Dentsply Sirona

Retention projects in global organizations

06-02-2019   Dentsply Sirona 2019

CONTENT

Dentsply Sirona – The world's largest provider of professional dental products

Dentsply Sirona:

- 16 000 employees

- Organizations in over 40 countries

- Our products are represented in 120 countries via global distributors

Head offices

Local offices

Product areas

Consumables and Healthcare
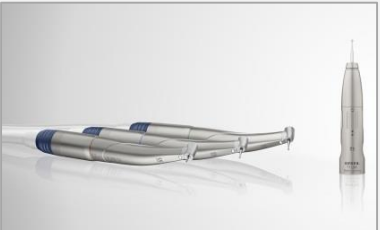
Preventive

Restorative

Prosthetics

Instruments

Endodontics

HealthCare (Wellspect)

Technology and Specialties

CAD/CAM

Imaging

Treatment Centers
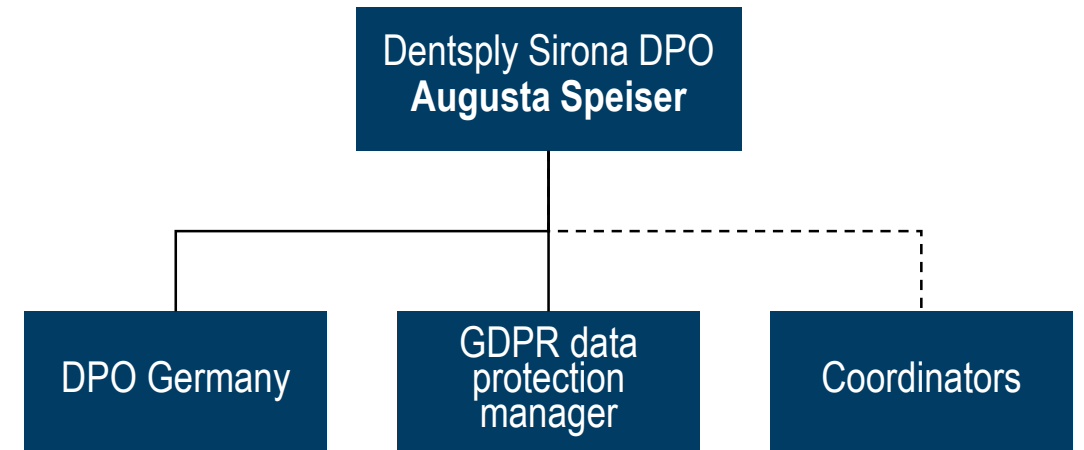

Implants

Orthodontics

The *only* manufacturer with comprehensive offering across all key categories for both general practitioners and specialists

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GDPR at Dentsply Sirona

- Implementation of Dentsply Sirona's GDPR project was started during 2017

- Carve out - retention and deletion

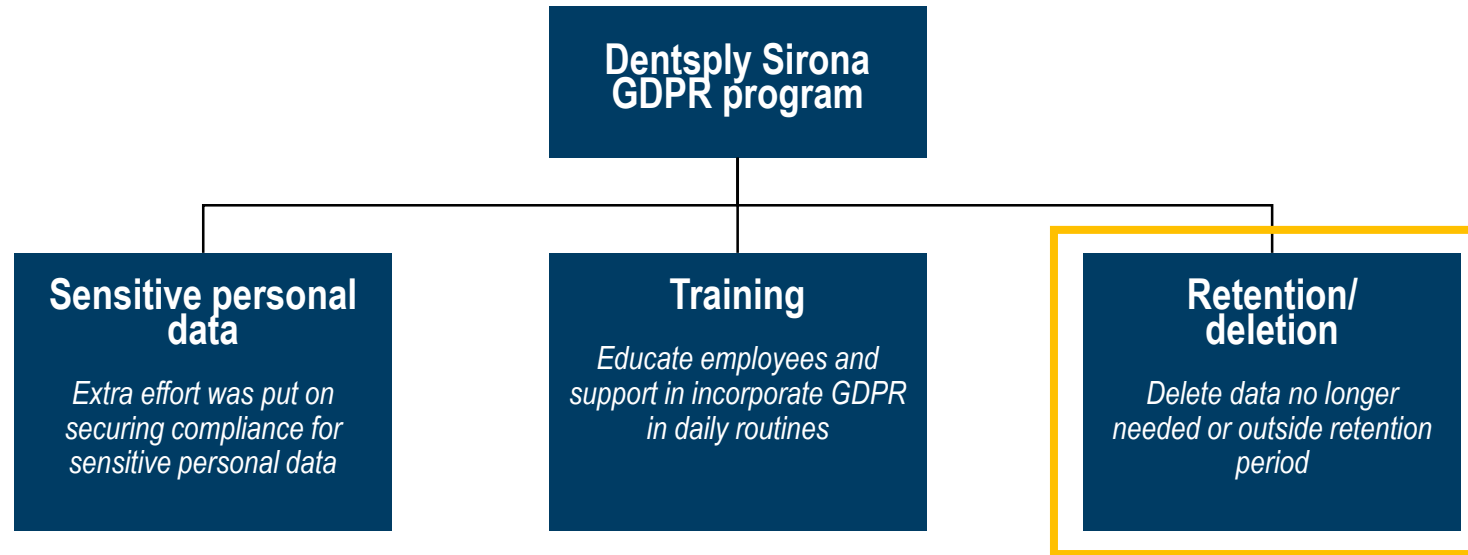- Coordinators appointed to cover all legal entities and business units in Europe

