

Data Protection Regulation

Data Protection Officers

The Data Protection Regulation introduces the requirement for certain organisations to appoint a Data Protection Officer.

You will be required to appoint a DPO if:

- your organisation is a public authority; or
 - your organisation's core activities require regular and systematic monitoring of individuals on a large scale; or
 - your organisation's core activities involve handling data related to racial/ethnic origin; political/religious/philosophical beliefs; health; sex life; genetic/biometric data on a large scale.
- monitoring implementation of data protection policies
 - monitoring compliance with the Regulation
 - staff training
 - maintaining records as required by the Regulation
 - putting in place data security measures and handling data security incidents
 - supervisory authority liaison
 - contact point for data subjects

If you fall into one of the categories above, you will need to:

- appoint a DPO:
 - consider whether you have one DPO per country or one for the corporate group (which you are entitled to do)
 - select someone with expert knowledge of data protection law and practice
- create a job description for the DPO. This should include:
 - provision of data protection compliance advice
 - raising awareness in the organisation of data protection issues
- create a protocol for working with the DPO including:
 - involvement of DPO in all data protection matters
 - independence of the DPO
 - reporting lines – the DPO must report to the top level of executive management
 - support to be provided to the DPO
 - performance management/dismissal – the DPO cannot be dismissed or disciplined because of the exercise of their duties
 - avoiding conflicts of interest

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