



The byDesign project has received funding from the European Union's Rights, Equality and Citizenship Programme (REC) 2014-2020



# Methodology and compliance material

Efrosini Siougle  
Hellenic Data Protection Authority

*Facilitating GDPR compliance for SMEs and promoting Data Protection by Design in ICT products and services*

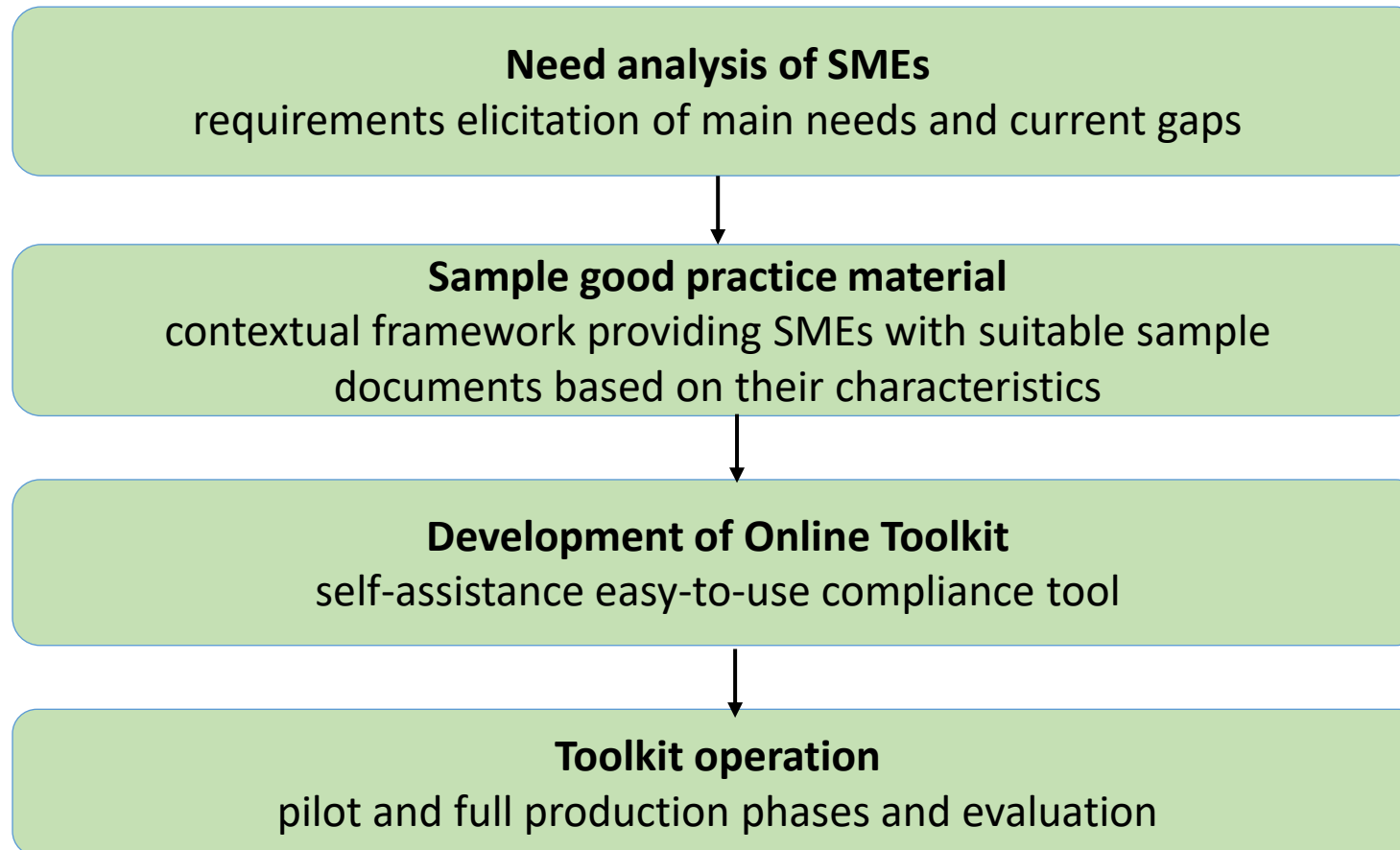
*[www.bydesign-project.eu](http://www.bydesign-project.eu)*





