

# GDPR Roadmap to Compliance: Effective from 25 May 2018

## 1. Governance

Identify your existing governance structure, including the key stakeholders responsible for compliance, and the policies and procedures governing the processing of personal data.

## 2. Accountability

Determine your organisation's demonstrable data protection compliance structure.

## 3. Data Processing Inventory

Understand and record your data processing activities, building an inventory of who, what, where, why and how.

## 4. Security & Data Breach

Determine what security measures you have in place to protect data, and consider what procedures you have to deal with potential data breaches.

## 5. Dealings with Data Processors

Review your processor due diligence process, and existing agreements with processors to assess adequacy of data protection provisions.

## 6. Cross-Border Data Transfers

Identify your cross-border transfers outside the EEA and the legal mechanisms you have to govern any transfers.

1

2

3

4

5

6

## 7. Gap Analysis

Analyse your existing data protection compliance efforts against requirements under the GDPR to assess what needs to be updated or newly introduced.

## 8. Remediation

Once you have considered your existing compliance framework, identify a set of recommendations for achieving GDPR compliance to build a remediation program.

## 9. Implementation

Implement your remediation program ensuring your practices, policies and procedures align with GDPR requirements. Aim to embed your compliance program across the various functions of your organisation.

## 10. Data Protection Compliance Pack

A key principle of the GDPR is that of accountability. This means having demonstrable compliance. Collate all relevant compliance information and documents in one, organised pack to easily maintain and audit your compliance programme and offer up required information to your supervisory authority, if need be. Include your:

- Policies, Procedures and Toolkits
- List of Security Measures
- Data Processing Inventory
- List of Key Stakeholders and Contact Info

# GDPR Compliance Roadmap



**Cynthia O'Donoghue**  
Partner  
London  
codonoghue@reedsmith.com



**Philip Thomas**  
Partner  
London  
pthomas@reedsmith.com



**Dr. Andreas Splittgerber**  
Partner  
Munich  
asplittgerber@reedsmith.com



**Daniel Kadar**  
Partner  
Paris  
dkadar@reedsmith.com



**Dr. Thomas Fischl**  
Partner  
Munich  
tfischl@reedsmith.com



**Anthony Pouloupoulos**  
Partner  
Athens  
apouloupoulos@reedsmith.com



**Mark Melodia**  
Partner  
New York  
mmelodia@reedsmith.com



**Bart Huffman**  
Partner  
Houston  
bhuffman@reedsmith.com



**Gerard Stegmaier**  
Partner  
Washington, D.C.  
gstegmaier@reedsmith.com

ABU DHABI  
ATHENS  
BEIJING  
CENTURY CITY  
CHICAGO  
DUBAI  
FRANKFURT  
HONG KONG  
HOUSTON  
KAZAKHSTAN  
LONDON  
LOS ANGELES  
MIAMI  
MUNICH  
NEW YORK  
PARIS  
PHILADELPHIA  
PITTSBURGH  
PRINCETON  
RICHMOND  
SAN FRANCISCO  
SHANGHAI  
SILICON VALLEY  
SINGAPORE  
TYSONS  
WASHINGTON, D.C.  
WILMINGTON

