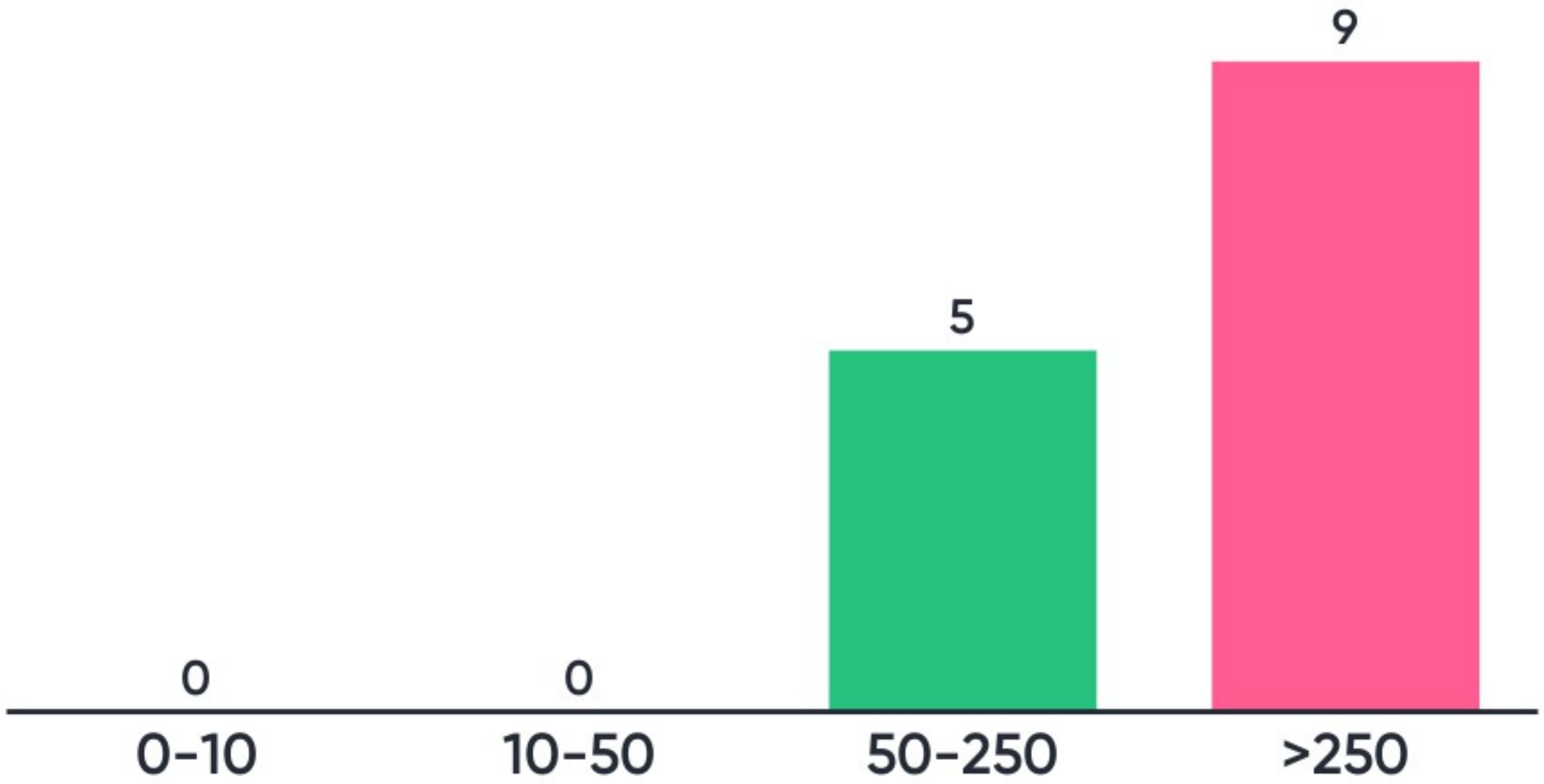
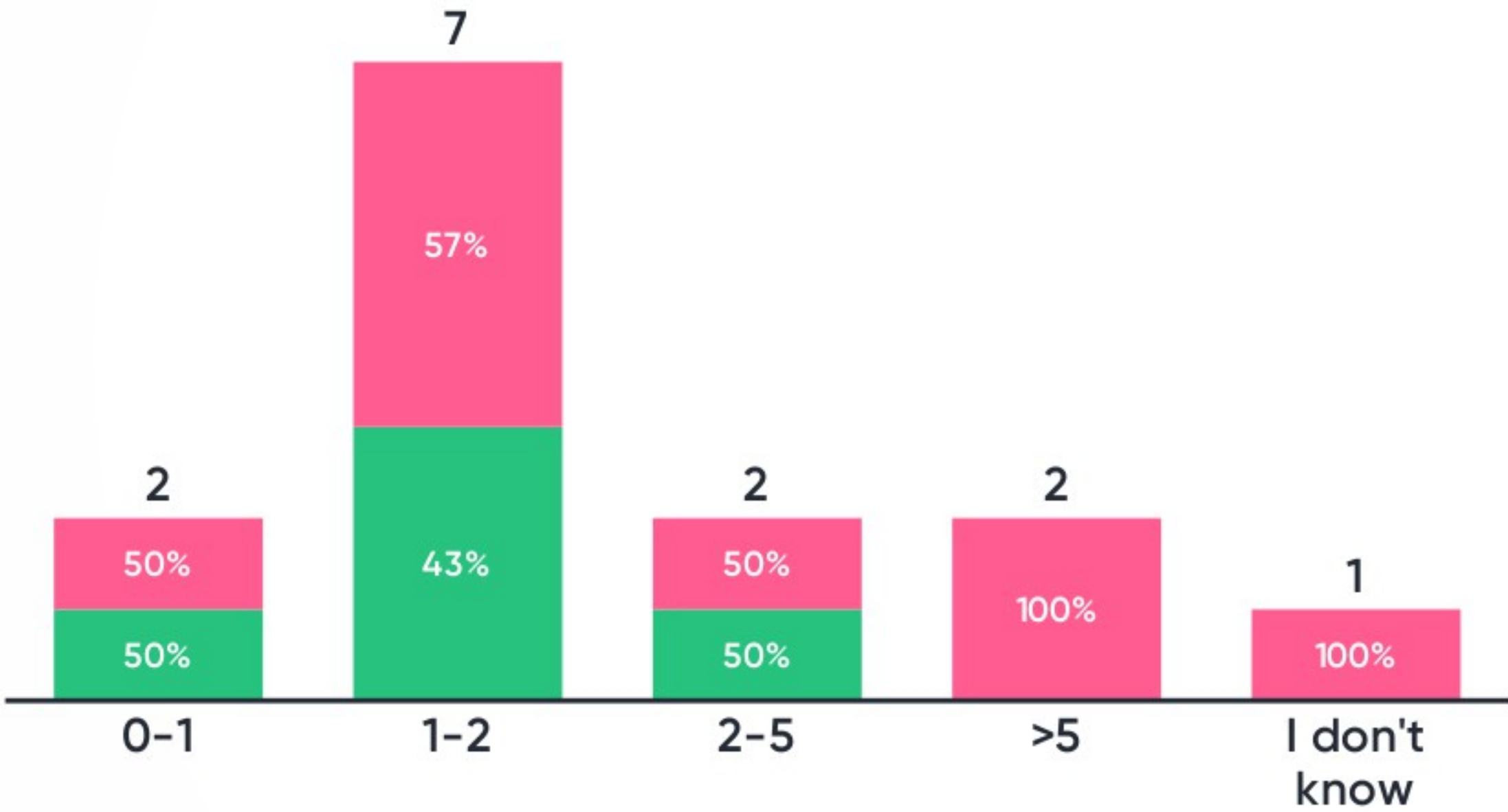


