

Welcome to the ARMA Swiss Chapter News

Dear Information Governance Professional,

May 25th was the day when [GDPR](#), the General Data Protection Regulation of the EU, came into force. The Deep Dive section of this Newsletter evaluates the question:

“Can an organization become GDPR compliant without having Information Governance or Information Lifecycle Management in place?”.

By having voted in favor of local memberships at the General Assembly of the ARMA Swiss Chapter on March 22nd, 2018, we all hope that this will boost the number of members. Your help is required to promote ARMA memberships, either as full international member or as local member of the Swiss Chapter only. Thanks for your support.

We are looking forward to seeing you at the next quarterly meeting on June 28th at Swiss Re in Adliswil,

Board of ARMA Swiss Chapter

Next Events (save the dates)

- June 28th, 2018, Swiss-Re, Adliswil
- September 27th, 2018, Basle
- December 13th, 2018, Zurich

Special Interest Groups

(Details available [online](#))

- Financial RIM Roundtable
- Semantic Information Management

Contact us! Visit our Website!

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<http://www.armachapter.ch>

Twitter: [@armaswisschapt](#)

All Newsletters are published and accessible on the website

Hot Topics from the • ARMA Swiss Chapter-only Membership Chapter

At the General Assembly held on March 22nd in Zurich the decision was formally taken to change the [bylaws](#) to allow accepting local memberships. Paragraph 3.2 of the bylaws read as follows: “This type of membership is with the ARMA Swiss Chapter only. It entitles the member to join all chapter events and receiving news and collateral materials issued by the chapter. It does not include any services granted by ARMA International.”. The yearly fee was set to CHF 50.00.

If you are interested in becoming a local member, please apply online on the [ARMA Swiss Chapter Membership page](#).

• Quarterly Meetings

Even that the attendance was below expectations the board has decided to keep the periodicity and format also in 2018. Meetings will be held on the last Thursday of the quarter except in Spring and Winter where the dates would collide with public holidays.

Please block the evenings of June 28th, September 27th and Dec 13th and try to attend. Discussions and networking become more valuable having a broad representation of experience and knowledge.

• ARMA International Website

The website of ARMA International has undergone a complete redesign. The new website should bring easier navigation and greater ease in accessing ARMA's tools and resources that are so important to your careers. You'll find new resources to help you and your stakeholders understand the value of IM and IG professionals, as well as ARMA's perspective on the IM and IG industries.

• ARMA Live! 2018

The ARMA International Conference 2018 takes place from October 22-24, 2018 at Anaheim Convention Center, California, US. Please visit the [web-site](#) for details.

Note: There won't be a European Conference this year!


Deep Dive and Knowledge Transfer

Use the EU General Data Protection Regulation (GDPR) as an opportunity to promote the importance of Information Governance

by Guy Rom, LL. B, member of the ARMA Swiss chapter board

Working Assumption: Without Information Governance no GDPR Compliance is possible

The following [slide](#) taken from a Danish consulting company provides a summary of what [GDPR](#) requests when attempting to be GDPR compliant. Personal data handling must follow the 7 guiding principles:



Data Minimisation
Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which those data is processed.

Accuracy
Personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

Storage Limitation
Personal data must be 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; it may be stored for longer periods solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Purpose Limitation
Personal data may only be collected for the specified, explicit and legitimate purposes and must not be further processed in a manner that is incompatible with those purposes.


Integrity and Confidentiality
Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measure.

Lawful, Fair & Transparent
It must be clearly explained to the data subject that data is being captured & what that data is; why that data is being captured, and by whom, and what will happen to that data. It must also be clear what rights the data subject has regarding their own data.

Accountability
The controller shall be responsible for, and be able to demonstrate compliance with, the GDPR principles.

7 GUIDING PRINCIPLES OF GDPR

• Compliance & Information Governance
• Information Management
• Reporting & Analytics

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This should be good news for all struggling to motivate management investing in Information Governance initiatives. Becoming GDPR compliant requires Information Governance along the entire information lifecycle, starting when the information is obtained or created. Article 13 of GDPR requires from the data controller being prepared to provide the data subject extensive details about what and how data is being processed. According to Article 4, Paragraph 2, “processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means [...]”. And honestly: Is there any company not processing personal data in some or many of their processes?

Anyone having consulted GARP, the [Generally Accepted Records Management Principles](#) issued by ARMA, will easily find parallels to the rules of GDPR. Hence, nothing surprisingly new for Information Professionals. It’s worth deep diving into the topic and mapping GDPR with GARP. Based on the mapping, you, as a responsible information professional, could evaluate the [Information Governance Maturity Level](#) of your organization and extract a chain of arguments to get management’s support for your IG initiative.

Adhering to both GDPR and GARP is not only to protect your organization from fines and other adverse consequences of non-compliance but strengthen the benefits for the company when managing information in a systematic and consistent manner. As outlined in an earlier [ARMA Swiss Chapter Newsletter](#) information should be considered as one of the organization’s most valuable assets.

