

Secure Systems • Secure Brand • Secure Bottom Line

GDPR

General Data Protection Regulation



Comsure 

Monthly GDPR Surgery Programme

Address GDPR **FEAR** with compliant **FACT**

Starts September 2017

8:00am to 9:30am

To Be Announced

6 x C.I. GDPR Surgery Workshops

from Sep 2017 to Feb 2018

www.comsuregroup.com/gdpr-information



GDPR

**70 places
sold**

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Contents

| | |
|--|-----------|
| Cut Cost & Cut Risk..... | 2 |
| Prevention is cheaper than cure..... | 2 |
| The Board & GDPR | 3 |
| Board/Management Questions..... | 3 |
| The view from the GDPR Authorities..... | 3 |
| Business Benefits of GDPR | 4 |
| C.I. GDPR Timeline | 5 |
| Time is now short within UK..... | 5 |
| Time is shorter within the C.I..... | 5 |
| C.I. GDPR Surgery Programme | 6 |
| Why you should attend the C.I. GDPR Surgeries..... | 6 |
| Article 29 Working Party 2017 Action Plan..... | 6 |
| C.I. GDPR Legal Status..... | 6 |
| GDPR Surgery Workshops Dates/Subjects..... | 6 |
| Surgery 1: The GDPR Compliance Roadmap | 7 |
| Surgery 2: Data risk mitigation, assurance & insurance..... | 7 |
| Surgery 3: Data management methods & solutions..... | 8 |
| Surgery 4: Right-sized data security obligations & tools..... | 8 |
| Surgery 5: Legal obligations & regulatory considerations | 9 |
| Surgery 6: GDPR Compliance Checklist & GAP..... | 9 |
| GDPR Surgery Package Prices..... | 10 |
| Launch Pack..... | 10 |
| Standard Pack £120.00..... | 10 |
| Selective Options from £25..... | 10 |
| Customised Training for your organisation, from £2,000..... | 10 |
| GDPR Resources | 11 |
| Gadzooks [Dil]Emma: Panic or Relax!..... | 12 |



Cut Cost & Cut Risk

Prevention is cheaper than cure

GDPR has **no silver bullet 'product'** solution.

GDPR has **no silver bullet 'admin'** solution.

GDPR requires robust **architecture** to design both
products & admin that meet & maintain
regulatory compliance

Comsure has spent over a year assessing the best GDPR tools,
so that you don't have to.

Comsure has spent over a year assessing GDPR admin best practice,
so that you don't have to.

Comsure has verified its findings with insurers so that

Comsure can assure & insure
cost effectively

for your organisation

Note: Insurances (Data, PI and D&O) provided by a JFSC licensed broker.

The Board & GDPR

Board/Management Questions

- A) Is the General Data Protection Regulation (GDPR) a threat or an opportunity for my business?
- B) How does the GDPR impact other regulations, specifically in relation to the C.I. international financial services industry?
- C) Can the GDPR improve sustainability and growth for my business?

The view from the GDPR Authorities

Building trust in the online environment is key to economic development

"Strong, reliable, consistently applied rules will make data processing safer, cheaper and inspire people's confidence. Confidence in turn drives growth. This is a message that is well understood worldwide. In a letter to the European Parliament strongly supporting the data protection reform package, 25 major US consumer organizations stressed that **"stronger privacy standards in Europe will benefit consumers around the globe"**.

Boost growth and encourage the flow of data

"Sharing data has become crucial for economic growth. Privacy protection and the free flow of data are complementary not contradictory concepts".

Allow business to get on with doing what it does best

"Businesses operating globally will benefit from clear rules that set out how they can use binding corporate rules (BCRs) and standard contractual clauses to transfer personal data securely. The proposal also abolishes many cumbersome prior-authorization procedures. Under certain conditions, it will be possible to transfer data outside the Union on the basis of codes of conduct".

Source: EU Factsheet 'Mythbusting'

The Islands are well positioned to leverage global reputation

"The Channel Islands are recognised world-wide for high standards of compliance; we are also 2 of the 9 territories outside the EU to have EU Adequacy. This creates a significant opportunity for the C.I. to build on past successes and reputation to ensure a strong and exciting future for our international industries".

Source: Emma Martins, the Information Commissioner of Jersey & Guernsey

Business Benefits of GDPR

General Notice: The following list has been compiled by **Comsure** Group. It is derived from the ongoing review of GDPR publications from the sources cited below.

