

# Fast & Dirty Data Protection

Or  
GDPR & why it matters to kinksters

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There are two ways to  
do this...

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## Legal bit

*Information given herein or communicated in no way guarantees you will achieve  
GDPR Compliance. It is individual companies responsibility to adopt measures  
deemed appropriate to achieve GDPR compliance.*

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Why ?



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# Why @ L.A.M



GDPR Article 9 - Processing of special categories of personal data

1. **Processing of personal data** revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data **concerning a natural person's sex life or sexual orientation shall be prohibited.**

GDPR A9

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# French CNIL Method



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# Appoint lead

Somebody **has** to be responsible



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# Map & Discover

Map your business processes.  
What data do you use in them ?

List the computer software you use  
and what for.

Identify the vendors/data  
processors involved in each activity.

Know where the data is being  
transferred and to whom, where it is  
hosted, and for how long it's  
retained.

GDPR (A30)

ICO Sheet



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# Prioritise based on risk

Only collect, process and retain what you need. MINIMISE

Identify legal basis for the data processing.

Review existing privacy notices

Verified all vendors & revise service agreements.

Create policies for Data Subject Rights

Verify security and Authorisations

[ICO](#)



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# Deal with the Dodgy

Data Protection Impact Assessments

ICO Guide

CNIL PIA Guide



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# Business as Usual

Data Protection, By Design & Default

Develop employee training and communication plans

Handle all data subjects requests related to individual data protection rights.

Prepare for data breaches



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# Document

Document everything.

Policy & procedure

Reasons behind decisions

Audit Results

Provable compliance



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# Rinse & Repeat



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# Snippets from the coal face

You wont know where your data is

CCTV

Telephone recording

Archiving

Data Destruction

Special category data.

..?

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**“If I had to do it again, I’d ask more questions.”**

*– Robert Brault*

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# Links

GDPR Text -> <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>

ICO Data Mapping Sheet -> <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/documentation/>

ICO Privacy Impact Assessment guide -> <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/>

French CNIL Privacy Impact Guide (in English) -> <https://www.cnil.fr/en/cnil-publishes-update-its-pia-guides>

What to include in your privacy notice -> <https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notices-transparency-and-control/what-should-you-include-in-your-privacy-notice/>

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