components:

- Procedures
- Technology
- Organisation
- Resources

Just like a professional baker, if you follow the recipe step by step, respecting proportions and shelf life. This way you will achieve a perfect information management strategy.

Now it's your turn to master GDPR like a chef!



IRON MOUNTAIN®

TO FIND OUT MORE...

Watch the virtual forum Physical Meets Digital session **"Mastering data privacy and Information governance in a post-GDPR world."**

WATCH THE RECORDING NOW ▷

ABOUT IRON MOUNTAIN

Iron Mountain Incorporated (NYSE: IRM), founded in 1951, offers information management services that help companies reduce costs, limit exposure to risks and eliminate inefficiencies in data management, both in digital form and on physical supports. Iron Mountain stores and protects billions of information assets, including critical business information, highly sensitive data, and cultural and historical artifacts. Providing solutions that include secure storage, information management, digital transformation, secure destruction, as well as data centres, art storage and logistics and cloud services. Iron Mountain helps organisations comply with regulations, recover from disaster, and enable a more digital way of working.

Visit www.ironmountain.co.uk for more information.

© 2019 Iron Mountain Incorporated. All rights reserved. Iron Mountain and the mountain logo are registered trademarks of Iron Mountain Incorporated in the U.S. and other countries. All other trademarks are the property of their respective owners.

Need more information, help, or advice?

CALL US AT: 08445 60 70 80 (UK/N.I.) | 1800 732 673 (R.O.I.)
IRONMOUNTAIN.CO.UK | IRONMOUNTAIN.IE