Data Protection Management

What is the size of your organization?



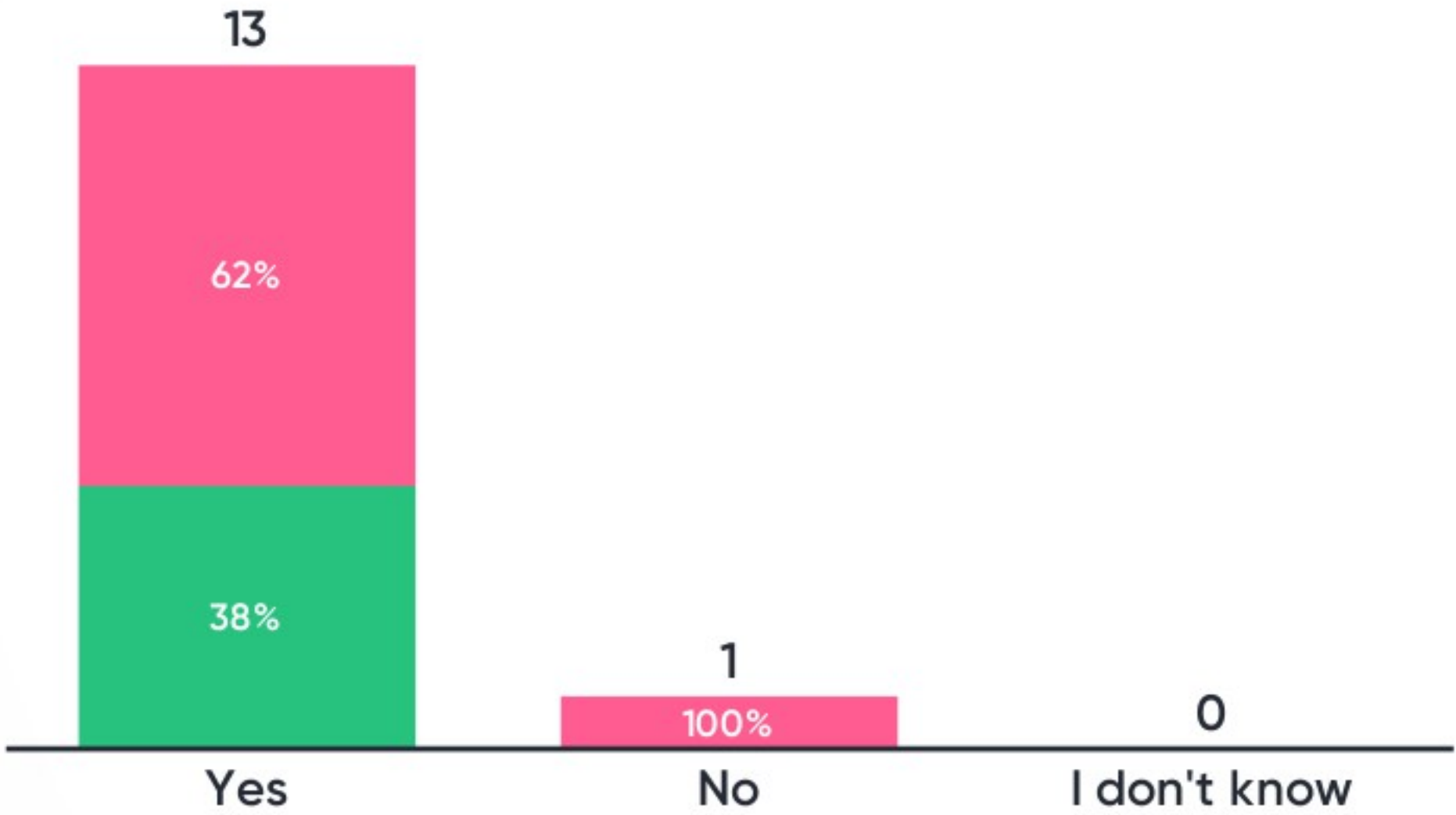
How many people (in FTE) work in DPM?



