### Outline GDPR Project Plan by Sue Milton

<table>
<thead>
<tr>
<th>MONTH</th>
<th>FOCUS</th>
<th>ACTIONS</th>
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</table>
| **December’18** | • Data Mapping  
• Benchmarking  
• GDPR requirements  
• Training | • Data mapping:  
  • In-house  
  • Cloud storage  
  • Other 3rd parties  
  • Contracts supporting storage and access arrangements  
**Benchmark compliance with the DPA 1998 if in the UK or equivalents in other EU jurisdictions:**  
  • Access rights  
  • Rights, roles and responsibilities of the data subject and the data controller  
  • Data subject searches.  
  • Data privacy, security and retention  
**Comprehend GDPR requirements:**  
  • Legal opinion  
  • GDPR and EU28 variations  
  • White listing  
  • Appoint the data controller  
  • Contact the relevant supervisory authorities  
**Training:**  
  • Design  
  • Board  
  • Identify key roles that process EU nationals’ data |
| **January’18** | • Process and Systems  
• Training | • Recap on:  
  • Progress  
  • GDPR updates and national interpretations  
  • Supply chain and 3rd party developments  
**Business process and IT systems review:**  
  • What is in and outside of GDPR scope  
  • Where and when EU nationals’ data is accessed, processed and stored  
  • IT infrastructure  
  • Creating and managing alerts  
  • Data subject searches  
  • Data subject erase  
**Design business process and IT system changes:**  
  • Document requirements and solutions  
  • Include security and privacy  
  • Create test plan on ‘use case’ and ‘misuse’ case  
  • Review and refine housekeeping tasks  
**Training:**  
  • Refine design  
  • Key roles |
| **February’18** | • Testing  
• Quality assurance  
• Training | • Recap on:  
  • Progress  
  • GDPR updates and national interpretations  
  • Supply chain and 3rd party developments  
  • Internal understanding  
**Implementation**  
  • Changes  
  • Documentation  
  • Quality assurance  
**Testing:**  
  • Test  
  • Check results  
  • Deal with errors  
  • Manage and resolve queries  
  • Refine test plan  
  • Create a Regression Pack  
**Training:**  
  • Refine design  
  • Staff and management roles |
| **March’18** | • Communications  
• Breach management | • Recap on:  
  • Progress  
  • Updates in GDPR and national interpretations  
  • Supply chain and 3rd party developments  
  • Internal understanding  
**Design:**  
  • Communications processes  
  • Breach management  
**Implementation:**  
  • Communications  
  • Breach management  
**Testing:**  
  • As for February  
  • Start business process tests |
| **April’18** | • Communications  
• Crisis management  
• Cutover | • Recap on:  
  • Progress  
  • GDPR updates and national interpretations  
  • Supply chain and 3rd party developments  
  • Internal understanding  
**Design:**  
  • Crisis management approach  
  • Cutover  
**Implementation:**  
  • Communications  
  • Breach and crisis management  
  • Housekeeping tasks  
  • Cutover  
**Test:**  
  • Communications  
  • Breach management  
  • Crisis management  
  • Cutover |
| **May’18** | • Cutover | • Final actions:  
  • Cutover  
  • Review  
  • Project sign-off  
  • Ongoing monitoring and looking ahead |