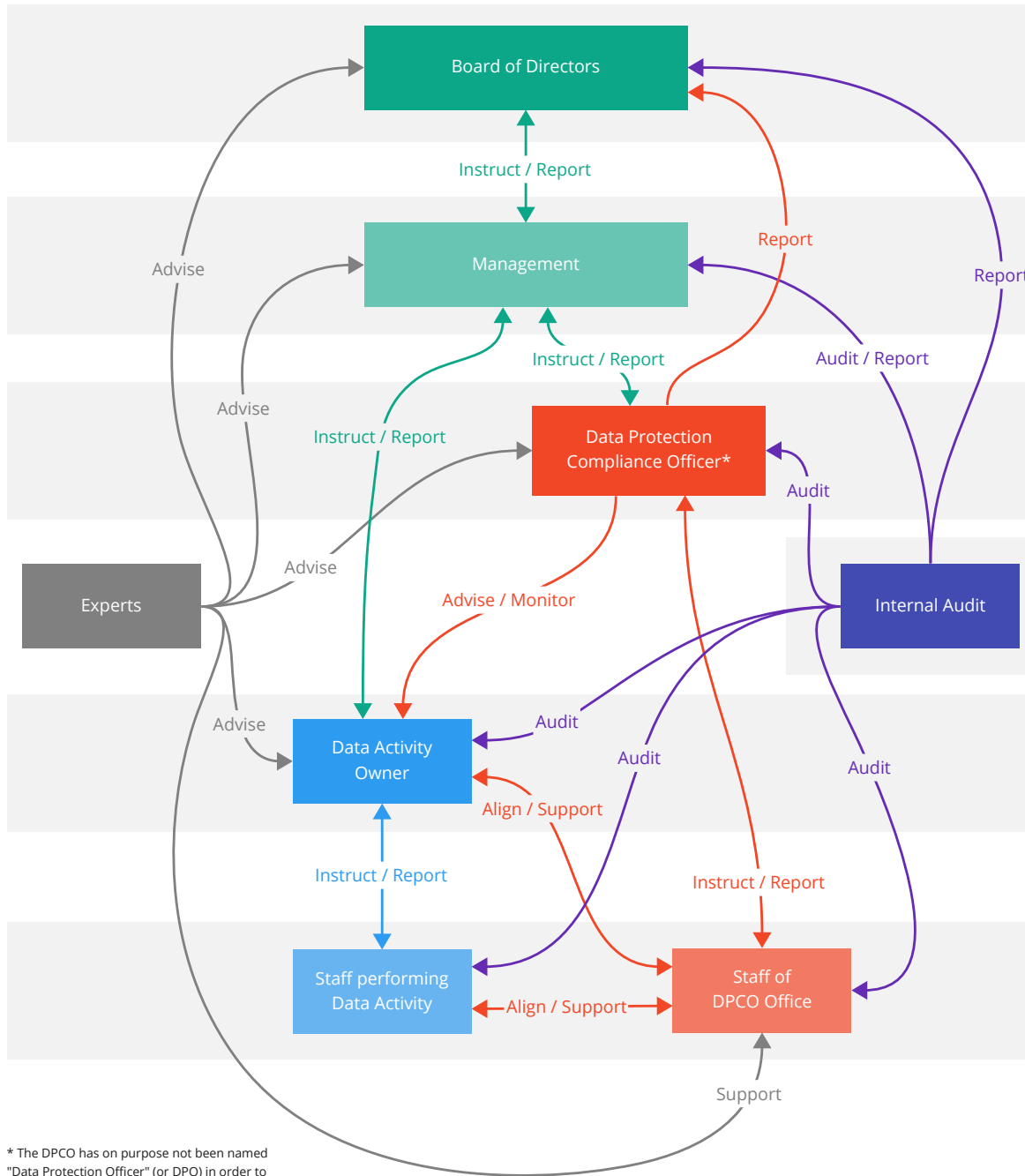


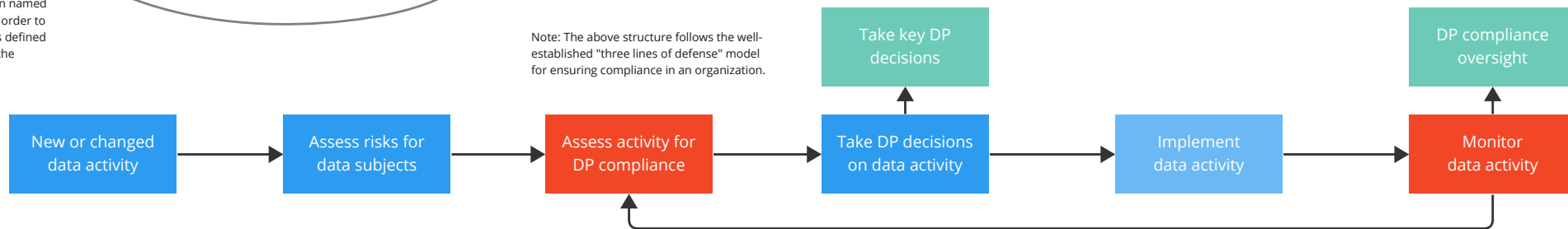
Model Data Protection Compliance Organization



* The DPCO has on purpose not been named "Data Protection Officer" (or DPO) in order to avoid confusion with the DPO role as defined by data protection laws; in practice, the DPCO will often also be the DPO.

Note: The above structure follows the well-established "three lines of defense" model for ensuring compliance in an organization.

Key process for ensuring DP compliance:



Implement	Decide and advise	Oversee and monitor	Understand
<ul style="list-style-type: none"> Appoint management with DP awareness and knowledge 	<ul style="list-style-type: none"> Require management to set up a DP compliance program and structure Decide on DP strategy 	<ul style="list-style-type: none"> Request reports from management, DPCO and audit Act upon reports 	<ul style="list-style-type: none"> Understand basic DP requirements Understand relevance and risks for company
<ul style="list-style-type: none"> Compliance program and structure Appoint capable staff Reporting 	<ul style="list-style-type: none"> Decide DP policy (rules, roles, procedures) Provide resources Decide key DP issues 	<ul style="list-style-type: none"> Request reports from staff, DPCO and audit Act upon reports Take key decisions 	<ul style="list-style-type: none"> Understand basic DP requirements Understand relevance and risks for company
<ul style="list-style-type: none"> Compliance program, including monitoring Reporting Appoint capable staff 	<ul style="list-style-type: none"> Advise Data Activity Owner on DP compliance Decide on own tasks Instruct own staff 	<ul style="list-style-type: none"> Monitor DP compliance efforts and report them Request staff reports Act upon reports 	<ul style="list-style-type: none"> Understand DP requirements in detail Understand relevance, risks and activities
<ul style="list-style-type: none"> Audit program for DP compliance Reporting 		<ul style="list-style-type: none"> Monitor DP compliance efforts and report them 	<ul style="list-style-type: none"> Understand DP requirements in detail Understand relevance, risks and activities
<ul style="list-style-type: none"> Appoint capable staff Reporting 	<ul style="list-style-type: none"> Decide DP issues Ensure DP compliance Provide resources Instruct own staff 	<ul style="list-style-type: none"> Request staff reports Act upon reports 	<ul style="list-style-type: none"> Understand own DP obligations in detail Understand relevance, risks and activities
<ul style="list-style-type: none"> Execute instructions Report on execution Align and support others 			<ul style="list-style-type: none"> Understand own DP obligations