



The SMEs' Privacy Challenges

Data



**GARANTE
PER LA PROTEZIONE
DEI DATI PERSONALI**

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*GARANTE PER LA PROTEZIONE DEI DATI
PERSONALI*



Agenda

- Importance of SMEs in Europe
- European SMEs: figures
- The SMEs: context
- SMEDATA events in Italy
- Feedbacks from SMEs
- Challenges
- Key Messages



Importance of SMEs in Europe

	Micro SMEs	Small SMEs	Medium-sized SMEs	All SMEs	Large enterprises	All enterprises
Enterprises						
Number	22,830,944	1,420,693	231,857	24,483,496	46,547	24,530,050
%	93.1%	5.8%	0.9%	99.8%	0.2%	100.0%
Value added						
Value in € (trillion)	1,525.6	1,292.1	1,343.0	4,160.7	3,167.9	7,328.1
%	20.8%	17.6%	18.3%	56.8%	43.2%	100.0%
Employment						
Number (in 000)	41,980,528	28,582,254	24,201,840	94,764,624	47,933,208	142,697,824
%	29.4%	20.0%	17.0%	66.4%	33.6%	100.0%

Note: Large enterprises are enterprises with 250 or more employees
Source: Eurostat, National Statistical Offices, DIW Econ

Source: European Commission: Annual Report on European SMEs 2017/2018
Number of SMEs and large enterprises in the EU-28 non-financial business sector in 2017 and their value added and employment



The SMEs context

- Market competitive pressure
- Limited resources to dedicate to Privacy (Budget, Personnel, Competences)
- Sometimes complex business relations
- Technology (services, solution packages)
- Limited contractual power with third parties (e.g. suppliers)



GDPR may be considered as a business limiting burden



Request for “simplification” of GDPR provisions



Training events in Italy

REGISTRATIONS:
SMEs: 930
Legal Professionals: 1.127
Total: 2.067



Roma



Firenze



Salerno



**12 events
6 cities
1.000+ participants
(SMEs and Legal Prof.s)**



Genova



Cosenza

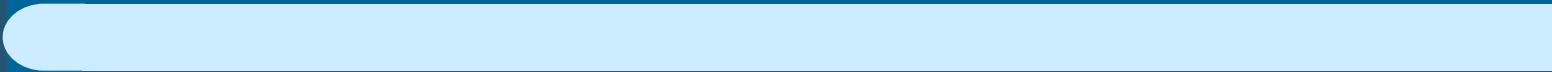


Milano (+ Streaming)

TRAINING HOURS PROVIDED
SMEs: 36 (48 including breaks)
Legal professionals: 36 (48 including breaks)
Total: 72 (96 including breaks)



Experts judgment on Tool's criteria



**Self-assessment tool's criteria –
Two events in Rome - feedbacks from more than 60 experts
from SMEs, their associations and Academia**

CONCOMMERCIO (Italian General Confederation of Enterprises, Professional Activities and Autonomous Work in trade, tourism and services that associates over 700,000 businesses)

CONFARTIGIANATO (Artisans and Small Entrepreneurs: 1.5 million artisan entrepreneurs with 3 million employees)

AEPI (European Association of Professionals and Enterprises)

CONFAPI (Italian Confederation of Small and micro enterprises)

AIIIP (Association of Italian Internet Providers)

FEDERFARMA (National federation representing over 16,000 private Pharmacies affiliated with the National Health Service)





Feedback from training events and meetings with experts in Italy

- Some concepts and GDPR definitions are still difficult to achieve when related to specific business context
- Demand of «simplification»
- High interest in tools and best practice that may help:
 - to identify rapidly their non compliance risks
 - provide them with sector-specific guided «pathways» to compliance



