

D P O

DATA **P**ROTECTION **O**FFICER



— **WAYS TO** —

SUCCEED

IN YOUR ROLE

What are you going to answer when a CEO asks,

"How is our data protection doing?"

A simple question from the CEO, but often challenging to the person responsible for the data protection to answer.

But it doesn't need to be that way.



Data Protection Officer (DPO) is working to ensure that the organisation processes personal data in compliance with the applicable data protection legislation.



DPO has many tasks in the desk, e.g., to

- Inform and advise
- Monitor compliance
- Advice with data protection impact assessments and privacy risk management
- Cooperate with the supervisory authority
- Draw attention to any failure to comply with applicable data protection provisions

These tasks can be split into smaller operative tasks DPO needs to manage. In practice, keeping track of these tasks all the time and consequently being able to report efficiently the status of organisation's data protection is challenging. However, it is possible to manage and succeed with this role. Next, we will give you five tips, how you, as a DPO or as a person responsible for data protection, can succeed in your role.

TIP

1.



Create an Annual Plan

An annual plan clarifies the organisation's data protection operations and tasks. Follow the "Plan, Do, Check, Act" -cycle, and you are bringing more structure to the data protection activities in your organisation.

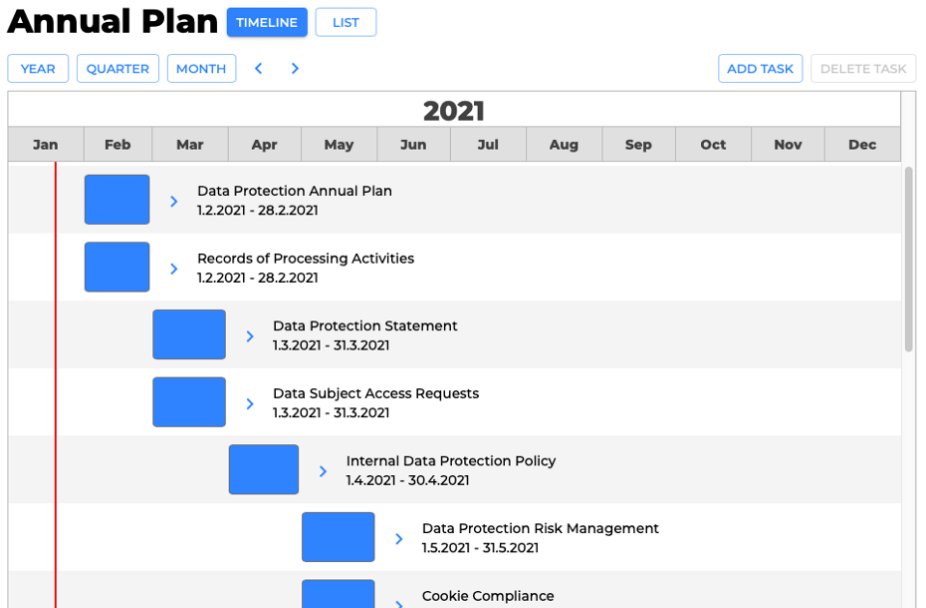
The annual plan constitutes a series of steps to be performed following a chronological order throughout a year, ensuring that the organisation's data protection goals are met. The creation of the annual plan for the next year starts with the report from the previous year.



The identified weaknesses, risks and major development activities taking place in the organization should be reflected in the plan. In practice, the annual plan is usually a combination of repeating routine activities and development projects.

A well-thought annual plan helps you manage and delegate privacy tasks and optimize the use of resources within your organisation. However, if you do not have an annual plan yet, it's never too late to start to work systematically with data protection!

Here's the Annual Plan view in DPO365 – it takes just **10 minutes** to create it!



Annual Plan TIMELINE LIST

YEAR QUARTER MONTH < > ADD TASK DELETE TASK

2021

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	■										
	■										
		■									
		■									
			■								
				■							
					■						
						■					

- > Data Protection Annual Plan
1.2.2021 - 28.2.2021
- > Records of Processing Activities
1.2.2021 - 28.2.2021
- > Data Protection Statement
1.3.2021 - 31.3.2021
- > Data Subject Access Requests
1.3.2021 - 31.3.2021
- > Internal Data Protection Policy
1.4.2021 - 30.4.2021
- > Data Protection Risk Management
1.5.2021 - 31.5.2021
- > Cookie Compliance

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TIP

2.



Draft Internal Data Protection Policy

Your organization must have appropriate technical and organizational measures in place to be able to demonstrate compliance. Data protection policy is the key document to describe these measures.

This includes in practice, e.g., that you have key documentation in place and the staff who process personal data are trained regularly. Taking responsibility for what you do with personal data and demonstrating the steps you have taken to protect people's rights results in better compliance and competitive advantage.



Also, if something goes wrong, and you are able show you have evaluated the risks and had the appropriate measures and safeguards in place, it can mitigate the potential enforcement actions.

In short, data protection policy describes data protection principles, processing of personal data and related roles and responsibilities in an organization.