What is the size of your organization?

- 0-10
- 10-50
- 50-250
- >250

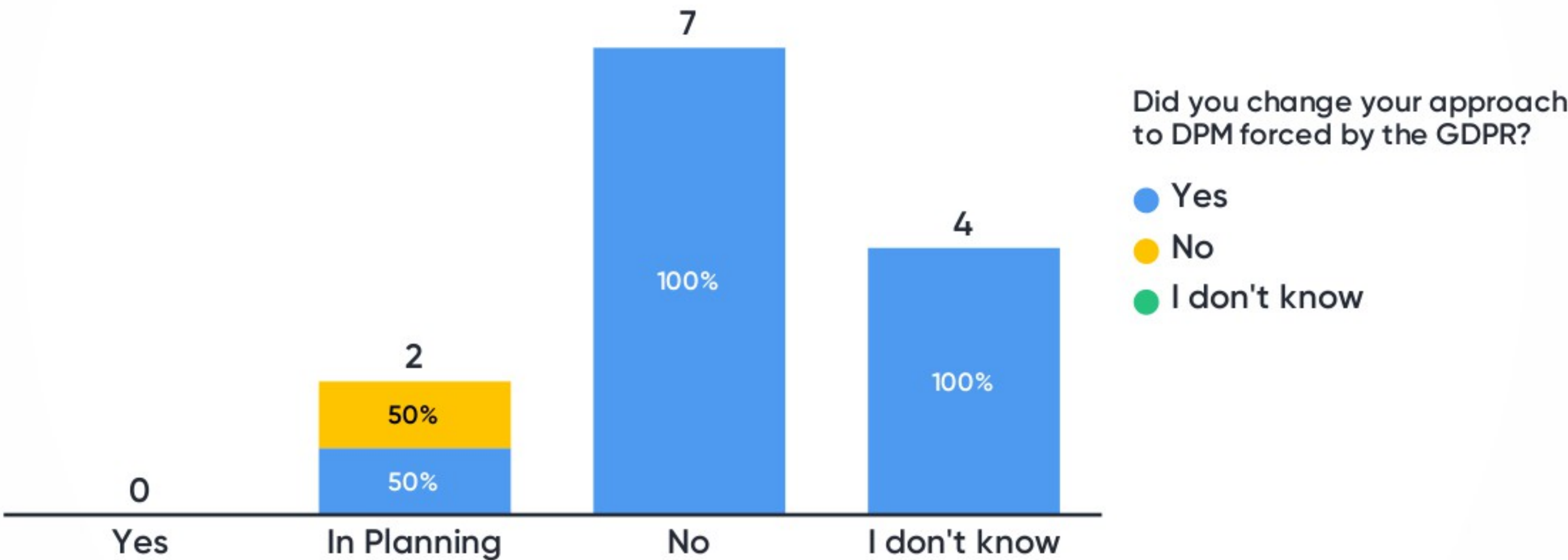
Did you change your approach to DPM forced by the GDPR?



