

| Data Protection Management Programme  | Governance and Risk Assessment (cont)  | Policies and Practices   | Processes   |
|---|--|--|---|
| <p><b>WHY</b> Helps an org. demonstrate accountability in data protection confidence to stakeholders and fosters higher-trust relationships with customers and business partners for business competitiveness.</p> <p><b>WHAT</b> 1. Governance and Risk Assessment<br/>2. Policies and Practices<br/>3. Processes<br/>4. Maintenance</p> | <p><b>Role of Data Protection Officer (DPO)</b> Ensuring that the organisation complies with the PDPA</p> <p><b>Culture of Accountability and Staff Training</b> Protecting personal data is the responsibility of everyone in the organisation – generate awareness and foster a culture of personal data protection</p> <p><b>Risk Assessment</b> <b>Strategic</b> - how it affects the strategic objectives of the company<br/><b>Operational</b> - affects operations<br/><b>Compliance</b> - affects org's compliance with regulations<br/><b>Financial</b> -affects financial processes of the company</p> | <p><b>WHY</b> To comply with PDPA and set expectations for individuals</p> <p><b>WHAT</b> What? Why? How? Contact details for any questions or concerns.</p> <p><b>HOW</b> Use plain language, FAQ, UX Design and Easy Access</p> <p><b>Data Privacy Practices</b></p> <ul style="list-style-type: none"> <li>- Identifies personal data protection issues early</li> <li>- Increases personal data protection awareness</li> <li>- Complies with PDPA obligations</li> </ul> <p><b>Data Privacy Communication</b></p> <ol style="list-style-type: none"> <li>1. Notification</li> <li>2. Consent</li> <li>3. Policy Updates</li> <li>4. Interaction with Users</li> <li>5. Access, Correction and Complaint Handling</li> </ol> | <p><b>Risk Identification and Mapping</b> To identify and map risks relating to personal data, through using:</p> <ul style="list-style-type: none"> <li><b>Data Inventory Map</b> – cataloguing personal data that includes, collection, use, disclosure, storage, disposal</li> <li><b>Data Flow Diagram</b> – depicts the movement of that data through internal systems and external transfers</li> <li><b>Risk Register</b> – records risks associated with the personal data and how it is used, likelihood and consequences of risk occurring</li> </ul> |
| Governance and Risk Assessment  |  |  |   |
| <p><b>Role of Senior Management</b> Responsible for org's approach to handling personal data by providing leadership to DPOs and guidance on data protection by providing leadership</p> <p>Senior management should have an understanding of risks and review how risks affects the organisation</p>                                     |  |  |   |



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### Processes (cont)

**Risk Remediation and Controls**

To implement of systems-based or process controls

- Identify where personal data is stored
- Determine level of security controls required
- Apply controls on systems/infrastructure that stores personal data
- Implement process controls to approve, review and manage access rights
- Build data protection measures during the software development lifecycle

**Risk Reporting**

Constant monitoring of risks and reporting risks to senior management

### Processes (cont)

**Breach Management**

Containing the breach

Assessing the risk

Reporting the incident

Evaluating the response and recover to prevent future breaches



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