C.I. Notice: Some of the publications are subject to change, specifically in the Channel Islands where relevant laws are in the process of being drafted.

Sources (web site links provided on the **GDPR Resources** page):

- The Official Journal of the EU and The EU Article 29 Working Party on GDPR
- the UK Information Commissioners Office (ICO),
- the Jersey Office of the Information Commissioner (OIC), and
- the Guernsey Office of the Data Protection Commissioner (ODPC).

| Business Benefits | Operational Benefits |
|-------------------------------|--|
| Single Standard | simplified legal requirements & reduced administration |
| Improved Security | reduced business risk & increased business protection |
| Improved Privacy | strengthens client relationship & business retention |
| Improved Trust | growth of digital business & increased business opportunity |
| Enhanced Efficiency | reduced time & cost of doing business |
| Explicit Best Practice | reduced ambiguity & subjectivity |
| Objective Evidence | reduced compliance, criminal & civil action risks |
| Traceable Liability | increased counter-party control & reduced counter-party risk |
| Holistic Regulation | commensurable with other business regulations |
| SME Optimised | flexible measures & exemptions appropriate for SME's |
| International Reach | creates a level playing field & reduces unfair competition |
| Protects Individuals | management, personnel & client rights equally protected |

C.I. GDPR Timeline

Time is now short within UK

The GDPR count-down started April 2016, when it was adopted into law within the EU (pre-BREXIT), and subsequently confirmed by UK Parliament later in 2016 (post BREXIT), not that many noticed (*the 'white noise' effect, so timely when strong regulations are ratified*).

Time is shorter within the C.I.

The Channel Islands (Jersey/Guernsey) have agreed to apply a unified C.I. version of the GDPR within local law. The published deadline for ratification of the **C.I. GDPR law is May 2018**, while the earliest drafts of the C.I. laws are expected after summer 2017.

Therefore C.I. businesses will need a mechanism to ensure they are fully informed about the progress of the C.I. GDPR law, including guidance on the implications of the drafts as they come available, specifically regarding financial services regulation considerations.

Beware: C.I. GDPR is not 'fixed' until ratified by C.I. law

| C.I. GDPR GANT Chart | | | | | | | | | | | | | | |
|---------------------------|-----------|------------------------|---|----------|-----|---------|-----|------------------|---------|---|-----|---------|-----|-----|
| Q2 2017 | | | Q3 2017 | | | Q4 2017 | | | Q1 2018 | | | Q2 2018 | | |
| Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | Jun |
| Awareness & Communication | | | | | | | | | | | | | | |
| | C.I. GDPR | Comsure Advisory | Comsure GDPR C.I. Surgery Workshops | | | | | | | Regulation Date 25th May 2018 | | | | |
| | | Data Assessment & Plan | Update Contracts, Notices & Consents | | | | | | | | | | | |
| | | Comsure Advisory | Define Policies & Procedures | | | | | | | | | | | |
| | | | GAP & Risk Audit | Training | | | | Comsure Advisory | | | | | | |
| | | | Implement Business & Technology Changes | | | | | | | Comsure Advisory | | | | |

C.I. GDPR Surgery Programme

Why you should attend the C.I. GDPR Surgeries

The GDPR has been published and accepted into EU, UK & IoM law in Q2 2016 as a complete regulation. However, the GDPR does not come into force until 25th May 2018 in order to allow interested groups to present objections/changes to the EU Article 29 Working Party.

The GDPR, as at Q2 2017, is not 100% complete and there are changes that may (or may not) be announced throughout 2017.

Article 29 Working Party 2017 Action Plan

The 2017 Action Plan includes the following key elements:

Completion of 2016 Work. The Working Party will finalize its work, begun in 2016, in relation to (1) certification mechanisms, (2) high-risk processing, (3) Data Protection Impact Assessments, (4) administrative fines, (5) the implementation of the European Data Protection Board and (6) the implementation of the one-stop-shop and the consistency mechanisms.

New 2017 Priorities. The Working Party intends to publish guidelines on the following GDPR topics in 2017: (1) consent and profiling and (2) transparency. In addition, the Working Party also intends to update its existing referentials and opinions that relate to (1) data transfers to third countries and (2) data breach notification.

