



COMPASS  
IT Compliance

PANNONE LOPES  
DEVEREAUX & O'GARA LLC  
*counselors at law*

# GDPR – Know Your Responsibilities

ADAM CRAVEDI – DIRECTOR OF BUSINESS OPERATIONS:  
COMPASS IT COMPLIANCE

JOEL GOLOSIE – SR. COUNSEL: PANNONE, LOPES, DEVEREAUX  
& O'GARA, LLC

Secure. Comply. Save.

# Agenda

---



COMPASS  
IT Compliance

- What is GDPR
- Who is Impacted by GDPR?
- GDPR Risks
- Enforcement Actions
- 4 GDPR Recommendations
- Q&A

Secure. Comply. Save.

PANNONE LOPES  
DEVEREAUX & O'GARA LLC  
*counselors at law*

# What is GDPR

- General Data Protection Regulation
  - Replaces the 1995 European Data Protection Directive
  - Applies to the processing of personal data of European Data Subjects, regardless of whether the company controlling or processing the data is in the EU
  - Became Effective May 25, 2018

Secure. Comply. Save.

# Who is Impacted by GDPR?



- All organizations that process information of Data Subjects
  - Regardless of whether payment is required for that processing
  - Regardless of where the business is located
  - Regardless of whether the data was obtained directly from customers (data custodian), or if the company acts as a vendor or has a relationship with the data custodian (data processor or third party)

Secure. Comply. Save.

# Who is Impacted by GDPR?



- US Industries including:
  - Colleges
  - Hotels
  - Airlines
  - Casinos
  - Large Retailers
  - Hospitals
  - US Companies with European Employers/Employees

Secure. Comply. Save.

PANNONE LOPES  
DEVEREAUX & O'GARA LLC  
*counselors at law*

# GDPR Risks



- Massive Fines Possible
  - Up to 20,000,000 Euros or 4% of annual revenue, whichever is GREATER
- Individuals have the ability to sue ALL HOLDERS of their data
- Reputational risk of having clientele aware security and data privacy is not taken seriously

Secure. Comply. Save.

# Enforcement Actions

- Supervisory Authorities (“SAs”)
  - Hundreds of Enforcement Agencies
    - National SA of each EU Member State
    - Provincial SAs within each Member State
  - Strategic approach to build public confidence
- Private Actors
  - NGOs
    - NYOB (Austria) re. FB, Google, WhatsApp; OCU (Spain) FB re. Cambridge Analytica
  - Trolls
    - Privacy’s version of blackhat hackers: malice, revenge & greed

Secure. Comply. Save.

# Recommendation # 1

- Data Identification
  - What Data is collected?
  - Where is that Data stored?
  - Who is the Data shared with?
  - Identify what Data is truly needed for the business? Is data collected that is not needed?
- Unstructured Data

Secure. Comply. Save.



# Recommendation # 2

- Disclosures and Consent
  - Are current disclosures easy to read and understand?
  - Do they detail what data is collected, and how it is used?
  - Are data retention and data sharing policies included?
  - Do customers have to “Opt-In” for consent?

Secure. Comply. Save.

# Recommendation # 3

- Data Transparency and Oversight
  - Has stored customer data been identified across all databases and systems?
  - Is there a list of vendors that customer data has been shared with?
  - Can customer data be scrubbed upon request?
  - Can an individual's data be delivered back to the customer in a usable format?
  - Can the customer easily submit a request for the data, and is the turnaround time reasonable (within 30 days)?

Secure. Comply. Save.

# Recommendation # 4

- Third Party Management
  - What data agreements are in place with other companies?
  - Do third-party vendors have GDPR and/or other security controls in place for any shared data?
  - Have all third-parties, vendors, and recipients of data been identified?
  - Is there a business justification for sharing the data (what processing is the other entity performing)?
  - ALL repositories of such data should be mapped.

Secure. Comply. Save.

# Contact Information

---



Adam Cravedi, Director of Business Operations: Compass ITC –  
[acravedi@compassitc.com](mailto:acravedi@compassitc.com)

Joel Goloskie, Sr. Counsel: Pannone, Lopes, Devereaux, & O’Gara, LLC  
[jgoloskie@pldolaw.com](mailto:jgoloskie@pldolaw.com)

Secure. Comply. Save.





COMPASS  
IT Compliance

---

# Questions?

Secure. Comply. Save.

PANNONE LOPES  
DEVEREAUX & O'GARA LLC  
*counselors at law*