General Data Protection Regulation

Keywords Framework

January 2018

Introduction

The General Data Protection Regulation (GDPR) will come into force on the 25th May 2018, replacing the existing data protection framework under the EU Data Protection Directive. In this document we set out the details of our GDPR framework and describe how GDPR impacts on our business and the steps we are taking to ensure compliance.

What is GDPR?

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU). (En.wikipedia.org, 2018). The principle of the GDPR is to protect the data held by companies and organisations that relate to individuals.

Currently, Ireland and the UK relies on the Data Protection Act of 1998 (DPA), which was enacted following the 1995 EU Data Protection Directive, but this will be superseded by the new legislation. It introduces tougher fines for non-compliance/breaches and gives individuals the opportunity to exercise more control over what companies can do with their personal data. The GDPR is also intended to create a more uniform approach to the regulation of data processing activities across the EU.

Keywords and GDPR

Keywords has been working diligently in preparing for GDPR and has established a framework to support the process and operations in a continuous and iterative manner.
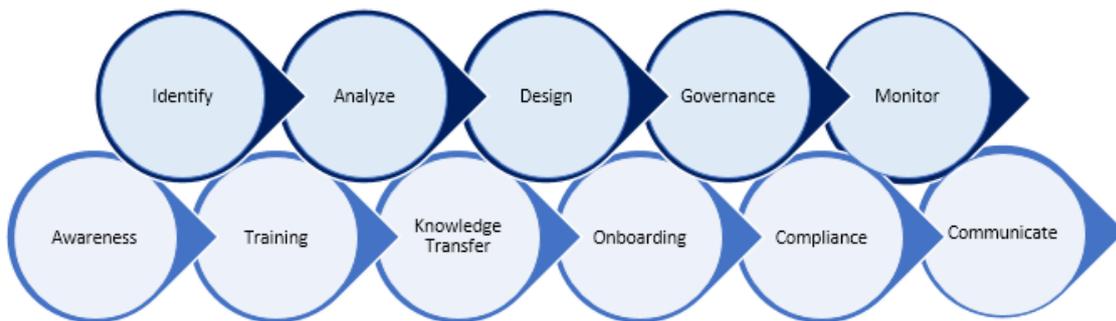

Figure 1 Keywords Information Security and Privacy Framework

Keywords InfoSec and Privacy Framework

Keywords follows an overarching InfoSec and Privacy Framework which underpins all Keywords standards, guidelines, and policies. The framework takes into consideration not only technology, but also spans across procedures and processes to ensure the strengthening of the Keywords security posture as Keywords continue to grow.

Identify   standard, scope, requirements
Analyse   assess scope, requirements, gap and risks
Design   programs, applications, systems, process, controls
Governance   controls testing and monitoring
Monitor   risks and compliance

InfoSec and Privacy Framework + GDPR

In alignment with the Keywords InfoSec and Privacy Framework, the Keywords GDPR programme has six major phases which apply equally to a department, a service line, a product group, all the way to individual employees.

01 Awareness

- Generate GDPR awareness in all aspects of our business.
- Be cognizant of impacts of GDPR in business areas and raise awareness of GDPR and its requirements.

GDPR is an important topic within the Keywords community. We ensure that this topic live and ongoing so that it remains at the forefront of our collective mind in the provision of our services to clients.

02 Training

- Provide targeted GDPR training to all employees appropriate to their roles and responsibilities.
- Assist in assessment of GDPR scope.

Keywords are evaluating different solutions to provide role-specific training to our employees. This will include ongoing general security and privacy training, and also in-depth GPDR training for roles that may interact with EU data and/or personal data.

03 Knowledge Transfer

- Global cross-functional discussions to ensure exchange of knowledge and lessons learned
- Centralised GDPR programme, information security and privacy knowledge in a single repository and reference point for building a best practice standard that applies to all Keywords Studios.

Keywords has implemented a GDPR management solution, along with secure corporate document retention solution, to provide a holistic platform for Keywords to not only manage but centralise GPDR related documentation, approved policies and process, internal KBs and FAQs.

04 Onboarding

- Each service line will complete its own onboarding cycle to the InfoSec and Privacy Framework and will be assigned a set of controls which shall be supported and owned.
- Those controls are dictated by Keywords Governance, which will be tested and continuously monitored.

The onboarding process ensures that each individual, service line and studio understand the standard and the meaning of the controls/artefacts that are required to support the controls. By assigning owners to controls, be it a process or a technological control, it ensures accountability as required by GDPR.

05 Compliance

Governance processes monitor controls and their supporting artefacts to gauge compliancy of a given standard, in this case, GDPR, as applied to the service line. Deviation from the standard or new requirements will trigger a corrective action in accordance to Keywords policy.

Compliance is achieved by diligent continuous monitoring. Although governance and internal auditing plays a significant role, Keywords also relies on individuals, business and service lines to monitor controls, to ensure the quality of artefacts submitted.

06 Communicate

Communication is key to improvements and to address any questions or issues. Everyone at Keywords is encouraged to voice their questions or concerns relating to Information Security and Privacy by contacting their local site security representative, submitting questions to monthly all-hands meeting, or by sending an email to Infosec@keywordsstudios.com.

At Keywords, communication is the utmost important success factor in all aspects of daily operations. This applies to the InfoSec and Privacy Framework, the GDPR program. There are multiple avenues individuals could raise questions, comments, suggestions. So…

Get in touch!

If you would like more information on Keywords GDPR programme, please contact Keywords Business Development Team, or your Account Manager. You may also write to us at:

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