

GDPR Project

November 2017

At Hymans Robertson, we've been preparing for GDPR since May 2016. Our GDPR programme is well underway and has made excellent progress over the recent months. We're well-placed to be ready to demonstrate compliance with GDPR from May 2018 and we're pleased to give you this update on our progress.

About our GDPR programme

Our management board has designated our GDPR programme as the firm's highest-priority internal project for 2017/18. We've established a steering group that includes a sponsor from our executive board (Nick Pope, our Finance and Operations Director), with five streams looking at technology and security, information governance, reviewing and mapping our processing activities, engaging with our clients and internal communications.



What we've done

- Engaged with the Board and senior leaders across the business
- Updated our data breach response strategy
- Developed our approach to reviewing and documenting our data flows and processing activities
- Developed GDPR-compliant clauses for client and supplier contracts
- Implemented data loss prevention (DLP) monitoring
- Produced three Sixty Second Summaries covering GDPR, the "joint data controller" issue and privacy notices
- Issued updated guidance to staff concerning data storage practices
- Published general awareness articles on our intranet
- Launched a data protection wiki for staff
- Identified and trained a firm-wide network of data protection business area representatives
- Launched a "trust centre" on our website as a hub for data protection and information security matters



What we're doing

- Engaging with our clients to update contracts
- Continuing to work with our suppliers to review contracts and update our due diligence
- Finalising our data flows and document our processing activities ("deep dives")
- Continuing to implement action plans arising out of the "deep dives"
- Developing our approach to Data Protection Impact Assessments (DPIAs)
- Finalising our simplified data retention policy
- Planning changes to our core IT systems to support automatic archiving of data
- Determining changes required to our data portal to support data minimisation
- Looking at interactive learning tools
- Reviewing our privacy notices
- Appointing a Data Protection Officer



What's next

- Refreshing and supplementing our data protection policies
- Reviewing our mandatory training module
- Supporting our colleagues across the business as they make progress with their GDPR action plans
- Developing an ongoing assurance programme
- Developing an internal "GDPR Hub" for staff
- Implementing our simplified retention policy