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DSCI - Deloitte GDPR Preparedness Survey Report

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Data Security Council of India (DSCI) and Deloitte Touche Tohmatsu India LLP (DTTILLP, or Deloitte) jointly conducted a survey to study the preparedness of organizations based in India with the requirements mandated by the European Union's (EU) General Data Protection Regulation (GDPR).

The objective of this survey was to gauge the GDPR readiness process and the overall alignment towards privacy of Indian organizations. The results of the survey indicate that organisations are pursuing a wide range of readiness approaches, driven by the combination of:



Early starters

Large organizations (>10,000 employees) embarked their GDPR readiness journey in the year 2016 while others embarked their GDPR awareness journey late 2017 or early 2018.



Need of the hour

While majority of respondents perceive GDPR as a compliance requirement, the regulation is also believed to provide a competitive advantage, enhancing brand value. Respondents also agree that GDPR will help in bringing a sense of privacy in business and innovation ideas.



Accountability

The top-rated roles identified as accountable for GDPR compliancewere Data Protection Officer / Chief Privacy Officer and Chief Information Security Officer. Majority of small organizations identified their Business Owner or Chief Information Officer as the person-in-charge.



Spreading awareness

Organizations have adopted a wide range of approaches to spread awareness about this new regulation.



Dedicated Privacy Team

The responses suggest that the size of a privacy team is relative to the size of an organization.



Data Protection Officer (DPO)

Respondents believe that a DPO could be an internal member/employee with a full time role in the organization. Almost half of the respondents consider legal and compliance as a key skill set of the DPO.



In their GDPR readiness journey, organizations are facing challenges –

To be ready with an ecosystem to address rights of data subjects. The most challenging rights were identified as

Right to Erasure Right to Data Portability Right to Restriction of Processing Though "Right to Erasure" is a major challenge, the additional challenge is to ensure that personal data has indeed been erased - a challenge that becomes furthermore critical in cases of third-party involvement.

To summarize, Indian organizations are gearing up to be ready for this privacy and data protection regulation. They are adopting leading practices to monitor, assess and manage privacy-related risks and steer the GDPR journey. Since this regulation touches all aspects of an organization's operations, it was noted that more guidance and support will help to accelerate efforts in this transformation. A proactive approach towards being GDPR ready goes beyond a regulatory requirement. It demonstrates an organization's commitment towards secure handling of their customer's personal data. Achieving this trust acts as a key enabler in an organization's growth. Therefore, GDPR drives a culture of privacy by design in an organization.

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