



GIBRALTAR REGULATORY  
AUTHORITY

## OUR AIM

*The Information Commissioner (the "Commissioner") launched a programme for the organisation of periodic data protection workshops for Data Protection Officers (DPOs) in Gibraltar, as part of his efforts to promote awareness and provide assistance to data controllers in relation to their data protection obligations.*

*The workshops present DPOs with an opportunity to broaden their understanding of data protection law. The workshops are also an opportunity for the Commissioner's office to get an insight into the issues/challenges faced by data controllers and DPOs.*

*The workshops also aim to be a platform that promotes discussion and facilitates collaboration between DPOs.*

## CONTACT

PHONE:  
+350 200 74636

WEBSITE:  
[www.gra.gi/dataprotection](http://www.gra.gi/dataprotection)

EMAIL:  
[dpoworkshops@gra.gi](mailto:dpoworkshops@gra.gi)

# DPO WORKSHOP

## Q1 2019

19<sup>th</sup> and 20<sup>th</sup> March 2019  
Gibraltar Regulatory Authority

## AGENDA

|               |  |
|---------------|--|
| 09:10 – 09:20 | Arrivals/reception                             |
| 09:20 – 09:30 | Information Commissioner's opening remarks     |
| 09:30 – 10:15 | Part 1 – Introduction & Getting Started (GDPR) |
| 10:15 – 11:00 | Part 2 – The Data Protection Officer           |
| 11:00 – 11:30 | Mid-morning break                              |
| 11:30 – 12:15 | Part 3 – Resources and Guidance                |
| 12:15 – 13:00 | Part 4 – International Transfers and Brexit    |
| 13:00 – 13:30 | Part 5 – Question and Answer session           |

## SUMMARY

For each Part of the workshop, a presentation was delivered using guidance issued by the Commissioner's office, the relevant provisions in law and information about data protection incidents investigated by the Commissioner's office to date. The guidance notes referred to during the event were the following –

- [GDPR Guidance Note on Getting Started](#)
- [GDPR Guidance Note on Data Protection Officers](#)
- [GDPR Guidance Note for SMEs](#)
- [GDPR Guidance Note on Identifying the Lawful Basis](#)
- [GDPR Guidance Note on Getting ready for Brexit](#)
- [GDPR Guidance Note on International Transfers](#)

The presentations included group exercises and case studies leading to group discussions on data protection issues, their resolution and best practice.

The following are some examples of details and/or issues discussed:

- **Getting started**
  - Taking into account the "bigger picture" to understand the need and value of data protection (e.g. the importance of understanding the data protection risks of technology to individuals, the digital economy and democracy and freedoms).
  - Adopting a risk-based approach and prioritising higher risk data processing activities.

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- **The role and responsibilities of the DPO**
  - The scenarios in which a DPO must be appointed and the requirements associated with the role.
  - The flexibility provided by the GDPR regarding the appointment of the DPO and related resources.
- **Storage limitation (Article 5(1)(e) of the GDPR)**
  - Adopting retention policies that are suitable for international organisations that are subject to different legal data retention requirements depending on the jurisdiction.
- **Guidance and resources**
  - The creation and maintenance of a “data inventory” and a documented data protection policy as measures that will help maintain and demonstrate compliance.
- **International transfers and Brexit**
  - In the event of a “no-deal” Brexit –
    - the GDPR would be absorbed into Gibraltar law; and
    - in most cases standard contract clauses could be the most useful tool for organisations to maintain data flows in to Gibraltar from the EEA.

## SUBSCRIPTION

Our quarterly e-newsletters aim to provide subscribers with news, updates, developments and additions to our website in relation to data protection matters and our work as the statutory body responsible for the enforcement of current data protection laws.

To subscribe, please visit our website: <https://www.gra.gi/subscribe>

## DPO WORKSHOPS

Email [dpoworkshops@gra.gi](mailto:dpoworkshops@gra.gi) if you are a DPO and would like to attend the GRA’s workshops for DPOs.

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## ATTENDEES

| Name                    | Organisation                             |
|-------------------------|--|
| Ivan Perez              | Abacus Financial Services Ltd            |
| Briseida Ayala-McCarthy | Addison Global Ltd                       |
| Abigail Carroll         | Bank J. Safra Sarasin (Gibraltar) Ltd    |
| ---                     | Bank J. Safra Sarasin (Gibraltar) Ltd    |
| Mark Rogers             | Bassadone Automotive Group               |
| Nicholas Macias         | Brinsop Ltd                              |
|                         | Castiel Winser Financial Consultants Ltd |
| Michelle Garcia         | Castiel Winser Financial Consultants Ltd |
| Gabriela Roulin         | Your Data Compliance                     |
| ---                     | Deloitte LLP                             |
| Gerard Fitzgerald       | Deloitte Ltd                             |
| ---                     | EY Limited                               |
| ---                     | Gibdock Limited                          |
| Alfred Pizarro          | Gibraltar Electricity Authority          |
| ---                     | Gibraltar Electricity Authority          |
| Mark Dellipiani         | Gibraltar International Bank             |
| Dwayne Lara             | Gibtelecom                               |
| Rachel Holgado          | Gibtelecom                               |
| ---                     | Greentube (Gibraltar) Ltd                |
| ---                     | GVC Group                                |
| Ciara Lally             | GVC Holdings                             |
| ---                     | Herold Mediatel Ltd                      |
| ---                     | HFFT Group                               |
| ---                     | Ibex Insurance Services Ltd              |
| ---                     | IDT Financial Services Ltd               |
| Amanda Moore            | Inline Framing Construction              |
| Michael Adamberry       | Isolas LLP                               |
| Anna Niewiadomska       | Kindred Group                            |
| Mark Hook               | Land Property Services                   |
| Alfred Brittenden       | Land Property Services                   |
| ---                     | Logistable Ltd                           |
| Jonathan Cabedo         | Lottoland Group                          |
| Steffen Latussek        | Playtech                                 |
| Faisal Dar              | Playtech                                 |
| ---                     | RBS International                        |
| ---                     | Red Sands Insurance Company (Europe) Ltd |
| Jimmy Imossi            | Sapphire Networks                        |
| ---                     | Sharrock Shand                           |
| ---                     | Sharrock Shand                           |
| ---                     | Taurus Insurance Services Ltd            |
| Sarah Cooper            | Transact Payments Ltd                    |
| ---                     | Transact Payments Ltd                    |
| Tyrone Vinet            | Turicum Private Bank                     |
| Caroline Moss Gibbons   | University of Gibraltar                  |
| Krystle Robba           | University of Gibraltar                  |
| ---                     | WN Morrisons Supermarkets plc            |
| ---                     | Xcel Media Ltd                           |

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*Note: only the names of attendees that consented to their name being incorporated in this public record are included.*