



GDPR: implementation in Syngenta

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Syngenta approach:



- The Syngenta approach to GDPR is a **risk-based** approach;
- The GDPR impacts across **various data protection domains**. It is not possible to have all measures in place and implemented by May 25;
- Ensure that Syngenta is “**as compliant as possible**” upon the GDPR entering into force in May 2018;
- Operationalize the ongoing maintenance of a **data processing inventory** and continue to **remediate legacy processes and systems**;

Scope for May 2018:

- **Have measures implemented and active for identified key Data Protection domains, while having measures for remaining domains in process of implementation**

Our guiding principles



Demonstrate our ability to comply with intent of the regulation



Country / Territory own local delivery



The implementation playbook will evolve over time



GDPR is a marathon not a sprint



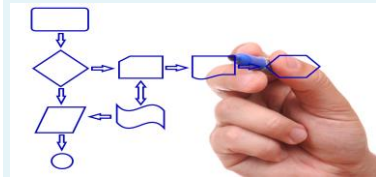
Governance of GDPR

Foundational Capabilities



People

Capable and accountable workforce, enabled through the right governance and aware of the importance of data privacy at Syngenta



Process

Simple pragmatic and streamlined processes enabling rapid reaction to data subject requests and allowing efficient monitoring and reporting of regulatory compliance



Technology

Efficient and fit for purpose systems to support data protection business requirements

1. 6 steps to comply with GDPR.

1 To create documentary platform for compliance with GDPR

2 To identify where DPC is needed and appoint accordingly

3 To communicate through the company GDPR implementation and relevant policies/guidelines

4 Global inventory list creation/ further legal assessment

5 To implement clear process of 3rd parties requests response

6 Data Breach management implementation

2. Go through step-by-step

1

To create documentary platform for compliance with GDPR

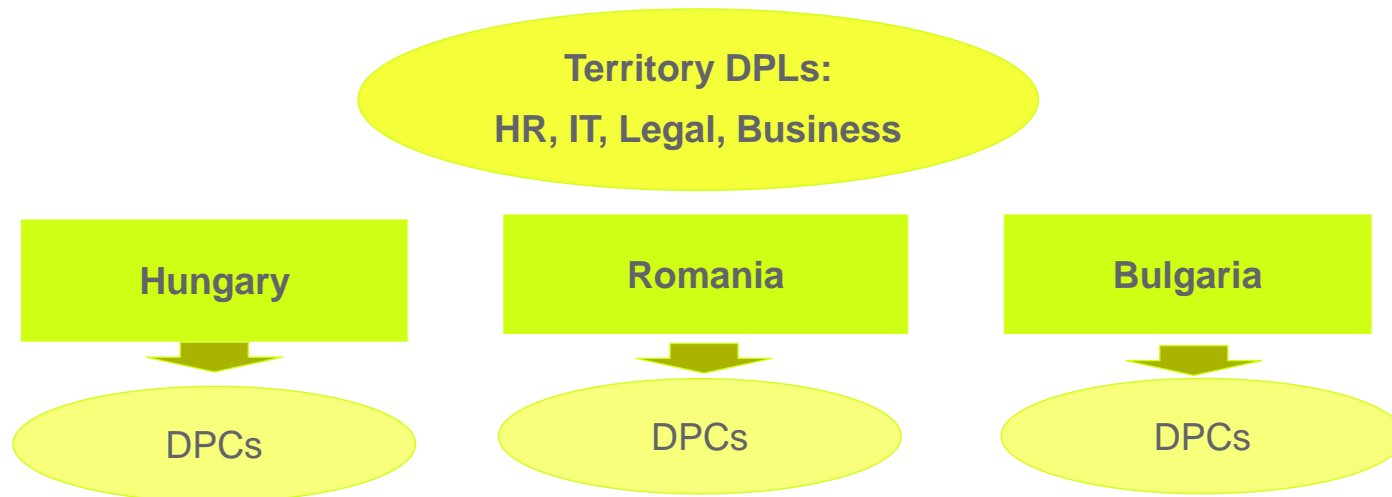
- Privacy Policy
- Risk management Methodology
- Data transfer procedure
- Privacy by Design Principles
- Breach Management Process
- Data subject right process
- Data protection principles including approach to consent

