## Checklist: Where are you on your GDPR journey? YOUR COMPLIANCE

Here is a checklist of questions to assess the level of your compliance with the GDPR requirements:

The relevant questions	Level of implementation	
	☑ Done	Planned on (date)
Stage of compliance 1: Making the ac	ction plan	
Has a GDPR action and compliance plan been developed?		
Does my company need to appoint a personal data protection		
officer (DPO)?		
✓ If yes, did I appoint one?		
Which entities/departments are involved in the compliance plan		
(inventory of business activities/procedures dealing with		
personal data)?		
Stage of compliance 2: Audit of the treatmen	t of existing da	
Did I identify the purposes and subjects of the processes		
and categories of personal data? Is my company able to justify the legal basis of each		
processing of personal data?		
Did I define retention periods for personal data (and		
communicate them to data subjects)?		
Are all personal data collected necessary for the processing		
(proportionality)?		
Stage of compliance 3: Identification of risky processes a	nd special cate	egories of data
Does my company perform processes that could potentially		
impact the privacy of the persons concerned?		
$\checkmark$ Did I define decision criteria for determining the need of		
a privacy impact study?		
✓ Did I define a privacy impact assessment method?		
Does my company perform processes that involve the <b>cross</b> -		
referencing of different categories of data or the reuse of data		
collected for another process? Does my company perform data <b>profiling</b> processes?		
Does my company transfer the processed data <b>outside the</b>		
European Union?		
Does my company use <b>subcontractors</b> who process personal		
data on behalf of my company (review of contracts with		
subcontractors and control of subcontractors' compliance with		
the GDPR requirements)?		
Stage of compliance 4: Implementation o	t procedures	
Did I incorporate elements of RGPD compliance into my company's procedures?		
Does my company have some management mechanisms in		
place for the collection, registration, modification and revocation		
of the consent of data subjects (when the legal basis is		

consent)?		
Did I establish procedures in order to satisfy requests for the		
exercise of rights under the GDPR (rights to access, rectify,		
erase data, to restrict processing, right to oblivion, right to data		
portability)?		
Do data subjects benefit from clear and understandable		
information at the moment of data collection?		
Does my company have mechanisms for archiving and		
deleting personal data?		
Did I integrate the GPDR into my company's HR training		
programme?		
Did I involve my company's IT department in GDPR		
compliance?		
✓ Did we put in place data security measures (protected		
access, pseudonymisation, encryption, secure storage		
and transfer, purge and archiving rules, etc.)?		
✓ Has a process for <b>detecting</b> , handling and reporting		
personal data breaches been adopted?		
Does my company's <b>insurance</b> cover the risks (penalties,		
damages, incidents, etc.) related to the processing of personal data?		
Stage of compliance 5: Document	ation	
Did my company <b>document</b> its compliance with the GDPR?		
Is there an <b>exhaustive mapping</b> of personal data processed in		
my company's information system?		
Did I carry out an impact analysis of processes that could		
potentially impact the privacy of the persons concerned?		
Did I establish a register of processing operations?		
Did I establish a register of data processing incidents?		