GDPR CONSIDERATIONS FOR DATABASE MIGRATION.

When preparing to migrate to a new database system, there will be some GDPR considerations that your executive search or recruitment firm will need to address. Sample steps are outlined below to help you to:

> (a) check the personal data you currently hold is cleansed and being held in line with your company's GDPR related policies; and

> (b) to ensure you have the plans and measures in place to keep your data clean and help you comply with GDPR ongoing after you migrate to your new database system.

Assessing risks

At the start of your project, consider carrying out a data privacy impact assessment (DPIA). This may help you identify and assess where there might be higher risks for data subjects, particularly where data may need to be handled in different ways to normal for the purpose of your database migration. For example: how personal data will be transferred from your old to new system; who will have access to the personal data during and after the project; points during your data analysis or cleansing process where personal data may be used or extracted for analysis reports, etc.

Keep a record of your DPIA to help you demonstrate how you have taken steps to understand and mitigate risks to data subjects.

Preparing your legacy data

1. Have you already established and documented your data retention policy for each type of data you hold in your database records?

    > *If **YES**: go to next step.*
    > *If **NO** or **PARTLY**: use the principles set out in the Data Retention section of the ComplyGDPR Action Plan to establish your rules for data retention of people's records. (Also, the ComplyGDPR Toolkit includes a sample data retention policy template in Annex 3 of the data protection handbook.)*

2. Is your programme of routine data cleaning and deletions being carried out regularly according to your data retention policy?

    > *If **YES**: go to next step.*
    > *If **NO** or **PARTLY**: use the rules set out in your data retention policy to cleanse data.*

3. Have you recently carried out routine spot-checks on people's records to see whether your data minimisation, data accuracy, data quality guidance is understood and being followed by users?

    > *If **YES**: go to next step.*
    > *If **NO**: carry out a handful of spot checks on random selection of people's data records. Record results and any remedial actions or follow-up actions. Carry out any immediately necessary actions preparation for your migration.*

4. Consider carrying out checks that comments and opinion in your database could not be deemed derogatory or offensive. Cleanse and provide refresher training for staff as necessary.

5. Is the status of the lawful basis you rely on for GDPR up to date for all person's record? E.g. do you have a records that every individual has been informed that you hold their data within 1 month?; where consent applies, do you have a record of consent being obtained and that consent has not expired?

*If **YES**: go to next step.*

*If **NO** or **PARTLY**: identify any data that needs to be deleted; where consent is due to be requested/re-renewed; or individuals who are due to be informed that you have their data. Take action accordingly.*

6. If you handle any special category data within your database systems, give particular thought to extra measures you can put in place to continue to protect it during the project and in your new database system.

7. Consider whether your findings from any of the above steps indicate you need to carry out any additional data quality related actions in preparation for your migration.

Preparing to manage your new database

8. Process

   o Check that data fields in your person records that contain key GDPR status information are being mapped to fields in your new database. E.g. lawful basis applicable; whether person informed for legitimate interests purposes; date and record of consent being obtained etc.

     Or, if this will not be included in your migration plan, decide and document what reliable processes you will use to manage your GDPR related processes in your new database.

   o Ensure that an individual has been assigned responsibility for ensuring your regular programme of data cleansing, data quality spot-checks and GDPR status spot-checks are carried out, to help ensure the lawfulness, accuracy and quality of your data is maintained ongoing.

9. Training

   o Does your planned user training include clear instruction about your process for how to inform individuals that you have their data, or how to use the GDPR status tracking features?

   o Consider giving your employees a refresher briefing on data quality and a reminder of rules and tips to help ensure people's records are suitable to be seen by the data subject to help keep your new database in good shape!

   o Consider producing best practice cribsheets to support both your current and future new employees to comply with GDPR in their day-to-day role.

Accountability

Keep a record of the activities you carried out for the above steps; how you have thought through the risk areas; and other actions you have taken to clean or delete data in preparation for your database migration. *(A sample record sheet is enclosed in* Annex A.*)*

Also, continue to keep ongoing records of your routine cleaning and deletion of data to demonstrate that this is not just a policy, but something you do in practice on a regular basis within your business.

Annex A

Record of data management activities for database migration project.

[Text in square brackets in the table below is for example purposes only.]

Date	Purpose (e.g. Routine scheduled review, specific project etc.)	Summary of activities carried out, decisions made and next steps.	Date next action or follow-up due.	Status (Live/Closed)	Owner / Action by (name)
[1st March 2020]	[Database migration project.]	[Reviewed data retention policy with management team and revised XYZ / concluded no changes needed at this stage / agreed policy should be assessed annually in future.] [Diarised next annual data retention policy review.]	[DATE]	[Live]	[NAME]