

# GDPR Is Coming: How Will It Affect You?


PRESENTED TO



Beaconfire RED




# GDPR...



What's all the  
fuss about?

Jeff Herron, EVP



Why it's not all  
bad!

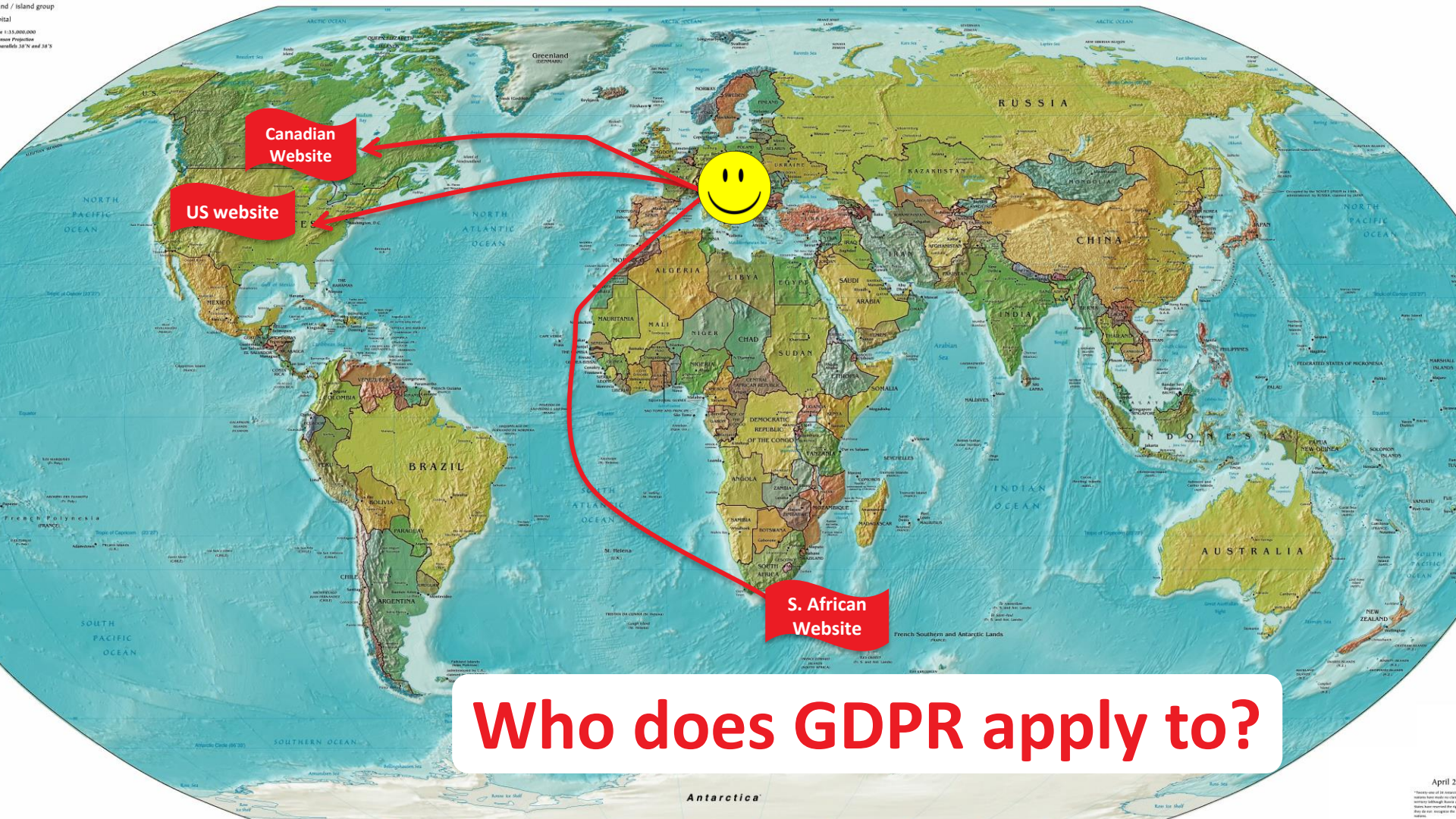
Sara Hoffman, Analyst

What do I  
need to do  
about it?