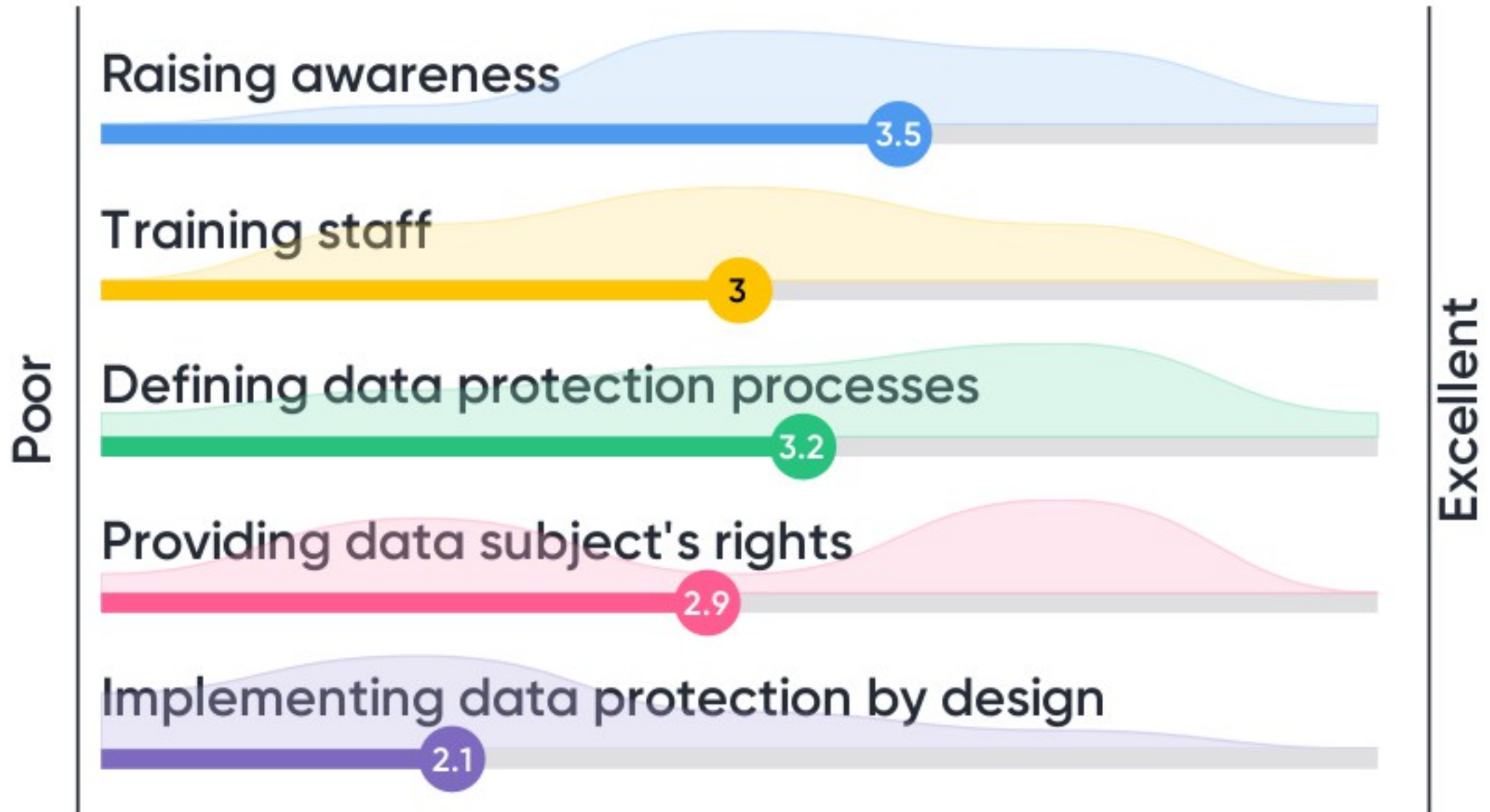
What is the size of your organization?

- 0-10
- 10-50
- 50-250
- >250

Has your data protection management been certified or do you plan to do so?



Please rate the maturity of your organisation's approach to DPM



Data Breach Management

What is your organisation doing to prepare for data breach management?

Unclear. We are not EU

set up process, raise awareness, set up register, exercise

Implement GDPR reporting request in existing incident management

Getting clear where what data is gathered

We have a (escalation) procedure involving the security officer and the privacy officer when an incident happens to determine whether it's a data leak.

incident and escalation process and prepared messages.