Mapping GARP Principles to a subset of provisions set out in GDPR:

GARP Principle	Description	Mapping to Articles in GDPR
<i>Principle of Accountability:</i>	<i>A senior executive (or a person of comparable authority) shall oversee the Information Governance program and delegate responsibility for information management to appropriate individuals.</i>	<i>Art. 37 ff GDPR (Data Protection Officer) Art. 24 GDPR (Controller) Art. 27 GDPR (Representation of the controller) Art. 28 GDPR (Processor)</i>
<i>Principle of Transparency:</i>	<i>An organization's business processes and activities, including its Information Governance program, shall be documented in an open and verifiable manner, and that documentation shall be available to all personnel and appropriate, interested parties.</i>	<i>Art. 5 Paragraph 2 GDPR (Controller's responsibility) Art. 12 GDPR (Transparency) Art. 13 GDPR (Information and Access) Art. 14 GDPR (Information if data was not received from data subject) Art. 19 GDPR (Notification about Erasure and Rectification) Art. 25 GDPR (DP by Design and Default) Art. 30 GDPR (Records of Processing Activities) Art. 40 GDPR (Codes of Conduct)</i>
<i>Principle of Integrity:</i>	<i>An Information Governance program shall be constructed so the information assets generated by or managed for the organization have a reasonable guarantee of authenticity and reliability.</i>	<i>Art. 5 Paragraph 1 lit b-e GDPR (Principles) Art. 16 GDPR (Rectification) Art. 17 GDPR (Erasure)</i>
<i>Principle of Protection:</i>	<i>An Information Governance program shall be constructed to ensure an appropriate level of protection to information assets that are private, confidential, privileged, secret, classified, essential to business continuity, or that otherwise require protection.</i>	<i>Art. 5 GDPR (Principles relating to processing personal data) Art. 24 GDPR (Measures to be implemented by Controller) Art. 32 GDPR (Security of Processing) Art. 44 ff GDPR (Transfers of Personal Data to 3^d Countries and International Organizations)</i>
<i>Principle of Compliance:</i>	<i>An Information Governance program shall be constructed to comply with applicable laws, other binding authorities, and the organization's policies.</i>	<i>GDPR in general and specifically Art. 6 GDPR (Lawfulness of processing) Art. 47 GDPR (Binding Corporate Rules)</i>
<i>Principle of Availability:</i>	<i>An organization shall maintain its information assets in a manner that ensures their timely, efficient, and accurate retrieval.</i>	<i>Art. 15 GDPR (Right of access by the data subject) Art. 20 GDPR (Data Portability)</i>
<i>Principle of Retention:</i>	<i>An organization shall maintain its information assets for an appropriate time, taking into account its legal, regulatory, fiscal, operational, and historical requirements.</i>	<i>Art. 5 Paragraph 1 lit. e GDPR (retention) Art. 15 GDPR (Right of access by the data subject)</i>
<i>Principle of Disposition:</i>	<i>An organization shall provide secure and appropriate disposition for information assets no longer required to be maintained, in compliance with applicable laws and the organization's policies</i>	<i>Art. 5 GDPR (Principles) Art. 17 GDPR (Erasure) Art. 20 GDPR (Data Portability) Art. 30 Paragraph 1 lit. f GDPR</i>

The references listed above aren't all-inclusive, there are more provisions within GDPR affecting an organization's Information Governance. However, from those mentioned alone it becomes clear that Information Governance, especially by adhering to GARP, is unavoidable to be GDPR compliant.

Evaluation your organization's Information Governance Maturity Level!

ARMA provides a tool by which the [Information Governance Maturity Level](#) of an organization can be evaluated. In accordance with the information outlined on the ARMA website the Maturity Model describes for each Principle the characteristics of effective Information Governance at five distinct levels of development: substandard, in development, essential, proactive, transformational:

**Level 1
(Substandard)** Information governance concerns are not addressed at all, are addressed minimally, or are addressed in a sporadic manner. Organizations usually have concerns that the Information Governance programs will not meet legal or regulatory requirements and may not effectively serve their business needs.

**Level 2
(In Development)** Environment where there is a developing recognition that Information Governance has an impact on the organization and that the organization may benefit from a more defined Information Governance program. The organization is vulnerable to redress of its legal, regulatory, and business requirements because its practices are ill-defined, incomplete, nascent, or marginally effective.

**Level 3
(Essential)** Essential or minimum requirements that must be addressed to meet the organization's legal, regulatory, and business requirements. Level 3 is characterized by defined policies and procedures and the implementation of processes specifically intended to improve Information Governance. Organizations may be missing significant opportunities for streamlining the business and controlling costs, but they demonstrate the key components of a sound program and may be minimally compliant with legal, operational, and other responsibilities.

**Level 4
(Proactive)** Organization-wide, proactive Information Governance program with mechanisms for continuous improvement. IG issues and considerations are routinized and integrated into business decisions. For the most part, the organization is compliant with industry best practices and meets its legal and regulatory requirements. Organizations can pursue the additional business benefits they could attain by increasing information asset availability, as appropriate; mining information assets for a better understanding of client and customer needs; and fostering their organizations' optimal use of information assets.

**Level 5
(Transformational)** Organization has integrated Information Governance into its infrastructure and business processes such that compliance with the organization's policies and legal/regulatory responsibilities is routine. The organization recognizes that effective IG plays a critical role in cost containment, competitive advantage, and client service. It implements strategies and tools for ongoing success.

Conclusion

One might argue and say that GDPR is about Personal Data of people in the EU only. This is certainly right but to determine what is in and out of scope requires looking into all information. Not only you'll reduce the amount of information retained, resulting in lower costs, but you'll benefit from the intellectual property contained in what you'll consider being worth keeping – remember: "Information is an asset ... and not only a liability!"

In the coming months, Switzerland will enact an amended version of the Swiss Data Protection Law to achieve an adequate level of data protection as required by the EU. Be prepared and avoid getting hit by law suits and fines or, even worse, by losing your good reputation built over a long period of time.

Note/Disclaimer:

This Newsletter is not to be considered as legal advice and reflects the author's view only.