2) To amend 3rd party contracts by standard DP clauses where needed

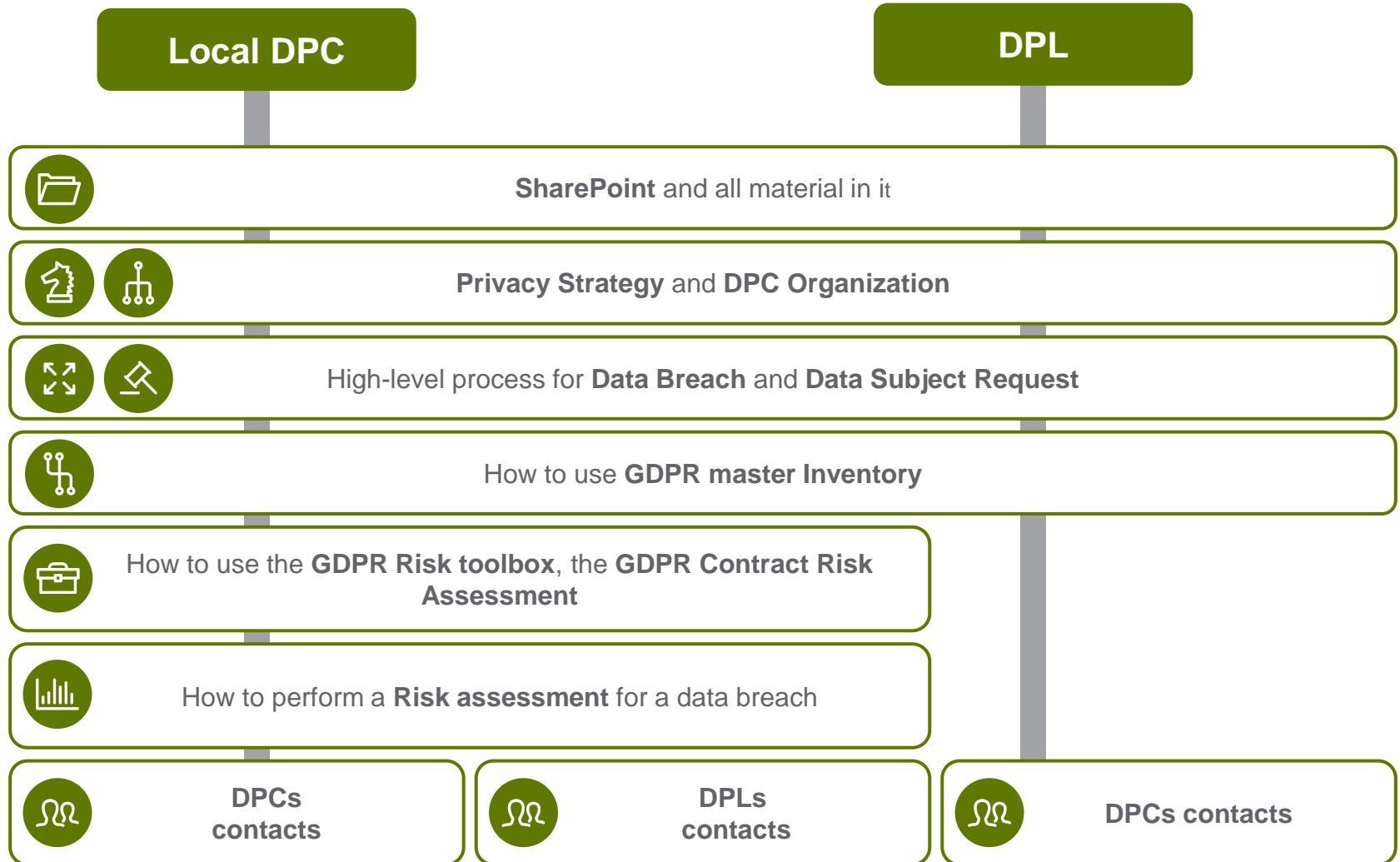
2. Go through step-by-step

2

To identify where DPC is needed and appoint accordingly



What do I need to know as a DPCO or as a DPL?



