

# How can LCP help pension trustees get GDPR ready?



**This note summarises the actions pension trustees may wish to consider taking to achieve compliance and how LCP can help pension trustees prepare for the new EU General Data Protection Regulation (GDPR) coming into force on 25 May 2018.**

The GDPR will increase organisations' data protection obligations. It aims to strengthen and unify data protection for all individuals within the EU and reshape how organisations across Europe process personal data. The GDPR introduces some new requirements which may require trustees to change their existing processes or risk facing tougher sanctions than those under the current Data Protection Act 1998 for non-compliance.



## *How can LCP help you prepare for GDPR compliance?*

We are able to work with you to achieve your requirements. The following are just some of the steps pension trustees should be implementing now, or as soon as possible in advance of 25 May 2018:

### **1. Trustee Training**

It is important that you are aware of the GDPR and the impact it is likely to have. This includes identifying any areas that could cause compliance problems under the GDPR. We can deliver a tailored training session based on your specific needs.

### **2. Data Audit**

The GDPR requires organisations to maintain records of processing activities. You should document what personal data you hold, where it came from and who you share it with. We can help you to carry out an information audit.

### **3. Gap Analysis**

In addition to the data audit we will help you to carry out a gap analysis of your existing data protection provisions against the new GDPR requirements.

### **4. Communicating privacy information**

You may be required to issue a new GDPR compliant privacy notice to all relevant members and beneficiaries. We can help you review your current privacy notice and put a plan in place for making any necessary changes.

### **5. Dealing with Third Parties**

Consider the appropriateness of current third party contracts. Identify who is processing data on your behalf & ask them what they are doing to prepare for GDPR.

### **6. Individuals' rights**

Review current procedures to ensure you cover all the new rights individuals will have under the GDPR, for example the right to be informed, the right of access and the right to restrict processing. Plan how you will handle such requests.

### **7. Lawful basis for processing personal data**

We will help determine and document the basis on which the personal data you hold is processed in order to comply with the GDPR accountability requirements.

### **8. Consent**

We will help you to review how you seek, record and manage consent from members, whether you need to make any changes and refresh existing consents if you do not meet the GDPR standard.

### **9. Data breaches**

The GDPR places a duty on all organisations to report certain types of data breaches. We will review your procedures to ensure you have the right procedures in place to detect, report and investigate a personal data breach.

### **10. Accountability**

Organisations need to consider whether or not you should designate someone to take responsibility for data protection compliance or consider whether you should formally designate a Data Protection Officer (DPO).

This generic note should not be relied upon for detailed advice or taken as an authoritative statement of the law. If you would like any assistance or further information on the contents of this generic note, please contact the partner who normally advises you.

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