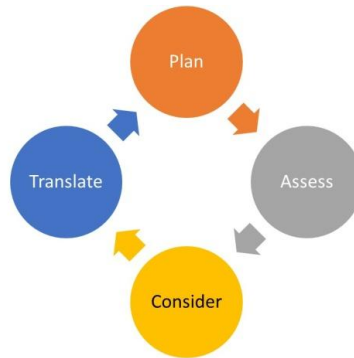


I ACT-Africa EU GDPR “PACT” Compliance Methodology v1.0

Dr Peter Tobin & Mr John Cato have developed a European Union General Data Protection Regulation (EU GDPR) “PACT” Compliance Methodology which is used to structure client projects. This methodology is based on experience gained during privacy compliance projects with past clients as well as international best practices. An integral part of the EU GDPR PACT Compliance Methodology is the involvement of the client at every step of the project. This means that the client must agree to commit the necessary resources to fulfil their obligations in terms of project tasks allocated to the client.



Step 1: Plan

- Set yourself up for success by formalising your compliance activities
- Establish a compliance preparation project
- Ensure you have proper authorisation and funding: we recommend a project charter is drawn up and approved by the project sponsor
- Update and sign the Project Charter
- Update and sign the Data Protection Officer and Deputy Officer appointment letters
- Develop a preliminary plan of action
- Ensure you identify and engage your stakeholders

Step 2: Assess

- Develop a solid business case based on impact area identification, costs and benefits of your compliance preparation project (optional)
- Complete a structured compliance assessment in terms of the requirements in the GDPR
- Use the Compliance Assessment Tools to discover areas for remediation to address the requirements of the GDPR; this can include up to 17 assessments and hundreds of assessment questions depending on what is reasonable and appropriate
- Document the assessments completed

Step 3: Consider

- In light of the Step 2 assessments, consider the areas that require remedial action to achieve an acceptable level of risk in terms of achieving compliance
- Consider what process, procedural, documentation, technical and contractual changes need to be made
- Consider the entire Personal Information (PI) life cycle from acquisition through ultimate disposal
- Consider all the organizational and technical factors for success (e.g. HR, IT, processes)
- Obtain approval for a plan to achieve the required level of compliance

Step 4: Translate

- Translate your plans into action, with clearly defined objectives and milestones to achievement
- Translate the conditions for lawful processing into specific evidence of your remediation plan taking effect
- Translate your short term compliance preparation project into a long term compliance commitment
- Translate the cost of compliance into the benefits of compliance