

# Understanding and addressing GDPR

## A pragmatic approach to the new regulation

When businesses think of the General Data Protection Regulation (GDPR), often their first instinct is to pass the issue to Legal because it's a perceived legal issue. Following Legal's input, it may end up in the hands of IT because the legislation is all about data. But that is not the right approach. Addressing GDPR should be done through a collaboration between the IT, business and legal departments with input from the whole of the business. Whether it's an email address from a marketing newsletter list or a photocopied image of your employee's passport, the GDPR will apply to the way in which organizations process data.

### Before we get started, what do you need to know about GDPR?

The GDPR will become fully enforceable from 25th May 2018 and broadly speaking, is intended to harmonize the data protection laws across the EU member states. The new legislation will not only apply to businesses which reside in the EU, but also has a broader territorial scope affecting global businesses that provide goods and services to monitor data subjects within the EU.

Any piece of information from which a living individual is identifiable falls within the definition of personal data and, as the GDPR makes clear, it's much more than just demographic details. In an age of online identities and technology, personal data includes **IP addresses, usernames and email addresses**, so it's important to understand the different forms that the data in your company takes.

Enhanced data protection regulation under the GDPR brings with it stronger rights for individuals. Individuals will retain the right to access their data at any time and will also be able to request that data they

have provided is passed to third parties, even competitors, with the introduction of the right of data portability – think of it as Netflix having to give Amazon Video their customer's TV show interests. As for consumers' consent, companies will need to ensure they are communicating exactly how they will be using and sharing their data in the form of a more detailed fair processing notice and will have to move to obtaining consent via an opt-in mechanism.

### The Hitachi Consulting Story

Hitachi Consulting has been an established part of Hitachi, Ltd. for more than 25 years. For us, GDPR is more than a new legal regulation, it has become a driver in driving a positive culture of compliance for our employees, our customers and prospective customers and our suppliers. We have implemented the following approach:

**Understanding GDPR and engaging the board** – It is important to view GDPR from more than just a legal perspective, given the impact of the regulation across our business. By taking a proactive approach in deeply understanding GDPR and the benefits that it brings, the team at Hitachi Consulting could engage its board in a meaningful way. Moreover, it was evident that GDPR ties in with Hitachi's values of honesty, fairness and trust that have been established for over 100 years ever since Hitachi was founded.

**Engage with third parties to undertake GDPR readiness review** – In the form of interviews and questionnaires with key members of the IT, business and legal function of Hitachi Consulting, we assessed the existing compliance landscape and plotted points where we needed to make adjustments to align with the new GDPR framework. Presenting to key stakeholders in a webinar allowed us to cement the findings to form a stance for our GDPR plan.

**Building the GDPR steering group** – Our GDPR steering group is made up of "GDPR champions" across the business, IT and legal functions. The steering group formally kicked-off the GDPR program partaking in duties such as educating employees, providing visible support for the initiative and deciding on priorities relating to GDPR. Part of this process involved the creation of the "GDPR hub" on our intranet to keep everything on GDPR in one place.

**Define baseline and build out plan** – A high-level project timeline defined our GDPR journey, identifying key activities to be maintained per quarter and mapping the responsibilities for each part of the business. It was important to realise that the plan is adaptable and processes are being fine-tuned along the way.

**Managing and improving the future** – We will be able to continuously manage and improve risk mitigation and data protection by default. Embedding the longer term GDPR compliance into future business decisions allows us to demonstrate to our customers our continued trust with their data.

Much of the fear around GDPR comes from the huge fines, which may be forced upon any company that is not compliant. Demonstrating your attempts to comply will most certainly mitigate the fines if a breach is incurred, but for companies who fail to implement an effective GDPR program the opposite will be true.

## Five steps to approaching GDPR

GDPR may seem overwhelming but the best way to approach the new regulation is in a pragmatic and structured way. Every company will have different GDPR priorities and challenges, so becoming compliant with GDPR will require a different plan that is unique to your organization.

That being said, there are clear steps all organizations should take to get started. Alongside our colleagues at the law firm RPC, Hitachi Consulting recommends the following five step approach.



### About Hitachi Consulting

Hitachi Consulting is the global solutions and professional services organization within Hitachi Ltd., a global innovation leader in industrial and information technology solutions and an early pioneer of the Internet of Things. Hitachi Consulting is a business integrator for the IoT era and a catalyst for digital transformation. Using our deep domain knowledge, we strategically

collaborate with our clients to help them innovate faster, maximize operational efficiency and realize measurable, sustainable business and societal value. As a consulting-led solutions company, we can help you leverage data as a strategic asset to drive competitive differentiation, customer loyalty and growth. To learn more, visit [www.hitachiconsulting.com](http://www.hitachiconsulting.com).

For more information on GDPR, please contact:

[Nigel.Collins@rpc.co.uk](mailto:Nigel.Collins@rpc.co.uk) or  
[Shinji.Kamata@hitachiconsulting.com](mailto:Shinji.Kamata@hitachiconsulting.com)