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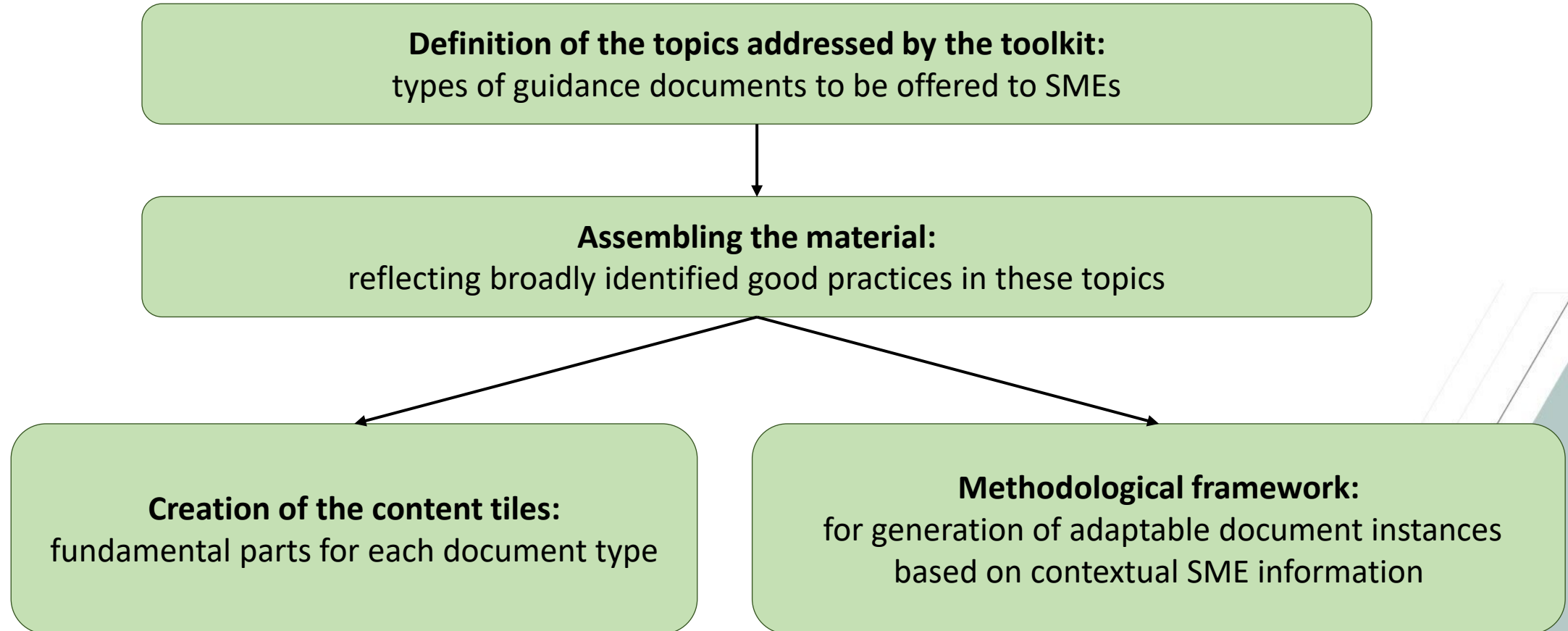
# Compliance Toolkit for SMEs: creation stages





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# Sample good practice material





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# Sectoral data analysis

- Identification of the **basic processing operations** based on the **typical business activities** of the SMEs on the **selected sectors**:
  - Customer management
  - Potential customer management
  - Personnel management
  - Management of prospective employees
  - Management of suppliers-natural persons
  - Videosurveillance
  - Data breach management



# Sectoral data analysis

- General analysis of each **basic processing operation** for each of the following areas:
  - Main purposes of processing + legal basis
  - Categories of data subjects
  - Categories of personal data + sources
  - Categories of recipients
  - Categories of processors
  - Period/criteria for the storing of personal data (indicative)
  - Rights of data subjects



# Preparation of the guidance material

- Need analysis -> **topics addressed** by the online Toolkit
- Various **types of guidance documents** for each topic (templates, policies, application forms, consent forms, checklists, model clauses) + simplified **FAQ** information material
- Specification of **content outlines** for each guidance document
- Drafting of the **content tiles**
- Generation of **adaptable concrete** guidance material for the particular SME



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# Contextual framework for concrete guidance material

- **10 simple questions** pertaining to the particular SME:
  - sector,
  - data processing operations,
  - direct marketing through electronic means,
  - videosurveillance,
  - consent as legal basis,
  - processors/contractors,
  - cookies,
  - e-Newsletter



# Sample good practice material

- Transparency
  - **12 detailed templates** for the provision of information to data subjects
    - table **matching** processing purposes – legal basis – data subject's rights
- Data subjects rights
  - **6 structured templates/request forms** for the exercise of the GDPR rights
    - general + specific information
- Consent as legal basis
  - **4 templates** for consent of: customer, employee, prospective employee
- Destruction of personal data
  - detailed **policy** + structured **protocol** template





# Sample good practice material

- Records of processing activities
  - Structured **model records** for **7** data processing activities
- Processors
  - **3** sets of **model clauses**: general use, direct marketing, cloud services
- Data security
  - **list of basic** organization and technical data security measures
- Data breach management
  - detection and handling **procedures** + **employee awareness leaflet** + **attacks** frequently causing data breaches



# Sample good practice material

- Video surveillance
  - minimum **installation and operation requirements per sector**
- Direct marketing through electronic means
  - **requirements + e-Newsletter** management
- Minimum website requirements
  - checklists on **transparency, security measures, cookies**
- Employees and prospective employees:
  - **model contract** for personal data processing, **model policy** for use of electronic media



# Toolkit operation

- **Pilot phase:** evaluation of the toolkit in production environment before its general release
- Invitations to a **representative set of pilot end-users:** from the SMEs that participated in the need analysis phase
- **Full production phase:** until the end of the project
  - Number of Toolkit access: 225
  - Number of output (zip) file generation: 292
  - Toolkit assessments (through the online survey): 15



# Tool operation

- **Toolkit operation**: the tool will continue to be offered well after the end of the project
- **Final evaluation: follow-up survey** conducted by means of online questionnaire
- **Toolkit maintenance**: fully maintained with technical support and updates



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# Thank you for your participation!