Implementing GDPR

Case: Royal Danish Library

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Agenda

Organisation at the Royal Danish Library

Implementation activities

"The processing of personal data should be designed to serve mankind. The right to the protection of personal data is not an absolut right; it must be considered in relation to its functions in society and be balanced against other fundamental rights, in accordance with the principle of proportionality"

Recital 4, Regulation EU 2016/679





Organisation

Deputy Director General

Responsible for compliance Approval of policies and templates Data Protection Officer and team

(IT Security specialist, head of IT-infrastructure, legal advisor)

Implementation task
Policies and templates
Legal basis
Technical measurements
Education
The Ministry of Culture's GDPR-network

Deputy directors and dedicated project manager in each division

Documentation and compliance

Dark data detectives





Basic principles

Lawfulness, proportional, transparency

Specific purpose

Dataminimization

Accuracy

Time limits

Integrity and confidentiality

Accountability



transparent to natural persons that personal data concerning them are collected, used, consulted or otherwise processed and to what extent the personal data are or will be processed...In particular, the **specific** purposes for which personal data are processed should be explicit and **legitimate** and determined at the time of the collection of the personal data. The personal data should be adequate, relevant and limited to what is necessary for the purposes for which they are processed....Personal data should be processed only if the purpose of the processing could not reasonably be fulfilled by other means.... Personal data should be processed in a manner that ensures appropriate security and confidentiality of the personal data, including for preventing unauthorised access to or use of personal data and the equipment used for the processing." Recital 39, Regulation EU 2016/679

"Any processing of personal data should be lawful and fair. It should be

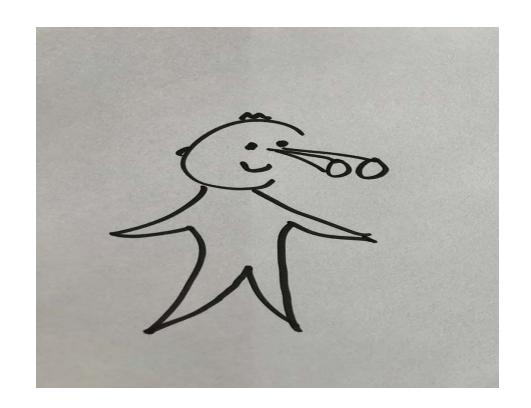


Implementation activities

Mapping

Document

Audit







Electronic records of processing activities

Library users Collections

Registered lenders Legal deposit collections

Lending history Private archives and collections

Courses/teaching activities

Licenses

Newsletters

.....and many more





Collections and GDPR Article 89

Article 15: Right of access by the data subject

Article 16: Right to rectification

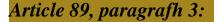
Article 18: Right to restriction of processing

Article 19: Notification obligation

Article 20: Right to data portability

Article 21: Right to object

(Article 17, paragrafh 3, litra d): The right to be forgotten does not apply for archiving purposes in the public interest)



"Where personal data are processed for archiving purposes in the public interest, Union or Member State law may provide for derogations from the rights referred to in Articles 15, 16, 18, 19, 20 and 21 subject to the conditions and safeguards referred to in paragraph 1 of this Article in so far as such rights are likely to render impossible or seriously impair the achievement of the specific purposes, and such derogations are necessary for the fulfilment of those purposes."





Accontability and transparency:

Document and Inform

Policies

Data Processing Agreements

Data Processing Agreement Template

https://www.datatilsynet.dk/fileadmin/user_upload/dokum enter/lkke-elektroniske_blanketter/dpa-template.docx





Dark Data Detectives

Awareness on the use and sharing of personal data







Thank you