# What is GDPR?

Laws governing the use of personal data





# Who does GDPR apply to?

# Who does it apply to?

Organizations who...

- are in any country
- collect personal data or behavioral information from an EU citizen
- target people in EU - e.g. marketing in their language and references specific to EU residents
- accept currency of an EU country
- have a domain suffix of an EU country

Not  
applicable  
generic  
marketing seen  
randomly by  
EU citizens

# What is Personal Information?

- Names
- Addresses
- email addresses
- IP addresses
- website cookies
- identification numbers
- biometric identifiers (fingerprints, iris patterns, DNA)
- physical or physiological attributes
- occupation
- location
- medical/health information

Including any notes you have about them or comments they provided to you

# When?

- Laws are effective May 25, 2018

# And what if we don't?

- Potential for audit
- Fines up to 20M€ or 4% of global annual revenue

# GDPR Summary

- Transparency & Consent
- Secure data storage
- Right to export and be forgotten



# What do I do?

# Preparation



## Step 1

ID who needs to be involved

- Senior management
- Legal
- Data “Officer”
- Appropriate team members
  - Marketing, fundraising, advocacy, communications, IT, Web

Get educated

Preliminary risk tolerance discussion

# Data Audit



## Step 2

What personal data do we collect?

Where did we get it?

Where is it stored?

How long are we storing it?

How is it getting updated?

How are we keeping it secure?

Who has access to it?

Who are we sharing it with?

# Reality Check & Plan



## Step 3

Where are the compliance issues?

- Consent
- Transparency
- Security

Is it worth it to fix?

What's the plan to get compliant?

For all or only European IP addresses?

# Take Action



## Step 4

Consent

Using & storing data

Privacy Policies / Terms of Service

Cookies & analytics

Exporting & forgetting

Contracts

# Consent

- Plain English
- Specific & granular (separate consent for different uses)
- Separate from other terms & conditions
- Positive Opt-in (no pre-checked or default selection)
- Easy and clear how to withdraw consent
- Name your org and any third parties
- Store consent data

Before  
collecting data

Before  
contacting  
people

Re-opt-in  
existing  
supporters  
before May 25<sup>th</sup>



# Examples of where to add consent:


- Web site forms
- Email sign ups
- Tracking website usage

Only for  
European  
*IP*  
addresses?

# e.g. Newsletter signup

## Contacting you

Your support is precious to us and we want to help you get the most from your relationship with the National Trust. We'd like to use your information so we can provide you with recommendations, as well as tell you about other things we do that are relevant to you.

We promise to never pass your information to other organisations. You're always in control of how we contact you and what we send you. For more information visit our [Privacy Policy](#) .

- ☐ Yes, that's fine
- ☐ No, thanks

\* Snippet from National Trust: [www.nationaltrust.org.uk](http://www.nationaltrust.org.uk)

# e.g. donation form

## Personal details

\*Required fields

Fill out your personal details below or sign in with your Oxfam account.  
Your details are kept secure and will never be shared with anyone else.



Secure  
payment

Title:\*

First name:\*

Last name:\*

Email:\*



☐ I would like to be kept up to date with Oxfam's projects and fundraising activities by email. (We will not share your data and you can unsubscribe at any time)

Phone number:



By providing your telephone number you are consenting to occasional future calls from Oxfam about our projects and fundraising activities.

☐ I would like to be kept up to date with Oxfam's projects and fundraising activities by text message. (We will not share your data and you can unsubscribe at any time)

House no. or name:

Postcode:\*  [Find my address](#)

## Informed Consent

The information provided in this PPT is for informational purposes only and not for the purpose of providing legal advice.  
© 2018

\* Snippet from Oxfam: [oxfam.org.uk](http://oxfam.org.uk)



We would like to keep you informed about our projects and fundraising activities by post and telephone. However, if you would rather not receive such information, please email us at [changes@oxfam.org.uk](mailto:changes@oxfam.org.uk), phone 0300 200 1300 or write to Supporter Relations, Oxfam House, John Smith Drive, Cowley, Oxford, OX4 2JY

# e.g. Membership form

Links to:

Marketing  
Preferences  
Centre

Privacy Policy

## Contacting you

Your privacy is important to us, so we'll always keep your details secure and never use them for marketing communications that you haven't agreed to receive.

