

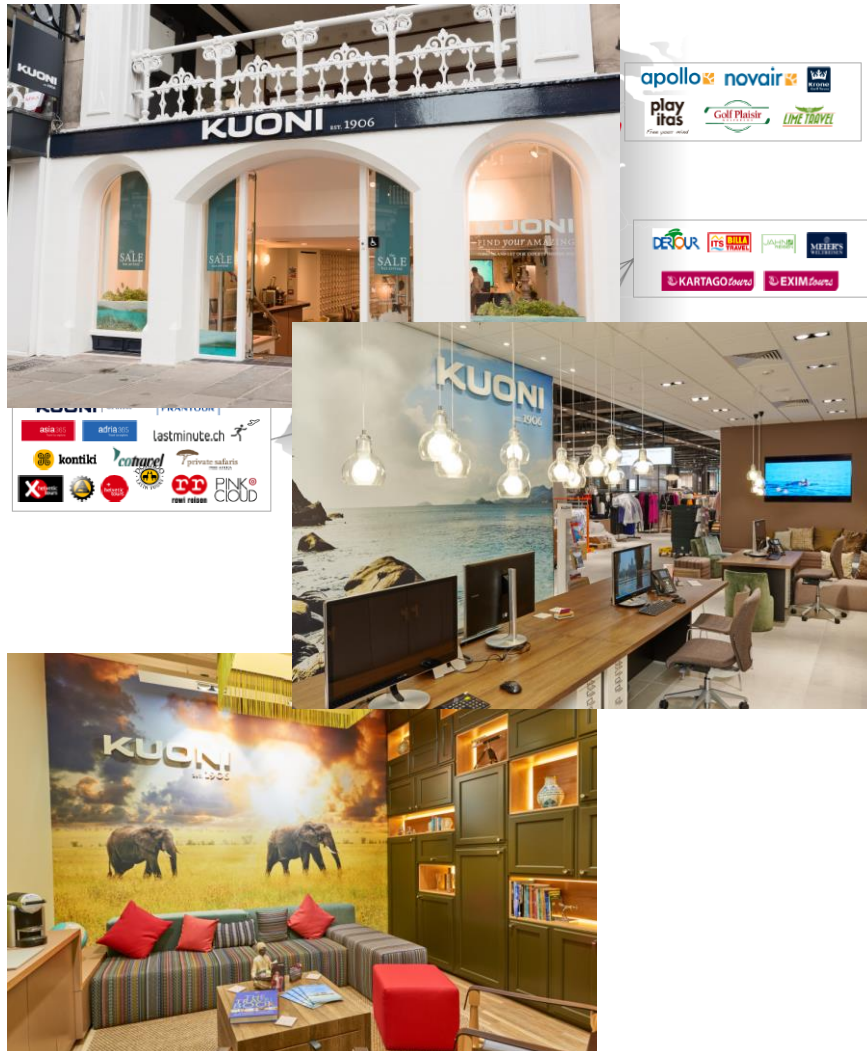


KUONI

Travel Out of the Ordinary

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Kuoni and DER Touristik



KUONI

DER Touristik is Europe's third-largest travel & tourism group

- The travel and tourism segment of REWE Group
- A market leader in Europe
- Representatives in 14 source markets
- 7.0 billion euros in revenue, 7.7 million guests, 9,400 employees

Kuoni

- Tailor-made luxury long-haul holidays
- Market leading service
- Sister companies CV Villas, Kirker, Jules Verne, Carrier
- Distributed through a network of 47 stores and through travel agents handled by a call centre in Dorking

DER
Touristik

GDPR is a change management project



“What if we don’t change at all ...
and something magical just happens?”

- Early communication and sponsorship at the highest level is essential
- Being able to speak with confidence about the topic will help ensure change happens - gather as much information as possible on the subject (web, seminars, industry contacts etc...)
- Since the process is well defined then the resources do not have to be gurus in terms of data protection; someone with attention to detail, able to keep track of who is doing what and with the personality to be able to insist deadlines are met is key
- It'll be frustrating! No-one likes to have to change their policies, processes and ways of doing things

A project means a defined set of tasks that isn't business as usual; this one involves ensuring that processes, systems and attitudes are changed – all take time, don't wait!

Where to start?

