



# Creating a data protection culture among SMEs

## HANDBOOK



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I.

# CREATING A DATA PROTECTION CULTURE AMONG SMES: INTRODUCTION TO THE MINDTHEDATA PROJECT



The EU co-funded project '**mindtheDATA – Creating a data protection culture among SMEs**' under the frame of the European Commission's **Erasmus+** Programme (Duration: November 2019 – October 2021) combines the expertise of five EU countries through 7 organisations in Bulgaria, Greece, Spain, Poland and Cyprus, accounting for a high-quality, cross-fertilising approach and training interventions for SMEs drawing from diverse contexts both at national as well as intracompany, organisational level. The project **mindtheDATA** aims to promote the idea for SMEs to act towards how they can better comply to the GDPR, considering this as an opportunity for driving their business into innovation and differentiation, rather than if they are exempt from it.

The EU's General Data Protection Regulation (GDPR) came into force on May 25, 2018. It is not simply introducing, but enforcing a set of rules concerning privacy and data security. GDPR affects organisations and companies, virtually anyone holding data on EU citizens, creating

a new data protection framework. GDPR expects broadly private sector SMEs to comply with the regulation. On the other hand, the GDPR framework doesn't want to put an extra bureaucratic burden to SMEs where it is not appropriate, bogging businesses and simply putting them on the defensive with imminent fines and non-compliance penalties. Along this vein, considering the new SME and business environment in the EU, it is of great importance to highlight how GDPR compliance for SMEs can function as a business differentiator for SMEs. Moving beyond the 'compliance-or-penalty' notion.

In this sense, the project is supporting business consultants as active facilitators towards this goal as they collaborate with SMEs in their standard support activities. The project wishes to make an intervention by the means of a set of tools, guidelines, practices to be used by business consultants to continuously support SMEs as parts of the European SME ecosystem to fully integrate the principles of data protection into their organisational culture and the mindsets of their human capital, not merely as a compliance element, but as a beneficial tool into their organisational culture.

To this goal, the project developed a modular set of online training material for business consultants (available in EN, BG, EL, ES, PL), covering the following issues:

- Pivotal, general aspects of the new data protection framework for EUs digital economy and society and the new SMEs environment;
- Integrated GDPR strategy according to their scope of activities and their GDPR 'readiness' - "data protection in EUs digital society and economy", "where does my SME stand and what should it do?", "data protection in everyday workplace".
- Training material to showcase the importance of GDPR for SMEs as a business differentiator, as well as the 'beyond compliance' multiple benefits for SMEs, which will methodologically transcend the training material as a whole, showcasing the four axes as mentioned above.



The online training provision will be complemented by the **this Handbook** for consultants to facilitate the use of the training material as an integrated provision adapted to the needs of SMEs (complemented by small-scale piloting among business consultants in the participating countries Bulgaria, Greece, Spain, and Poland). The **Handbook** will be of high usability for consultants, VET trainers and facilitators, either as extra- or intra-company actors to support SMEs and staff in data protection issues as coupled with existing organisational structure and culture. Availability in EN, BG, EL, ES, PL will guarantee impact as well as transferability on the potential for development in further languages.

**The Handbook** will be an elaborated guide serving two main objectives:

- ✓ The pedagogical aspect of the training provision accounting for the main axes of the methodological framework of the developed training material and the methodological path connecting the three thematic parts and their subjects in one training offer that can be followed either in a linear fashion or on demand by business consultants.
- ✓ The technical aspects of the training provision as available online and how to better exploit the online material as a curriculum for supporting SMEs.

Read more about mindtheDATA project on our [website](#)

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mindtheDATA project is coordinated by [Yambol Chamber of Commerce and Industry](#) in Bulgaria, and implemented together with [Militos Consulting](#) (Greece), the [Business Support Centre for Small and Medium Enterprises – Ruse](#) (Bulgaria), [EQA HELLAS S.A.](#) (Greece), [Innovation Training Center](#) (Spain), [PAIZ Konsulting Sp. z o.o.](#) (Poland) and [RNDQ](#) (Cyprus).



**II.**

## DESIGNING THE MINDTHEDATA TRAINING PROVISION



## 1. GDPR as a regulation and the new way of doing business

Within the mindtheDATA project a research has been made in Bulgaria, Greece, Poland, and Spain on the competences and array of knowledge that business advisors/consultants of SMEs would require in order to effectively support SMEs in the process of becoming GDPR compliant even beyond “the compliant side”.

The **quantitative part** of the research on project level included **69 business consultants** and **49 representatives of SMEs** that were surveyed online.

In addition, a **qualitative survey** was conducted among **20 business consultants who were interviewed** in person or via Skype/telephone in order to gain more detailed understanding on their needs and experience in working with SMEs, as well as on their existing knowledge/experience in GDPR issues.

### SMES AND GDPR – MAIN FINDINGS

The majority of the SMEs representatives stated that their **companies are required** by law to become GDPR compliant. And irrespective of the fact of being obliged to be GDPR compliant, almost 90% of the participants stated that it is in their **intentions to become compliant**, which means that they are willing to follow the GDPR regulation. The majority of the respondents don't have a data protection officer.

According to the survey, **two** are the main ways, by which the companies have prepared for their GDPR compliance – **they have either created a data inventory of the data they held and which is subject to GDPR (22%), or they appointed a data protection officer to deal with the matter (22%)**. A good part of them have conducted **assessment of their ability to comply with the new regulations**. Despite the fact that most of the SMEs have taken measures to meet the new personal data protection requirements, **only 4% of the respondents have indicated that they have allocated budget specifically for the GDPR compliance**.

They acknowledge the benefits of becoming GDPR compliant, especially regarding **company reputation** and **loyalty of customers** and collaborators.

**Uncertainties about how the EU regulation affect their business (i.e. fines, sanctions, audits, etc.)** seems to be the **biggest concern** for them regarding the acquisition of readiness to become GDPR compliant. This means that they still approach GDPR compliance from the punitive side (fines, penalties) rather as an investment priority that should be of an active rather than a passive character. Other concerns are **the need of having appropriate policies in place, adequate tools to deal with security breaches**, as well as **data security and dealing with breaches**. Among all **staff training** is also highly appreciated.

Around 72% of the respondents find the **information and guidance** in their countries to be **good or satisfactory** and 24% think that it is of poor quality. Very small percentage think that it is very good.

**As positive outcomes of GDPR compliance**, the majority of the SMEs chose **greater data security globally** as the most relevant, followed by **reputation** and then greater **customer loyalty**, which is closely associated with the former. **Increasing the revenue** of companies is not among the GDPR compliance positive outcomes anticipated.

With respect to training and consulting initiatives for SMEs to support them in becoming GDPR compliant, there seems to

be a wide-spread awareness of the availability at the market level. However, the difference among the 4 countries are very visible. For Spain and Greece- 90% of the surveyed SMEs were aware of the training support while in Poland- 80% of the surveyed SMEs were not aware for such support.

**Understanding the specific requirements of GDPR** and personal data protection is highlighted as the most relevant training topic for SMEs in the first place, followed by **Ensuring staff awareness and training**.

When it comes to actual training, the **e-learning** and **learning through traditional** (hard copies material and formal education) are the most **preferred tools**, while **blended learning** is the most preferred delivery method.

## **BUSINESS CONSULTANTS AND GDPR – MAIN FINDINGS**

Business consultants (BCs) are the main target group of the project. The survey participants are all operating in Bulgaria, Poland, Spain and Greece and the majority of them do not provide GDPR relevant consulting services but are interested to do so.

