



# GDPR Readiness Assessment

Assessment Owner(s): DSFE Automation

Progress			Risks Triggered		
	BREAKDOWN			BREAKDOWN	
	● N/A	0%		● Very Low	0%
	● Non Compliant	0%		● Low	0%
	● Partially Compliant	0%		● Medium	0%
	● Compliant	0%		● High	0%
	● Unanswered	100%		● Very High	0%

<div> <div> <div></div> <div>Published</div> </div> <div> <div>Last Modified: April 26, 2021</div> <div>0/115 Questions Answered</div> </div> <div> <div>Category: GDPR</div> <div>Owner(s): DSFE Automation</div> </div> </div>		
<div> <div>Section 1: Personal Data Visibility</div> <div> <div>Q1</div> <div> <div>My organization can identify all locations where personal data is stored (including internal, cloud or third-party systems).</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div> </div>		
<div> <div>Q2</div> <div> <div>My organization can locate all instances of personal data for a given data subject.</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div>		
<div> <div>Q3</div> <div> <div>My organization has a formal process for validating and conducting searches for personal data in a timely manner.</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div>		
<div> <div>Q4</div> <div> <div>My organization has automated the formal process for validating and conducting searches for personal data.</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div>		
<div> <div>Section 2: Personal Data Classification</div> <div> <div>Q1</div> <div> <div>My organization can categorize all the different types of personal data it uses.</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div> </div>		
<div> <div>Q2</div> <div> <div>My organization applies tags or labels based on the categorization of personal data.</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div>		
<div> <div>Q3</div> <div> <div>My organization has tools that implement classifications automatically and in a timely manner.</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div>		
<div> <div>Section 3: Personal Data Inventory</div> <div> <div>Q1</div> <div> <div>My organization has tools to catalog how and where personal data is collected, stored, and processed.</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div> </div>		
<div> <div>Q2</div> <div> <div>My organization has a complete inventory of how and where personal data is collected, stored, and processed.</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div>		
<div> <div>Q3</div> <div> <div>My organization has a process to fully or partially keep the inventory up to date.</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div>		
<div> <div>Q4</div> <div> <div>My organization has an inventory of all processes by which it obtains personal data.</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div>		
<div> <div>Q5</div> <div> <div>My organization has a process to document each processing activity (including scope, purpose, notifications, and consent management).</div> <div> <div>Response Option(s)</div> <div>Response</div> <div>Internal Response</div> </div> </div> </div> <div> <div>Owner</div> <div>DSFE</div> </div> <div> <div>Status</div> <div>Not Answered</div> </div>		
<div> <div>Section 4: Data Governance</div> </div>		

Q1	Owner	Status
My organization has a formal data governance program.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q2	Owner	Status
The data governance program has a formal organization structure and official charter.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q3	Owner	Status
The data governance program is integrated across teams to make it effective across the organization.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q4	Owner	Status
The data governance program includes data privacy and protection policies.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q5	Owner	Status
My organization has tools and practices to protect, monitor, and report on both privacy and protection violations.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q6	Owner	Status
The data governance program includes special protections for the personal data of children.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q7	Owner	Status
The data governance program includes policies to enforce accountability within the organization.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q8	Owner	Status
The data governance program includes justification for using special categories of personal data.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Section 5: Data Subject Rights - Notification		
Q1	Owner	Status
My organization provides data subjects with notices that describe how their data is used in a concise, transparent, intelligible and easily accessible form, using clear and plain language.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q2	Owner	Status
My organization provides data subjects with clear contact details for data protection officers.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q3	Owner	Status
My organization clearly informs data subjects about the purpose of data collection and consent collected at every collection point.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q4	Owner	Status
My organization clearly informs data subjects about their right to request, rectify, erase, reject, object, or complain about their personal data.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q5	Owner	Status
My organization has automated the consent collection and management activities.	DSFE	Not Answered
Response Option(s)	Response	Internal Response
Q6	Owner	Status
My organization has established processes and systems to manage consent when data is collected from sources other than the data subject.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

Q7	My organization has established processes and systems to manage consent when using the data for new purposes.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Section 6: Data Subject Rights - Objections

Q1	My organization has an established process for discontinuing processing of all forms of personal data following objections raised by data subjects that are deemed appropriate by the organization.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Q2	My organization notifies data subjects with justification for continued use of personal data when their objections are deemed inappropriate.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Q3	My organization has automated the process to register objections, discontinue processing, and maintain evidence.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Section 7: Data Subject Rights - Consent

