



Issue 2 - January 2022

# NEWSLETTER

The advent of the GDPR has created several challenges; among others, the need of SMEs for guidance and tools so that their compliance is facilitated, and the need for appropriately educated ICT professionals to implement Data Protection by Design.

This newsletter has received funding from the European Union's Rights, Equality and Citizenship Programme (REC) (2014-2020), under grant agreement No. 101005833.

The byDesign project's duration is 24 months, starting November 1, 2020 and it is coordinated by the Hellenic DPA.

**Disclaimer:** The content of this newsletter represents the views of the authors only and is their sole responsibility. The European Commission does not accept any responsibility for use that may be made of the information it contains.

# The Partners

---

The byDesign consortium is compiled by three partners that represent three areas: regulatory, academic and software industry. The coordinator of the project is the Hellenic Data Protection Authority and the other two partners are the University of Piraeus Research Center and ICT Abovo PC.



# Contents

---

1.	<a href="#"><u>In brief</u></a>	4
2.	<a href="#"><u>Sample Good Practice Material Report</u></a>	5
3.	<a href="#"><u>Interconnection of the two tasks (2.1 and 2.2.)</u></a>	5
4.	<a href="#"><u>Methodology of the task - overview</u></a>	6
4.1.	<a href="#"><u>Topics addressed</u></a>	6
4.2.	<a href="#"><u>Assembling the material</u></a>	7
4.3.	<a href="#"><u>Methodological framework for the generation of the sample good practice material</u></a>	8
5.	<a href="#"><u>Conclusion</u></a>	8

## In brief

---

The byDesign project aims to provide assistance to SMEs and other relevant stakeholders, through developing appropriate compliance kits and training programmes, with respect to addressing the challenges stemming from the effective implementation of the GDPR.

In this context, one of the main pillars of the project is the **development of a compliance kit for SMEs**, facilitating self-assistance for SMEs with a set of context-aware templates of essential documents and online tools.

To this end, after having identified the needs and current gaps regarding the GDPR compliance of SMEs in the previous task of the project (Task 2.1), a sample of good practice material was assembled reflecting recognised good practices in the topics addressed by and assessed in the aforementioned task.



# Sample Good Practice

## Material Report

A report (“Sample Good Practice Material Report”) has been drawn up aiming to present all good practice related material and the compliance methodology for SMEs. More precisely, it presents the topics addressed by the sample of good practice material, how the material and the content tiles were created and assembled and the methodological framework for the generation of suitable and adaptable sample guidance documents to the SMEs based on the contextual information of each particular data controller.

Moreover, the report presents and describes the specific topics addressed by the sample material templates, their purpose and benefits for the SMEs and it concludes by assessing how the sample material will contribute to the compliance of the SMEs with the GDPR.

## Interconnection of the two tasks (2.1 and 2.2.)

The second task of the project (Task 2.2) is based on the analysis of needs and the relevant findings of the first task (Task 2.1), the main goal of which was to assess the main needs and to shed light on the requirements for SME compliance with the GDPR (see Newsletter [issue 1](#)).

More specifically, the second task began by defining the topics addressed by the online tool, continued by assembling the material reflecting recognised good practices in these topics and will result in a contextual framework providing SMEs with suitable sample documents based on their characteristics, thus significantly facilitating their compliance process.



# Methodology of the task

## - overview

### Topics addressed

The requirements identified through the stakeholders from Task 2.1 constitute the basis for the setting out of the topics addressed by the online compliance toolkit, i.e. the types of guidance to be offered (data protection policies, data subjects' rights exercise templates, website related policies, terms of use, model clauses for subcontractors, sample texts for satisfying the transparency of the data processing, model records of processing activities, etc.). Through this online toolkit the actual sample good practice material that corresponds to each of the topics addressed will be available to the SMEs.

The general functional requirements of the easily extensible online toolkit as specified in Task 2.1 indicate the existence of an online wizard which would require as input identity and contact data of the SME, the business sector to which it belongs (Commerce, Tourism and Hospitality, Education, Health and other sectors) and the particular activities of the SME. The toolkit will provide as output several adaptable document templates, notices that can be integrated into websites, educational material, guidelines and simplified texts/FAQs.

The topics addressed by the online toolkit focus on the following major areas, each one elaborated in types of guidance to be offered:



### **A. Lawfulness and transparency**

1. The Provision of Information from SMEs to Data Subjects
2. Consent
3. Data protection rights and data subject request handling procedures
4. Destruction of personal data

### **B. Accountability**

1. Records of processing activities
2. Security measures
3. Data breach handling
4. Assignment of data processing to contractors/processors

### **C. Business activities entailing data processing**

1. Website
2. Direct marketing through electronic means
3. Video surveillance
4. Employee records

### **Assembling the material**

Task 2.2 continued by assembling the material reflecting broadly acknowledged good practices in the above major topics with the relevant sub-categories. This work extends along two directions: i) creation of the content tiles, i.e., fundamental parts for each document comprising the major topics that will be consequently used to populate the actual instances of the documents based on the specific characteristics of an SME data controller; ii) the methodological framework for the generation of concrete document instances based on the contextual information on the particular data controller, such as the sectors to which the controller belongs, the data types collected, the processing operations it performs, the underlying purpose, complementary legal obligations (e.g. sectorial laws requiring data retention), etc.

Based on these two directions, byDesign will result in a contextual framework providing SMEs with suitable sample documents based on their characteristics, thus significantly facilitating their compliance process.



### Methodological framework for the generation of the sample good practice material

The methodological framework for the generation of the sample good practice material is based upon the content tiles (see 2.1) and facilitates the generation of guidance documents adaptable to each SME's particular needs.

The online wizard of the toolkit contains a set of interactive questions that will guide the user (an SME) to produce the desirable guidance outcome based on the characteristics of data processing pertaining to the particular user, containing clear instructions to the SMEs, as data controllers, for further adjustment of the documents as well as hyperlinks to other template documents of the byDesign project.

## Conclusion

The sample good practice material will facilitate the GDPR compliance process of Greek SMEs, by giving them useful and practical information and templates on the most crucial topics of GDPR compliance, such as the provision of information to data subjects, the consent as a legal basis for data processing, the exercise of data subjects' rights, the transparency requirements, the destruction of files containing personal data, the records of processing activities, the basic security measures, the handling of personal data breach, the assignment of data processing to contractors/processors, the website data protection requirements, the direct marketing through electronic means – e-Newsletter, and video surveillance, both at customer and employee levels.

In this way, all the important issues and requirements of GDPR compliance will be covered and analysed.

On the basis of this work, the development of the online toolkit will be completed soon (Task 3.2), and its pilot operation will follow promptly.







<https://bydesign-project.eu/>  
email: [byDesign@bydesign-project.eu](mailto:byDesign@bydesign-project.eu)