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GDPR can create value
for business
- A practical approach

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JYLLANDS-POSTENS FOND

POLITIKEN-FONDEN

JP/POLITIKENS HUS A/S

EKSTRA
BLADET

POLITIKEN

JYLLANDS-
POSTEN

JP/POLITIKENS
FORLAG

POLITIKENS
LOKALAVISER

ERHVERVS-
MEDIER

SAXO.COM

NICHER

HISTORIE

BØRNEAVISEN

POLARIS

HR. FERDINAND

JYLLAND

FINANS

WATCH-MEDIER

BØRSEN (49,9 %)

INFOMEDIA (50 %)

LASSO (19,9 %)

BLADKOMPAGNIET (50
pct.)

DANSK AVIS OMDDELING
(50 %)

ERRITSØ TRYK
(100 %)

RITZAU (29,2 %)

Ekstra
Bladet

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POLITIKENS
FORLAG **P**


MORGENAVISEN
Jyllands-Posten

POLITIKEN

saxo

WATCH MEDIER
FINANS

LÆS LYT LEV

The practical approach can be challenging

- The theoretical approach are usually black/white.
- Practical we have to work more in grey nuances
 - More compromises are needed in practice compared to theory.



Compliance must be relevant and meaningful

We have started our journey by picking up the largest pieces of rocks.

- Rocks continue to be there, but they differentiate in size.

Systems for compliance must create business value and have multifunctional purposes – not only for compliance

- Systems have to be a part of the every day work
- Avoid documentation just for the documentation



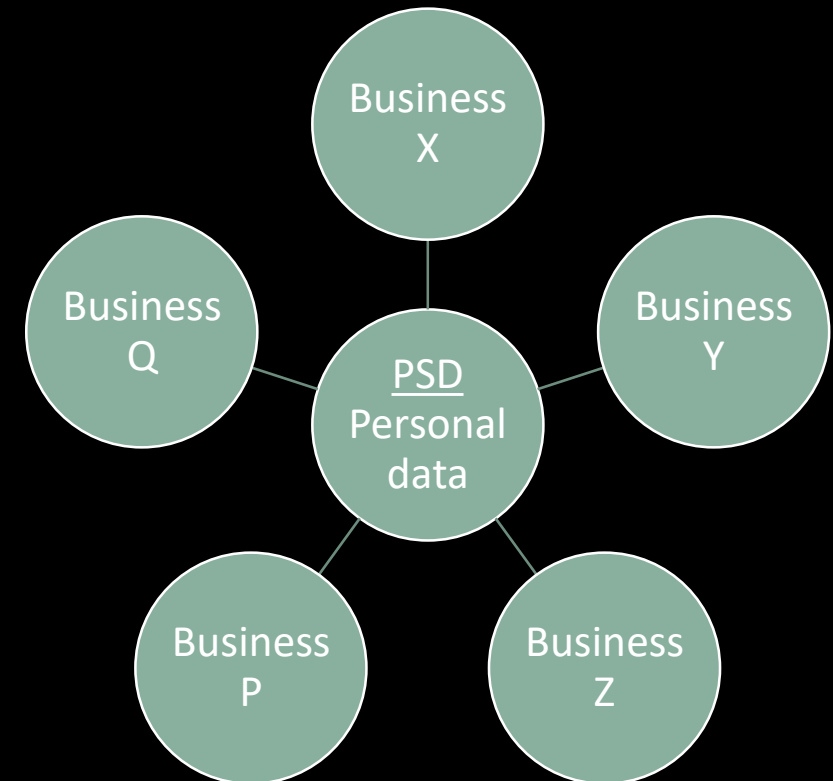
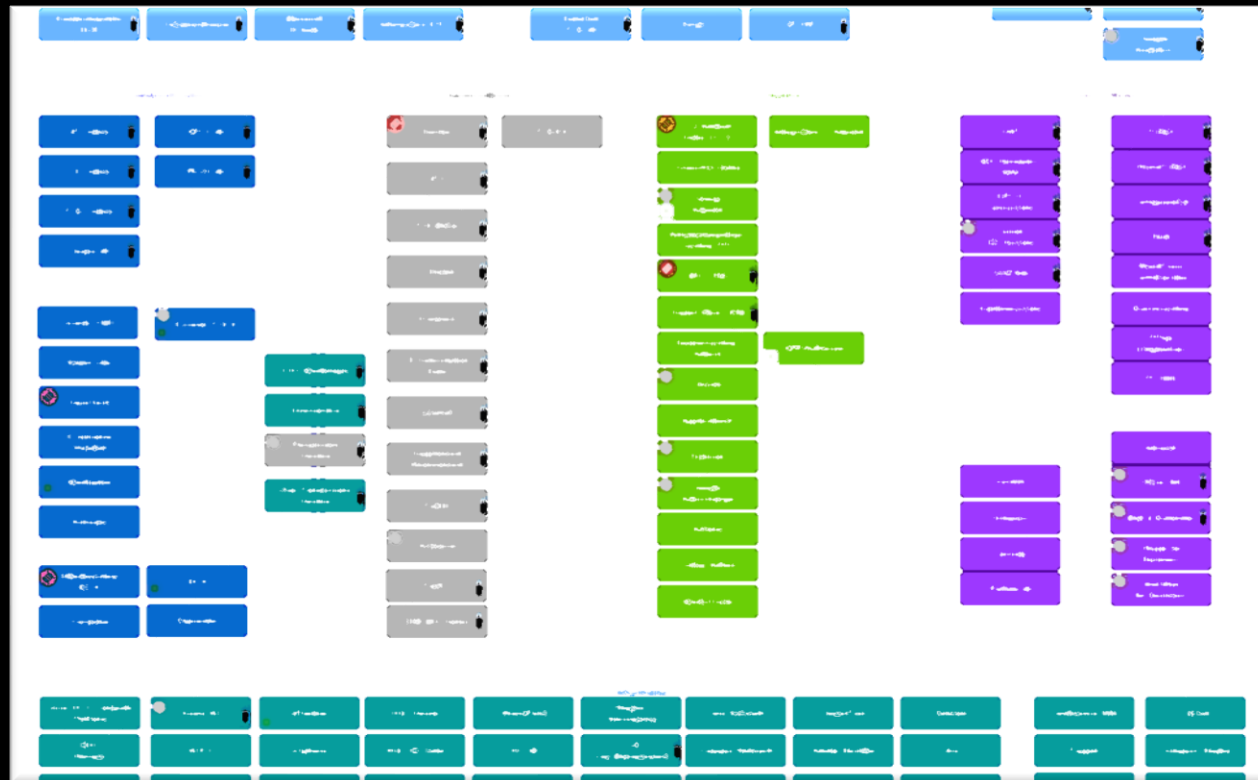
A large pile of unsorted, multi-colored puzzle pieces. The pieces are in various colors including yellow, orange, green, blue, red, and grey. They are scattered and not yet assembled into a picture.

