

International Data Protection and Data Privacy Governance

GDPR and UK GDPR are often regarded as setting the gold standard for organisations in relation to data protection and the proper handling of personal data, but many countries are now following suit. This means that organisations need to align their personal data governance across multiple jurisdictions.

We've been involved in several international projects to set up global programmes relating to data governance.

We've advised a global manufacturer on its GDPR readiness programme across its Eurasia region. We were appointed as specialist data protection lawyers from a UK perspective and as the legal project manager for the project. We coordinated regional legal specialists from a Magic Circle firm in Poland, France and Russia, as well as IT security specialists from Belgium.

The initial work involved three phases:

- 1. Full data audit onsite at multiple Eurasia companies, which produced a final multi-jurisdictional report on the risks and recommendations and a plan for the next phase of the GDPR readiness programme
- 2. Acting as legal project manager for the Eurasia region, focusing on drafting data protection policies, procedures, privacy notices and compiling the personal data inventories for all the Eurasia companies. The majority of the GDPR documentation was drafted either at a Eurasia or Group company level, so we coordinated the different regions to ensure that documentation incorporated and complied with requirements and applicable laws of the different jurisdictions
- 3. Following the success of the Eurasia project, we were asked to advise on the GDPR readiness programmes for the US parent company and several other group companies outside of the Eurasia region, which were caught by the extra-territorial effect of GDPR. For the group companies outside of the EU we've undertaken data audits and assisted with the drafting of personal data inventories and drafting of GDPR policies, procedures and privacy notices.



I Following the implementation phase we continued to advise on an ad hoc basis, including in relation to the complex issue of intra-group data sharing and export.

n addition, we're currently on the lead team advising on a 22-country data privacy compliance programme.

This involves revisiting and updating the existing GDPR compliance programme and aligning it (where possible) with emerging data privacy requirements in other jurisdictions such as China. This required a detailed gap analysis in all countries to identify the priorities, review policy documentation, privacy notices and vendor procurement.

A key topic for any data governance programme is to ensure that any personal data that's shared, is shared in a compliant and appropriate way to meet the requirements of the organisation and the rights of the individuals affected. This is a hot topic in many countries (and their regulators and courts) and can impact on the timelines and costs of global procurement. We've established a procurement process and standard documentation (where possible) to deal with the complex issues of data sharing and export.



Joanne Bone Partner

- +44 (0)7710 883 924
- joanne.bone@irwinmitchell.com

"You clearly are experts in this fast moving and new area of law – and in addition to a very heavy workload from us and others, you take the time to make sure you have the most up to date insights as they are being developed."

The Eurasia General Counsel