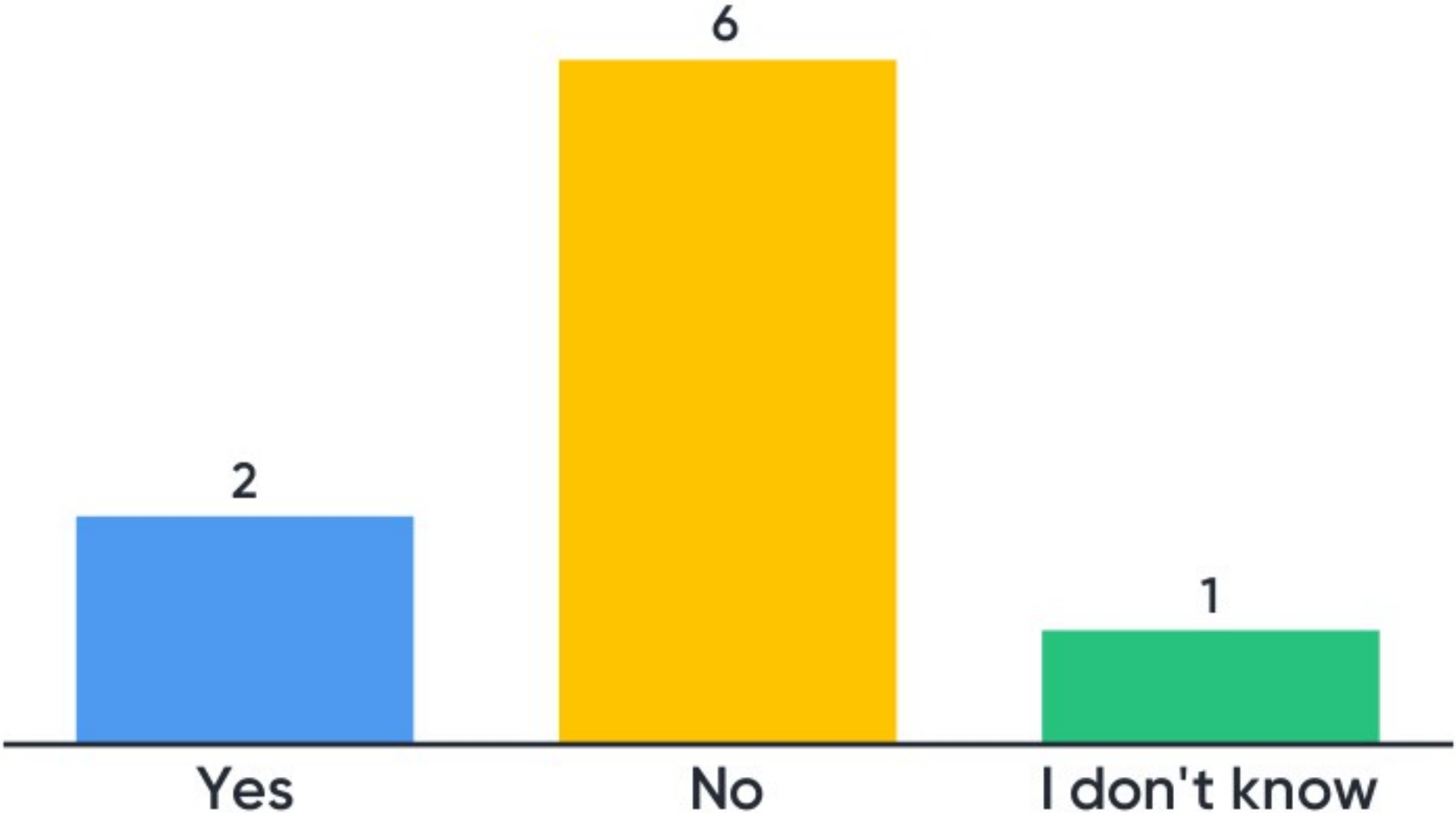
Defining processes
Co-operation with incident management

entered into contingency/emergency planning + processes

CIO



Do you seperate data breach management from incident handling?



Who is responsible for Data Breach Management?