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              ┌──────────────────────────┐
              │   Dentsply Sirona DPO    │
              │     Augusta Speiser      │
              └──────────────────────────┘
        ┌──────────────┼───────────────────┐
┌──────────────┐ ┌──────────────┐ ┌──────────────┐
│ DPO Germany  │ │  GDPR data   │ │ Coordinators │
│              │ │  protection  │ │              │
│              │ │   manager    │ │              │
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Dentsply Sirona GDPR organization

GDPR at Dentsply Sirona

Key focus areas in Dentsply Sirona's GDPR program:

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                    ┌─────────────────────┐
                    │  Dentsply Sirona    │
                    │   GDPR program      │
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Dentsply Sirona GDPR program

Sensitive personal data

Extra effort was put on securing compliance for sensitive personal data

Training

Educate employees and support in incorporate GDPR in daily routines

Retention/ deletion

Delete data no longer needed or outside retention period

This presentation will focus on retention and deletion of personal data

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CONTENT

Retention Policy - Four step approach for defining and anchoring the retention policy

Input 1:
- ✓ Understand GDPR implications for storing personal data

Input 2:
- ✓ Review existing Dentsply Sirona retention policies

Define and anchor retention policy

Input 3:
- ✓ Identify processed personal data

Input 4:
- ✓ Understand (local) legal requirements for storing different documents containing personal data
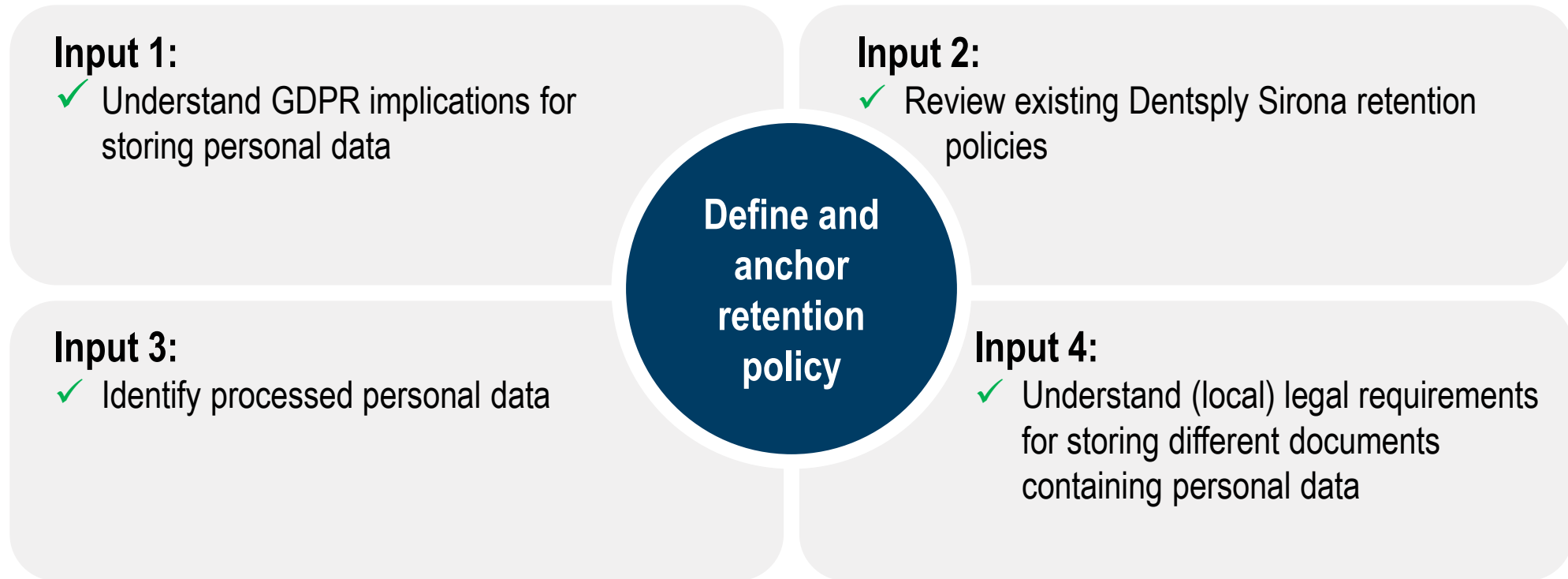
Input 1: Interpretation of GDPR

