

# How to turn GDPR compliance into an opportunity

Keys for the correct  
management of personal  
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## Keys for the correct management of personal data in documents

On the 5th of March, personal data (names, surnames, IDs, dates of birth, ...) and the qualifications of more than 30,000 applicants who had taken the 2018 MIR healthcare training tests <sup>(1)</sup> were filtered. Due to the more than likely complaints from those affected, the Ministry of Health will have to face possible penalties for this leak. However, had it happened after the recent full application of the new European General Data Protection Regulation (GDPR), and had its sanctioning regime been applied, the sanctions would have been a much higher amount. It is estimated that with this new regulation, sanctions for violating the fundamental right to protection of personal data of citizens, can reach 20 million euros or 4% of the annual turnover of companies and institutions <sup>(2)</sup>

The application of this standard seeks to turn Europe into one of the safest areas in the world for the development of a trustworthy commerce and to establish the privacy of data as a fundamental right of people.

Like the bad students with lack of foresight and organization, many companies in our country have allowed time to pass without properly doing the tasks to prepare and adapt to the application of the regulation. Adjusting to the new norm is not a banal issue, as it is a complex and holistic regulation. It is a challenge to defend and ensure with impeccable criteria the privacy of the data of European citizens. It requires organizational, procedural changes and a high investment in the IT area to adapt the dispersion of information in all final repositories that exist in any large organization.

The warnings of the professor have not been enough and, despite being the current issue throughout the business sector, organizations still have, even when the regulation has already entered into force, many doubts about how to apply the GDPR. For this reason, companies

are launching basic initiatives (locating the data, securing it and managing the consents of the interested parties) that allow them to pass the test in the best possible way.

In that preparation towards the final exam, in general, a very important subject that is needed to pass has been forgotten: unstructured information.

**Organizations handle a large volume of personal data, in the electronic, digitalized and physical documents they save. 90% of the documents that companies store, contain some type of personal information, whether from customers, employees or third parties.<sup>(3)</sup>**

The documentary and content management systems absorb huge amounts of information that supports the business, and that is very relevant in a GDPR context. This information includes contracts, invoices and other documentation provided by the client in the framework of business processes that affect different areas of the company such as human resources, marketing or financial services. As a consequence, the content management models focused on 360° client file management seem fundamental. They allow the optimization of the management of personal data, ensuring the trust of the clients (the EU regulators affirm that the lack of

<sup>1</sup> <http://www.elmundo.es/espana/2018/03/05/5a9d92d9e2704e157d8b45d4.html>

<sup>2</sup> <https://www.eugdpr.org>

<sup>3</sup> Minsait



confidence in data security is one of the key inhibitors in digitalisation) and even to apply differential retention processes when clients request portability.

Despite the intimidation caused by possible sanctions, the GDPR should not be seen as an imposition, but as an opportunity for differentiation at a competitive level. With the fulfillment of the new regulation, especially thanks to an efficient Management of the Digital Content, a series of opportunities can be seized that add differential value to the mandatory investment, like the improvement of the relation with the clients or the optimization of processes:

