



# GDPR DATA PRIVACY

General Data Protection Regulation  
National Council 10<sup>th</sup> February 2018

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David Storey – Privacy & Security Consultant

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# DAVID STOREY



## Background

- Information / content management
- Security / privacy
- Legal admissibility / Evidential weight
- Managing consultant / Programme manager
- Highly regulated industries

## Relevant qualifications

- General Data Protection Regulation Practitioner (EU GDPR P)
- Lead Auditor for Information Security Management Systems (ISO 27001)
- Programme Manager (MSP)

## Previous / relevant experience

GDPR 2016 - Privacy

- Life Sciences, Membership Services

DPA 1998 - Privacy

- Utilities (PCI), Insurance, Pensions

ISO27001 – Information Security

- Nuclear, Oil & Gas, Defence, Utilities, Aerospace & Automotive

## Awards

- Enterprise Project of the Year (2014)
- Consumer Website of the year (2013)



**Information Security & Privacy Consultant**

# WHAT IS THE GDPR?

The EU General Data Protection Regulation (GDPR) replaces the UK Data Protection Act 1998 on 25th May 2018.

GDPR will be embodied in UK law and extended by the current Data Protection Bill.

## Main Differences – DPA 1998

- Revised Principles
- Enhanced Individual Rights
- Emphasis on Informed Consent
  - No Implied Consent
  - Obligation to Prove Consent
- Reduced Timelines
  - Breach: 72 Hours
  - Subject Access Request: 30 Days
- Wider Geographical Reach
- Costlier Penalties



# WHAT IS PERSONAL DATA?

**Personal Data:** Information that enables a natural living person to be identified either directly or indirectly

**Processing:** Any operation performed on Personal Data, automatically or manually

Source: GDPR

## Personal Data Examples:

Name, address, date of birth, age, identification number, online identifier (email, social media name, IP Address), picture, gas meter number, car registration

**High Risk Data:** Bank account details, direct debit instructions, credit card number, insurance policy

## Special Category Data Examples:

Racial, political, religious, philosophical or trade union membership, genetic, biometric, health or sex life / orientation

Processing of Special Category Data prohibited (with exceptions)

# WHAT ARE THE PRINCIPLES OF GDPR?



## Principles - Personal Data shall be:

Processed **lawfully, fairly** and in a **transparent** manner

Collected for **specified, explicit** and **legitimate** purposes

**Adequate, relevant** and **limited** to what is necessary

**Accurate** and, where necessary, kept **up to date**

Retained only for as **long** as necessary

Processed in an **appropriate** manner to **maintain** security

Enhanced Organisational Accountability

# WHAT RIGHTS DOES AN INDIVIDUAL HAVE?

Data Subject (Individual) – Has the right:

to be **informed**

of **access**

to **rectification**

to **erasure** (to be forgotten)\*

to **restrict processing**

to **data portability**\*

to **object**

to restrict **automated decision making** and **profiling**

\*GDPR Introduces Two New Rights

# WHAT IS A PRIVACY BREACH?

**Personal Data Breach:** a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed

## Types of Breach

**Confidentiality:** Unauthorised or accidental disclosure or access

**Integrity:** Unauthorised or accidental alteration

**Availability:** Unauthorised or accidental loss of access, or destruction

## Obligations

Assess Risk / High Risk

Notification (High Risk)

- CCC within 24 Hours
- ICO within 72 Hours
- Individuals As Soon As Possible

Document the Cause and your Response

Risk to the Rights and Freedoms of  
Individuals



# PENALTIES

**Up to €20,000,000 or 4% of  
Worldwide Turnover**

Infringement of:

- Personal Data Principles
- Data Subject Rights
- Third Country Transfers
- Cooperation with  
Supervisory Authorities

**Up to €10,000,000 or 2% of  
Worldwide Turnover**

Infringement of:

- Processing Activities
- Information Security
- Data Protection by Design
- Impact Assessments  
(DPIA)
- Data Protection Officer  
Duties
- Breach Notifications