Your support matters, so we'd like to use your details to keep in touch about things that may matter to you. If you choose to hear from us we may send you information based on what is most relevant to you or things you've told us you like. This might be about visiting our places, volunteering with us, membership, events, conservation work, fundraising, our shops and holidays.

I'm happy to hear from you about things I might like by:

Email:\* ☐ Yes ☐ No

Post:\* ☐ Yes ☐ No

Phone:\* ☐ Yes ☐ No

At any time you can change your mind about whether to receive that information from us or how you're contacted for marketing purposes in our [Marketing Preferences Centre](#) or by contacting us on 0344 800 1895. Please see our [Privacy Policy](#) for more information on how we look after your personal information.

"We" means the National Trust, charity number 205846, and National Trust (Enterprises) Limited.

\* Snippet from National Trust: [www.nationaltrust.org.uk](http://www.nationaltrust.org.uk)

# Collect only what's needed

- Adequate
- Relevant
- Limited to what is necessary

No more asking  
for extra data  
like...

demographics if  
it's not relevant  
to the situation

# Consent expires!

- No *required* time period
- Information Commissioner's Office (ICO) *recommends* re-opt-ins every 2 years



# GDPR and Analytics

# GDPR & Analytics

- Don't send personal data into GA
  - E.g. usernames in page URL's, phone # during form completion event, email address as customer identifier in custom dimension
- IP Address - if this is accessible in GA, use a plug-in to anonymize the last part of the IP address
- Geographic data (zip/post codes) - track only partial codes (enough to get to regional reporting)
- Long URLs with user-specific attributes - with a shortened version

# GDPR & Cookies

- Cookies are personal data
- Need explicit and specific consent – for each cookie purpose
- Need a way to opt-out later
- Need a response for “Do Not Track” browser requests

