[organization logo]

[organization name]

**PROJECT PLAN**
**for Complying with the European General Data Protection Regulation**

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# Purpose, Scope and Users

The purpose of the Project Plan is to clearly define the objective of the European General Data Protection Regulation (EU GDPR) implementation project, documents to be written, deadlines, and roles and responsibilities in the project.

The Project Plan is applied to all activities performed in the EU GDPR implementation project.

Users of this document are members of [top management] and members of the project team.

# Reference Documents

* EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC)
* [relevant national law or regulation for GDPR implementation]
* [other local laws and regulations]

# EU GDPR Implementation Project

## Project Objective

Project objective is to implement the EU GDPR Management System in accordance with the General Data Protection Regulation (EU GDPR 2016/679) of the European Parliament and of the Council standard by [date] at the latest.

## Project Results

In order to ensure the most efficient project planning, the Company should use the GDPR Readiness Questionnaire to determine which areas of GDPR compliance need the most work.

During the EU GDPR implementation project, the following documents (some of which contain appendices that are not expressly stated here) will be written:

* **General Personal Data Protection Policy** – a policy meant to establish the general data protection principles as well as to prove the commitment of the company to those principles;
* **Employee Data Protection Policy –** a policyto set out the conditions under which the company processes personal data of its employees;
* **General Data Protection Notice –** a notice to set out the conditions under which the company processes personal data of its clients/website visitors;
* **Register of General Data Protection Notices** – a document where you need to list all the published notices;
* **Data Retention Policy –** a policy to set out the period for which personal data may be kept by the company;
* **Data Protection Officer Job Description –** a document that describes the responsibilities of the data protection officer;
* **Guidelines for Processing Activities Inventory –** a document which explains how to list all the data processing activities;
* **Inventory of Processing Activities –** a document meant to be used by the Company to prove compliance with the requirements of art. 30 of the EU GDPR;
* **Data Subject Consent Form -**  a document used by the Company to obtain consent from the data subjects for processing personal data for a specific purpose;
* **Data Subject Consent Withdrawal Form -** a document used by the data subjects to withdraw their consent;
* **Parental Consent Form -** a document used by the Company to obtain consent from the parent/legal guardian/representative of a minor to process personal data for a specific purpose;
* **Parental Consent Withdrawal Form** - a document used by the parent/legal guardian/representative of a minor to withdraw the consent from processing personal data for a specific purpose;
* **Data Subject Access Request Procedure –** a document to set up the process by which the Company answers to data subjects requests;
* **Data Protection Impact Assessment Methodology** – a document that describes how to assess the necessity and proportionality of a certain processing activity and provide measures to mitigate potential risks to the rights and freedoms of data subjects;
* **DPIA Register –** a document used by the Company to document the DPIA process. It includes the Threshold questionnaire and the DPIA questionnaire;
* **Cross Border Data Transfer Procedure –** a document for establishing the conditions under which a cross border data transfer may be carried out;
* **Standard Contractual Clauses –** model clauses issued by the EU Commission to provide adequate safeguards with respect to the protection of the privacy and fundamental rights and freedoms of individuals and as regards the exercise of the corresponding rights.
* **Processor GDPR Compliance Questionnaire –** a questionnaire meant to assess supplier’s compliance with EU GDPR;
* **Supplier Data Processing Agreement –** a contractual document meant to establish the limits and conditions under which a supplier (processor) can process personal data on behalf of the Company (controller);
* **IT Security Policy** – describes basic security rules for all employees;
* **Access Control Policy** – defines how the management approves the access rights to particular users of information systems;
* **Security Procedures for IT Department** – describes security rules that need to be used for the IT infrastructure;
* **Bring Your Own Device (BYOD) Policy** – describes the rules for using mobile and other non-company devices for business purposes;
* **Mobile Device and Teleworking Policy** – describes security rules for using laptops, mobile phones and other devices outside of the company premises;
* **Clear Desk and Clear Screen Policy** – defines how to protect the information that is located in the workplace and on computer screens;
* **Information Classification Policy** – defines how to classify data according to confidentiality, and how to protect the data accordingly;
* **Anonymization and Pseudonymization Policy** – defines how to use these techniques in order to protect the personal data processing;
* **Policy on the Use of Encryption** – defines how to use cryptographic controls and keys to protect the confidentiality and integrity of the data;
* **Disaster Recovery Plan** – defines how to recover the infrastructure and the data after a disrupting incident;
* **Internal Audit Procedure** – defines how to test, assess and evaluate the organizational and technical safeguards in a company;
* **Appendix** **– ISO 27001 Internal Audit Checklist** provides a series of questions based on 114 controls that are listed in ISO 27001 Annex A;
* **Data Breach Response and Notification Procedure –** a procedure that establishes the Company’s obligations in case of a personal data breach;
* **Data Breach Register –** Company’s internal register of data breaches;
* **Data Breach Notification to the Supervisory Authority** – the document to be used in case of a data breach
* **Data Breach Notification to the Data Subjects**– the document to be used in case of a data breach

## Deadlines

Deadlines for acceptance of individual documents in the course of EU GDPR implementation are as follows:

|  |  |
| --- | --- |
| ***Document*** | ***Deadlines for document acceptance*** |
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Final presentation of project results is planned for [date].

## Project Organization

### Project Sponsor

Each project has an assigned "sponsor" who does not actively participate in the project. The project sponsor must be regularly briefed by the project manager about the project status, and intervene if the project is halted.

[name, job title] has been appointed project sponsor.

### Project Manager

The role of the project manager is to ensure resources necessary for project implementation, to coordinate the project, to inform the sponsor of the progress, and to carry out administrative work related to the project. The project manager's authority should ensure uninterrupted project implementation within set deadlines.

[name, job title] has been appointed project manager.

### Project Team

The role of the project team is to assist in various aspects of project implementation, to perform tasks as specified in the project, and to make decisions about various issues that require a multidisciplinary approach. The project team meets each time before the final version of a document from section 2 of this Project Plan is completed, and in all other cases when the project manager deems it necessary.

*Table of participants in the project*

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *Name* | *Organizational unit* | *Job title* | *Phone* | *E-mail* |
|  |  |  |  |  |
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## Main Project Risks

The main risks in the implementation of the project are the following:

1. Extension of deadlines
2. Performing activities that incur unnecessary costs and waste time
3. Shortage or lack of competent employees (e.g. a DPO)

Measures to reduce the above mentioned risks are the following:

* The project manager ensures that all activities in the project are performed within defined deadlines, and seeks intervention by the project sponsor in a timely manner
* Hiring a consultant to ensure that time or resources are not spent on activities that are not important for the project, and that individual activities are not headed in the wrong direction
* Contracting a data protection expert to propose the most appropriate activities

## Tools for Project Implementation, Reporting

A shared folder including all documents produced during the project will be created on the local network. All members of the project team will have access to these documents. Only the project manager [and members of the project team] will be authorized to make changes and delete files.

The project manager will prepare a project implementation report on a monthly basis and forward it to the project sponsor.

# Managing Records Kept on the Basis of this Document

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Record name | Storage location | Person responsible for storage | Control for record protection | Retention time |
| Project implementation report (in electronic form) | Shared folder for project-related activities  | Project manager | Only the project manager is authorized to edit data | The report is stored for a period of 3 years  |

# Validity and document management

This document is valid as of [date].

Owner of this document is [job title].

[job title]

[name]

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[signature]