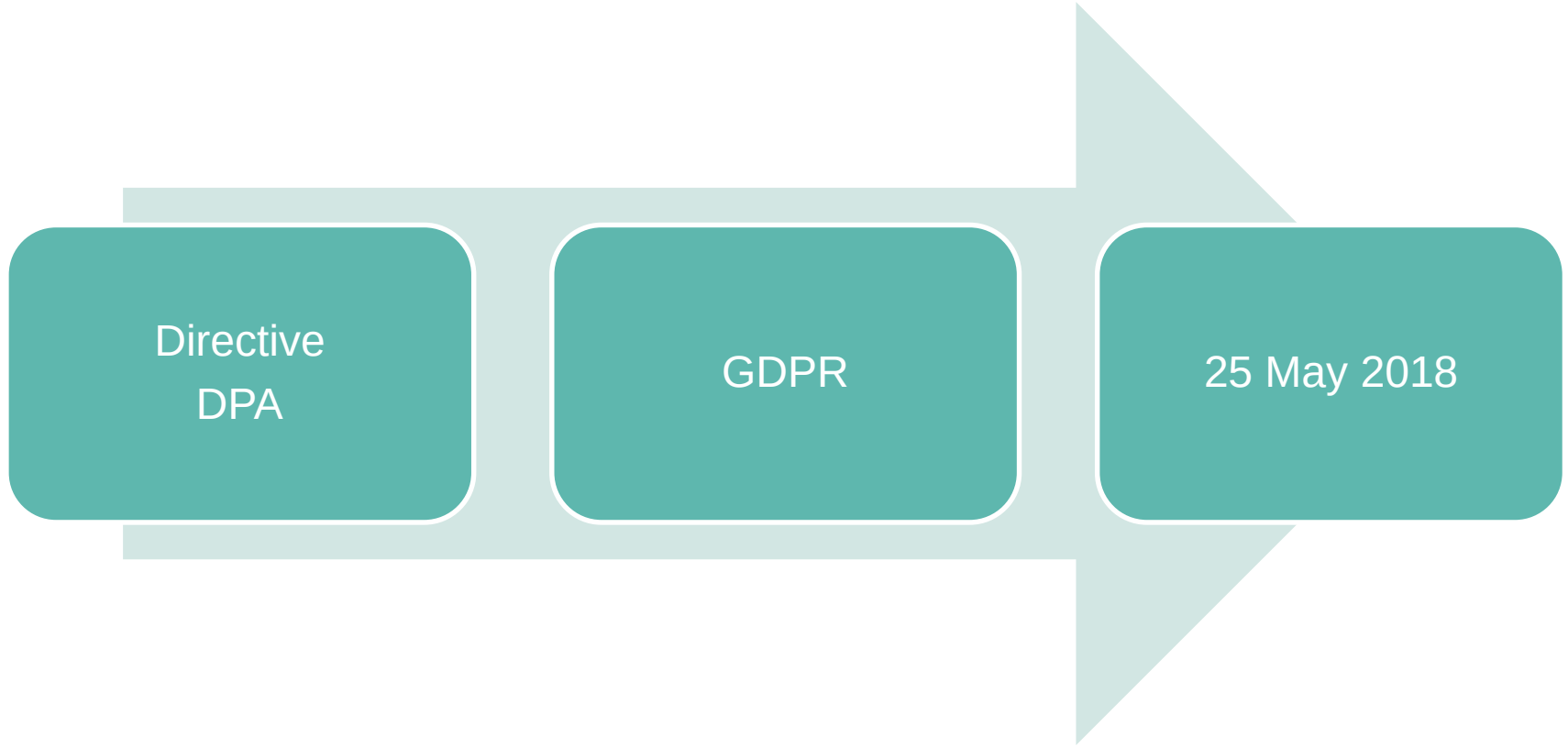


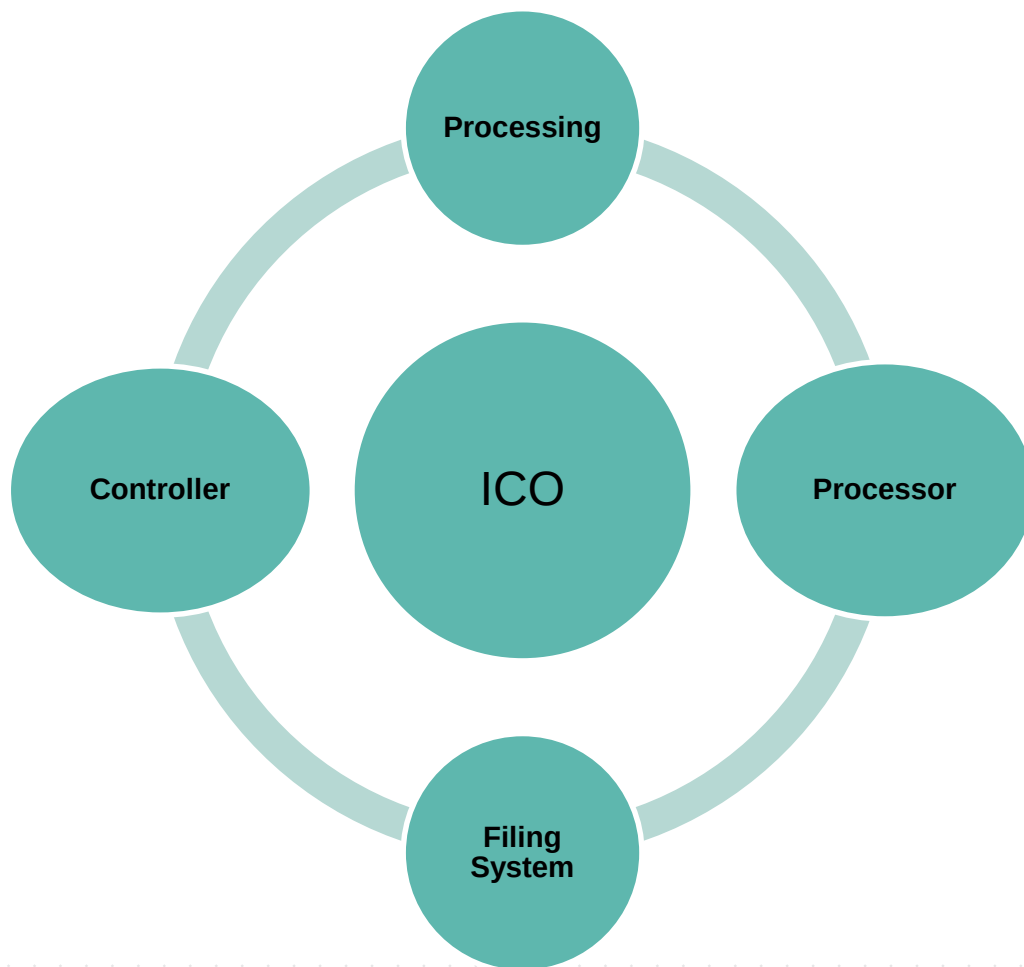


ACA/APL Meeting on 22 February 2018 GDPR

