

How to get ready for the GDPR

Capgemini and Oracle can support your organization to prepare for the GDPR

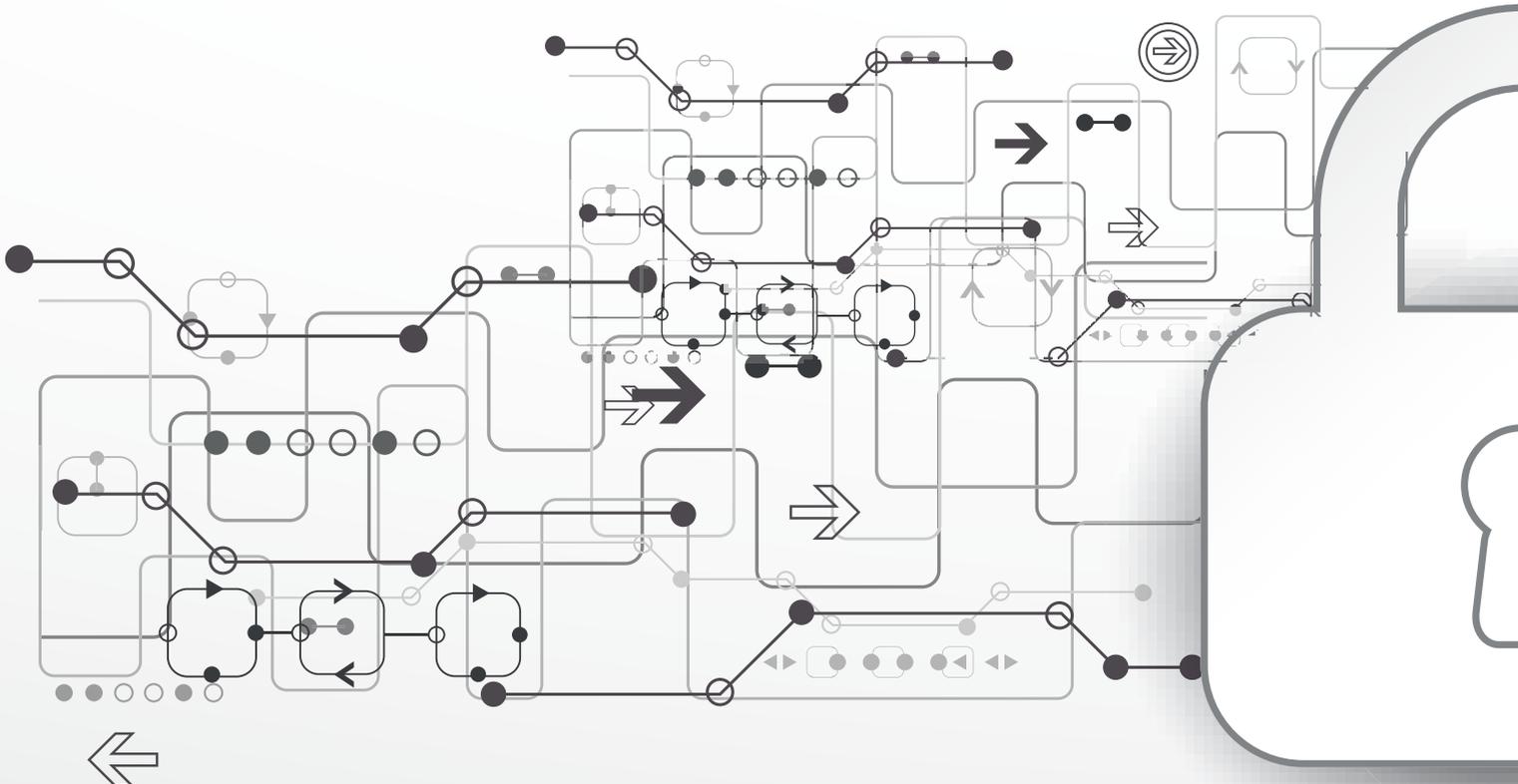


What is GDPR all about?