DPO

DPO

CIO

FG

President

DPO is responsible - CEO is accountable

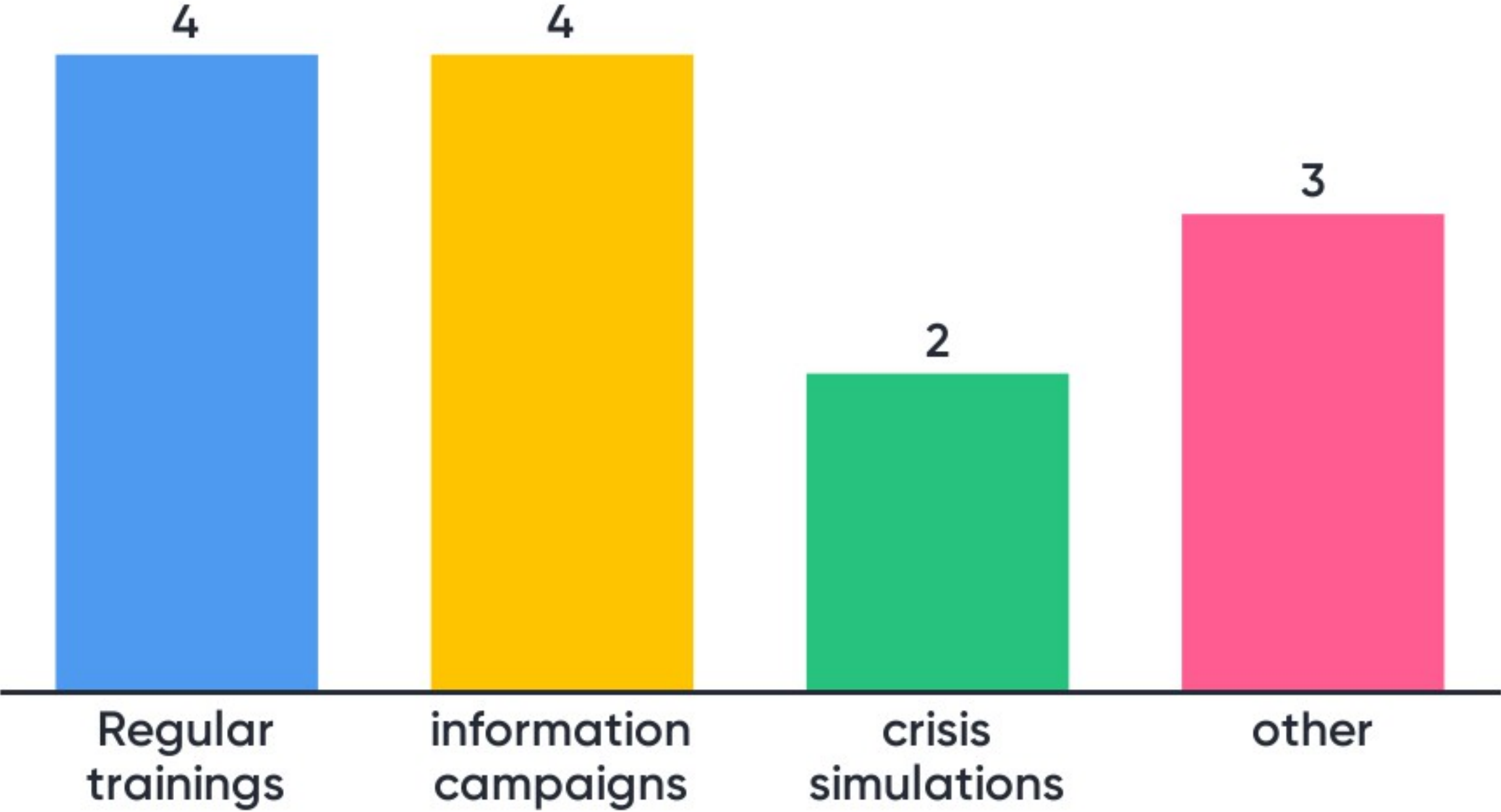
DPO

CIO

Privacy Officer



What do you do to raise awareness and train staff



Is there an internal threshold defined, justifying a notification? What is the threshold?

Probably, but I don't know it

TBC, process to be defined

No

Don't know

The DPO decides

defined in Bavarian DP Act,
possible loss of multiple
personal data

Officially no threshold defined,
depends on assessment

Not sure

we report easily just to be sure



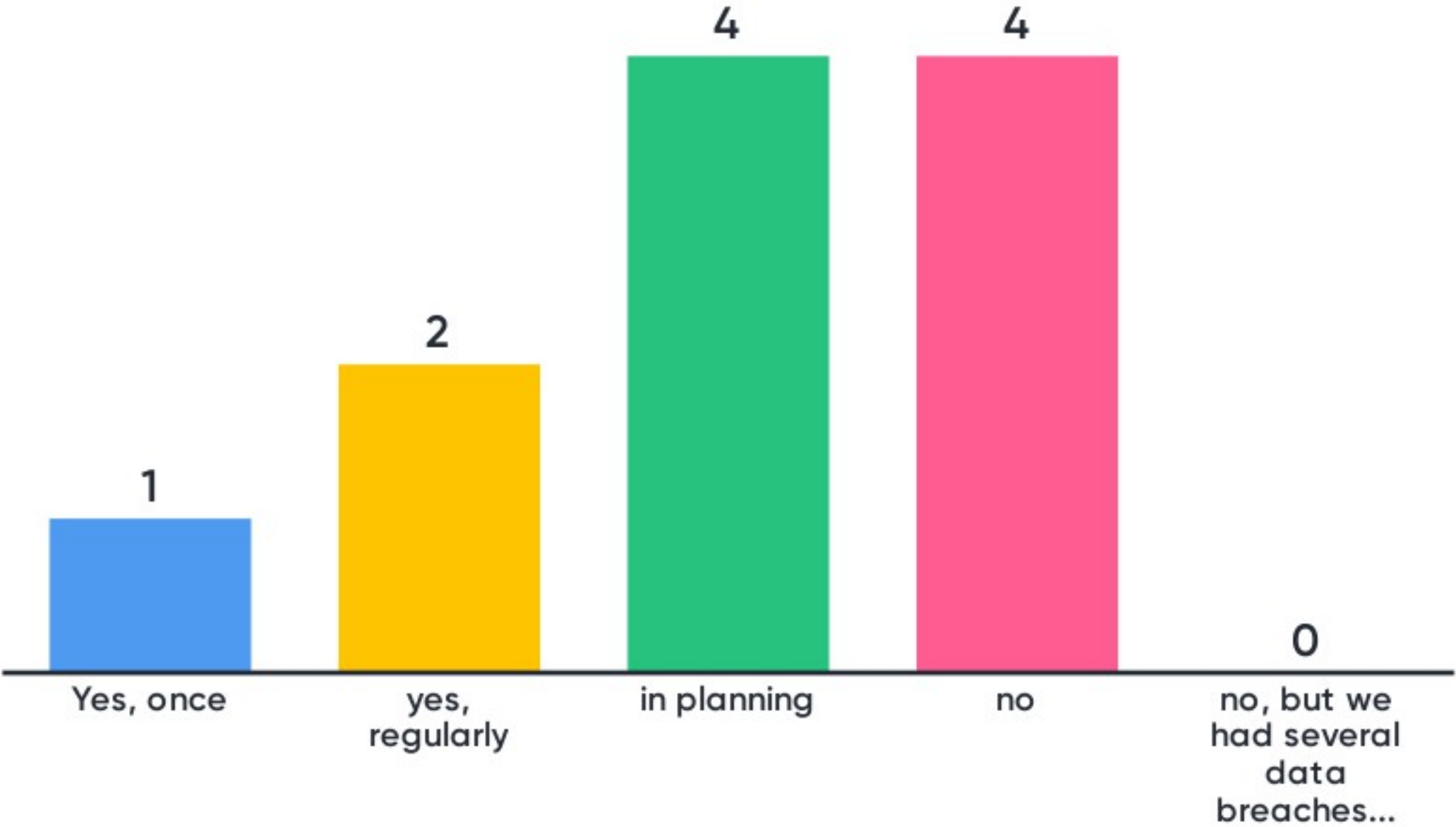
Is there an internal threshold defined, justifying a notification? What is the threshold?