- GDPR does not explicitly state how long personal data can be stored

- Article 5 (1)(e) is the main article impacting the retention period

Article 5(1)(e)
Personal data shall 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');

Input 2: Review existing Dentsply Sirona retention policies

Approach:

- Existing policies containing retention periods were identified
- People involved in the creation were interviewed

Learnings:

- Developed without consideration to GDPR
- Considered as recommendations
- Unclear reasoning for several retention periods
- The structure was helpful

Existing retention policy had to be extensively revised

Input 3: Identify personal data that is processed within the company

Approach:

- Make an inventory of personal data in the organization
- The purpose was to identify if we process personal data, in addition to what exists according to the Retention Policy
  - **Structured sources:** gathered through PIAs
  - **Unstructured sources:** support from the coordinators to make the inventory in their organization

Findings:

- New categories of processed personal data were identified

Structured data   Unstructured data

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Input 4: Understand (local) legal requirements for storing different documents containing personal data

Approach:

- Relevant representatives were contacted to identify local legal requirements

- HR was the area which required most effort

- Other areas in scope for this activity were:
  - Marketing
  - Sales & aftermarket
  - Sourcing
  - Compliance & ethics
  - Quality assurance & regulatory assurance (QA/RA)
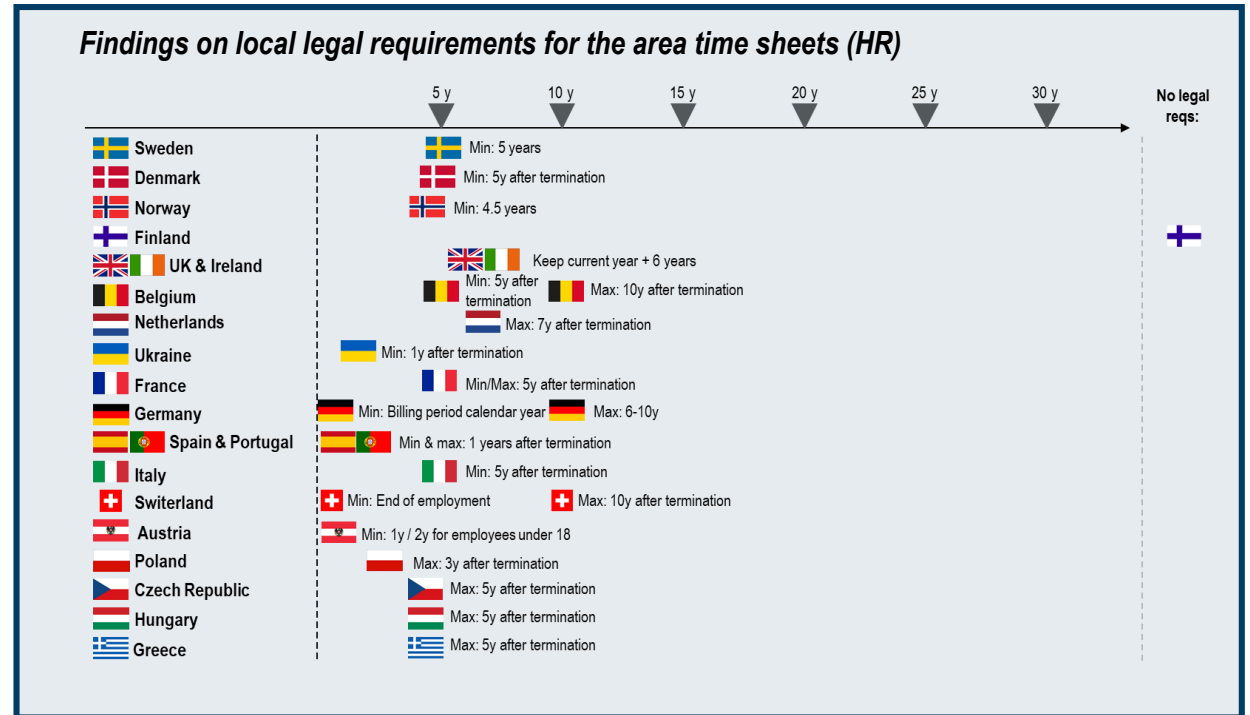
> **All the identified local legal requirements were incorporated in the Retention Policy**

