RPM

GDPR Implementation Checklist
for
Chief Compliance Officers/Data Protection Champions

Required Documents/Procedures	Status
1. Verify whether a DPO is required in any country in which you operate	
2. Verify whether any local country privacy registrations are required where you operate	
3. Circulate Global Data Protection Policy	
4. Circulate Employee Privacy Notice to all EEA Employees	
5. Training – Implement Training Program for applicable employees	
6. Review IT Checklist and confirm IT has received and it complying with it	
7. Data Protection Impact Assessments a. Review the guide and conduct DPIAs as needed	
8. Individual Rights Requests a. Review the Guide and respond to requests as needed	
9. Develop retention periods that a country-specific for Personal Data managed by your company	
10. Data Breach	
(a) Distribute the Data Breach Reporting Instructions to all employees	
11. Data Mapping Survey/Record of Processing Activities	
(a) Work with team to add Paper Docs to Online Survey	

(b) Develop a process for adding new systems to the Online Survey	

12. Data Processing Addendum for Vendors
    a. Ensure distribution to all vendors processing Personal Data by May 25, 2018
    b. Develop a process for execution by all new vendors	

13. Add Data Processing Due Diligence to existing vendor due diligence processes	

14. Incorporate reference by way of a link to the copy on the website to the Privacy Notice ("For information regarding how we process your personal data, click here") in the following documents:
    a. Ensure on Website
    b. Link in email footers
    c. Invoices
    d. Purchase Orders
    e. Order /acknowledgments
    f. Marketing materials
    g. Job applications	

15. Legitimate Interests- review the Guide and conduct assessments as appropriate	
16. Cookies Banner – ensure it is in use on all websites	
17. Circulate Password Protection and Encryption How to Instructions	
18. Marketing Materials	
(a) Distribute Marketing "Do's" and "Don't's" to Marketing teams (b) Ensure Marketing Materials include an Opt Out link	

19. Review all inquiries that come to dataprotection@_____	
20. Distribute the Privacy by Design Guide and assist with application	