They state that according to their professional experience, **SMEs are not very well aware** of GDPR importance, which is reflected in the fact that SMEs do not have GDPR as a business priority on their agendas.

**Most BCs** have stated that for SMEs, **establishing a data protection culture is the most challenging issue** while preparing to become GDPR compliant. Furthermore, the BCs stressed **assessment of what is needed to become compliant, prioritization of GDPR** among other business priorities, as well as **potential fines** and **costs of compliance** as the next important challenges.

With respect to **preferred learning methods and tools** that would best suit them, almost half of the BCs state that their knowledge and skills level is **middle or good** now, so eventually they are interested in receiving relevant training.

The main sources of acquiring skills and knowledge on the topic of GDPR compliance for the business consultants have been the **personal research and interest on the topic**, as well as **case studies**.

The **e-learning/online learning** is undoubtedly the most appealing form of improving their competences and skills, but the **blended training programmes and the workshops** are preferred methods too.

Although more than half of the respondents are already providing GDPR related services to SMEs, most of them have never been trained on how to provide these services to the companies.

The important training subjects are those touching upon **the data protection in everyday workplace and GDPR as a competitive advantage**, as well as **GDPR as an opportunity for a business-culture shift for SMEs beyond the 'compliance' aspect**.

On the demand side (**what SMEs request/ need**) the most relevant topics according to the BCs are the **need to understand and getting acquainted with GDPR requirements**, as well as that of **establishing appropriate data protection and security policies**. **Staff training, awareness, compliance and maintaining the necessary documentation in line with the principles of accountability** are highlighted as well.

**Missing policies and absence of staff training**, which often **leads to intra-company breaches by employees** according to BCs are the most common breaches points for SMEs. They are followed by overall **failure to identify personal data, inappropriate communication**, as well as **lack of security measures** in general.



Business consultants seem to be in line with SMEs regarding the perceived benefits of becoming GDPR compliant, that is, **customer loyalty** and **company reputation**, adding, however, as equally important **the benefits that entail the establishment of a corporate data protection culture** that reaches beyond direct benefits.



## 2. Designing the mindtheDATA training provision

The logical sequence of steps taken in the design process of the mindtheDATA training provision, which started with the needs & gaps analysis introduced in the previous section of this guide, drove the development team to the need to elaborate **a guiding and planning document on the basis of the direct deductions emanating from the results of the comparative analysis performed**, to compile and clearly define in a single document a full set of considerations to create the target training provision and integrated support aimed at expanding both the knowledge and capacity of business consultants to assist SMEs in the process of responding to the new data protection principles, and most importantly, embracing GDPR as an element of business development and innovation.

This guidance and planning document is formally titled ['Methodological Framework for the development of business consultants training material towards creating a data protection culture in SMEs'](#) and has, in brief, a two-fold aim:

- Describe the theoretical background in terms of methodological elements and tools facilitating the production of the mindtheDATA digital training Modules and online environment.
- Distinguishing the essential components of the training provision (both content and technically-wise) as well as the structure around which the educational contents would be organized.

Following these objectives, the contents of the Methodological Framework, except for the introduction and annexes to the document, were divided into two main sections, each one aimed at providing key information and answering the questions directly related to one of the above main objectives agreed within the mindtheDATA consortium.

These sections/subsections and its relevant contents are described below:

### SECTION 2 – THEORETICAL BACKGROUND

#### 2.1. Overview of the theoretical background & IO2 objectives

Presents **introductory information to the mindtheDATA training provision** such as main course topics, goals and objectives, target learners (consultants/advisors), main needs to be covered and the structure of the theoretical framework itself.

#### 2.2. Needs identified at the stage of application

Contains the three **indicative subjects/parts** to be tackled by the training Modules according to the primary research done while drafting the project application.

#### 2.3. Needs identified through the desktop research

Describes the desktop research and lists a wide set of **conclusions on needs and challenges faced by SMEs to become GDPR compliant and recommendations to let SMEs seize the opportunities and benefits of GDPR readiness/compliance.**

#### 2.4. Needs identified through the quantitative & qualitative field research

Gathers the **specific needs of business consultants and SMEs in terms of knowledge, skills and training content** to better consult and support SMEs in GDPR issues, serving as the main guidelines for the development of the methodological framework.

#### 2.5. Proposed content structure with the core results and needs identified

Provides a **methodological matrix/set around which educational content would be organized and implemented**, including topics, layout, formats, duration as preferred by the survey participants. It follows the 3-parts structure included in the original application, with some changes regarding titles and terms.

#### 2.6. Adult learning principles & constructivism theory

Describes the **pedagogical approach and training methodology** adopted according to the needs and characteristics of the target learners.

### SECTION 3 – TRAINING MODULES STRUCTURE

#### 3.1. General recommendations

Proposes **action methodologies for the learning delivery of the training experience, technical solutions** as well as **tips for the development of learning outcomes**.

#### 3.2. Structure, Learning Outcomes and Instructions for content development

Presents in detail the courses/subjects that participants are more likely to engage with, structured into **Modules, Units and Subunits for the online-based course**.

#### 3.3. Horizontal activities

Provides specifications for basic readings and additional learning resources.

As mentioned at the beginning of this section, the Methodological Framework served not only as a guidance but also as a **planning document**. For such purpose, the consortium further developed the content structure described in sections 2.5 and 3.2 in the so-called 'content development excel matrix', a roadmap Excel document for the development of the thematic parts and Units of the mindtheDATA online training provision, both content-wise as well as technically to be made available in an online environment. This document also served to detail and distributed the specific content development activities to be performed among the consortium members.



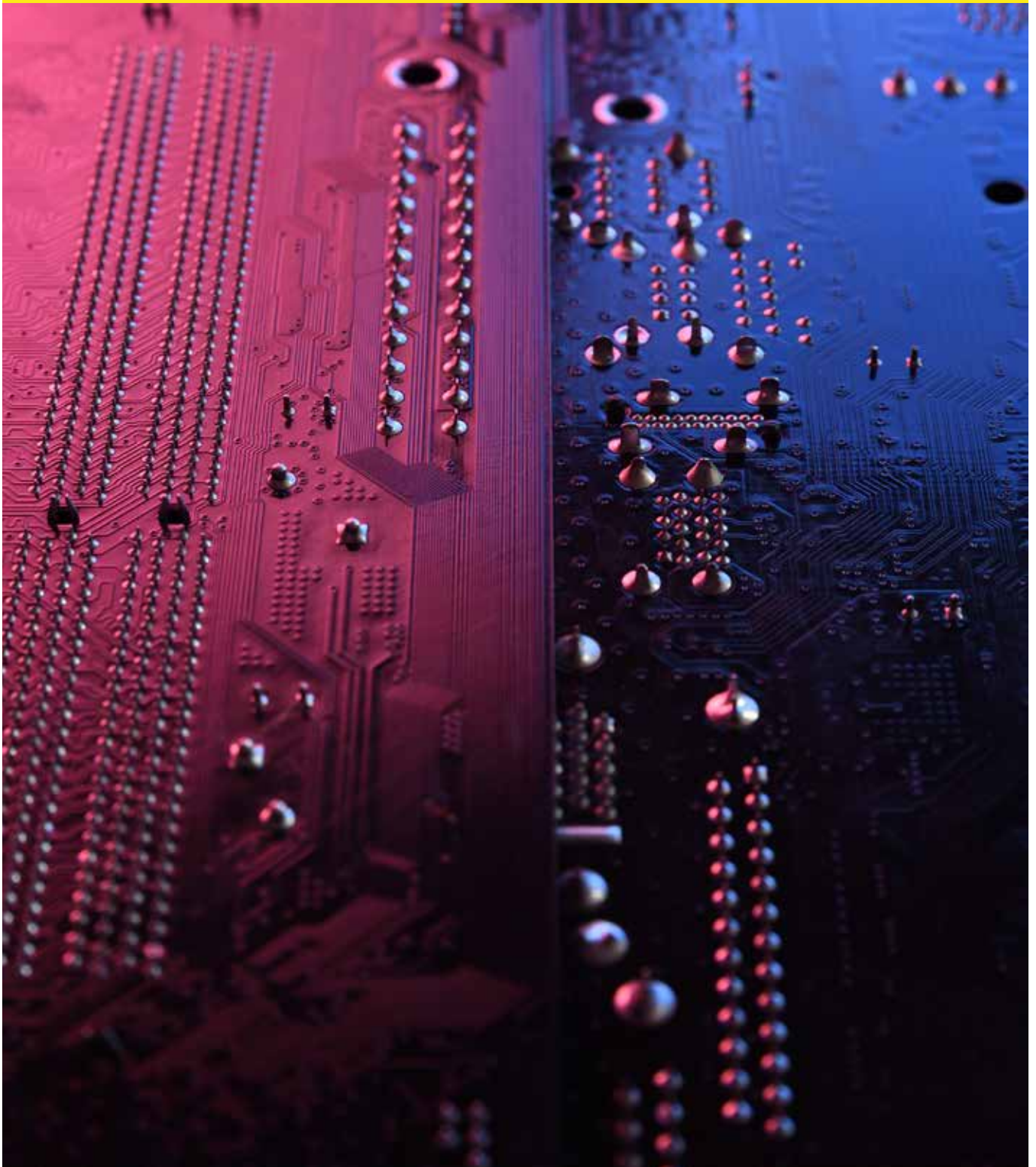
Therefore, the content development excel matrix can be defined as:

- A reference tool and working document presenting a clear structure of the training provision and division of tasks, defining the responsibilities of Thematic part leader (monitoring the process of content development, uniformity of language, the balance between text and images or checklists and other non-text elements, takes care of final proof-read version) and Unit developers.
- An elaborated and detailed guide for the training subjects to be developed per Module/topic and the proposed formats of tests and self-assessment tools to be used (both content- and format-wise);
- An intra-partnership pool of suggestions and input according to expertise, to support both the pedagogical aspects and topics to be addressed during the content development phase along with discourse and presentation style (the technical and graphic online environment solutions to support the training delivery).
- A collection of important recommendations to consider when developing the learning materials such as following a learning objectives approach, consistency in terminology, common narrative approach and acknowledging sources.



### III.

## HOW TO USE THE MINDTHEDATA TRAINING PROVISION



## 1. The structure of the e-platfrom

The URL of the e-platform supporting the training is <https://training.mindthedata-project.eu/> (Figure 1).

In the landing page, users can download short guidelines on how to navigate and use the material (“READ THE GUIDELINES”). They also have access to this document (“DOWNLOAD THE HANDBOOK”).



Figure 1: The landing page of the training platform

## 1.1. Access and registration

To register and access the platform content, the user has to follow these steps:

1. Click on “ENTER TRAINING”  
(yellow button on the middle right side of the landing page - see Figure 1).
2. This opens a page with the structure of the modules (on the left menu). See Figure 2.

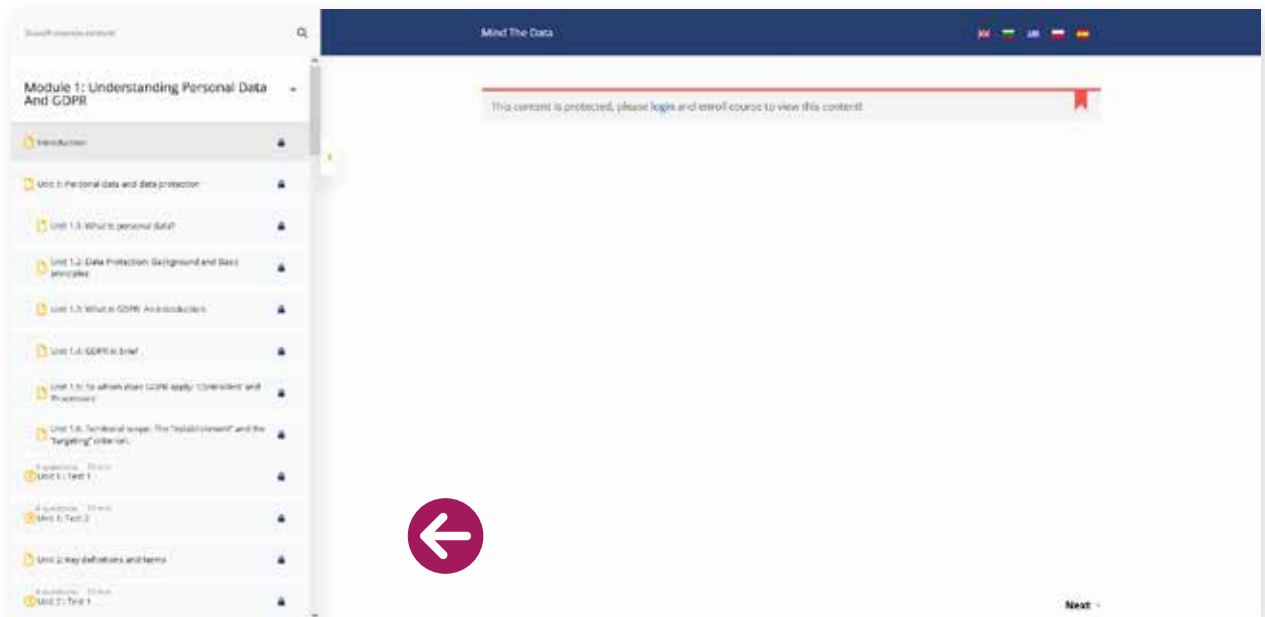


Figure 2: Step 2: the menu page

3. Click on “log in” (Figure 3)

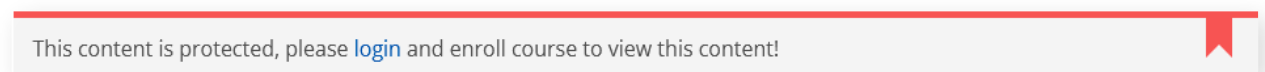


Figure 3: Click on log in

- 
- The screenshot shows the login interface of the 'Mind The Data' platform. A large red arrow points towards the login form. The form includes fields for 'Username or email' and 'Password', a 'Remember me' checkbox, and a yellow 'Login' button. A link for 'Lost your password? Register' is located below the login button. The top of the page features the 'Mind The Data' logo and a row of flags (UK, Germany, France, Spain) with a European Union flag and text indicating funding by the European Union. The bottom of the page displays a row of logos: the European Union flag, 'militos', the 'EUROPEAN COMMISSION', 'ECHO', 'PAIZ', and 'RD'.

- 
- The screenshot shows the registration page for NINE T.I. DATA. The page has a white background with a red header bar. The header bar contains the NINE T.I. DATA logo on the left and a row of European Union flags on the right. The main content area is a white box with a light gray border. It contains a registration form with the following fields: Username, Email, Password, and Confirm Password. The Password field is highlighted in yellow. Below the form is a blue 'Register' button. To the left of the button is a red arrow pointing right. Below the button are links for 'Log in' and 'Lost your password?'. The footer contains a row of logos: NINE T.I. DATA, milits, ECU, EGU, PAIZ, and JRD. Below the logos is a disclaimer: 'The European Commission support for the production of this publication does not constitute an endorsement of the contents, which reflect the views only of the authors, and the Commission cannot be held responsible for any use which may be made of the information contained therein.' At the bottom of the footer is the copyright notice: '© 2020 Inland T.I. Data | Inshoreline | Powered by Inria'.