In May 2018 the General Data Protection Regulation (2016/679, known as “GDPR”) will come into force. GDPR is a European Union “EU”-wide framework for the protection of personal data of EU-based individuals. GDPR is directly applicable in each EU Member State. After May 2018, organizations processing personal data will be held more accountable for their data collection and use than ever before. Although many organizations have already adopted processes consistent with GDPR, the new Regulation will impact most organizations on many levels. Failing to comply with the GDPR can lead to a fine of up to 4 percent of the worldwide turnover or 20 million euro.

The objective of this paper is to explain possible implications of the GDPR and how our combined set of offerings of products, services and technological solutions can help you getting ready for the GDPR. First, we will describe the impact of the GDPR. Second, we will describe fictional organizations, their degree of readiness and how they prepare towards the new Regulation. Third, we will explain our portfolio and how this can help your organization get ready for the GDPR.

Oracle and Capgemini are partnering to help you get ready for the GDPR. With more than 420,000 customers and deployments in more than 145 countries, Oracle's major market share in database and business applications uniquely positions it to offer a comprehensive set of database security controls to increase data protection and thus assist companies with their GDPR requirements. With more than 180,000 people in over 40 countries, Capgemini is a global leader in consulting, technology and outsourcing services.



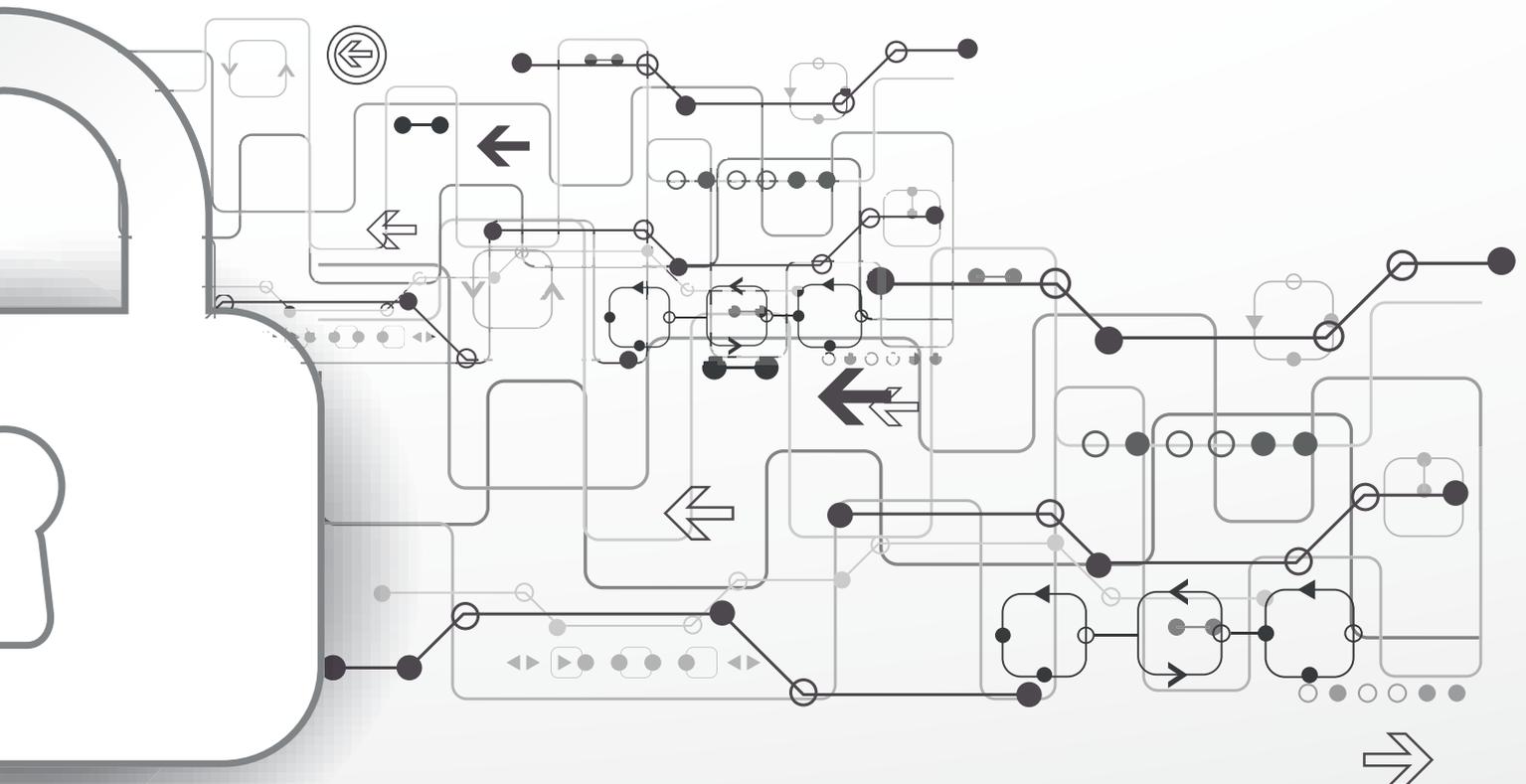
What is the GDPR and why is it important for your organization?