C.I. GDPR Legal Status

Jersey and Guernsey have agreed to a unified C.I. GDPR law. The drafting process will be carried out throughout 2017. However, the [late] deadline for completion is May 2018.

The C.I. GDPR Surgery Workshops allow attendees to be informed and enabled to adapt to change through 2017/18.

GDPR Surgery Workshops Dates/Subjects

| | | |
|----------|-------------------|--|
| Tuesday | 26 September 2017 | The GDPR Compliance Roadmap |
| Thursday | 19 October 2017 | Data risk mitigation, assurance & insurance |
| Thursday | 16 November 2017 | Data management methodologies & tools |
| Tuesday | 12 December 2017 | Right-sized data security obligations & tools |
| Thursday | 25 January 2018 | C.I. Legal obligations & regulatory considerations |
| Thursday | 22 February 2018 | GDPR Compliance Checklist & GAP Analysis |

C.I. GDPR Surgery Programme

Surgery 1: The GDPR Compliance Roadmap

| | |
|--------------------|---|
| Key Speaker | Comsure Group |
| Date/Time | 26 th September 2017, 8.00-9.30am |
| Location | To be announced |
| Objectives | <ol style="list-style-type: none"> 1. Issue the official GDPR Handbook <ol style="list-style-type: none"> a) GDPR Roadmap (ICO 12-step programme) & Milestones, b) General support materials & resources, c) Best Practice: GDPR tools & certified training review, 2. How to complete a GDPR Benchmark Assessment (self-assessment & independent assessment options) & Action Plan, 3. Open forum 4. Prep for Surgery 2: Data risk mitigation, assurance & insurance |

Surgery 2: Data risk mitigation, assurance & insurance

| | |
|-------------------|---|
| Host | Data2Vault |
| Date/Time | 19 th October 2017, 8.00-9.30am |
| Location | To be announced |
| Objectives | <ol style="list-style-type: none"> 1. Publish GDPR updates <ol style="list-style-type: none"> a) GDPR currently defined data risk mitigation measures & standards, with 'watch-list' threats specifically relating to C.I., b) Data risk mitigation support materials, example risk mitigation & control methods & resources, c) How 'IDE' reduces residual risk (insurance) costs. 2. How to complete a Data Risk Assessment (self-assessment & independent assessment options) & Risk Mitigation Action Plan, 3. Open forum 4. Prep for Surgery 3: Data Management - get it right |

C.I. GDPR Surgery Programme

Surgery 3: Data management methods & solutions

| | |
|--------------------|--|
| Key Speaker | HP Enterprise |
| Date/Time | 16 th November 2017, 8.00-9.30am |
| Location | To be announced |
| Objectives | <ol style="list-style-type: none"> 1. Publish GDPR updates 2. Management of structured & unstructured data: <ol style="list-style-type: none"> a) Know what is where (mapping), b) Know what is relevant (organising), c) Take control of business data (optimising). 3. Open Forum 4. Prep for Surgery 4: Right-sized data security obligations & tools |

Surgery 4: Right-sized data security obligations & tools

| | |
|--------------------|---|
| Key Speaker | Galaxkey |
| Date/Time | 12 th December 2017, 8.00-9.30am |
| Location | To be announced |
| Objectives | <ol style="list-style-type: none"> 1. Publish GDPR updates 2. Understanding 'exemptions' with best of breed tools; <ol style="list-style-type: none"> a) Focus on ACIA methodology, b) Take security to the source, with 3rd parties wrapped in, c) Protect your enterprise, protect your future, leverage your brand. 3. How basic is a Data Security Action Plan? <ol style="list-style-type: none"> a) Is this your aim? b) Do you want to be in business 1, 2 or 3 years from now? 4. Open Forum 5. Prep for Surgery 5: Legal obligations & regulatory considerations |

C.I. GDPR Surgery Programme

Surgery 5: Legal obligations & regulatory considerations

| | |
|--------------------|---|
| Key Speaker | Bedell Cristin |
| Date/Time | 25 th January 2018, 8.00-9.30am |
| Location | To be announced |
| Objectives | <ol style="list-style-type: none"> 1. Publish GDPR updates - specific to C.I. <ol style="list-style-type: none"> a) GDPR currently defined legal obligations & 'watch-list' threats, specifically relating to other regulatory/legal considerations, b) Legal support materials, sample T&C's/Notices & resources c) Legal methods of deleting PII data d) Example Binding Corporate Agreement (BCA) 2. How to deal with 3rd Territories, within the GDPR and C.I. framework. 3. Open Forum 4. Prep for Surgery 6: GDPR Compliance Checklist & GAP |