6. You will receive an automatic confirmation email (Figure 6).  
Click on the second link contained in the email body text (Figure 6).

Username: [redacted] To set your password, visit the following address: <https://training.mindthedata-project.eu/resetpass/?key=kRkOLmBpHhS8z9H1xrr1&login=Militos> <https://training.mindthedata-project.eu/login/> If you have already set your own password, you may disregard this email and use the password you have already set.



Figure 6: Confirmation email

7. Enter your username and password (Figure 7).

## Login

Username or email \*

Password \*

☐ Remember me

Login

Lost your password?  
[Register](#)

Figure 7: Enter username and password

1.2. Navigating the course

Once logged in, a page with the courses the user is enrolled in appears (Figure 8). Click on “Courses” on the left side menu.

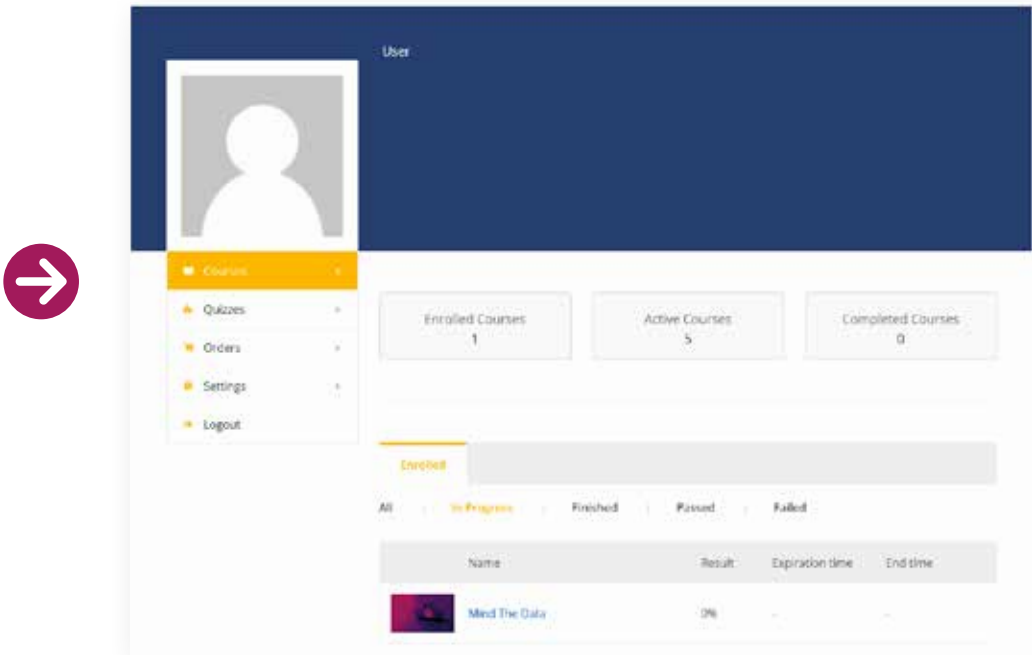


Figure 8: The courses page

An icon of the mindtheDATA course appears. Click on it (Figure 9).

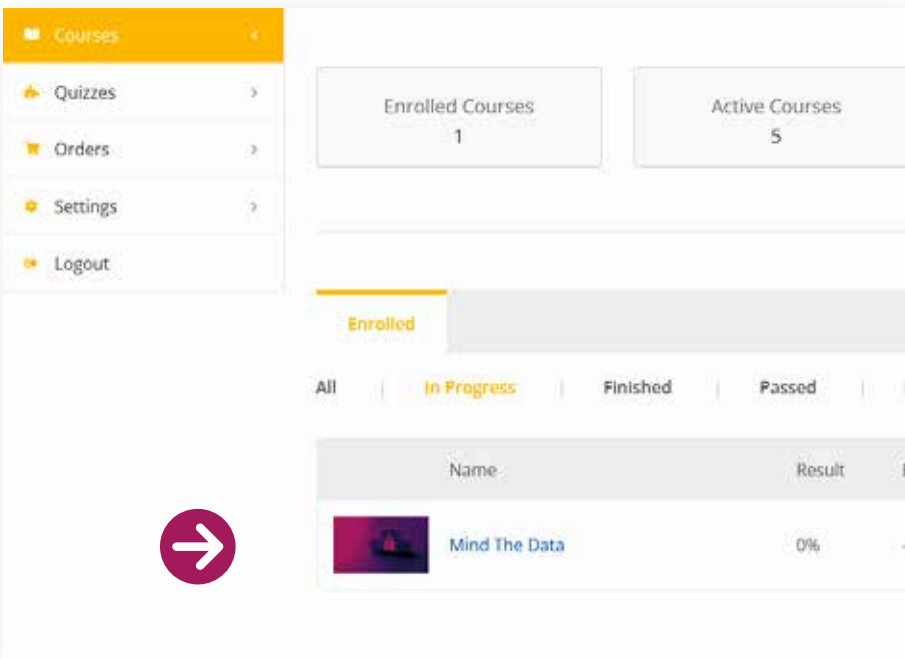


Figure 9: The course icon

The course page opens (Figure 10). Here, at the top, the basic information of the course appears (Figure 10): number of lessons, number of quizzes and number of users. Click “Continue”.

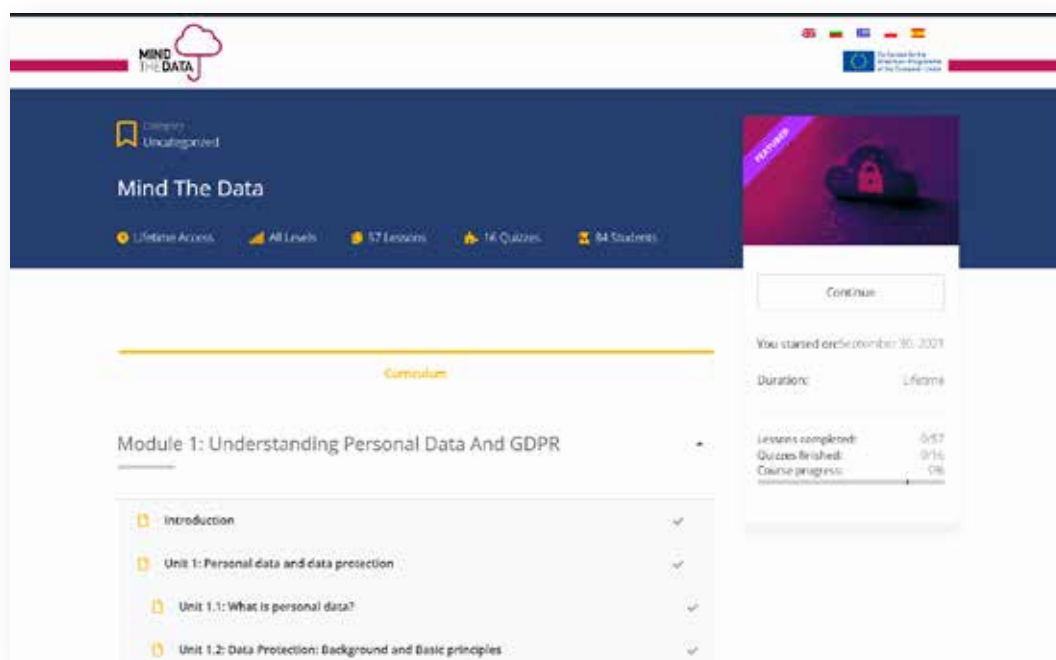


Figure 10: The course menu page

You will be directed to the introductory page of the course (Figure 11).