Example of Internal Data Protection Policy



- ① **Introduction**
- ② **Organisation & Leadership**
 - Applicable Legislation
 - Data Processing Roles
 - Roles & Responsibilities
- ③ **Planning**
 - Objectives
 - Annual Plan
 - Risk Management
- ④ **Support**
 - Resources
 - Training & Awareness
- ⑤ **Operation**
 - Records of Processing Activities
 - Data Protection Impact Assessment
- ⑥ **Performance Evaluation**
 - Key Documentation
 - Key Performance Indicators
 - Annual Report

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TIP

3.



Identify Key Documentation

One important way to demonstrate compliance and thereby be accountable is through proper, well-maintained documentation.

First of all, identify key documentation. Secondly, create and update the key documentation if needed. Thirdly, make sure the key documentation is available for the relevant stakeholders in your organization.

Some examples of key documentation include Records of Processing Activities, Data Protection Policy, Data Retention Schedule, Privacy Statements and Data Breach Register. If you are unsure whether you have all documents in place, please download our list of documentation from [here](#).



All key documentation should be linked to your annual plan. By doing so, you will remember to manage your key compliance documentation.

Reserve some time from your annual plan for reviewing these documents and ensure that all the relevant stakeholders have easy access to these.

Identifying Key Documentation in DPO365:

Key Document	Status	Progress	Due Date
ACME Inc. privacy statement		67 %	30.3.2021
Cookie consent solution		100 %	31.5.2021
Cookie policy		100 %	31.5.2021
Data breach guideline		100 %	30.6.2021
Data protection risk management process		0 %	31.5.2021
Data protection training log		33 %	30.9.2021
Data Protection Annual Plan (in DPO365)		100 %	23.2.2021

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TIP

4.



Report

Remember to report to the CEO and the management regularly how your organisation is doing with data protection.

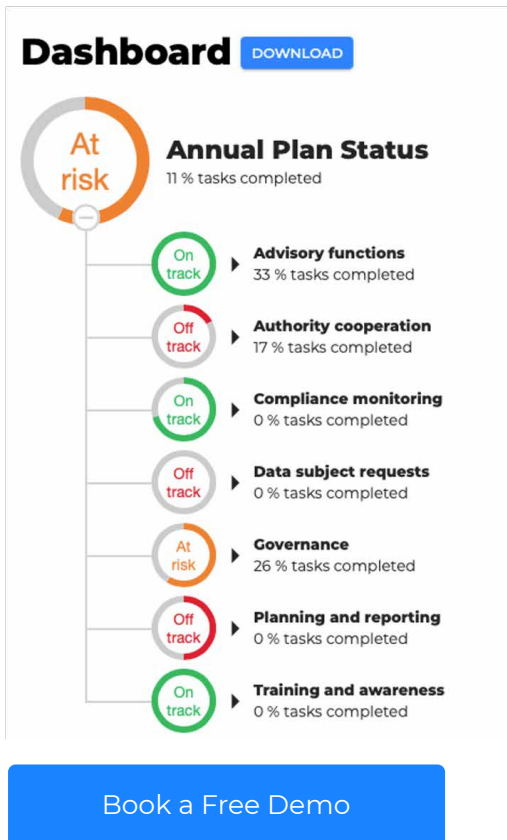
Data protection is always a matter of the top management. The top management of your organisation is responsible for ensuring that your organisation is processing the personal data of your customers, employees, and other relevant individuals in a rightful manner and providing you with the resources you need to succeed with your role as DPO.



An annual report is an excellent tool for demonstrating how data protection tasks have proceeded in your organization: the report summarizes the main development activities and achievements, exceptions, weaknesses, and risks.

Presenting an easy-to-read report from the previous year and a clear plan for the following year with scheduled tasks and goals helps you receive the resources you will need to meet the goals in the future.

Reporting in DPO365 is easy



TIP**5.**

Assign Responsibility

DPO is working towards ensuring that his/her organisation processes personal data in compliance with the applicable data protection laws.

Even though there is a list of tasks and responsibilities, it does not mean that DPO needs to do everything alone. On the contrary, one of the most challenging task is to implement data protection to the processes and practices of the organisation.



Privacy organisation or the DPO and can assign responsibilities to the different departments and stakeholders in the organisation and monitor that these responsibilities are met. The annual plan should include the defined roles and responsibilities of the relevant stakeholders in connection with the tasks assigned to them.

You can easily assign responsibilities in DPO365:

Annual Plan

[TIMELINE](#)
[LIST](#)
[BOARD](#)

#	Task ↓	Assignee ↓	Status ↓	Progress ↓
1	▶ Role of Data Protection Officer	▶ Maximilian Schrems	●	100 %
2	▶ DPO Communications with Supervisory Authority	▶ Patrick Breyer	●	100 %
3	▶ Regulatory Monitoring	▶ Maximilian Schrems	●	100 %
4	▶ Data Protection Annual Plan	▶ Maximilian Schrems	●	100 %
5	▶ Records of Processing Activities	▶ Patrick Breyer	●	100 %
6	▶ Data Protection Statement	▶ Unassigned	●	0 %
7	▶ Data Subject Access Requests	▶ Unassigned	●	100 %

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Privaon

A Finnish company Privaon created a SaaS service to help organisations and DPOs to succeed in their role.

If you want to have [peace of mind](#) and ensure that your organisation's data protection tasks are on track - get to know [DPO365!](#)

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