

# General Data Protection Regulation (GDPR): A Guide for the Property Industry

## HOW GDPR WILL AFFECT YOU

GDPR gives customers, prospects and employees more control over their personal data. Any business that collects data needs to ensure that explicit consent has been given and that all relevant information is communicated in plain, no nonsense terms. Property Developers must demonstrate compliance from 25 May 2018.

### YOUR BANK BALANCE

Fines of €20m or 4% of global revenue, whichever is greater

### YOUR CLIENTS

Clients' and prospects' new rights to manage data held about them

### YOUR REPUTATION

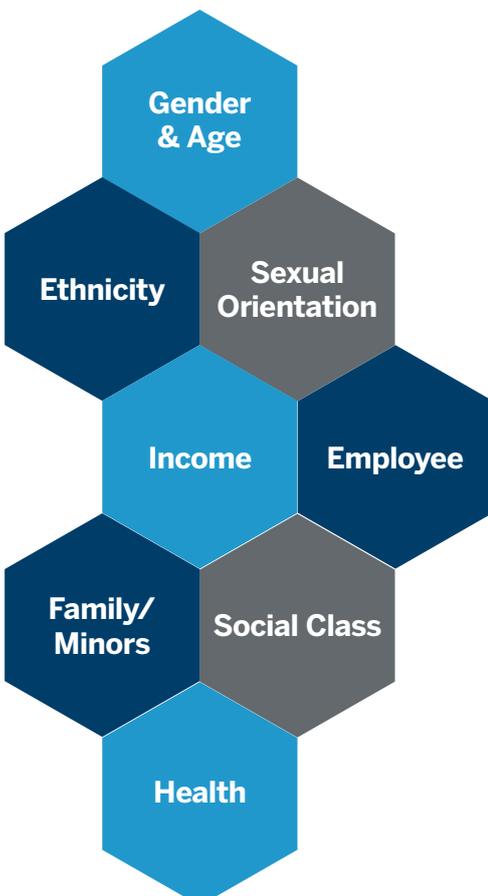
Reputational damage can affect your ability to partner with industry players

### THE REGULATOR

Stricter rules on data on individuals is held, managed and processed

## DID YOU KNOW?

Property Developers and agents hold some of the most sensitive data as characterised under GDPR, including data in the following categories:



## GDPR CHALLENGES FOR THE PROPERTY INDUSTRY

-  High volume of manual processing activity
-  Unstructured data (e.g. from marketing suite negotiators, joint agents and 3rd party agents)
-  Ad hoc filing of data
-  No data request process to fulfil the subject rights requirements
-  No protocols for responding to Data Breaches
-  Culture of collecting all data
-  Little to no third party data accountability
-  Lack of consent for collecting data
-  Lack of consent compatibility with data usage
-  No protocols for responding to data deletion requests
-  No protocols for responding to data portability requests
-  Inter transfer of data both within and external to the organisation

## IMPLICATIONS FOR THE PROPERTY INDUSTRY

GDPR expects that 9 key operational pillars are upheld. Solving your data management issues for each of these operational pillars is key to **avoiding negative impacts**. The chart below indicatively highlights how this change impacts you.

GDPR OPERATIONAL PILLARS	PROBLEM AREAS									IMPACT				
	Manual processing of data	Unstructured data	Ad hoc filing of data	No data request processes	No breach protocols	Over collection of data	No 3rd party data accountability	No consent for collecting data	No consent compatibility	Inadequate data documentation	Clients	Regulator	Market Exposure	Bank Balance
<b>Governance</b>	✓	✓	✓		✓	✓	✓			✓	✓	✓	✓	✓
<b>Accountability and Responsibility</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>3rd Party Liability</b>						✓	✓			✓	✓	✓	✓	✓
<b>Right to Object</b>		✓	✓	✓						✓	✓	✓	✓	✓
<b>Right to be Forgotten</b>		✓	✓	✓						✓	✓	✓	✓	✓
<b>Data Portability</b>	✓	✓	✓	✓		✓				✓	✓	✓	✓	✓
<b>Consent</b>				✓			✓	✓	✓		✓	✓	✓	✓
<b>Breach Notification</b>	✓	✓			✓	✓	✓			✓	✓	✓	✓	✓
<b>Profiling</b>						✓	✓	✓	✓	✓	✓	✓	✓	✓

## HOW WE CAN HELP

Workshops & Training	Programme Management	Maturity Assessment	Technical Audits
BA Support	Stakeholder Alignment	Gap Analysis	Operational Transformation
Comms & Embedding	Data Flow	Interpretation	Organisational Alignment

### Making GDPR work for the Property Industry

**Reputation:** Recognising the unique and politically sensitive role of property developers in society and ensuring that clients maintain a favourable view of established brands

**Governance:** Delivering modern and progressive privacy governance across your national and international networks

**Legacy:** Embedding self sufficient and sustainable practices to maintain compliance beyond May 2018

## THERE ARE 7 THINGS YOU NEED TO DO

<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>
<b>Complete Data Mapping &amp; Inventory</b>	<b>Update/Design the 5 core policies</b>	<b>Implement an Incident Response Plan</b>	<b>Design Procedures for Subject Access Rights</b>	<b>Complete Vendor Assessments</b>	<b>Update your Contracts</b>	<b>Training and Embedding</b>
<ul style="list-style-type: none"> <li>Document all your data</li> <li>Prioritise high risk processes</li> </ul>	<ul style="list-style-type: none"> <li>Privacy Policy, Data protection, info-sec, DPIA, Notice and consent</li> </ul>	<ul style="list-style-type: none"> <li>Plan 72hr data breach notification</li> <li>Define data requiring notification</li> </ul>	<ul style="list-style-type: none"> <li>Plan what requests are reasonable to service</li> <li>Design processes and procedures</li> </ul>	<ul style="list-style-type: none"> <li>Assess the exposure from third parties</li> <li>Restructure relationships</li> </ul>	<ul style="list-style-type: none"> <li>Update employment, client and sub-contractor</li> <li>Restructure relationships</li> </ul>	<ul style="list-style-type: none"> <li>Undertake awareness training</li> <li>Evaluate deep dive training for accountable staff</li> </ul>

## WHY WORK WITH US

### Pragmatic

We undertake a results-orientated approach focused on minimal viable compliance

### Independent

We minimise impact on BAU and leverage our connections to the GDPR community

### Cost-Effective

We implement 1 to 6 week engagements driven by your risk appetite

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### EXPERTS WITH IMPACT

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