Figure 11: Introductory page

At the bottom of each course page is the complete button. Once clicked, a confirmation box appears, asking the users to confirm (Figure 12). Then the progress of study appears on the progress bar, on the top right of the page.

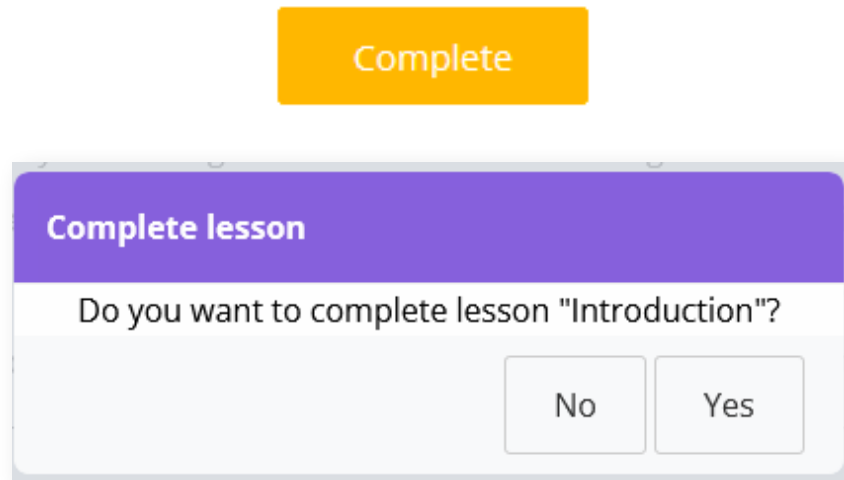


Figure 12: The 'Complete' button

During study, the content menu on the left can be hidden, by clicking on the yellow arrow (Figure 13).

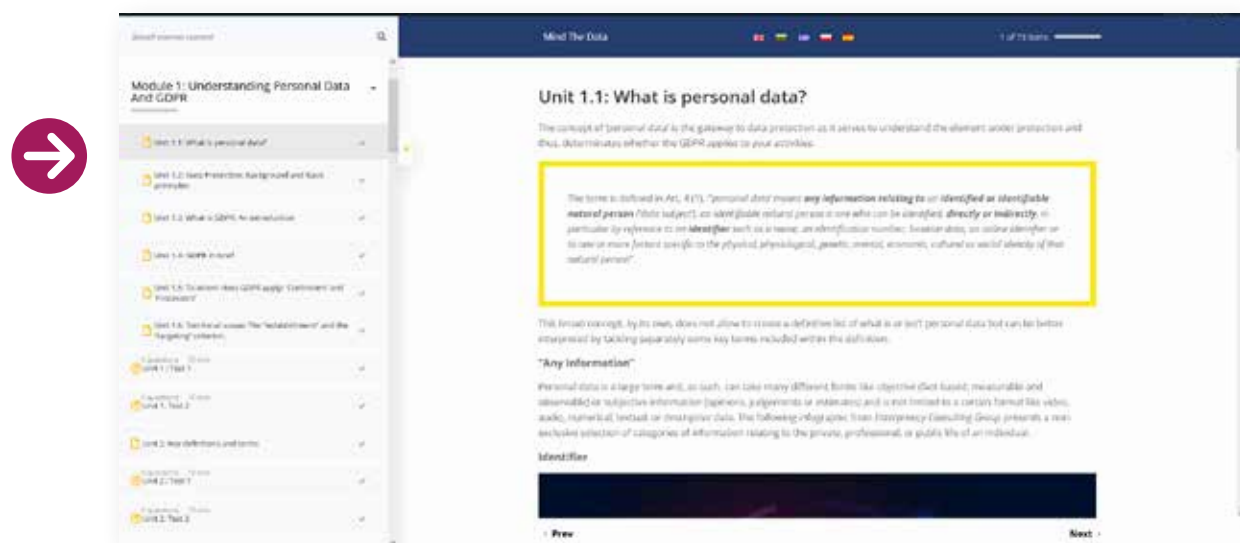
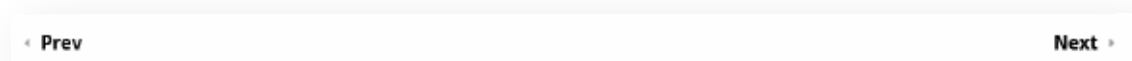


Figure 13: Hiding the menu

There are two alternative ways of navigation: either from the menu, or by clicking the "Next" and "Previous" buttons at the bottom of each course page.





### 1.3. Taking the tests

At the end of each Unit, users can evaluate themselves by taking two tests. Click on “Start” to begin with each test (Figure 14).

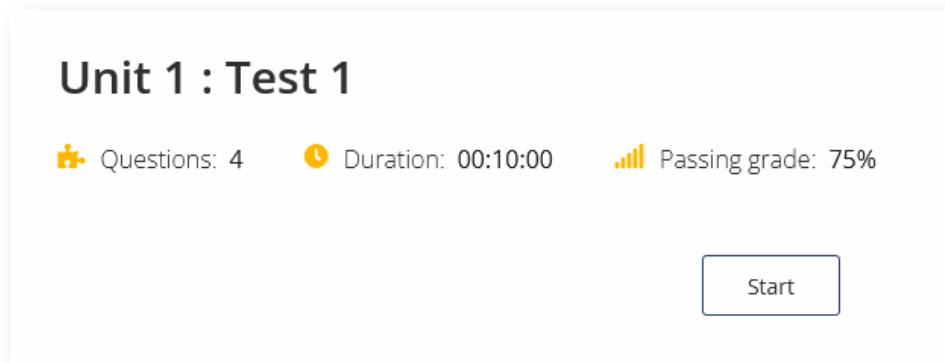


Figure 14: Taking a test

Each test contains a number of questions shown below (Figure 15). Once the correct options are clicked, the user can proceed to the next question.

After completing all questions, the “Finish Quiz” button appears, along with a confirmation message (Figure 15).

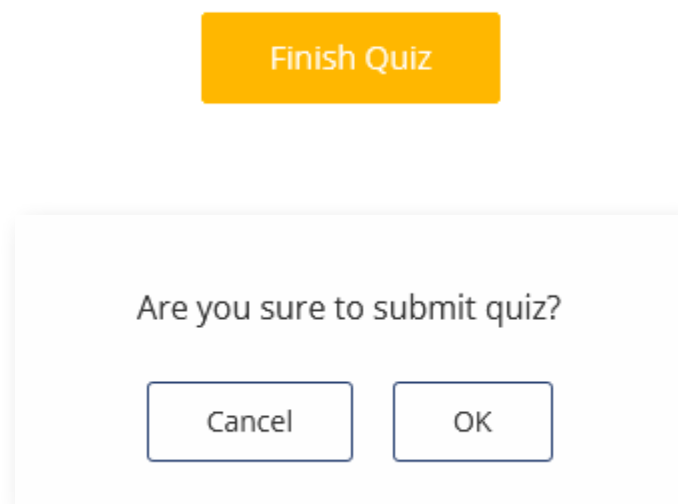


Figure 15: finishing the quiz



### Unit 1: Test 2

Question 3 of 4 09:20 FINISH QUIZ

3. The data processor is the company/organisation determining the purposes for which (the why) and the means by which (the how) personal data is processed. So, the data processor is the one who takes over-arching decisions on, amongst others, the legal basis - including secure of data subject's rights - the purpose/s for and the items and content of the data collection.