Hard evidence of data having leaked

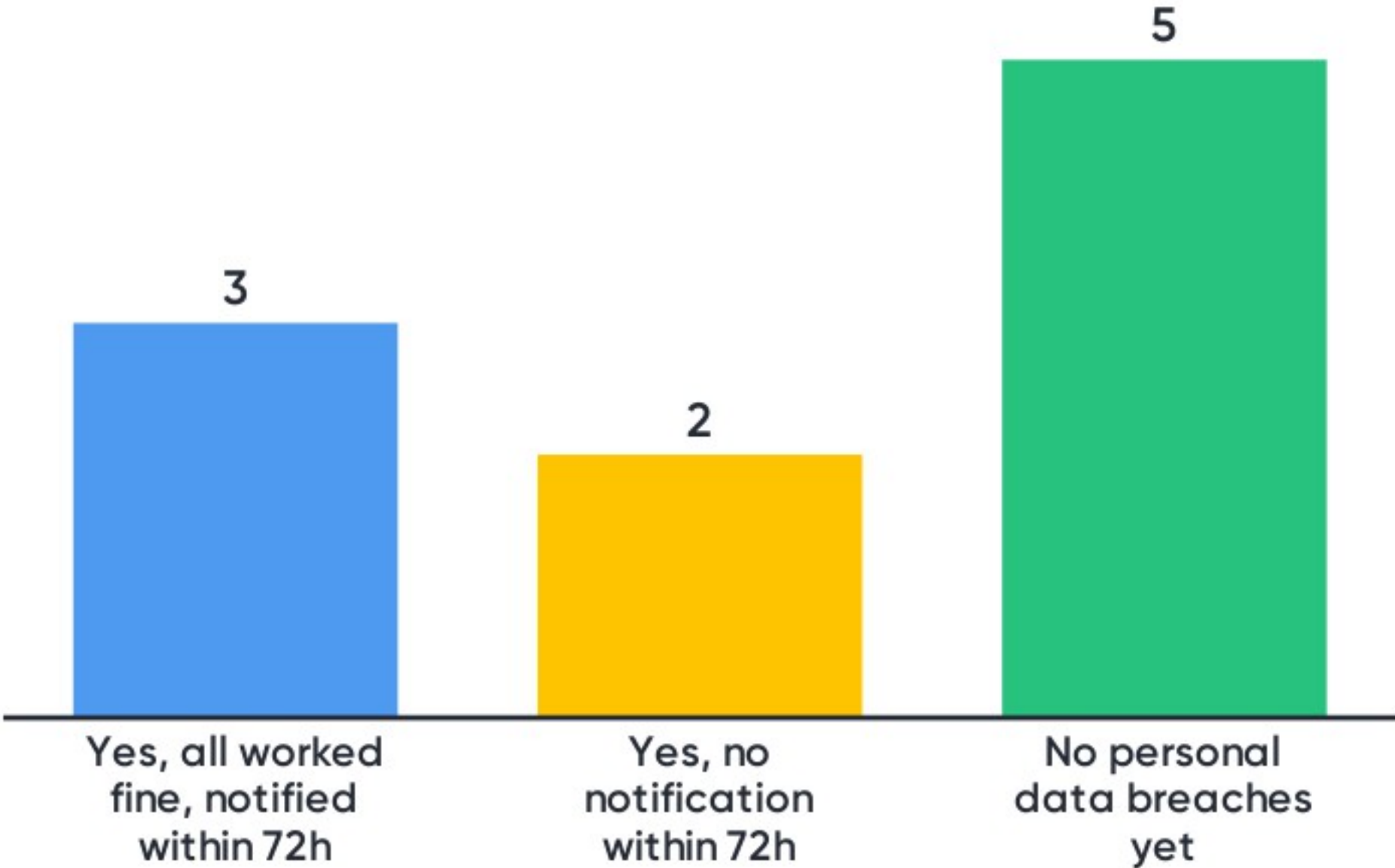
Some individuals in some institutions in our constituency tends to report even very small incidents - will find a ballance over time, I'm sure



Do you test your approach to data breach management?



