

UNDER THE TREE OF KNOWLEDGE – POLICY SESSION

Theme: Data Protection Regulation 2019...imperatives for Halogen businesses



26th February 2019

Data Protection...why should Halogen bother?

- The regulation has implication on and interface with fundamental human right (section 37). As an employer of substantial labor, Halogen has a HIGH risk exposure
- As a technology company, the regulations will influence our gathering, use and storage of data
- The potentials exist for litigations as the Data Subject is now 'king'
- With Halogen's increasing digital footprint, the possibilities and risk exposures of data breaches becomes higher

Some Key Business Imperatives

- The data protection regulation engenders that the Data Subject must be protected
- Personal data must be collected, processed and stored in accordance with specific, legitimate and lawful purpose
- Data must be secured against breaches and attacks
- There has to be express consent given before data is collected – and it must be informed, unambiguous and specific



	Halogen's "To Dos"	Date By	Proposed Lead
1	Nominate a Data Protection "Champion" for Halogen Group...who will lead the implementation of this "To Do" list	Monday 4 th March 2019	GMD
2	Update consent form – with clear indications of what the data will be used for and the conditions for Data Subject withdrawal	18 th March 2019	Head HR
3	Develop organization Data Protection Policy in line with NITDA's regulations	24 th March 2019	Director of Strategy
4	Have a designated Data Protection Officer for the purpose of ensuring adherence to the Regulation	24 th March 2019	Head HR
5	Conduct a root and branch audit of current practice to identify variances from Regulations	By 25 th March 2019 – this is a statutory requirement	Director of Strategy – PM Team
6	Ensure compliance to Regulation	By end of June 2019 – this is a statutory requirement	As above
7	Make data protection policies available to staff , clients and the general public via web site and other information dissemination platform(s)	28 th June 2019	Director of Marketing

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