2. Go through step-by-step

3

To communicate through the company about GDPR implementation and relevant policies/guidelines

Communication to all employees incl. link to Sharepoint

Communication regarding approved templates for requests

Trainings for employees

2. Go through step-by-step

4

Global inventory list creation/ further legal assessment

- To make a data mapping per country;
- To create global Inventory list
- To transfer data from inventory list to Assist tool
- Further legal assessment is made by IT project team through an automated process
- Local follow-up on identified gaps
- Regular manual update of Assist tool for every country

GDPR Assist Tool

The screenshot displays the GDPR Assist tool interface. On the left is a navigation menu with options: Home, Main, Applications, Data controllers, Applications/Controllers, My records, Trackers, Reports, and Administration. The main area shows a table titled 'Applications by data controller' with columns for ID, Application, GAI ID, Data controller, and Entity. Below the table is a 'Request details' form with various sections for entering request information.

ID	Application	GAI ID	Data controller	Entity		
52	ACCSYS	4630	Syngenta South Africa (Pty) Ltd	ZA016CP	Delete	View record
53	ADP	6804	Syngenta Semences SA	MA001	Delete	View record
54	Agriclub Poland	3673	Syngenta Polska Sp. z.o.o. - CP	PL011	Delete	View record
55	Bonusland	3672	Syngenta Agro GmbH	DE012	Delete	View record
56	Check&In	4614	Syngenta Italia SpA - crop	IT007	Delete	View record
57	CIMR	6803	Syngenta Maroc SA - CP	MA002CP	Delete	View record
58	CropExpert	3769	Syngenta Agro AG	CH030	Delete	View record
60	Foundation ERP ECC - EAME/APAC Finance	6611	Syngenta Seeds GmbH	CH01		
61	Foundation ERP ECC - NA Commercial	3290	Syngenta France SAS (Seeds division)	FR01		
62	Geofolia	6692	Syngenta Italia SpA - crop	IT00		
63	GPC - Group Product Costing (Seeds)	2467	Syngenta Seeds NV	BE00		
64	Horoquartz - eTemptation	7388	Syngenta France SAS (Crop division)	FR01		
65	HSE4U	2853	Syngenta UK Ltd (CP)	GB01		
66	Infobudget	7558	Syngenta Italia SpA - crop	IT00		
67	ISAPLAN	6693	Syngenta Italia SpA - crop	IT00		
68	JuniorWeb	6472	Societa Produttori Sementi S.p.A.	IT01		
69	Lenel	7389	Syngenta Production France SAS	FR01		
70	Level 5 - L5	6315	Syngenta Crop Protection NV	BE09		
71	OdProv	4610	Syngenta Italia SpA - crop	IT00		
72	Plantacja Ziemia	3683	Syngenta Polska Sp. z.o.o. - CP	PL01		
73	RobertKnows	5579	Syngenta Agro GmbH	DE01		
74	SalesForce.com EAME/APAC	3754	Syngenta UK Ltd (CP)	GB01		

Request details

Save Return to read-only

Meta Data of the request

Type of data subject: Customer / Client Type of request: Right to erasure

Additional information required: Date request received: 11/06/2018 16:51:16

Employee responsible for request: Name of local DPO/DPC:

Global DPO responsible: Local DPO/DPC responsible:

Syngenta entities impacted: No data to be shown

Personal data (about the data subject and request)

Name of the data subject: Timeframe of the involved data:

Scope of the request (description):

Reason for the request:

Request verification (request submission process)

Kind of request according to process: Please select... Verification of data subject (requestor): Please select...

Verification of request under GDPR: Please select... Comment regarding verification:

Request tracking

*List of new mandatory attributes provided in next 2 slides

2. Go through step-by-step

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To implement clear process of 3rd parties requests response

- Guidance in place
- Templates in place
- Trainings to be provided
- Communication to all employees
- Permanent DPL support

High level process

The process for managing Data Subject Requests consist out of **five** main phases:



8.1 Example request form

Please note that the official request form will be issued by the GDPO and may be subject to change. Please contact the GDPO for the most recent, updated request form.

