



Data Privacy - A New Imperative

Living in an age of Data Driven Economy

April 2021



Privacy and Data protection have become imperative in today's digital business world. Customers and regulators increasingly demand adequate protection of personal data.

A data-driven economy along with the deployment of privacy-invasion technology is growing, and the quantity and impact of privacy-related scandals are increasing. Privacy regulations

worldwide are being amended, enhancing the private rights and protection of individual data. Organizations need to substantially change their data privacy framework to be compliant with these regulations.

Pervasive Connectivity



- Evolving Businesses with proliferation of Mobile internet & connected devices.
- Connected devices may surpass 20 Billion threshold by 2020.

Increasing Data



- Increasing amount of personal data is shared and accessed online.
- Digital data universe may soon be measured in Zettabytes.

Customer Delight



- Analyzing customer profile and behavioral patterns to enhance service experience.
- It is highly individual focused, targeted business models will rise.

Cyber Threats



- Evolving cyber threats are focusing more on personal identifiers.
- There is an increase in personal identity thefts with financial motives.

EU - General Data Protection Regulation (GDPR)



The General Data Protection Regulation (hereafter referred as "GDPR") is the European's view of what the baseline expectations are for processing personal information of European Union (hereafter referred as "EU") as we continue through the digital revolution.

The GDPR is a strong piece of legislation and represents a clear shift from the current privacy regulation environment in the EU and is in force from 25 May 2018.

Key Highlights

- Requirements to gain explicit consent instead of implicit consent.
- Sensitive Personal Information have been extended to include biometric & genetic information.
- Data subject rights have been extended to include Data Portability and the Right to Erasure.
- Companies must perform Data Protection Impact Assessment (DPIA) if the activity is considered as "high risk."
- **Digital Marketing:** Individuals must be informed of their right to object "at the point of first communication" and in the privacy notice.
- **Data Processors (DP)** and Data Controllers must conduct due diligence into processors suitability.
- **Data Breach:** Requirements to report Privacy breaches to the regulator within 72 hours
- Requirements around monitoring and encryptions.
- **Data Inventory:** Organizations need to maintain a personal data inventory.

Key Obligations

Data Security & Breach Notification Standard

Data Subject Consent

Cross Border Data Transfer

Data Controllers & Processors Obligations

Code of conduct & certification

Data Protection Officer

Profiling & Right to Object

Right to be Forgotten & Data Portability

Pseudonymization of Personal Data

Data Privacy Law in Kuwait & Neighboring countries

Egypt Personal Data Protection



The Law aims to safeguard the rights of individuals in Egypt in respect of their personal data and to place responsibilities on businesses in how they process personal data.

Kuwait CBK - CSF



Central Bank of Kuwait published the cybersecurity framework for banking sector in Kuwait.

The framework defines three core principles that enhances the cybersecurity and resilience capabilities.

Bahrain Personal Data Protection Law



Bahrain Personal Data Protection Law applies to individuals & businesses who collect personal data of individuals living in Bahrain.

Our Services



Personal Data Inventory

- Identify data actors and develop personal data inventory
- Share the personal data inventory with business owners and management.



Current State Assessment

- Conduct current state assessment with respect EU GDPR requirements
- Discuss the current state assessment report with identified risks and recommendations.



Legal Basis of Processing

- Develop Data Privacy Framework, policies and procedures based on EU GDPR requirements
- Develop privacy notice, consent and templates to cater Data Subject Rights
- Develop template for Legitimate Interest Analysis (LIA).



Data Protection Impact Assessment

- Define criteria for determining high risk process and classify business processes
- Perform the Data Privacy Impact Assessment (DPIA)
- Provide recommendations to mitigate the risk identified
- Provide list of clauses to be added in the third party agreements.

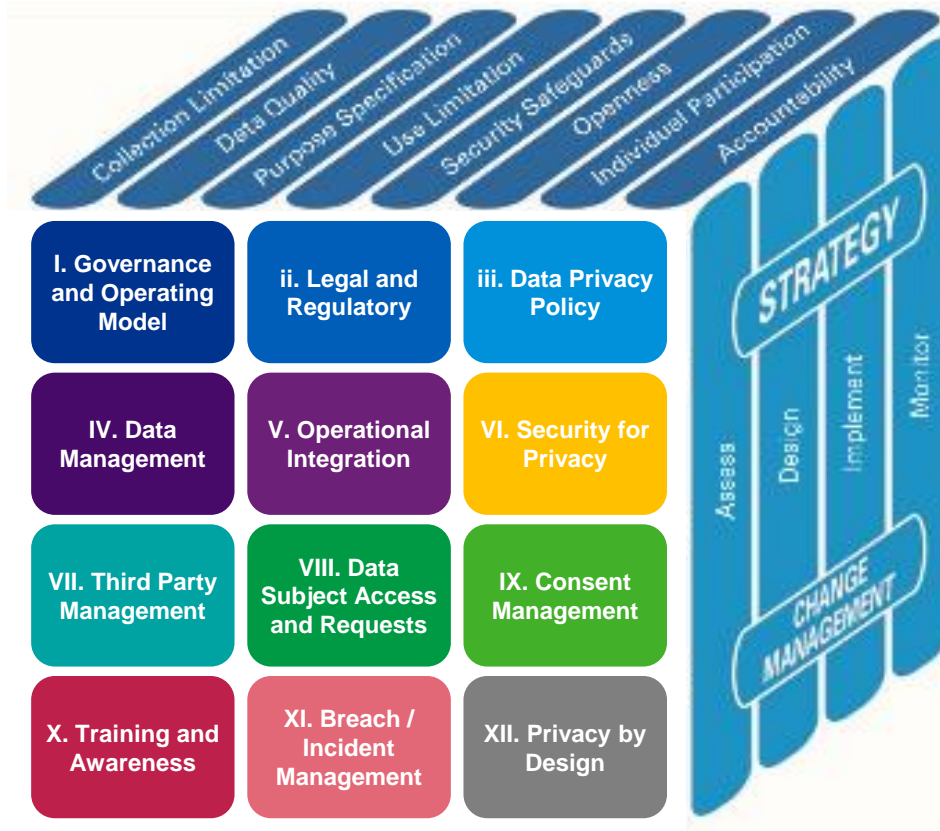


Implementation Roadmap & Training

- Develop a comprehensive implementation roadmap
- Conduct workshop with management to discuss the implementation roadmap and collate inputs
- Develop EU GDPR training material
- Conduct EU GDPR training for key stakeholders.

KPMG Privacy Management Framework

KPMG's Privacy Management Framework covers the twelve main categories covered by data protection regulations worldwide. These categories are looked at from the privacy and data protection principles.



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