When the textbooks don’t match reality

- reflections on trying to make things work



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A few introductory notes

- Any examples of illegal activities, GDPR breaches or similar matters are exaggerated and provided solely for educational purposes
- In any case, all applicable limitation periods have long since expired
- This talk is by Fagforbundet's DPO, given with all freedom and independence afforded by law and by Fagforbundet – but constitutes no representation by Fagforbundet



Fagforbundet

- Norwegian Union of Municipal and General Employees
- Established in 2003, with roots dating back to 1920





276 collective agreements

169,103 members covered by the largest

5 members covered by the smallest

1 in 10 Norwegians
of voting age is a member of Fagforbundet



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We’re trying to get data protection right



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The textbooks tell us

- Get leadership buy-in
- Create an Article 30 record of processing activities
- Use this record alongside existing controls
- Repeat until you change jobs, retire or move on to your next consulting gig



What reality taught me

- Buy-in is uncertain, qualified, nuanced, and probably not that well thought through (by any of us)
- Article 30 doesn’t work
- There are no existing controls



What does «leadership buy-in» mean?

- Time?
- Material scope?
- Political scope?
- Unknown unknowns?
- And who counts as «leadership»?



We'll skip Article 30

- It doesn't work anyway – see next slide



What to do when nothing exists?

- Largest risks? Most visible risk?
- Holistic risk approach - most risks are connected
- Usable – not perfect



Key takeaways

- Prioritise what matters most – you can’t fix everything all at once.
- Make some friends. Join their struggle – and they might join yours.
- Adapt the textbooks to reality – not the other way around.



Thank you for your time and attention.

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