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# DPO WORKSHOP (R2)

Date: 30<sup>th</sup> September 2019

Venue: University of Gibraltar

## OUR AIM

*Earlier this year, the Information Commissioner (the "Commissioner") initiated 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

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## AGENDA

09:00 – 09:15	Arrivals/reception
09:15 – 09:30	Opening remarks
09:30 – 10:45	Part 1 – The Right of Access
10:45 – 11:00	Mid-morning break
11:00 – 12:15	Part 2 – Personal Data Breach Notifications
12:15 – 13:15	Lunch & Networking Opportunity
13:15 – 14:30	Part 3 – Data Security
14:30 – 15:45	Part 4 – Data Protection Impact Assessments
15:45 – 16:00	Mid-afternoon break
16:00 – 16:30	Part 5 – Regulatory Collaboration
16:30 – 17:00	Question & Answer Session

## SUMMARY

The workshop aims to assist collaboration and the sharing of knowledge and experience. Beyond presentations and/or other activities prepared and delivered by the Commissioner's office, the Commissioner deemed it would be useful and of great value, to also have presentations and/or other activities delivered/led by participating DPOs/practitioners. In this workshop, four DPOs/practitioners led discussions/content in relation to selected areas. The DPOs/practitioners were –

Michael Adamberry, Isolais LLP  
Graham McKay, Deloitte LLP  
Ainhoa Gonzalez, GVC Group  
Tyrone Vinet, Turicum Private Bank (content prepared by Tyrone Vinet with brief delivery by GRA)

Each session 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:

- **Part 1 - The Right of Access**

*Delivered by Michael Adamberry, Isolais LLP*

- An energetic and informative delivery, summarising the basics regarding the handling of Subject Access Requests (SARs).
- Participants were walked through the SAR process giving consideration to the redacting of information pertaining to third parties and the appropriate use and application of exemptions.

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- Practical guidance was provided throughout, highlighting the importance of identifying SARs, establishing the appropriate processes within the organisation to effectively deal with SARs and understanding the implications of not fulfilling the requirements of a SAR from a data protection perspective.

- **Part 2 – Personal Data Breach Notifications**

*Jointly presented by Graham McKay (Deloitte LLP) & Ainhoa Gonzalez (GVC Group)*

- Both provided a balanced insight into the types of data breaches different organisations face, including breaches caused as a result of human error to the threats posed by large-scale credential stuffing attacks.
- The importance of implementing appropriate organisational and technical security measures was discussed, with the advances and ingenuity of the online world highlighted as an opportunity, but one where security risks exist and must be protected against.
- Practical guidance was provided on how to handle and contain data breaches, when to notify the Commissioner and what approach to take when assessing the severity of said breaches.

- **Part 3 – Data Security**

*Delivered by Ainhoa Gonzalez (GVC Group)*

- A topic which was broken down into two main themes. The first laying emphasis on the importance of understanding the security risks to your everyday business, and thereafter, the need to perform data risk assessments and implementing appropriate security measures.
- A series of case studies were examined, focussing on the security risks triggered by phishing emails, password attacks and the unauthorised transmission of data.

- **Part 4 – Data Protection Impact Assessments**

*Delivered by Graham McKay (Deloitte LLP)*

- A detailed and useful explanation on when to use and how to incorporate data protection impact assessments (“DPIA”) into the work stream was provided, including a description of how the DPO may be implicated in such processes.
- The topic gave rise to discussion about the definition of high risk processing engaging participants to provide their organisation’s interpretation of this.
- A sample DPIA was shown and further discussed shedding light on the concerns around high-risk processing, how to triage and ultimately mitigate these risks whilst complying with data protection legislation.

- **Part 5 – Regulatory Collaboration**

*Content prepared by Tyrone Vinet (Turicum Private Bank) with brief delivery by the GRA*

- The objective of this Part was to promote regulatory collaboration, underlining the elements of approachability, mutual assistance and cooperation with the supervisory authority.

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- An example of regulatory collaboration involving the Gibraltar Bankers Association was briefly discussed, in regard to preparing guidance documents targeting specific topics faced by the banking sector – a working relationship which proved useful to those involved.
- The Commissioner's office subsequently invited participants to engage and work together, as a collective determined by their business sector, to identify areas of concern which our office could further explore and provide assistance with.

## 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.

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## DPO WORKSHOPS

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

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## ATTENDEES

<b>Name</b>	<b>Organisation</b>
Paul Miles	Acquarius Trust Group
Briseida Ayala-McCarthy	Addison Global Ltd
Mark Rogers	Bassadone Automotive Group
Lourdes Ghio	Bassadone Automotive Group
Gayle Grech	Bassadone Automotive Group
Sharon Crippin	Betfred
Nigel Unsworth	Bland Group
Michael Etheridge	Collingwood Insurance Company Ltd
Gabriela Roulin	Your Data Compliance
Graham McKay	Deloitte LLP
Gerard Fitzgerald	Deloitte Ltd
Nathan Payas	EY Limited
Anna Bailey	Gibdock Limited
Alfred Pizarro	Gibraltar Electricity Authority
Gillaine Davis	Gibraltar Electricity Authority
James Edge	Gibraltar Electricity Authority
Kayleigh Hollins	Gibraltar Electricity Authority
Mark Dellipiani	Gibraltar International Bank
Dwayne Lara	Gibtelecom
Florian Linzer	Greentube (Gibraltar) Ltd
Christina Kotar	Greentube (Gibraltar) Ltd
Ainhoa Gonzalez	GVC Group
Beth Brooker	GVC Group
Karen Griffin	HFFT Group
Steve Phillips	IDT Financial Services Ltd
Gareth Williams	IDT Financial Services Ltd
Michael Adamberry	Isolas LLP
Anna Niewiadomska	Kindred Group
Jimmy Imossi	Sapphire Networks
Tyrone Vinet	Turicum Private Bank
Krystle Robba	University of Gibraltar
Paul Bowling	University of Gibraltar
Caroline Moss-Gibbons	University of Gibraltar
Shaied Mohammed	William Hill

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