The GDPR is an EU Regulation related to the protection of personal data and free movement of such data. The GDPR requires a very systematic and comprehensive management of IT security. It requires data protection management, reporting and accountability mechanisms, including a requirement to notify data breaches, map data flows and conduct data protection impact assessments. The GDPR provides enhanced rights for individuals and increased scrutiny by regulators. Non-compliance may lead to substantial fines.

When the GDPR comes into force, many organizations will be required to have a Data Protection Officer (DPO) and a fundamental understanding of the processes and the classification of the data. A data subject's consent to the use of his/her personal data should be given by a clear affirmative act. Organizations will be required to notify the authorities and to communicate the data breaches to data subjects. Other obligations, such as data protection impact assessments will come into force, too. Violation of the GDPR may lead up to 4 percent of the total worldwide annual turnover or 20 million euro – whichever is higher.

Are you ready for the GDPR?

Oracle and Capgemini work with organizations from all industries across the globe. Together, we have a deep understanding of the GDPR, associated business challenges and technology solutions. Below are three hypothetical examples where we illustrate how Oracle's and Capgemini's offerings can jointly assist you in preparing for the GDPR. The challenges described in these organizations reflect the preparatory work we see in practice.





Example 1: large European bank

The first organization is a large European bank. The bank is working towards GDPR compliance and considers readiness as a means to underscore trust and security. Senior management has consulted a specialized law firm and its technology partners. Senior management understands the implications of the GDPR. The bank drafted a road map to achieve GDPR readiness and appointed a DPO in 2015 even before the approval of the new law. The bank has modified its applications, portal and processes to give clear information to its customers and to collect different degrees of consent about usage of personal data. The organization understands how to address the GDPR holistically in the context of the many other regulations it has to comply with. Also, Data Protection has been integrated into the Information Security Management System (ISMS) of the bank.

Additionally, it has adopted an internal communication strategy that explains the need for its new measures. The DPO has helped identify all applications that process personal data and all databases containing personal data. The bank strives to avoid – at all cost – the loss of personal data. However, on two occasions a data breach was reported. Processes geared towards mitigation and recovery ensured that the breaches were addressed quickly and the consequences were minimized. Additionally the bank promptly reported the breaches to the required authorities and the affected clients according to the predefined procedures. The bank has worked with Capgemini and Oracle to build a plan for readiness. The execution of the plan ensures readiness of its staff, organization, processes, infrastructure and IT for the GDPR.