# Cookie Policy Examples



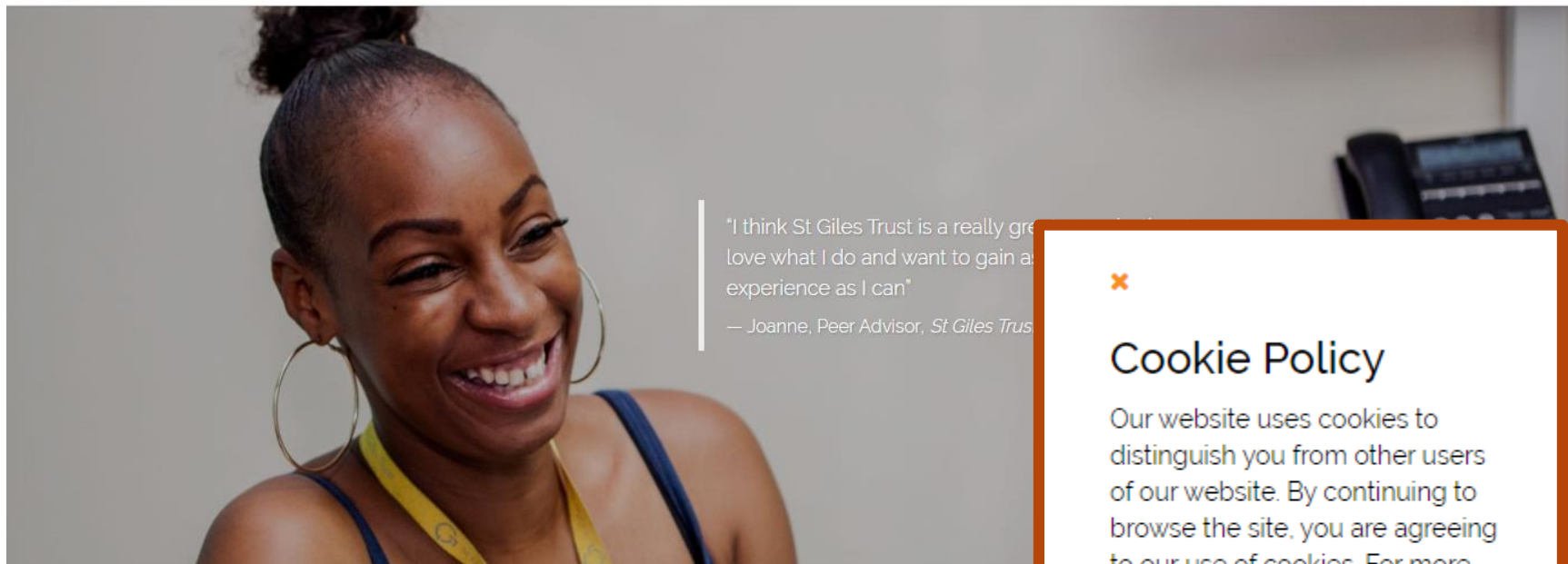
## COOKIES ON OXFAM

We use cookies to ensure that you have the best experience on our website. If you continue browsing, we'll assume that you are happy to receive all our cookies. You can change your cookie settings at any time.



[Find out more »](#)  
[Accept](#)

\* Snippet from Oxfam: [oxfam.org.uk](https://oxfam.org.uk)



"I think St Giles Trust is a really great organisation. I love what I do and want to gain as much experience as I can"

— Joanne, Peer Advisor, *St Giles Trust*

## ABOUT ST GILES TRUST

\* [stgilestrust.org.uk](http://stgilestrust.org.uk)

St Giles Trust is a charity helping people facing severe disadvantage to find jobs, homes and the support they need. We help them to become positive contributors to local communities and wider society.

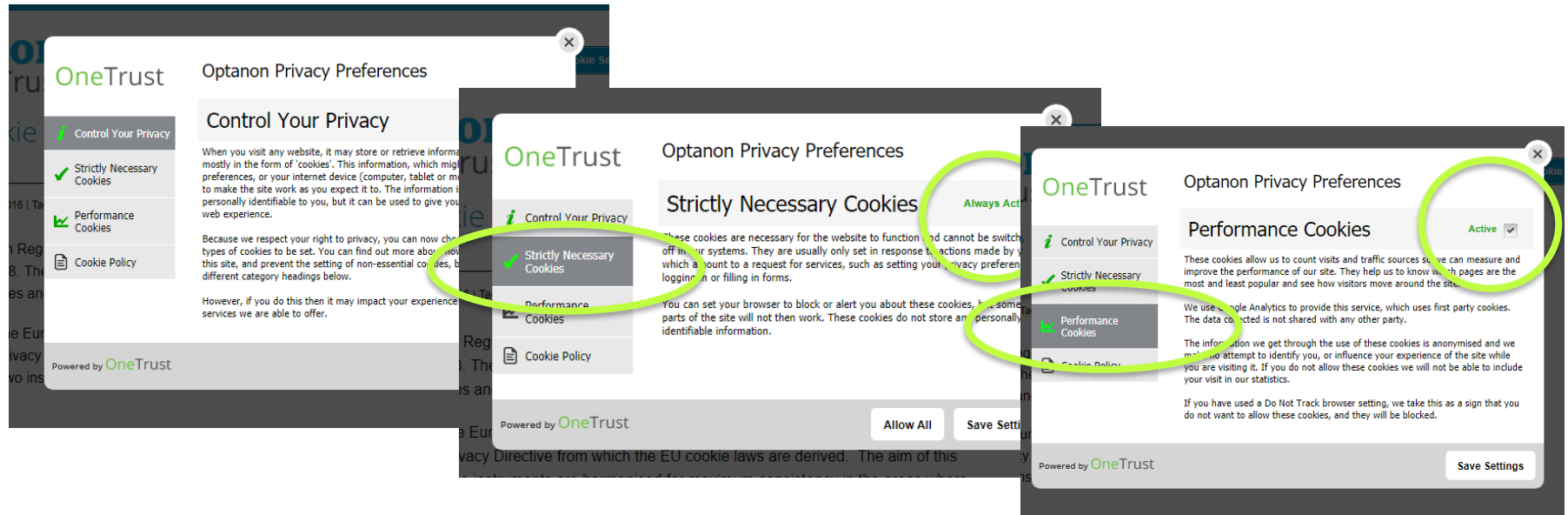
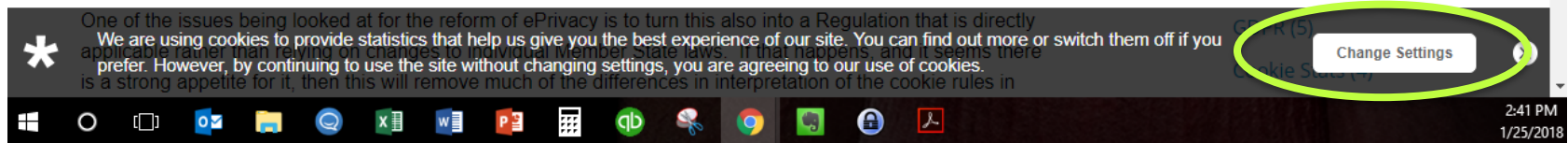