Before GDPR: Decentralized data and system “overview”

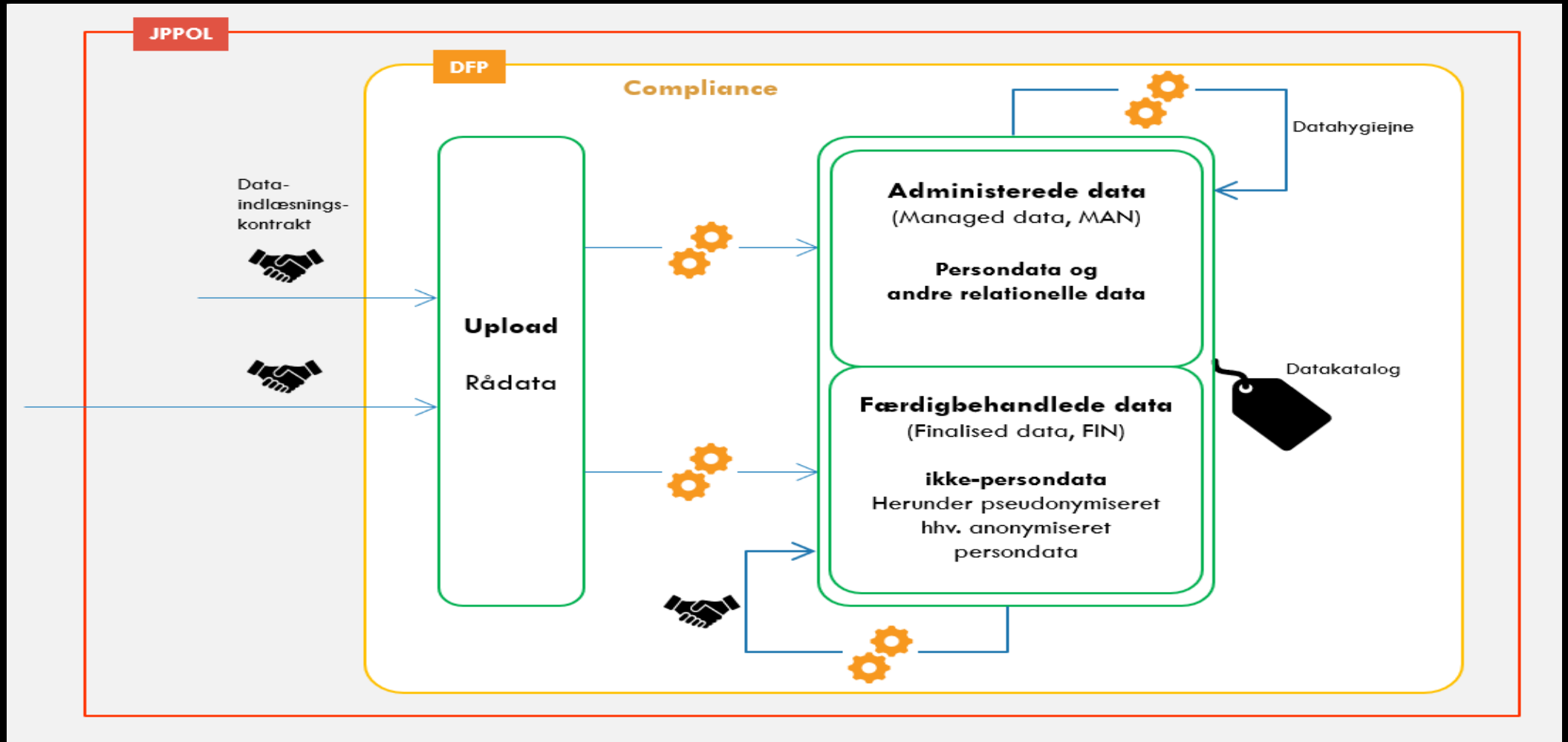
Every business had their own strategy for collecting and processing data