Findings on local legal requirements for the area time sheets (HR)

	5 y	10 y	15 y	20 y	25 y	30 y	No legal reqs:
Sweden	Min: 5 years						
Denmark	Min: 5y after termination						
Norway	Min: 4.5 years						
Finland							+
UK & Ireland		Keep current year + 6 years					
Belgium	Min: 5y after termination	Max: 10y after termination					
Netherlands	Max: 7y after termination						
Ukraine	Min: 1y after termination						
France	Min/Max: 5y after termination						
Germany	Min: Billing period calendar year — Max: 6-10y						
Spain & Portugal	Min & max: 1 years after termination						
Italy	Min: 5y after termination						
Switerland	Min: End of employment — Max: 10y after termination						
Austria	Min: 1y / 2y for employees under 18						
Poland	Max: 3y after termination						
Czech Republic	Max: 5y after termination						
Hungary	Max: 5y after termination						
Greece	Max: 5y after termination						

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Define and anchor retention periods

Once the legal requirements had been identified, the following steps were performed to define and anchor the updated retention policy:

Propose updates in the Retention Policy	**Anchor the updates for each area**	**Inform top management about the updated Retention Policy**	**Launch the updated Retention Policy**

Activities performed:

- Added categories
- Updated/shorten retention periods
- Added local deviations
- Created retention policy document'

- Key stakeholders from Marketing, Sales & Aftermarket, Clinical Trials, Sourcing, HR, QA/RA and Legal
- Create a document showing what considerations that were taken and the reasoning behind the decisions to what retention periods to apply.

- Anchored material and inform about the launch

- Formalized the launch
- Performed communication to organizations

Having the Retention Policy in place enable us to perform the deletion exercise

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Deletion of personal data

Scope:

- Following personal data to be deleted:
  - Outside the retention period
  - No longer needed (with data minimization principle in mind)

- Instructions were developed to enable the employees to perform the deletion for:
  - Structured data
  - Unstructured data

The deletion approach for structured and unstructured data will be described on the next slides

Deletion of structured data

- Deletion of personal data in structured sources (for existing systems) took place mostly manually based on outcomes of DPIA's conducted on existing systems and applications

- The Article 30 register has been the basis for the scope of work

- The flow of personal data between and within the application had to be mapped to ensure proper deletion in the application (i.e. to avoid deletion in one system but not in another)

Deletion of unstructured data (1/2)

- A cleansing guide, including guidelines, was developed to support the organization

- The following unstructured data sources are in scope:
  - Shared department folders
  - OneDrive
  - My Documents
  - Outlook
  - Physical documents
  - Phones/tablets/USB

- A detailed internal document (for the privacy office) on the way of working and rationale behind all decisions have been created.

Cleansing guide including guidelines

The exercise was divided into three steps, presented on the next slide

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Deletion of unstructured data (2/2)

The process for deleting unstructured is shown below:
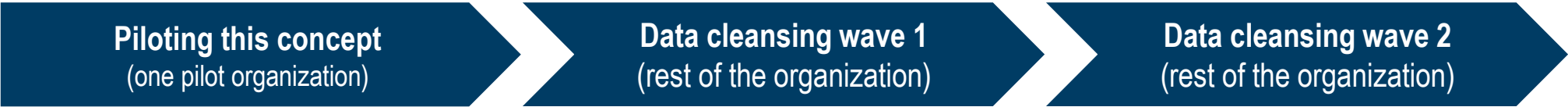
Sources in scope:	Piloting this concept (one pilot organization)	Data cleansing wave 1 (rest of the organization)	Data cleansing wave 2 (rest of the organization)
Shared dep. fold.	X		X
OneDrive	X	X	
My documents	X	X	
Outlook	X	X	
Physical docs.	X		X
Phone & tablets	X	X	
USB	X	X	

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Key takeaways

- Challenging to get priority and engagement – mandatory but not so motivating

- Find a realistic level – risk approach

- Many new issues have been discovered during the project which have developed the overall program further.

- Extremely wide stretch – very cross functional in the organization, but also need access to experts

- Would have been easier in a perfect world where processes and information flows are documented and followed

- How to make this to continuous work – privacy by design, change management, audits etc.

CONTENT

Questions & Answers

Any questions?

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Thank you for your attention!