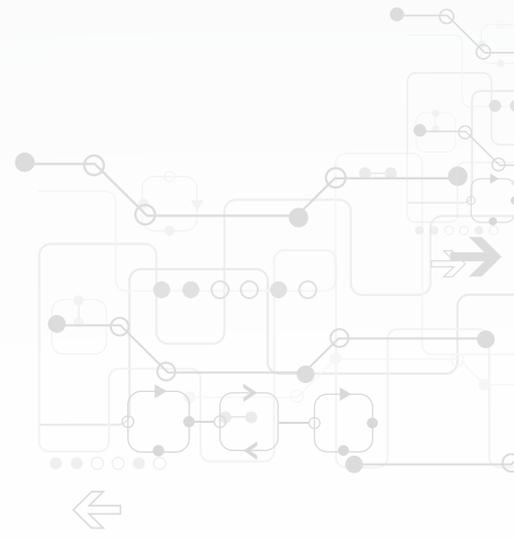
Example 2: large car manufacturer

The second organization is a large car manufacturer. The manufacturer associates GDPR compliance with its valuable brand image, which is key to the organization and is therefore keen on getting GDPR right. The car manufacturer had adopted a new strategy where big data and analytics serve as the cornerstones of their plans, leading them to increasingly using and producing an abundance of data. Although the car manufacturer has appointed a DPO and has set-up elaborate awareness campaigns on data and protection, the vastness, technical complexity and international character of its data and database landscape is becoming increasingly complex. Although the car manufacturer is unwilling to accept risk, its data protection and data experts know that the GDPR and future data breaches spell fines from the EU – which may harm brand image and lead to an unacceptable loss in fines. The car manufacturer works with Capgemini and Oracle to implement solutions to further increase database security, identity and access management and resilience solutions

Example 3: family owned national retail organization

The third organization is family-owned national retail organization of 300 small and mid-size supermarkets in Western Europe. Its senior management is not aware of the GDPR and no measures have been taken that are geared towards compliance. The organization has never dealt with significant data breaches, although it has been collecting personal data from its clients since 2005. The retailer uses the data for digital marketing and online shopping. The retailer does not have a DPO in place and does not link data protection or security to its core business. Its landscape of applications and associated databases has not been checked for personal data. In short, the leadership of the organization has not considered data protection and security and is not yet ready to deal with data breaches. The retail organization had turned to Capgemini and Oracle for an analysis and recommendations on planning, governance, process, culture, data and technology with the aim to test readiness for GDPR.

How can we help?

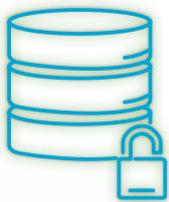


Oracle and Capgemini are partnering to help you get ready for the GDPR. We have designed a combined set of offerings that may fit into your needs to prepare for the new Regulation, whether you are ready or still have a long way to go. Our portfolio considers the most important topics for executives regarding data protection and security. Our portfolio consists of four categories:

