Sample GDPR Action Plan Summary



Awareness

Readiness assessment

Formalise GDPR Compliance plan

Staff Training

Privacy Program Components

Information Held

Audit and document high risk data, processes and third party transfers

Contract Review based on audit results

Identify where Controller and Processor

Data Quality

Formalise and document procedures

Individuals' Rights

Privacy Notice review based on risk assessment and audit

Policies and procedures for new rights

May require technology solution to enable

Legal Basis for Processing

Use audit to identify types and purpose and ensure minimisation

Establish, document and maintain legal basis

Create and implement a retention schedule and disposition policy

Consent

Established as part of the audit

Document, manage and monitor

Children

No initial actions

Data Breaches

Review and enhance Incident Response Plan

Impact Assessments

Develop thresholds and templates

Implement based on risk areas identified

DPO

Document decision

International

Review guidance and reporting requirements

Formalise policies and procedures

Using audit to implement existing strong controls

Consider use of encryption