Q1	My organization obtains data subject consent consistently and promptly prior to using the data subject's personal data for all processing activities.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Q2	My organization explicitly obtains consent for the use of special categories of personal data, such as racial or religious data.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Q3	My organization meets the requirements for obtaining special consent before processing the personal data of children.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Q4	My organization validates the age of a child and the identity of a guardian, as required by relevant regulatory authorities.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Q5	My organization has automated the consent management system.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Section 8: Data Subject Rights - Access

Q1	My organization has a published and accessible way for data subjects to communicate with it on privacy issues.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Q2	My organization has implemented an electronic mechanism for consumers to communicate data access requests.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Q3	My organization validates the identity of the entity initiating the data access request.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Q4	My organization has tools and processes to track and resolve data access requests and communicate with consumers in a timely manner.	Owner	Status
DSFE		DSFE	Not Answered
Response Option(s)	Response	Internal Response	

Q5			Owner	Status
My organization has a tracking system that data subjects and regulators can use to review the status of DSR requests.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q6			Owner	Status
My organization has automated the tracking system that data subjects and regulators use to review the status of DSR requests.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

## Section 9: Data Subject Rights - Rectify

Q1			Owner	Status
My organization corrects inaccuracies and completes or updates personal data related to a data subject.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q2			Owner	Status
My organization maintains and readily shares evidence related to any rectification or update activity.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q3			Owner	Status
My organization communicates any rectification of personal data to each processor or recipient to whom the personal data have been disclosed.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q4			Owner	Status
My organization has automated the personal data rectification process.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

## Section 10: Data Subject Rights - Erase

Q1			Owner	Status
My organization has established and published processes to locate and erase personal data.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q2			Owner	Status
My organization has processes, personnel, and tools in place to determine the validity of and execute personal data erasure requests.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q3			Owner	Status
My organization maintains and readily shares evidence related to any erasure activity.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q4			Owner	Status
My organization contacts additional controllers, processors or recipients of personal data to fulfill data erasure requests.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q5			Owner	Status
My organization communicates any erasure of personal data to each processor or recipient to whom the personal data have been disclosed.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q6			Owner	Status
My organization has automated some or all of the personal data erasure process.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

## Section 11: Data Subject Rights - Export

Q1			Owner	Status
My organization has a mechanism to provide data subjects with a copy of their personal data, particularly in electronic, machine readable format.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q2	My organization has processes, personnel, and tools in place to determine the validity of and execute personal data export requests.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Q3	My organization maintains and readily shares evidence related to any export activity.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Q4	My organization has automated some or all of the data export process.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Section 12: Data Subject Rights - Restrict					
Q1	My organization has processes, personnel, and tools in place to suspend or restrict its sale of a consumer's personal data to third parties when required or requested.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Q2	My organization contacts additional controllers, processors or recipients to restrict processing.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Q3	My organization has processes and tools to notify data subjects when restrictions on processing activities have been lifted or when processing has resumed.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Q4	My organization maintains and readily shares evidence related to restrictions on data processing activities.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Q5	My organization has automated the process of restricting personal data processing.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Section 13: Automated Personal Data Processing					
Q1	My organization has processes, personnel, and tools to manage, and when necessary, intervene with automated processing of personal data.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Q2	My organization has processes in place to let data subjects question decisions made by automated processing.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Section 14: Privacy Program Maturity					
Q1	My organization has a person appointed as Data Protection Officer.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Q2	My organization has a formal privacy program.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		
Q3	My organization has a formal risk management program.			Owner	Status
	DSFE				Not Answered
	Response Option(s)	Response	Internal Response		

Q4			Owner	Status
My organization performs formal and independent reviews of its privacy and risk management program.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Section 15: Privacy and Data Protection by Design				
Q1			Owner	Status
My organization has made data protection and privacy key components of all of its policies and procedures, and embedded them into its culture through training and awareness programs.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q2			Owner	Status
My organization pseudonymizes personal data.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q3			Owner	Status
My organization has a documented process to determine how much personal data is needed to perform its operations, and to minimize the amount of data that is collected.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q4			Owner	Status
My organization has established access controls (including segregation of duties) where available technologies are insufficient to protect privacy.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q5			Owner	Status
My organization provides access to personal data using the principle of least privilege.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q6			Owner	Status
My organization has integrated data protection and privacy into its software development lifecycle.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Section 16: Encryption				
Q1			Owner	Status
My organization has policies, procedures, and tools in place to identify personal data that must be encrypted, determine how to encrypt it, perform the encryption, and ensure that the encryption technology is kept up to date.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Section 17: Security Controls				
Q1			Owner	Status
My organization has the necessary processes, personnel, and tools to protect the confidentiality, integrity and availability (CIA) of personal data.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q2			Owner	Status
My organization has formal processes or programs to regularly enhance CIA measures.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q3			Owner	Status
My organization has technologies and process controls in place to ensure personal data is only used as authorized.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q4			Owner	Status
My organization has established agreements with external partners or service providers to use personal data only as authorized.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		