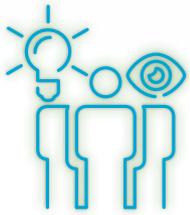
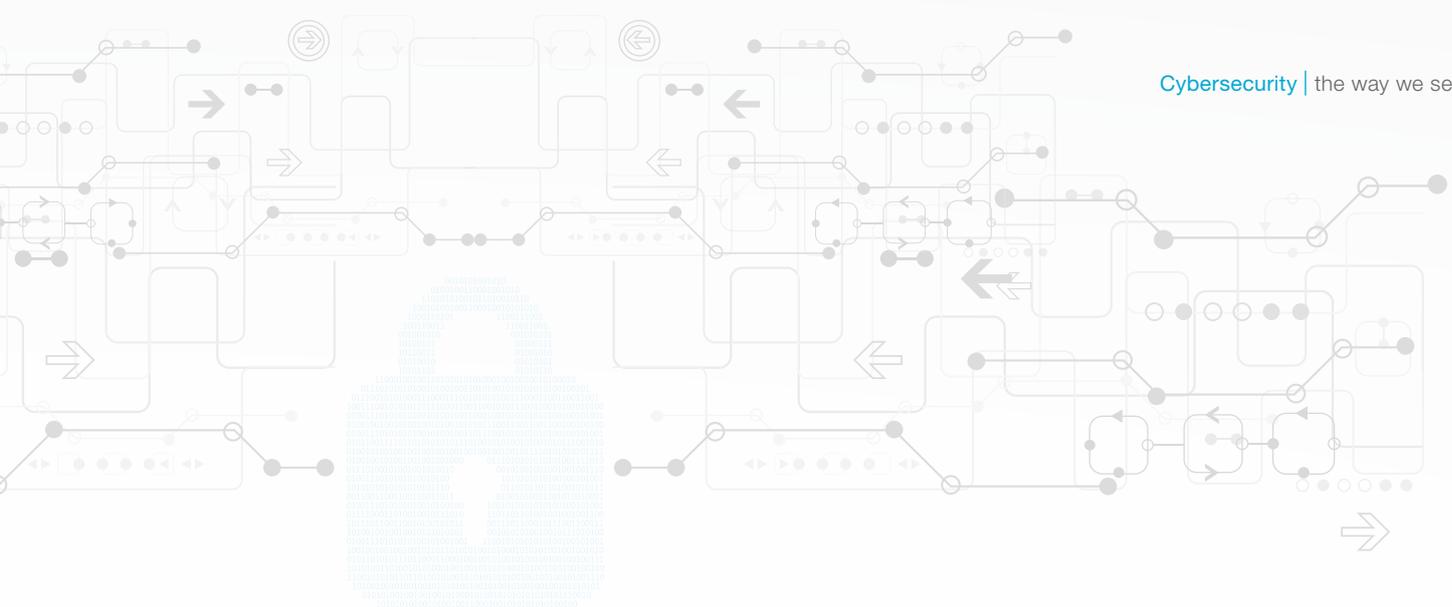
- GDPR assessment
- GDPR strategic plan
- GDPR data protection impact assessment
- GDPR technology solutions

GDPR assessment

Capgemini proposes a two-week assessment which provides an analysis and recommendations on planning, governance, process, culture, data and technology. The assessment is performed by a team of three specialists who collect and analyze the available materials on the aforementioned categories, interview key persons responsible for these areas in the light of the GDPR and check Oracle databases for materials related to data protection. The assessment is based on market standards for methodology, such as ISO, ISF, CSA, and C2M2. The result of the assessment is a list of categorized findings, conclusions and actionable recommendations with the aim to prepare for the GDPR. The assessment may be the first step towards implementation of other categories, such as planning, governance, process, culture, data and technology. The assessment may also confirm that all preparations are in place. In particular, the following areas will be assessed:



- **Territorial Scope:** assess whether all or part of your organization falls within the scope of the GDPR.
- **Individual Rights:** review of and assess your internal processes to determine whether they meet the requirements of individuals' rights (e.g., providing consent, how to grant access to data)
- **Data Breach Notification requirements:** review and assess your organization's readiness with respect to the new GDPR rules regarding data breach notification to Supervisory Authorities and individuals.
- **Record Keeping:** review and assess your organization's current databases, records, and archives to see what is in place and what is missing to meet the new records requirements.
- **Data Protection Officer ("DPO"):** assess the need for your organization to have a DPO and review the current position of a DPO (if any) to evaluate what organizational changes are needed.
- **Consent and Notice:** review customer-facing materials to comply with new consent and transparency requirements (and if applicable, in particular with respect to data analytics, profiling, free services and digital offerings to children).
- **Third Party Agreements:** review and update agreements and templates with your organization's data processors (suppliers, partners, etc.).



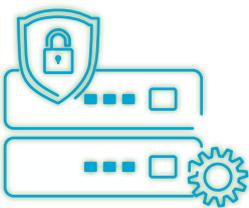
GDPR strategic plan

Capgemini proposes to include into your strategic plan for the GDPR a set of defined action items that employ the use of technology to raise the quality and level of personal data protection within your organization. The development of the plan will involve the stakeholders of your organization and result in a realistic, supported, and actionable plan. Capgemini will facilitate plan development and use its experience of strategic plan development, GDPR readiness capabilities and gained insight into your business and technology solutions. A strategic plan can be developed in two to four weeks.