### Cookie Policy

Our website uses cookies to distinguish you from other users of our website. By continuing to browse the site, you are agreeing to our use of cookies. For more information please click [here](#)

[Accept and Continue](#)

# CookieLaw.org





# Analytics Decision Points

- Third party tool audit
  - Sharing plugins
  - Video Embeds
  - User/Social Login
  - Commenting
- Review their privacy policies.

# Usage of the data

- Use it only for its intended purpose
- Need consent if you use it for something else
- Don't share it with any third-parties without consent
- Don't contact supporters if they've withdrawn consent

# Storing the data

- Protected against
  - Unauthorized or unlawful access
  - Accidental loss
  - Destruction or damage
- Ensure 3rd-party providers (e.g. eCRM) are compliant
  - Include in contracts
- Follow rules on notification in case of breach

# Individual rights include

- Ability to review & edit
- Right to export their personal data\*
- Right to be forgotten

**Silver ♥ Lining**

# Resources

- Your senior management & lawyers
  - In-depth explanations:
    - **Guide to General Data Protection Regulation (GDPR)** created by the Information Commissioner's Office, an independent authority in the UK  
<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>
    - **Microsoft White Paper**  
<https://info.microsoft.com/DataGovernanceforGDPRCompliancePrinciplesProcessesandPractices-Registration.html>
  - Articles with advice & guidance:
    - **What is the GDPR? And What Does it Mean for the Marketing Industry?**  
Written by HubSpot, <https://blog.hubspot.com/marketing/what-is-the-gdpr>
    - **Nonprofit Times article**  
<http://www.thenonprofittimes.com/news-articles/eu-clamping-data-use-marketing/>
    - **Direct Marketing Association UK article**  
<https://dma.org.uk/article/innovative-approach-to-refreshing-consent-ready-for-gdpr>
- Sample Internal Briefing document from MobLab, shared by Ted Fickes - <http://moblab.io/gdpr>

The information provided in this PPT is for informational purposes only and not for the purpose of providing legal advice.  
© 2018

# To-do list

Questions?

[lynn.labieniec@beaconfire-red.com](mailto:lynn.labieniec@beaconfire-red.com)

Before  
May  
25th

1. Preparation and data audit

2. Reality check & plan

3. Take action on changes to:

- |   |   |
|---|---|
| <input type="checkbox"/> Web forms          | <input type="checkbox"/> Privacy Policy     |
| <input type="checkbox"/> Cookie tracking    | <input type="checkbox"/> Cookie Policy      |
| <input type="checkbox"/> Analytics tracking | <input type="checkbox"/> Terms & Conditions |
| <input type="checkbox"/> Preference center  |   |

Long term

4. Privacy by design