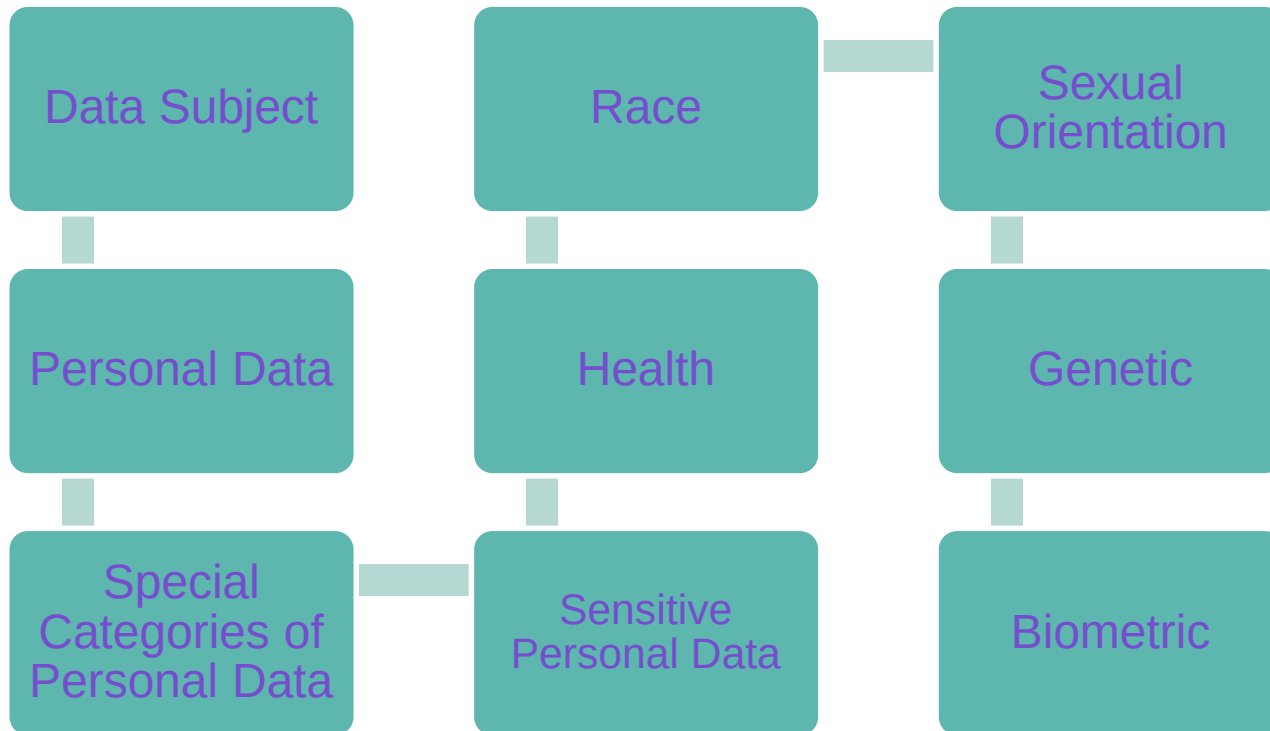
Patrick Kennedy
Partner, Gateley Plc
Director, Entrust Pension Limited



