

The Syngenta logo is positioned on a dark green horizontal bar. It consists of the word "syngenta" in a white, lowercase, sans-serif font. A small, stylized leaf icon is placed above the letter 'n'.

syngenta

# GDPR: implementation in Syngenta

12 July 2018

## 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**;

# 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**



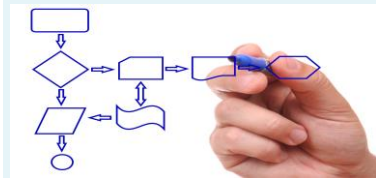
**Governance of GDPR**

# 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 3<sup>rd</sup> parties requests response

**6** Data Breach management implementation

## 2. Go through step-by-step

1

To create documentary platform for compliance with GDPR

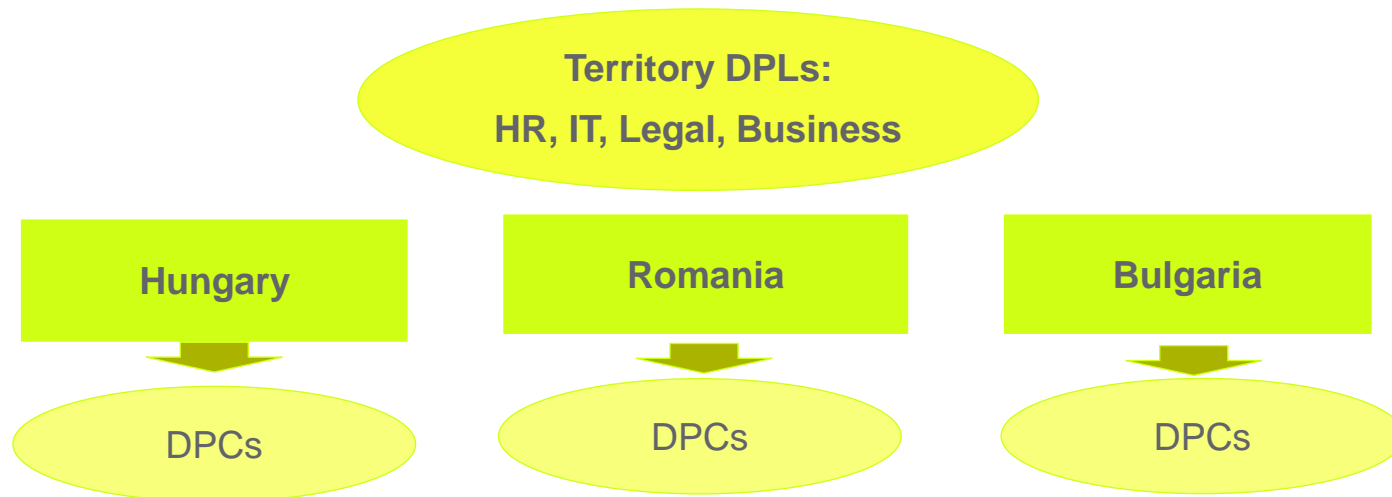
- Privacy Policy
- Risk management Methodology
- Data transfer procedure
- Privacy by Design Principles
- Breach Management Process
- Data subject right process
- Data protection principles including approach to consent

2) To amend 3<sup>rd</sup> party contracts by standard DP clauses where needed

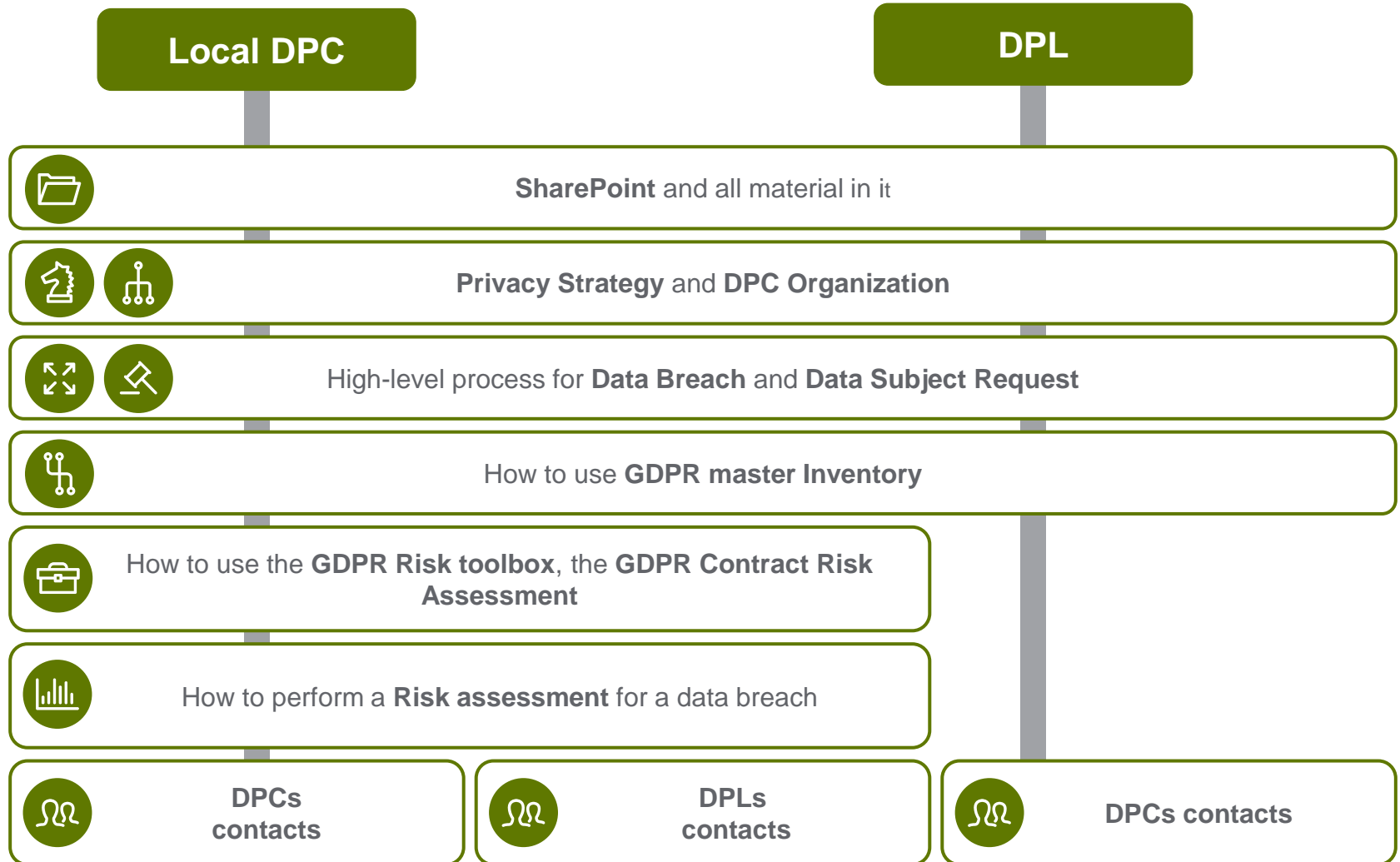
## 2. Go through step-by-step

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

## 2. Go through step-by-step

5

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 the information we process about you *(or specify)*.

*(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 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

6

### Data Breach management implementation