Surgery 6: GDPR Compliance Checklist & GAP

| | |
|--------------------|--|
| Key Speaker | Comsure Group |
| Date/Time | 22 nd February 2018, 8.00-9.30am |
| Location | To be announced |
| Objectives | <ol style="list-style-type: none"> 1. Publish GDPR updates 2. Roundup & Checklist <ol style="list-style-type: none"> a) GAP identification & resolution methods/resources b) GDPR checklist & best practice standards, with GAP analysis & outstanding risk exposure specifically relating to C.I., c) Compliance 'fast-track' support materials, methods & resources, 3. Open Forum 4. Disaster planning: how our team can help you, pre 25 May 2018. |

GDPR Surgery Package Prices

Launch Pack

All paid attendees of Comsure "GDPR Project [No] Fear" seminar (18 May 2017) have automatic membership of the Comsure GDPR Surgery programme.

- = 12.5 CPD hours + all other benefits
- Official GDPR Handbook
- Free personal online GDPR & security tools
- Free access to Comsure "GDPR Project [No] Fear" updates & Guides

Standard Pack **£120.00**

All those who book as attendees of Comsure "GDPR Project [No] Fear" GDPR Surgery programme.

- 9 CPD hours + all other benefits
- Official GDPR Handbook
- Free personal online GDPR & security tools
- Free access to Comsure "GDPR Project [No] Fear" updates, guides & support

Selective Options from **£25**

To accommodate those who think this compliance challenge simply requires an update or two - we are happy to provide selective options, as follows:

- Official GDPR Handbook (at RRP)
- Personal online GDPR & security tools (at RRP)

Customised Training for your organisation, from **£2,000**

Comsure

get **assured** to be **insured**

Book your place [here](#)

www.comsuregroup.com/gdpr-information

GDPR Resources

Comsure Group Tools, Services & Certified Training - beyond GDPR

www.comsuregroup.com

Video 'taster': <https://www.youtube.com/watch?v=CTaRneG3gTE&feature=youtu.be>

Comsure Group Partner resources

<http://www.galaxkey.com>

<https://dynamisk.com>

<https://www.amisafeonline.com>

The C.I. Office of the Information Commissioner

<https://dataci.je>

<https://thinkgdpr.org>

Digital Jersey

www.digital.je

EU GDPR

http://ec.europa.eu/justice/data-protection/index_en.htm

http://ec.europa.eu/newsroom/just/news.cfm?tpa_id=2026

<http://www.eugdpr.org/more-resources-1.html>

UK Information Commissioners Office

<https://ico.org.uk>

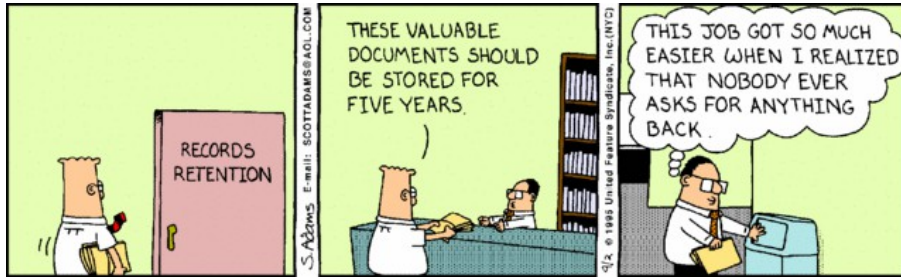
FIPS 140-2 & NIST

<https://www.nist.gov>

<http://csrc.nist.gov>

<https://www.corsec.com/fips-140-2/?gclid=CIC0zpPCptQCFUg8Gwodv3kIeg>

Gadzooks [Dil]Emma: Panic or Relax!



GET PREPARED. GET TRAINING.



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"Before I write my name on the board, I'll need to know how you're planning to use that data."

Copyright 2004 by Randy Glasbergen. www.glasbergen.com



"I'm sure there are better ways to disguise sensitive information, but we don't have a big budget."

Gadzooks [Dil]Emma: Panic or Relax!



Maybe there is a better way than the old way?