GDPR data protection impact assessment

Capgemini proposes to assess the GDPR readiness of your IT infrastructure for any type of processing. At the start, a data protection impact assessment scope, governance, questionnaire and tooling are tuned to the specific needs of your organization. To ensure cooperation of all target groups, an awareness campaign on GDPR and data protection is initiated. A selection of relevant information systems is made based on their initial data protection risk. Based on the answers given in the data protection impact assessment tool, the impact of each system is calculated and an overview of gaps, risks and measures is generated. The tool provides for each role a dashboard with gaps, risks scores and mitigating measures which are categorized. Subsequently a consolidated internal (board) and external (regulator) report can be generated. The results provide the starting point for an improvement plan for the Data Protection Officer.



GDPR technology solutions

Capgemini proposes the project management, and Oracle the technical implementation, of three technology solutions which are applicable to existing, legacy and new digital systems:

- Database Security options, best solutions to secure the Oracle DB (Oracle on Oracle), such as Advanced Security and Key Vault, Database Vault, Audit Vault and Database Firewall, Database Masking and Subsetting and Label Security.
- Identity and Access Management, to manage the opportunity given by the digital transformation, such as Identity Governance, Access Management, Directory, Identity Cloud Service and API Platform Cloud Service.
- High availability and resilience solutions, an area where Oracle has achieved the excellence since many years, with products like Exadata, Real Application Cluster and DB Recovery Appliance to name a few.

In our experience, an early start towards GDPR readiness is critical. May 2018 is closer than most realize. GDPR can have a significant impact on the business processes of your organization and therefore GDPR readiness cannot be achieved overnight. Our combined set of offerings ensures readiness for GDPR, as well as improved risk mitigation. Additionally, readiness for GDPR improves your overall data management, which in turn will protect your assets.

Who should you contact for help?

Capgemini and Oracle work with organizations from all industries across the globe. Together, we have a deep understanding of the GDPR and associated business issues and technology solutions. Our portfolio for assessment, development of a strategic plan, data protection impact assessment and technology will help you get ready for the GDPR.

Please contact us for more information.

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About Oracle

Oracle offers an integrated array of applications, databases, servers, storage, and cloud technologies to empower modern business. For most companies, exibility is critical. Oracle provides a wide choice of software, systems, and cloud deployment models—including public, on-premises, and hybrid clouds—to ensure that technology flexes to the unique needs of a business.

Oracle Cloud is a complete, integrated stack of platform, infrastructure, and application services. With advanced scalability and security, Oracle Cloud enables technical agility across the enterprise, connects people to information for clearer insights, and fosters ef ciency through simpli ed work ows.

More than 420,000 customers across 145 countries have harnessed Oracle technology to accelerate their digital transformation. Oracle reported US\$37 billion total GAAP revenue in FY 2016.

Learn more about Oracle at

www.oracle.com

About Capgemini and Sogeti

With more than 180,000 people in over 40 countries, Capgemini is one of the world’s foremost providers of consulting, technology and outsourcing services. The Group reported 2015 global revenues of EUR 11.9 billion. Together with its clients, Capgemini creates and delivers business, technology and digital solutions that fit their needs, enabling them to achieve innovation and competitiveness. A deeply multicultural organization, Capgemini has developed its own way of working, the Collaborative Business Experience™, and draws on Rightshore®, its worldwide delivery model.

Sogeti is a leading provider of technology and software testing, specializing in Application, Infrastructure and Engineering Services. Sogeti offers cutting-edge solutions around Testing, Business Intelligence & Analytics, Mobile, Cloud and Cyber Security. Sogeti brings together more than 23,000 professionals in 15 countries and has a strong local presence in over 100 locations in Europe, USA and India. Sogeti is a wholly-owned subsidiary of Cap Gemini S.A., listed on the Paris Stock Exchange.

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www.capgemini.com or www.sogeti.com