Q5	My organization has processes, personnel, and tools in place to restore the availability of personal data in a timely manner in the event it becomes unavailable due to (but not limited to) incidents such as cyber attacks, natural disasters, power outages, or technical challenges.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q6	My organization implements appropriate safeguards to ensure that personal data transfers across international boundaries and to international organizations follow standards published by European Union (or national EU) government agencies.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q7	My organization implements appropriate measures to maintain personal data confidentiality (including permissions, access control, and physical security measures).			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q8	My organization implements appropriate measures to maintain personal data Integrity.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Section 18: Breach Management

Q1	My organization performs a breach impact assessment for personal data.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q2	My organization has a clear breach response plan in place.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q3	My organization notifies required parties of breaches of personal data, including data subjects and supervisory authorities, when there is a high risk of impact to data subjects.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q4	My organization notifies supervisory authorities of personal data breaches within 72 hours.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q5	My organization has automated the breach notification process.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q6	My organization has processes, personnel, and technology to detect data breaches across all data stores in its control, including online, offline, and third-party systems.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q7	My organization maintains detailed records of data breaches, including their origin, impacts, and remedies.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q8	My organization documents and applies lessons learned from data breaches.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			

Q9	My organization regularly updates data breach response policies, procedures and technologies.			Owner DSFE	Status Not Answered
Response Option(s)	Response	Internal Response			



Q10	Owner	Status
My organization maintains KPIs for breach detection and response, including operational impact and remediation efficiency.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

## Section 19: Security Assessments

Q1	Owner	Status
My organization has the required processes, personnel, and tools in place to regularly test its security measures (both manually and with the help of technology).	DSFE	Not Answered
Response Option(s)	Response	Internal Response

Q2	Owner	Status
My organization mandates that external partners and managed services must periodically test, assess, and evaluate their organizational and technical security measures.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

## Section 20: Record Keeping

Q1	Owner	Status
My organization maintains an accurate record of all data processing activities with contextual information related to the purpose or scope of those activities.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

Q2	Owner	Status
My organization maintains organization records that are detailed enough to include types of personal data used, categorization of personal data, justification of use, and key organizational contacts.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

Q3	Owner	Status
My organization has processes, personnel, and tools in place to record this information.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

Q4	Owner	Status
My organization augments this record keeping with relevant codes of conduct, standards, guidelines, data residency requirements, and binding corporate rules.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

## Section 21: Tracking Data Flows - International data transfers

Q1	Owner	Status
My organization maintains records of all processing activities that involve personal data transfer into and out of the EU, including records of ad-hoc transfers that are not part of an ongoing process.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

Q2	Owner	Status
My organization has dynamic data flow record keeping, taking into account changing international laws and capabilities of countries and organizations to safeguard personal data.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

Q3	Owner	Status
My organization has processes, personnel, and tools in place to record and safeguard personal data transfers across international boundaries.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

Q4	Owner	Status
My organization has automated the data flow record keeping process.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

## Section 22: Tracking Data Flows - 3rd party service providers

Q1	Owner	Status
My organization maintains records of all processing activities that involve personal data transfer into and out of third-party service providers and recipients, including records of ad-hoc transfers that are not part of an ongoing process.	DSFE	Not Answered
Response Option(s)	Response	Internal Response

Section 23: Data Protection Impact Assessment				
Q1			Owner	Status
My organization assesses the level and types of risks associated with processing personal data.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q2			Owner	Status
My organization determines, documents, and implements processes to mitigate identified risks.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q3			Owner	Status
My organization conducts Data Protection Impact Assessments (DPIAs) whenever it identifies high-risk processing activities.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q4			Owner	Status
My organization has processes, personnel, and tools in place to complete DPIAs.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q5			Owner	Status
My organization has a DPIA process that engages data subjects, privacy advocates, and subject matter experts.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q6			Owner	Status
My organization maintains and readily shares evidence related to DPIA activities.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		
Q7			Owner	Status
My organization has automated the DPIA process.			DSFE	Not Answered
Response Option(s)	Response	Internal Response		