Audit vendor compliance
Audit security development lifecycle and privacy by design
Audit data collection and processing activities

GDPR-readiness effort has been underway since January 2017
Established a GDPR program, identifying team, goals, and timeline
- Global team led by CTO, General Counsel, and CIO
- Involves all businesses and departments

Involving a compliance consulting firm to assess our data privacy practices and providing remediation guidance
Drafting policy updates, designing process changes, defining new data privacy/security standards, and procurement requirements

Naming functional leaders to implement new GDPR requirements
Working with vendors to assess readiness and amend contracts
Publishing readiness statements on our corporate websites

Positioning to be GDPR-ready prior to May 25, 2018

Established GDPR program, team, goals, and timeline
Documented GDPR interpretation
Identified resource gaps and estimated initial resource / budget requirements

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SOLARWINDS PLAN SUMMARY

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APR 2017

PHASE 1

DEFINE

Established GDPR program, team, goals, and timeline
Documented GDPR interpretation
Identified resource gaps and estimated initial resource / budget requirements

JUL 2017

PHASE 2

ASSESS

Inventoried notices and contracts
Inventoried data collection and processing activities
Updated security policies and processes
Updated procurement requirements
Performed GAP analysis

AUG 2017

PHASE 3

PLAN

Outlined requirements for enhanced rights of data subjects
Outlined system security requirements
Approved remediation plan / budget
Inventoried vendor compliance

JAN 2018

PHASE 4

BUILD

Initiate external communications
Enforce updated procurement requirements
Develop communication / training plan
Finalize audit plan
Execute remediation plan
Revise legal notices and contracts

FEB 2018

PHASE 5

VALIDATE

Audit vendor compliance
Audit security development lifecycle and privacy by design
Audit data collection and processing activities

MAR 2018

PHASE 6

OPERATE/TRAIN

Initiate internal training
Publish updated privacy notices
Maintain and monitor changes in the law

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