2. Checkpoints	
1. Processing for specified, explicit and legitimate purposes (Article 6) Personal data must be only collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data were collected or for which they are further processed.	Level Of Implementation: <input type="checkbox"/> Done <input type="checkbox"/> Not Yet Implemented
2. Processing of special categories of data (Article 8) The processing and recording of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and the processing of data concerning health or sex life is only allowed under certain circumstances. Are there any special categories of data as mentioned processed in your company?	Level Of Implementation: <input type="checkbox"/> Yes <input type="checkbox"/> No
3. The Data Subject's Rights (Article 12-14) Every data subject has the right to obtain from the controller: <ul style="list-style-type: none">- Right of access- Right to object- Right to have inaccuracies corrected,- Right to have information erased Are there any implemented procedures according to this rights?	Level Of Implementation: <input type="checkbox"/> Done <input type="checkbox"/> Not Yet Implemented

- Review of ICO site is a good place to start
- We reviewed their recommendations
- We have started to identify any gaps in our current process
- We are working with key members of the business teams to decide how to prioritise the order of updating processes that need to change

Keep in mind the key dates, start early and plan in contingency

Shout about it ... in as many different ways as possible



DER Touristik Group Departments My workplace Locations Marketplace ? (help) - Notfall

[\(UK\) IT](#) > [IT Home Page](#)

General Data Protection Regulation (GDPR)

Created by [Taylor, Steve](#), last modified on [May 24, 2017](#)

What is the GDPR?

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Court of Justice of the European Union, and the Council of the European Union unify data protection for all individuals within the European Union (EU).

Currently, the UK relies on the Data Protection Act 1998, which was enacted following the 1995 EU Data Protection Directive, but this v

- We are making sure ALL staff are informed
- We have updated our Intranet
- Progress is discussed at UK Board meetings and International Business Review meetings
- We update staff regularly and share progress

**It is important to continually remind staff of their role in compliance
– it isn't just the IT department's responsibility**

Know your data ...

Salutation	First Name	Surname	Postal Address	Post Code	E-Mail Address
N	N	Y	Y	Y	N
N	Y	Y	N	N	Y
N	Y	Y	Y	Y	Y
N	Y	Y	Y	Y	Y
N	N	N	N	N	N
Y	Y	Y	Y	Y	Y
					Y
	N		Y	Y	N

- Performed an information audit; what personal data is stored and in what application
- Identified Application owners
- Logged personal identifiable data types in conjunction with application owners
- Defined the data input / output of the applications

Keeping track of where data is stored and how it interacts is vital






Not just us ...



- We have started engaging with our suppliers
- It is our responsibility to ensure they are aware of GDPR
- We need to review their roles; data controllers, data processors or both?
- Beyond the EU. Is your data in the cloud? Do you know where your data is...

Be aware of the whole data chain

Our top 5 'be aware' topics ...

	Updating privacy policies on the website, ensuring they are clear, concise and consent functions are thoroughly tested
	Subject Access Request process documented and all staff trained to understand what this is and what to do
	Right to be forgotten and how to ensure this is auditable, especially if this includes 3 rd parties
	Subject Access Rectification and Portability , under which an individual has the right to have inaccuracies updated and have the data in a format that can be passed on, must be actioned within one month
	Children are identified as 'vulnerable individuals' so requires specific protection, make sure capture of this data is justified and well documented

Data protection by design

- For developed or purchased applications we now factor in how data can be classified and tracked
- Introduced use of the Privacy Impact Assessment Templates to identify data that is in scope . Will use the PIAs to show compliance later on
- Assisting our third party developers in their compliance
- Resources to help with this include Information Commissioners Office (<https://ico.org.uk/>) and Bird & Bird (<https://www.twobirds.com/>)

Adding steps to compliance at the beginning of the process will be far easier than retrofitting later

Boring & unproductive work but ...



A council has been fined £150,000 for publishing sensitive personal

- Create a detailed checklist
- Be relentless in discussing the topic so that everyone starts to think about data protection
- Plan early and build in contingency
- Keep track of where data is stored and how it is used
- Be aware of the whole data chain, talk to your suppliers
- Update your privacy policies and ensure all staff know what is expected of them
- Consider data compliance implications when creating new systems and processes

Thank you for listening