After GDPR

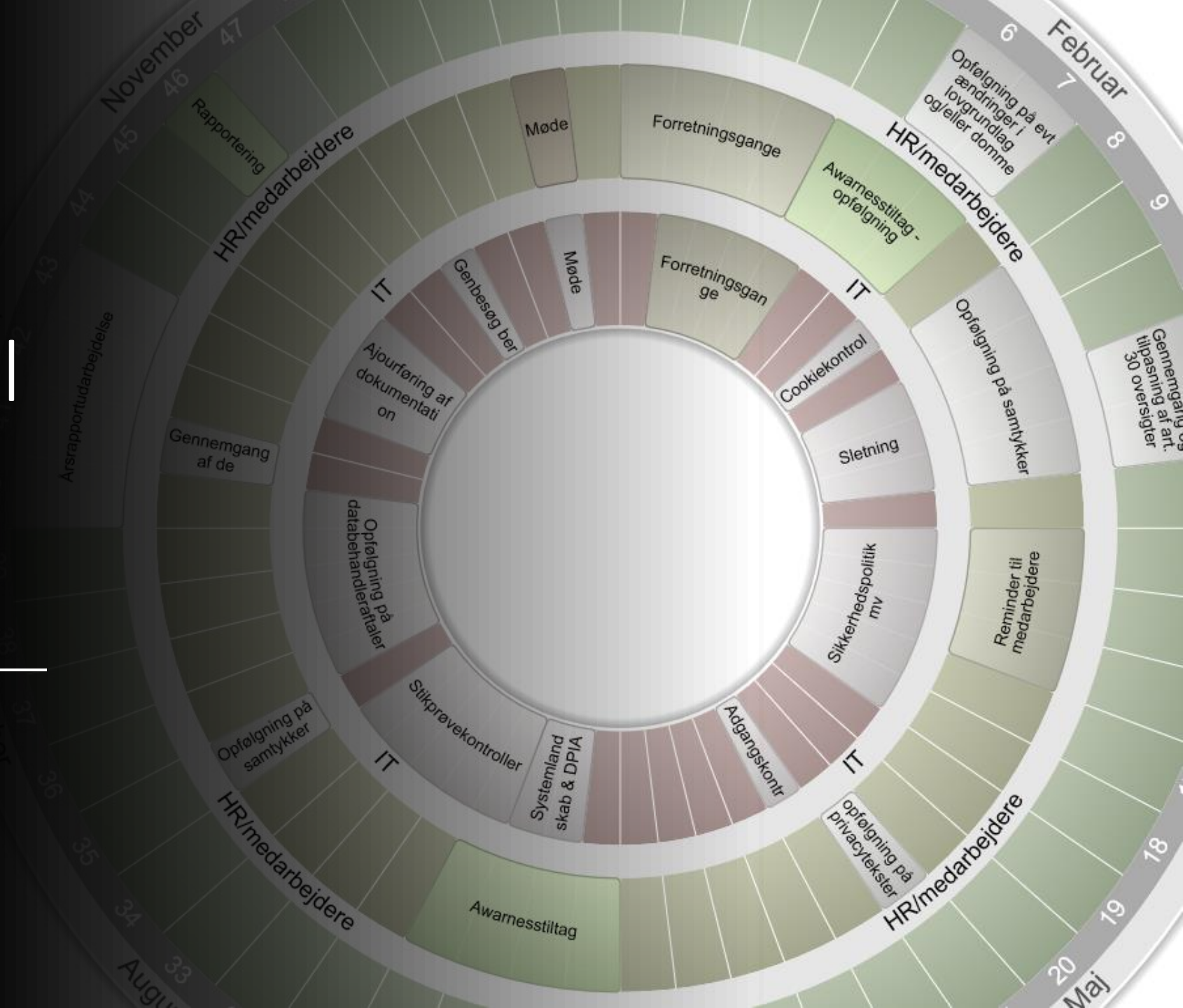
Centralized initiatives and strategies for collecting and processing data.
Centralized system overview