☐ False

☐ Correct

Figure 16: Navigating a test

After finishing, the results are presented as in Figure 17. The user can choose either to review correct and incorrect answers, or to take the test once again.

### Unit 1: Test 2

0%  
75%

Failed ✕

Time spend	00:03:11
Point	0 / 4
Questions	4
Correct	0
Wrong	2
Skipped	2

Retake (99)

Review

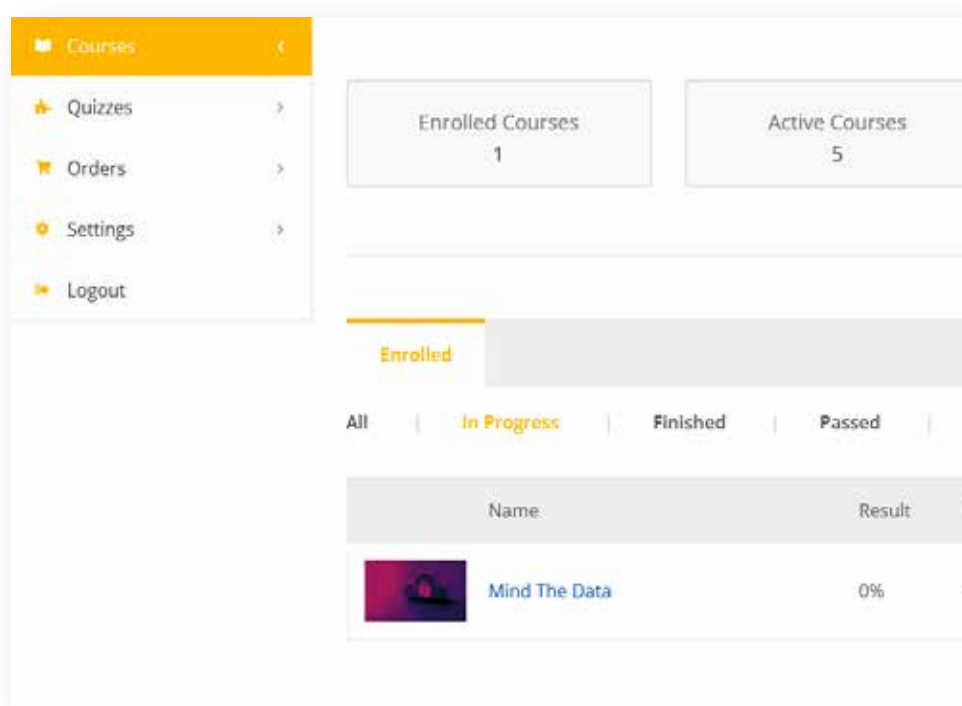
Figure 17: retake or review quiz

## 2. The mindtheDATA Modules

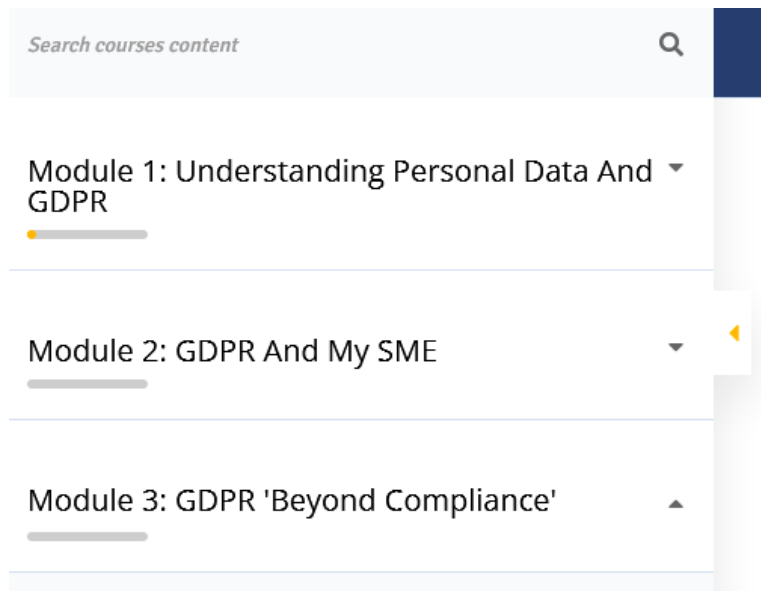
The online training platform is practical and easy to use. The platform gives the opportunity to business consultants to have access to detailed and well documented knowledge of various aspects regarding GDPR for free. The training material consists of three Modules and it is translated to five languages (English, Bulgarian, Greek, Polish and Spanish). These three modules give the chance for the consultants to familiarise with basic terminology and knowledge about the new data protection framework, to grasp the readiness of the SMEs to comply with the GDPR, as well as the modules highlighting all the benefits of the GDPR compliance and how SMEs can deploy them.

To enter any of the 3 Modules you need to:

- Enter a username, your email and a password
- You will then be able to log in (you will also receive an automatic confirmation email).
- Once you log in, click on “Courses” on the menu on the left, then click on “Mind the Data”



You will be directed to the Introduction of the training material. On the left side of the page you can find a navigation where you can find the 3 Modules, which include the Units and the Sub-units. Using the navigation you can move directly to any section you want.

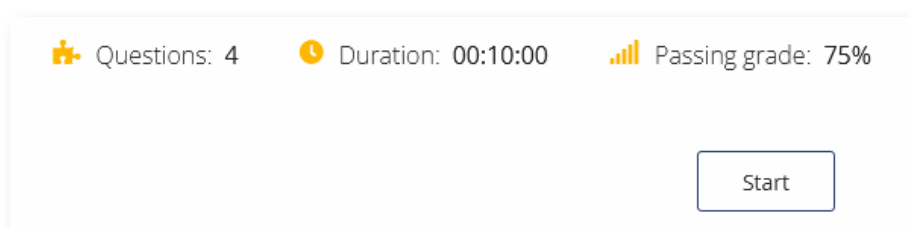


The platform shows you the number of the lessons that you have completed, the quizzes that you have finished as well as counts your course progress.

When you finish with a Unit you should click the button

Complete

**Module 1: 'Understanding Personal Data And GDPR'** and **Module 2: 'GDPR And My SME'** follows the same structure. Both of them start with an introduction and have 5 Units. After each of the Units 1-4 there are two short tests which indicate you if you have understand the content and if you have acquire the appropriate knowledge or you need more practice. Each test has 4 multiple choice or True/False questions which should have been answered in ten minutes. The passing grade is 80%.



Press "Start". Good luck!

Unit 5 for both the first and the second Module contains the bibliography and basic resources and documents for further reading. There are no tests about this Unit.

The last part of the training material is **Module 3: 'GDPR beyond compliance'**. In this section there are no tests and the structure is different. The module 3 is separated in six **cards**. Each card has its own power and purpose. The aim of this module is to highlighting and suggesting clear the benefits of the GDPR compliance for a SME. Each card has a purpose either by suggesting ways that GDPR compliance processes can fit together with other purposes, or by prompting businesspeople to reflect on ways that GDPR can serve them as an opportunity for stepping stone rather than thinking if it as an obligation.



## 2.1. Thematic Part 1

The general objective of **Module 1: 'Understanding personal data and GDPR'** is to introduce the learner to the background and general context of the GDPR, that is, the reasons behind the birth of personal data protection regulations and the specific problems of individuals and societies to be solved or, in other words, the specific fundamental rights to be preserved. This contextualization aims to fertilize the ground to, deductively, approach the specific context of data protection for SMEs with a focus on raising the learner awareness on the importance of GDPR and, subsequently, become familiar with its basic requirements and particularities.