GDPR



GDPR



GDPR

**Stricter
consent**

**Greater
accountability**

Time limits

**Wider
notification**

**DIRECT OBLIGATION FOR
DATA PROCESSORS**

72 hours

**Rights for data
Subjects**

**Contracts with
Data processors**

EURO 10M/2%

**RIGHT TO BE
FORGOTTEN**

**REPORTING
BREACHES**

EURO 20M/4%

Principles

Lawfully, fairly, transparent
Specified, explicit, legitimate
purpose
Adequate, relevant
Accurate, up to date
No longer than necessary
Security



Legal Bases

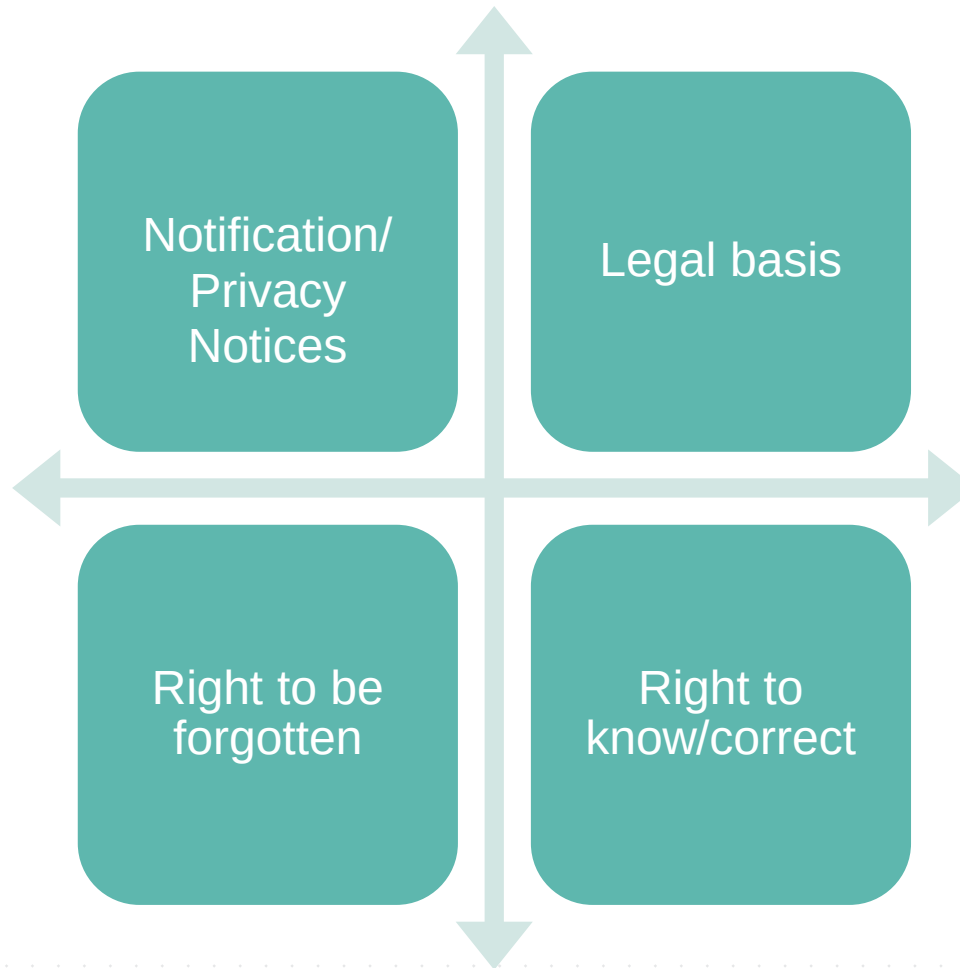
Data subject consent
Contract
Legal obligation
Vital interests
Public interest
Legitimate interests of data
controller

Consent

“freely given, specific, informed and unambiguous indication of data subject’s wishes”

“clear affirmative action signifies agreement”

Documented policy



Accountability/Record
keeping

Most significant
addition

Security procedures

Data Protection Officer

**Gateley Health
Warning:
Do not under any
circumstances
become a Data
Controller**