DMP Architecture



Cycle of annual GDPR activities



Phone recordings – Sales and customer relations



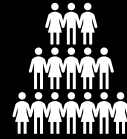
Pre-GDPR: All conversations
were recorded

Now: only employees are
recorded

Ustructured data



Where to start?



A lot of time for each employee



One time scans gets old fast



Next step: Ongoing live scanning of e-mails and files

Central contract management

Decentral contracting

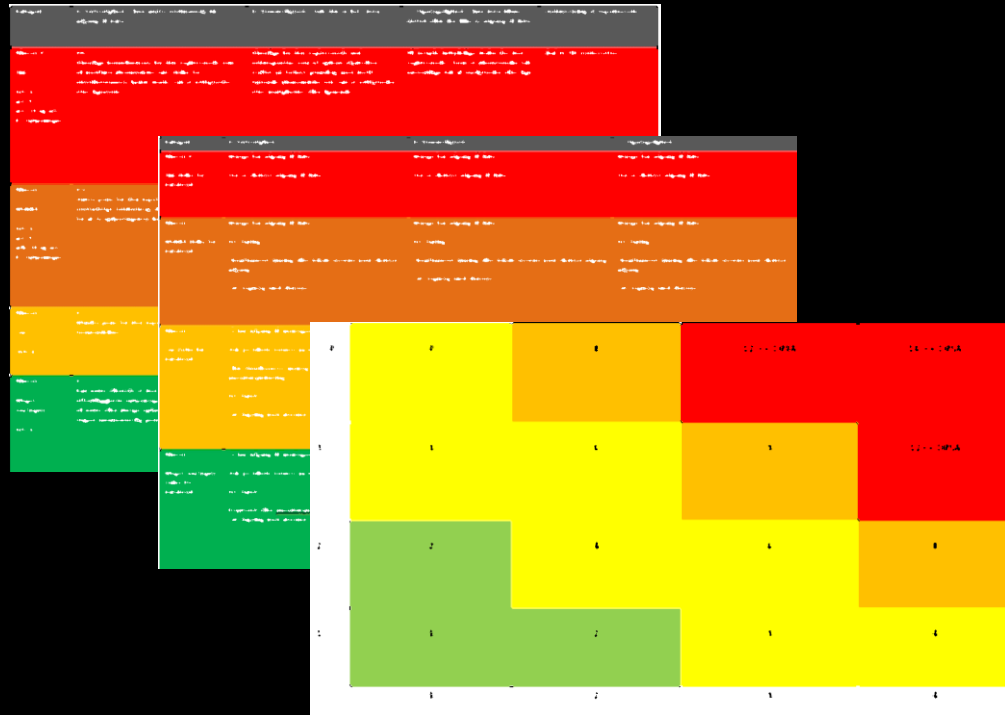


Central contract management

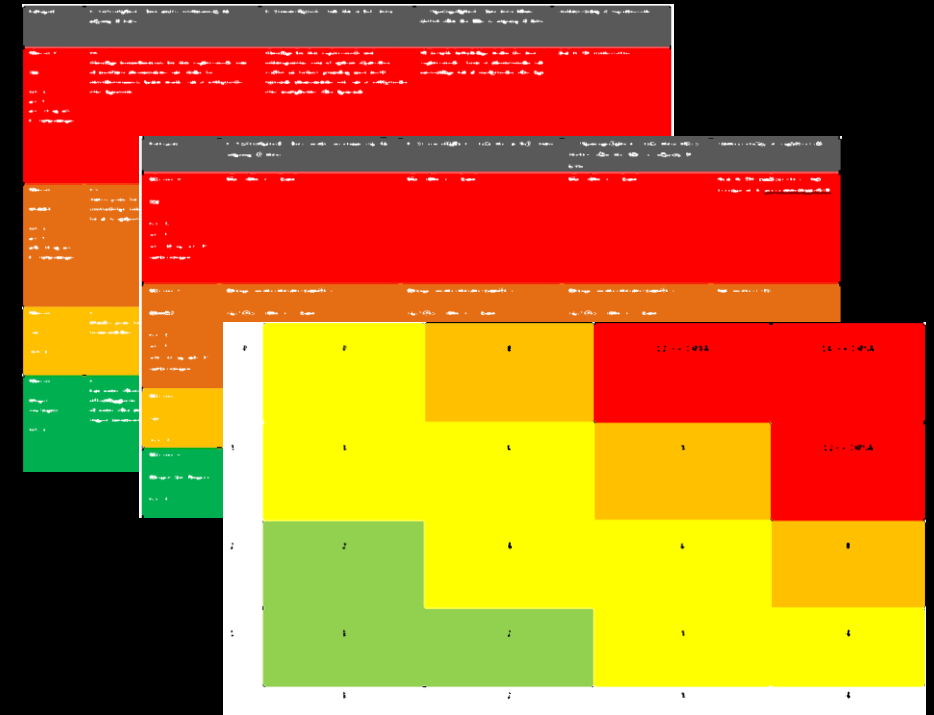


Risk based approach

Risk classification from the registered point of view



Risks for data processing by data processors



New perspectives on risk assessments

1

Previously - and still to some extent- the companies risks was the focus point of risk assessment.

2

GDPR has changed the focus to the registered – at least in GDPR risk assessments.

3

Previous risk assessments must be renewed with a GDPR focus.



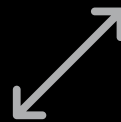


Challenge: Find the right people

Anchoring in the organization



Board members and C-level



Koncern data

A small central unit with knowledge about GDPR, IT and the company

The combination of knowledge makes it easier to consult the company in the right decisions



Privacy accountable from each business unit

The local privacy accountable know their businesses – their processes and their challenges.

Change of mindset vs. project



Support from
management



Business
understanding



Awareness
(Roadshow, E-
learning, Intro
courses)



One of the most important messages
we try to makes is:

Personal data is borrowed data

Carrot and control

- Positive feedback instead of guilt
 - Solution and adjustment of processes
 - Rewards and acknowledgement for pointing out problems
- Inspection does not have to be all bad
 - We have made our inspections in December and it created like a Christmas calendar
 - Rewards to everyone affected



The surprises

- The extent of:
 - Data processing agreements
 - Inspections of data processors
 - Cookie challenges
 - The amount of unstructured data
 - Unknown challenges
- The Danish Data authority's approach
- The world is constantly changing
 - It is therefore necessary to keep the eyes on the ball and get the relevant updates.



The gains

- Improved data quality
- Central contract management
- Collaboration across businesses
- Understanding of each others challenges across
- Understanding the importance of processing data with care
- ...





Questions?



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