

## **Assess your GDPR Subject Rights Compliance Posture According to Article 3, 5, 7, 12 – 21, and 39**

1. Are you processing personal data of EU data subjects where the processing activities are related to monitoring of their behavior or offering of goods or services to residents of European Union directly by your company or on behalf of your customers? (As defined by GDPR Article 3)
2. How do you demonstrate compliance with the Article 5 Principles of Processing Personal Data:
  - data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
  - processed lawfully, fairly and in a transparent manner; adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization');
  - kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
3. How do you demonstrate proof that data subject has consented to processing of his or her personal data?
4. How can data subject withdraw his or her consent at any time as easily as they gave their consent?
5. How do you facilitate the exercise of data subject rights under Articles 15 to 22?
6. How do you demonstrate that Data subject rights don't diminish regardless how many parties are involved in data processing?

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7. How do you demonstrate a proof that, at the time when personal data are obtained, data subjects were provided with all of the following information as per Article 13, including:
  - the right to withdraw consent at any time
  - the identity and the contact details of the controller and, where applicable, of the controller's representative;
  - the contact details of the data protection officer, where applicable;
  - the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
  - where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;
  - the recipients or categories of recipients of the personal data, if any;
  - where applicable, the fact that the controller intends to transfer personal data to a third country or international organizations.
  
8. How do you provide data subject or the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information as per Article 15:
  - the purposes of the processing;
  - the categories of personal data concerned;
  - the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries
  - where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
  - the right to lodge a complaint with a supervisory authority;
  - where the personal data are not collected from the data subject, any available information as to their source;
  - the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

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9. How do you enable data subjects to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the grounds in Article 17 Paragraph 1 applies?
10. How do you enable data subjects to obtain from the controller restriction of processing where one of the grounds in Article 18 Paragraph 1 applies?
11. How do you communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed as mandated by Article 19?
12. How do you provide personal data to the data subject concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and facilitate the right to transmit data to another controller without hindrance from the controller to which the personal data have been provided as outline in Article 20?

Ferroot has pioneered a Privacy Management approach that integrates Data Controllers and their processors' Privacy Lifecycle Management to automate GDPR Article 3, 5, 7, 12 to 21 obligations and requirements for fulfilling Data Subject Rights and demonstrating proof of compliance.

**Ferroot aims to make privacy compliance a competitive advantage**  
Schedule a demo at [www.ferroot.com/demo](http://www.ferroot.com/demo)