MMcL M. McLoughlin & Co. Solicitors

ACTION PLAN
for the General Data Protection Regulation (GDPR)

1 **Do a data inventory.**
Identify personal data (any information either on its own or when combined with other information can identify a living human being) that you collect.

2 **Ascertain if you collect special categories of personal data.**

3 **Identify who you collect personal information from.**
If from children – do you need guardian permission?

4 **For each piece of personal data answer the following questions:**
- What do you do with it? Do data mapping by tracing where the data goes within your organisation.
- Where is it stored?
- How did you obtain it/collect it?
- How secure is it? Is it encrypted? How accessible?
- Do you ever share it with third parties?

5 **What is your lawful ground(s) for processing the personal information?**

6 **Identify any processing that you outsource.**
Review contracts for compliance with GDPR.

7 **Ascertain if you need to appoint a Data Protection Officer.**

8 **Ascertain if you can comply with each of the six guiding principles.**
Check your security systems.
Update your data storage policy.
Update your data retention policy.

9 **Ascertain if you need to carry out any Data Protection Impact Assessment.**

10 **Update the Privacy Statement(s).**

11 **Update your Consent Notices.**
Ascertain how you will capture oral consent.

12 **Update your existing contracts of employment and staff handbooks.**

13 **Put in place policies and procedures to:**
- detect,
- investigate,
- record, and
- report

a data breach.

Prepare template mandatory reports and notification documents. Create an incident register to log potential breaches for investigation.

14 **Put in place a Subject Access Request Procedure.**
Prepare a template response.

15 **Decide how you will document your processing activities.**

16 **Put in place appropriate operational and technical measures.**
Taking into account the state of the art and costs of compliance, ensure ongoing monitoring.

17 **Train staff on the updated policies and procedures.**

18 **Consider certification.**

19 **Follow Guidance of Regulator & European guidance**
Check out www.gdprandyou.ie.

20 **Follow any codes of conduct and guidance, if any, of your industry group.**

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