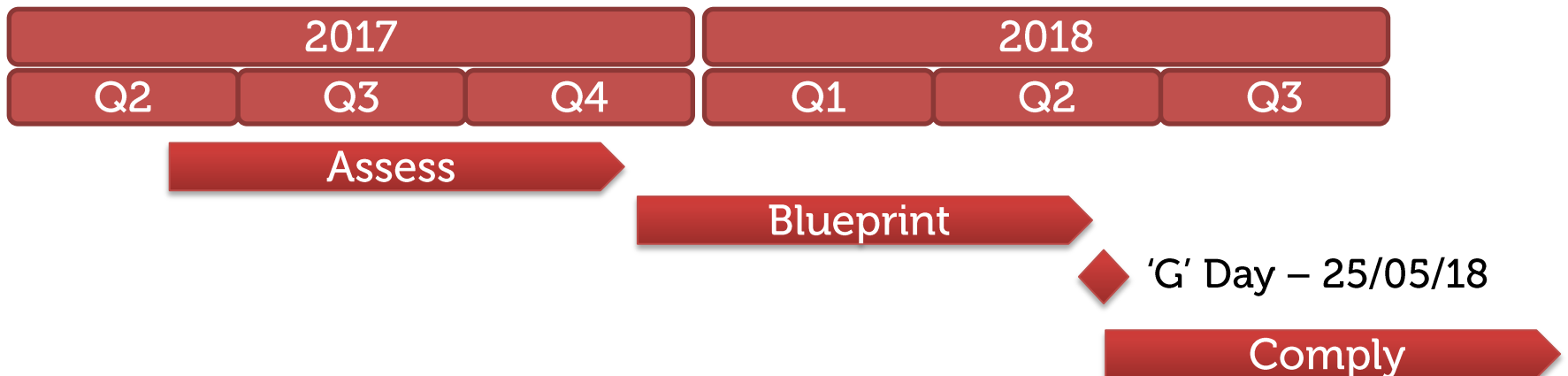
**Penalties: Effective, Proportionate and  
Dissuasive**

# GDPR READINESS APPROACH

## Programme Objectives

- To protect the reputation of C&CC by complying with the GDPR
- To maintain optimum contact levels with Members and Other Stakeholders

## Programme Roadmap



102 Days to GDPR

# GDPR DOCUMENTATION CHANGES

## Completed Changes

### Third Party Contracts, Agreements:

- Controller / Processor Templates & Variations
- Data Usage Agreement Template

### Communications:

- Data Protection Statements & Competition T&C's



## Planned Changes (Pre May 2018):

### The Club:

- Data Protection Policy & Procedures
- Retention Schedule

### Website:

- Revised Data Protection Policy and Fair Processing Notices
- Privacy Policy
- Cookie Notification Banner

# NEW DATA PROTECTION STATEMENT



| Statement   | Principle / Purpose |
|---|---------------------|
| The protection of personal privacy is an important concern to The Camping and Caravanning Club. Any personal data collected will be treated in accordance with current data protection legislation.   | Empathy             |
| We will use your personal data to deliver your inclusive membership services including; advice, events, courses, awareness communications (including offers), details of Club Units, products, publications, newsletters, quality research, analysis, the AGM & voting and to administer your membership account. | Lawful & Fair       |
| In order to meet our membership obligations to you we will share relevant personal data with Club committees, local groups, sites, special interest groups/societies and business partners.   | Transparent         |
| For more information about our data protection policy please go to <a href="http://www.campingandcaravanningclub.co.uk/aboutus/privacy-policy/">www.campingandcaravanningclub.co.uk/aboutus/privacy-policy/</a>   | Transparent         |

Website and Printed Data Capture Forms

# CLUB UNITS



*Future State – Work in Progress*





David Storey – Data Protection Officer & GDPR Consultant

# **QUESTIONS AND ANSWERS**