Were there any data breaches yet, how did your approach to data breach management work?



What did not go well? What cost much time? What went wrong?

Need clearer set of internal processes

The processes were a little awkward and had to be refined. Communication between IRT and privacy people took too much time.

(Not able to answer without consulting my DPO/GDPR staff)

Most time went into making an inventory of personal data used/stored by services we offer and determining the risk classification (low/medium/high).

the good thing is that you just file a notification within 72 hours and you can update and add more details later



Are you using any tools in this process?

Don't know :(

Not sure.

not yet

Ticketsystem, email

Email

Trouble Ticket System, Email

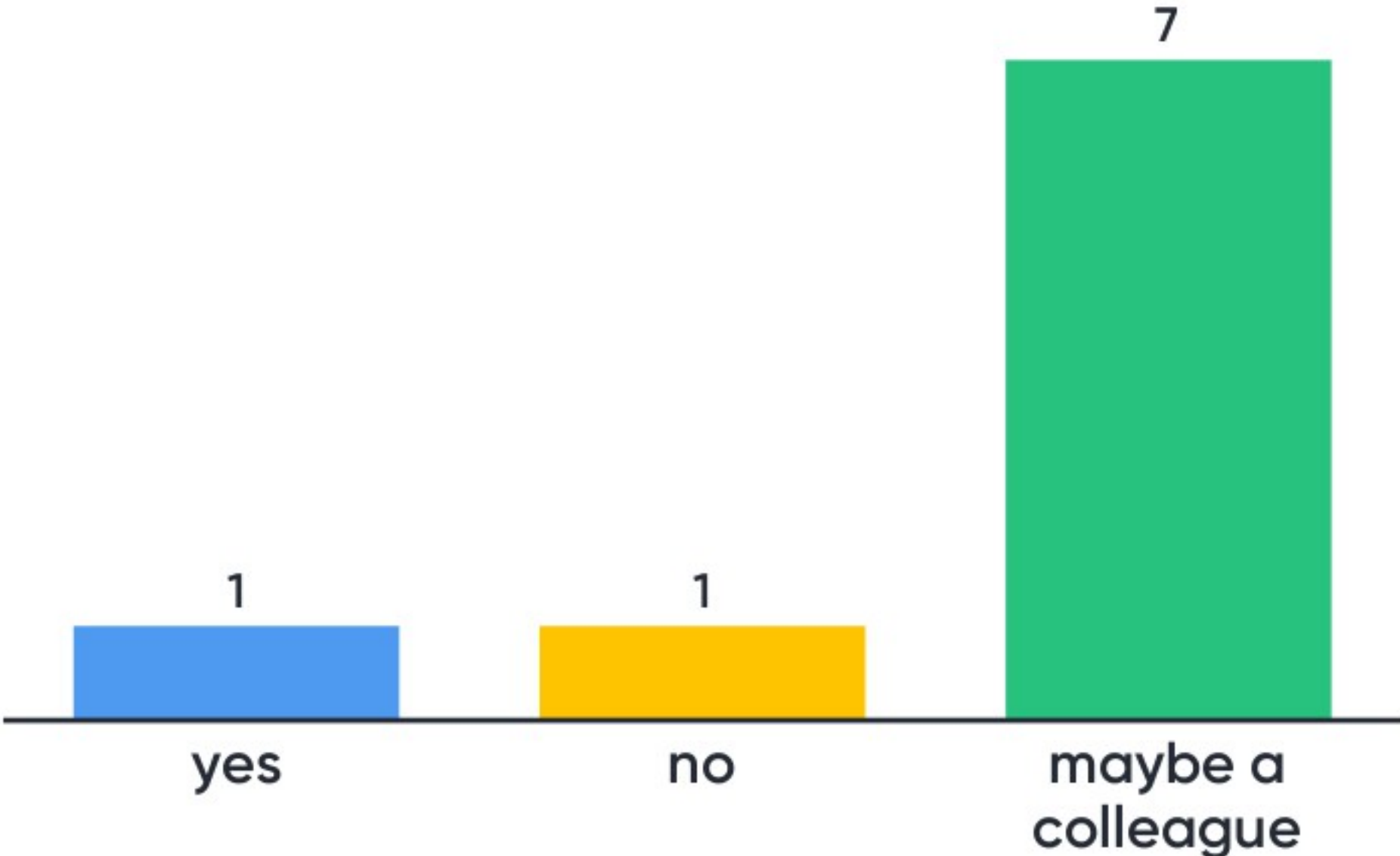
Not sure. Think just email

Common templates, developed by ourselves or adopted from institutions or DPA. Dedicated e-mail adresses



Feedback and Participation

Are you willing to participate in in-depth interviews to help the project?



How can you profit the most by the project?

smooth processes

useful tools

recommendations, especially for smaller NRENs

training and awareness

Check procedure and close the gaps

clear process

examples of good practice

Common knowledge, recommendations, tools

raise awareness and get training materials.



How can you profit the most by the project?

Refinement of processes

Recommendations,