**Module 1 consists of five clearly differentiated learning Units:**

### UNIT 1: PERSONAL DATA AND DATA PROTECTION

Section 1.1 offers an introduction to the key GDPR-related concept of 'Personal data' as a prior step to discover the basic principles and historical antecedents of data protection in section 1.2 Afterwards, Subunit 1.3 explores the evolution of data protection regulations, a chronological review that derives into Subunit 1.4, which summarizes the inherited, new and revised features of GDPR.

Subunits 5 and 6 are the starting point of the detailed review of the most relevant theoretical elements for Business Consultants of GDPR, which cover, respectively, the material (to whom apply) and territorial (when does GDPR apply) scope.

### UNIT 2: KEY DEFINITIONS AND TERMS

This Unit consists of a glossary of the 20 most relevant terms for SMEs in GDPR along with explanations of their meanings.

### UNIT 3: GDPR PRINCIPLES

As a continuation of the analysis of the GDPR basics, this Unit presents an SME-tailored and practically oriented explanation of the set of rules that determine how companies and organizations should manage personal data to become GDPR compliant and embracing it as a business differentiator and driver: the Seven Principles of GDPR.

### UNIT 4: THE GDPR INDIVIDUAL RIGHTS

This Unit provides a simple explanation, aided relevant examples for SMEs, of how GDPR empowers individuals and consumers by expanding their rights and capacities to safeguard their personal data, meaning one of the main changes introduced by the Directive.



## UNIT 5: BASIC READINGS, RESOURCES, DOCUMENTS

This Unit takes the form of a repository of readings, resources, documents, presentations and YouTube videos on the topics covered in this Module. These additional learning materials for business consultants are clustered into sections according to topics covered.

### Learning outcomes:

By completing Module 1 learners will be able to

- Identify and distinguish 'Personal Data' according to the GDPR definition.
- Present the historical antecedents and drivers motivating social and legislative birth and evolution of Data Protection.
- Determine the role, obligations and degree of responsibility of the organisations involved in the processing of personal data.
- Support SMEs in considering whether they are directly subject to the EU GDPR's data-privacy protection requirements.
- Define the most useful and important terms and definitions in GDPR.
- Provide companies and organisations with a guide on how they can best manage their personal data and achieve compliance with the GDPR principles.
- Detect infringements of the basic principles for processing personal data.
- Explain new and revised features of GDPR including the individual's rights.
- Present how GDPR safeguards fundamental rights and freedoms of natural persons by giving them control over their personal data.

Estimated time: 90 – 120 minutes

## 2.2. Thematic Part 2

**Module 2: 'GDPR And My SME'** concentrates on the consequences of the General Data Protection Regulation (GDPR) compliance for an SME.

It is comprised of 5 Units with Subunits.

### UNIT 1: GDPR IN EU DIGITAL TRANSFORMATION AND ECONOMY

This Unit concentrates on **the situation of personal data and its privacy in the digital age** as well as the **challenges** the General Data Protection Regulation poses to **SMEs**.

### UNIT 2: PREPARING FOR GDPR: WHERE DOES MY SME STAND AND WHAT SHOULD BE DONE?

Unit 2 concentrates on **assessing the SME's situation** in relation to GDPR and the steps needed to assure **GDPR compliance**.

### UNIT 3: GDPR AND DATA PROTECTION IN EVERYDAY WORKPLACE

Units 3 and 4 provide information on **how to assure the GDPR compliance** in SME's everyday activities and operations. Unit 3 gives tips on how to work to keep personal data safe.

### UNIT 4: DATA PROTECTION 'BY DESIGN' AND 'BY DEFAULT'

Unit 4 is directly concentrated on **application of the rules and principles** of personal data processing, illustrated with examples.

### UNIT 5: BASIC READINGS, RESOURCES, DOCUMENTS

This Unit contains **readings, resources, documents, links, presentations and YouTube videos** about Personal data, data protection as well as GDPR origins, principles and individual rights.





By completing Module 2 you will be able to:

- present the definition of privacy
- describe how technology can be both a challenge and a supporting tool to privacy
- describe the challenges for SMEs in implementing GDPR
- explain GDPR lawful bases for processing and their importance
- prepare a GDPR assessment tool and checklist
- present the steps to be taken according to the assessment results
- describe how the SME should prepare and respond to personal data breaches
- carry out a data protection impact assessment
- define the elements of a GDPR mindset and business culture, its monitoring and maintaining
- explain the concepts of data protection 'by design' and 'by default' with examples

This Module contains **tools you can use for assessing the GDPR readiness of the SMEs** you work with.

It will take you about 80-90 minutes to study this Module (without an in depth study of the sources).

### 2.3. Thematic Part 3

**MODULE 3: 'GDPR 'beyond compliance'** is the last Module of the mindtheDATA training provision. It follows a **different approach than the other 2 Modules**. It is less informative and instructional in nature. Its main objective is to provide business consultants as well as SMEs managers and personnel with **incentives to jointly explore, identify and put into action ideas and interventions at the organizational level of an SME**, that draw exactly from the process and also the effects that GDPR compliance has on the ways an SME operates.

Hence, it looks into GDPR as a business innovation tool to **bring about a competitive advantage and solidify customer engagement**. While Modules 1 and 2 carry business consultants and SMEs along the process and the changes that the SMEs ecosystem are undergoing, Module 3 is **building on the pathways along which data flow within a company** – from one department to another, between persons, clarifying the ownership of these data, identifying for the first time maybe unused pools of data, applying value to certain data, that was probably unknown and so on.

Module 3 rests on how the compliance process or the status of a GDPR compliant SME has or is **questioning business practices, challenging them, and offering opportunities for optimisation and most importantly innovation**.

The desired **learning outcomes** for business consultants and SMEs by setting up and carrying out consultancy sessions using the Module 3 cards as incentives are to help them:

- Identify innovative business and organisational ideas that are connected with the application of GDPR practices
- Use GDPR as a customer engagement tool by placing the protection of personal data at the top of the company culture and approach in providing goods or service
- Exploit the knowledge and monitoring of data throughout the “protection processes” towards a competitive advantage that differentiates their SMEs on the face of the ongoing digital transformation processes of economic, business and social activity.





## How can business consultants collaborate with SMEs using Module 3

Business consultants can find **5 cards** in Module 3, which help them to work with company owners, managers, and company personnel, and explore together how GDPR compliance and the changes it brings in the way their company works, can lead to business innovation, but also function as a competitive advantage and a customer engagement tool.