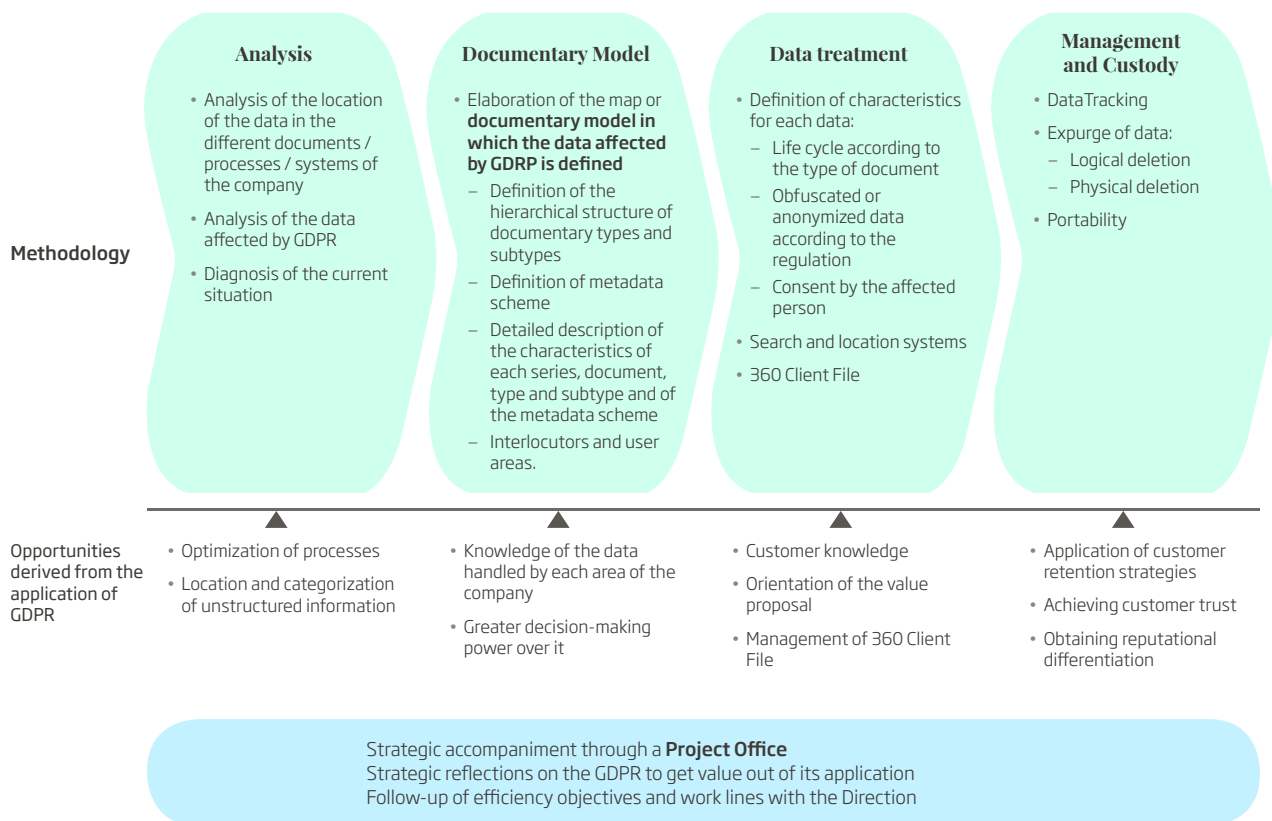
- **Better relationship with customers:** there is no doubt that the new regulation will substantially change the relationship between customers and the organizations / entities that manage the data. Companies must guarantee the domain and privacy of personal data, improving the ability of decision and control of customers over it. In this context, having a documentary model focused on the management of the 360° "file" of the customer seems fundamental, allowing the collection of the client's data currently dispersed in the systems of the companies. This makes it possible to have a greater knowledge of the clients, being able to better define the value proposal and even apply differential retention processes.
- **Process optimization:** The implementation of this standard, which is being gradual due to imperative reality, will be of enormous complexity. Content Management will help to apply GDPR, optimizing the processing of information, achieving two important advantages: saving costs and having greater control over business processes.
  - Quickly locating documents that include personal data at the precise moment they are needed, saves time and, therefore, costs.

- Allowing the implementation of disposition policies (transfer, preservation and expurgation) inherent to the rule - in as much as the right to oblivion is concerned - through tools such as Record Management allows, through rules, to have control of the route followed by the data in order to safeguard the information that is subject to the legislation and to destroy or transfer the one that is not. This greatly facilitates the adaptation to the GDPR of business operations and avoids possible heavy economic sanctions.

A great deal of information with personal data is managed through email and in applications that are not integrated with the management policies required by the GDPR. Usually CRMs absorb huge amounts of information that may not be essential for the business but is very relevant in a GDPR context. It is a hidden risk, where in the case of a data breach, if the information is not categorized or properly managed in a centralized manner, it can cause this rule to be violated. Therefore, with the application of technologies with a level of maturity that is currently adequate, such as the use of natural language processing techniques (NLP), with processes of classification, extraction and hierarchization, this unstructured information can be managed, so that we can have greater control over the data.

Consequently, those companies that have Content Management successfully consolidated in their information governance policy, start with an advantage when implementing the GDPR. Their systems are more organized and are able to easily identify personal data to perform all the operations required by the new regulation.





To take advantage of the opportunities presented by the GDPR, like good students who base their preparation on the application of simple study techniques that allow them to easily reach their goals and achieve excellent results, companies must apply a methodology that allows them to achieve their objectives. To accomplish it, companies must raise awareness in the entirety of the organization, so that they seek to ensure that the client's rights are met at all times through the appropriate treatment of data and a continuous evaluation of the risks that affect them. For this purpose, a methodology is proposed, divided into four main phases: analysis, documentary map, data processing and, finally, the management and custody of this data throughout its journey through the company until its expurgation. In this way, Content Management allows companies to approach first class- honours in compliance with the GDPR.

The scenario that has appeared before companies with the application of the GDPR is radically different from the past. Many of them will have to go to the second chance examination, mainly because of not having realized that 80% of the information they manage is not in databases.

In Minsait we are specialists in content governance processes, having worked for more than three years in optimizing document management by applying cognitive robotization for search and classification, using technological and consulting capabilities. These capabilities are key for the deployment of new models to ensure compliance with current and future legislation for companies and, therefore, in line with the current GDPR. From Minsait we believe that thanks to a solid Content Management, companies can take advantage of its application, differentiating themselves and providing the client with added value based on their security and trust. In addition, it can also help to avoid the high economic sanctions that the breach of this regulation entails, or even worse, the discrediting among its clients that this breach may entail.

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Minsait is the Indra business unit that responds to the challenges which digital transformation poses for companies and institutions. Indra is one of the leading global consulting and technology companies and the technology partner for the key businesses of its clients around the world.

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