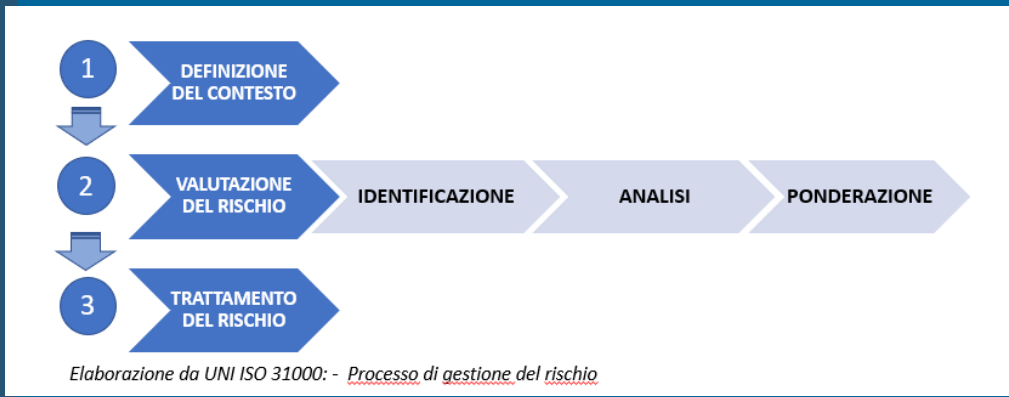
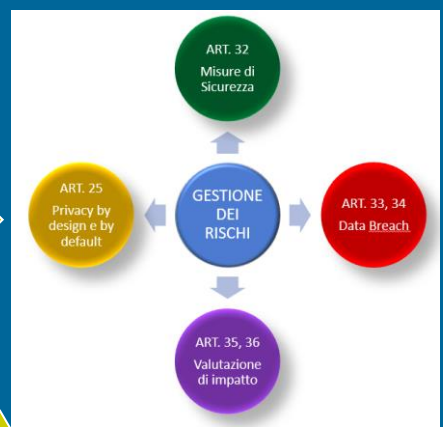
Challenges

- Be acquainted of Article 5) principles' gaps when running the business
- Accountability principle in practice
- Risk based approach to compliance
- Set up an adequate internal information flow to support GDPR compliance
- Become aware of the specific business context's compliance requirements
- Be able to translate GDPR provisions in actionable policies and practices



Promoting compliance by «Best Practices»

TITOLARE/CONTITOLARE/RAPPRESENTANTE DEL TITOLARE <i>[inserire la denominazione e i dati di contatto]</i>									
RISPONSABILE DELLA PROTEZIONE DEI DATI <i>[inserire la denominazione e i dati di contatto]</i>									
	TIMING/LOGICA DI TRATTAMENTO	FINALITA' E BASI LEGALI DEL TRATTAMENTO	CATEGORIE DI INTERESSATI	CATEGORIE DI DATI PERSONALI	CATEGORIE DI DESTINATARI <i>[indicare eventuali responsabili del trattamento o altri linked con i dati senza comunicazioni]</i>	TRASFERIMENTO DATI VERSO PAESI TERZI O ORGANIZZAZIONI INTERNAZIONALI <i>[indicare il Paese terzo o l'organizzazione internazionale cui i dati sono trasferiti ed "operatori" adottate al sensi del capo V del GDPR]</i>	TERMINI ULTIMI DI CANCELLAZIONE PREVISTI		MISURE DI SICUREZZA TECNICHE E ORGANIZZATIVE
1									
2									
3									
...									



Elaborazione da UNI ISO 31000: - Processo di gestione del rischio



		IMPATTO		
		BASSO	MEDIO	ALTO
PROBABILITA'	ALTA	MEDIO	ALTO	ALTO
	MEDIA	BASSO	MEDIO	ALTO
	BASSA	BASSO	MEDIO	ALTO



Key messages

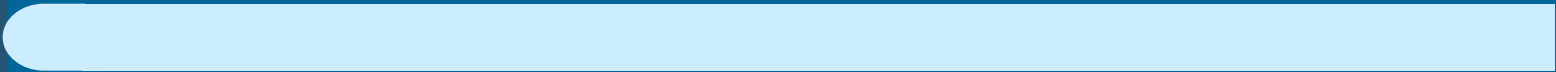
- Rise up awareness on business value of privacy
- Look for «Scalability» more than «simplification» - Scalability: learn to size the compliance process to specific business context and dimension
- Provide appropriate «customized» training, tools and best practices
- Leading and Training «by examples»



Foundamental Role of SMEs associations as multipliers



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Thanks !