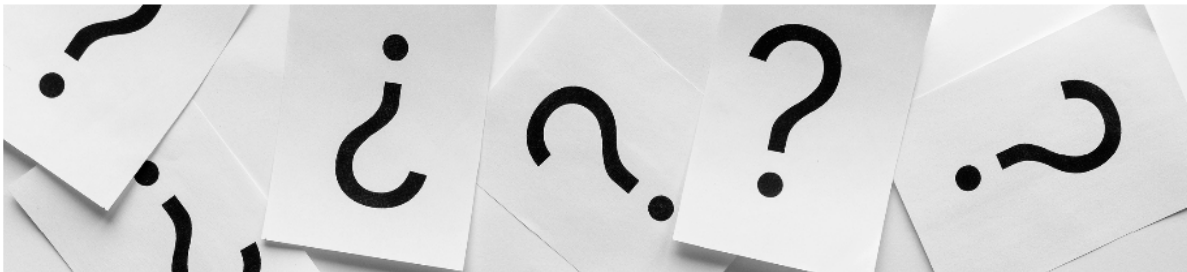
The 5 cards and their topics:

### #1 First...follow your data!

**First.....follow your data!**

**In order to protect data, you have to know them!**

**In order to turn data protection to a business advantage, you have to follow them...**

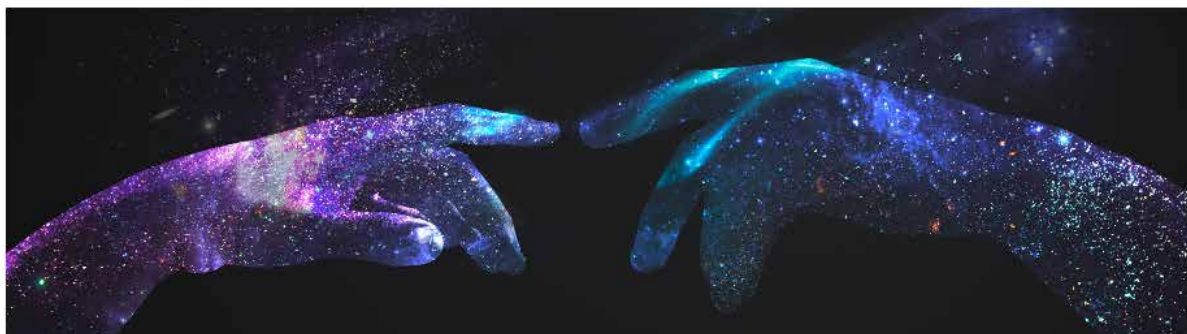


### #2 Thinking about GDPR and innovation

#### **#2 Thinking about GDPR and innovation**

Regulation vs Innovation

Regulations – like that of GDPR – are more than often experienced as constraints on choices – as limitations to innovation. Why? Because certain privacy regulations or personal data protection obligations are limiting what can be developed, either as product or service. Research\* has shown that in those case, companies have 3 + 1 choices



## #3 Engage your customers: The power is shifting to the person

### #3 Engage your customers: The power is shifting to the person

GDPR is not only creating a new business environment, but more than this, it introduces new patterns of relationships between the individual and the State, as well as the market and its actors.

In all those cases, the 'power is shifting to the person'!

**to the citizen** in the case of a governmental organisation or institution

**to the patient** in the case of health providers

**to the consumer** in all market related transactions

**to the customer** and the client in the case of a company or a business

Showing that a company is seriously considering the protection of personal data of its customers or clients according to GDPR is becoming a powerful tool for customer engagement!

**It is more than making all your communication or marketing outreach GDPR compliant!**

**It is more than having the "correct" communication forms or templates!**



## #4 GDPR and digital transformation: Setting the 'new normal' in doing business

### #4 GDPR and digital transformation

#### Setting the 'new normal' in doing business

Digital transformation is about how businesses innovate processes with technology. For every business, no matter how small or large, digital transformation in that sense has increasingly become a priority, especially when we look to the new model of customer engagement through and within a digital economy and even digital culture beyond and above the economic field.

A business, whatever the scope or size....

- will not be able to seize growth opportunities,
- and will not be competitive if it stays clear from a digital transformation process



## #5 Turning GDPR into a competitive edge

### #5 Turning GDPR into a competitive edge

GDPR compliance is positively impacting organisations across a series of dimensions. An SME can examine this impact, compare and identify the competitive advantages that either have arisen due to GDPR compliance, or remain unexploited due to lack thereof.

Below follow the dimensions in which the impact of GDPR can be measured. Whatever the size, sector, or scope of a company, the impact could be monitored across some or all those dimensions. The dimensions are categorized as External and Internal, leading to corresponding benefits and advantages.

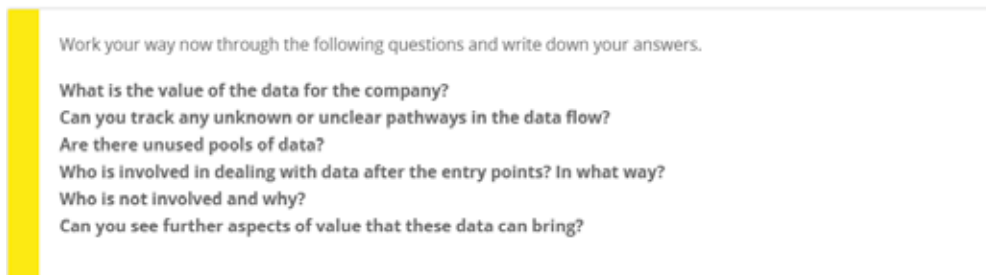


Each of the 5 cards is structured in the following way:

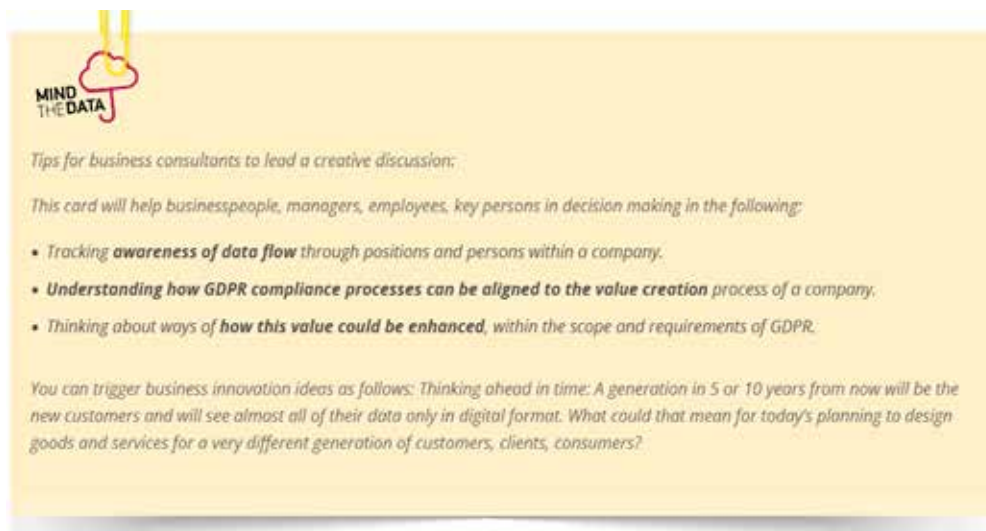
- Short introduction that puts in the perspective the respective topic of each card as implied in the card title



- A set of questions that can ignite a common exploration discussion between consultants and SMEs managers/persons



- Tips for business consultants to lead a creative discussion
- Further triggers for discussion that can be adapted to specific SMEs scopes



The duration of Module 3 can only be accounted for in terms of its application in practice. Besides that, regarding what it would take in time for consultants to understand how the cards in the Module work, we should consider as needed time, the potential use of the cards as tools to recap knowledge already acquired by going through Module 2. To that end, the topics of the cards are transgressing certain Units of Module 2, since the incentives for discussion they provide, meet topics explored in the previous Modules.

In particular, while planning consulting sessions with the use of the cards, consultants should revisit relevant Units that deal with processes which are directly connected with the objectives of the cards and the learning outcomes of the Module.

The Units and topics connected with the subjects and topics of the cards are the following:

## **MODULE 2: GDPR and my SME**

In Unit 2: Preparing for GDPR: Where does my SME stand and what should be done?

### **2.3 Strategy and implementation**

In Unit 3: GDPR and data protection in everyday workplace

### **3.2 The actors**

### **3.3 The data**

Unit 4: Data protection 'by design' and 'by default'

### **4.2 The impact Of GDPR for future project/services planning**

It will take you about 45 minutes to study this Module.





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