

IS YOUR TECHNOLOGY GDPREPARED?

This isn't another checklist where the bullet points were copied from the most menacing article headers in the GDPR text. Those have their place, but they don't address the substance of what makes GDPR compliance hard.

GDPR is hard because of lines like this one:

"Taking into account the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, **the controller shall implement appropriate technical and organisational measures to ensure and to be able to demonstrate that processing is performed in accordance with this Regulation.** Those measures shall be reviewed and updated where necessary."

- General Data Protection Regulation, Article 24.1 (emphasis added)

GDPR breaks new ground because it sets technology standards, not just policy standards. It tells you specific technical tasks you need to do, and it's up to you to figure out how to do them.

So sure, check off that list of article headers. But make sure that you're set up to perform all of these technical tasks, too.



GDPR TECHNOLOGY CHECKLIST

LOGGING AND ACCOUNTABILITY TECHNOLOGY

You need to... be able to prove that you're following your policies, not just that you have them. That means technical measures that will let you log when data is used and when the protocol for subject rights requests is invoked—and whether it's followed.

Read: Article 5.2

A PERSONAL DATA INVENTORY WITH ENTITY RESOLUTION

You need to... know which data you're storing, and where, for each person you have personal data about. Entity resolution is the only way you'll be able to tell which pieces of your data refer to the same actual, real-life person.

And because there are time constraints on your subject rights responses, you need to get this rolling before people start invoking their subject rights.

Read: Article 12.3; Article 15.1

WEB-SCALE TECHNOLOGY

You need to... be prepared to handle millions of requests, because GDPR allows any—or all—of the EU's 510+ million citizens to ask whether you have their data. That means web-scale technology, because even if only 0.25% ask you on May 25... that's 1.3 million requests for you.

Read: Recital 39; Article 15.1

DATA QUALITY THAT MONITORS AND REPAIRS

You need to... be constantly measuring and improving your data quality. Yes, you read that correctly—GDPR specifies that your data should be “accurate”, otherwise known as 100% quality. That's a technology investment that goes way beyond your garden-variety DQ monitoring dashboard.

Read: Article 5.1.d



☐ INTERCONNECTED ACCESSES TO ALL YOUR SYSTEMS AND DATABASES

You need to... be ready to not just get data from all your systems and databases, but to update it in place, too. GDPR guarantees data subjects the right to correct or complete their information. If you have a system that you can't easily update, you need to fix that very soon.

Read: Article 16

☐ HEAVY-DUTY DATA PARSING AND TRANSFORMATION

You need to... deliver a data subject's data to them or to another controller in a "common, machine-readable" format—so, something like CSV. It does not matter at all what format it's in for you right now: you need to make that into a clean and understandable record. If you're not set up to parse and transform your data into an appropriate format, you need to become set up for that, sooner rather than later.

Read: Recital 68; Article 20.1

☐ PROCESSOR AGREEMENTS

You need to... make sure that you have a processor contract in place with all the third-party companies you work with that might handle EU citizen personal data. That's all the way down to the fundamentals: start figuring out if you have to sign something with Microsoft if you use Office 365, or with Intuit if you use Quickbooks.

Don't forget about your shadow IT for this part, either.

Read: Article 28

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CONTACT US

Still looking for a way to perform your personal data inventory (with entity resolution) or to be effective in your responses to subject rights requests?

Learn more about MIOvantage GDPR Compliance Center and how it can help.

Call us:

+1 608-210-1193

Email us:

sales@miosoft.com

ABOUT MIOsoft

MIOsoft provides industry-leading software and services for companies that need to trust their data.

A deep commitment to customer success guides MIOsoft in providing real, practical solutions to the full range of data problems facing enterprises today. Companies worldwide have relied on MIOsoft to overcome the obstacles keeping them from making the most of their data.

Founded in 1998, MIOsoft has a global presence through MIOsoft Corporation (North America), MIOsoft Deutschland GmbH (Europe), and MIOsoft (Beijing) Corporation (Asia-Pacific).