Data Subject Name	(First Name)	(Last Name)
Data Subject Category	(First Name)	(Last Name)

8.2 Example 1 of Acknowledgement of Receipt

The following template shall be used to respond to a request received from :

Dear *(name of individual)*

Thank you for your letter/email of *(date)* in which you make a request for access to your personal data. We will process your request as soon as possible. We will contact you if we need more information to process your request.

(Pick the relevant paragraph)

8.4 Example Data Subject Notification

Dear *(name of individual)*

The following is in response to your letter/email of *(date)* in which you made a request for *(specify the kind of request)*.

(Pick the relevant paragraph)

(Subject to your request)

8.5 Example Request for Additional Information

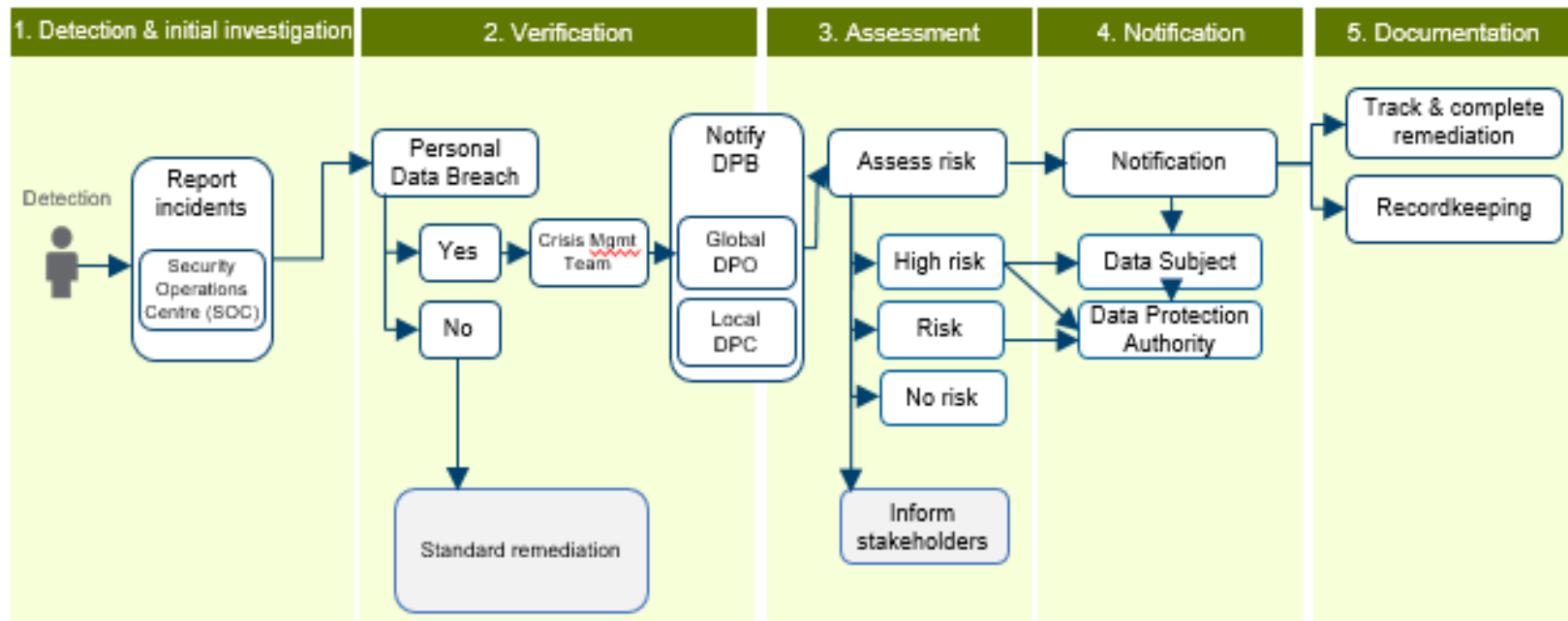
The following template shall be used to respond to a request where insufficient information has been provided by the data subject.

Email subject: Data Subject Request for Additional Information, Case reference number: [Case#]

2. Go through step-by-step

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Data Breach management implementation



GDPR 3rd party request case in Russia