

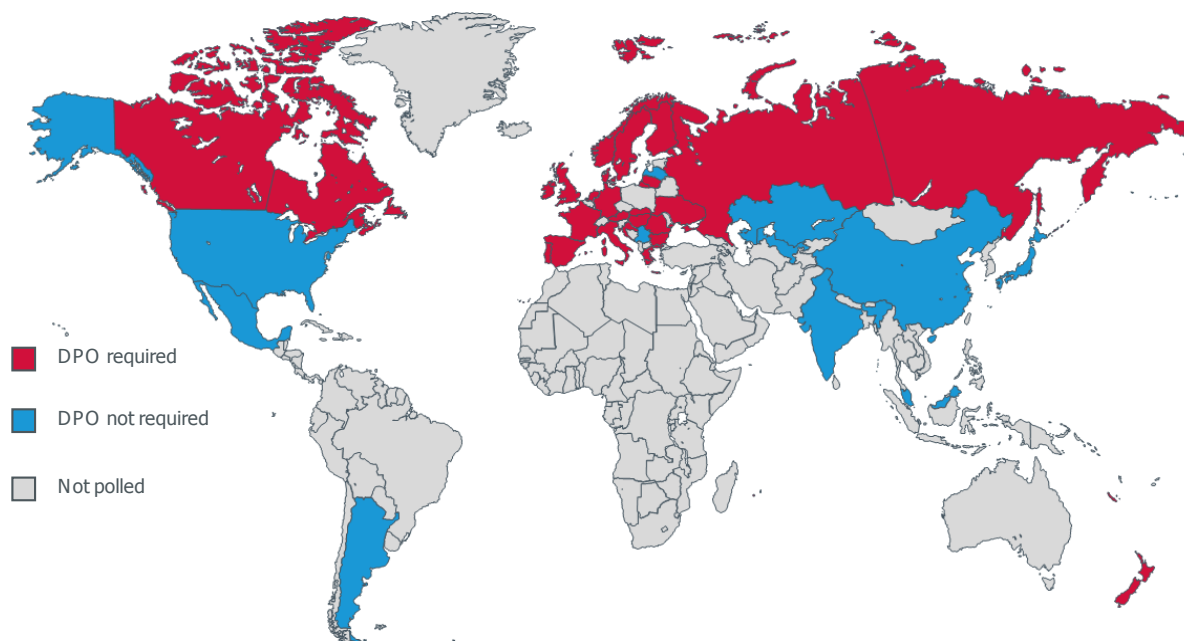
INTERNATIONAL SURVEY OF DATA PRIVACY AND SECURITY OFFICER REQUIREMENTS

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One of the most publicized provisions of the European General Data Protection Regulation (“GDPR”) was the requirement that certain companies had to appoint a Data Protection Officer (“DPO”). The concept of a DPO was not new. Germany had for years required that most companies that processed personal data appoint a DPO, but the GDPR dramatically expanded the quantity of companies required to appoint a DPO and brought renewed attention to the role.

We polled 34 countries in the BCLP Data Network – a group of highly experienced privacy practitioners from around the world – to find out more about which countries around the world had followed the lead of the GDPR by requiring that a privacy or security officer (generically a “Data Officer”) be appointed, and which countries within Europe have gone beyond the GDPR to require that a DPO be appointed in situations not mandated by the GDPR itself. The following provides a snapshot concerning current legal trends. For the purpose of this survey we use the term “Data Officer” to generally refer to a requirement to appoint someone that is responsible for data privacy or data security, even if those responsibilities are not identical to those within the GDPR. Our survey was also intended to capture countries that had a *general* requirement to appoint a DPO – it does not account for industry sector specific requirements that exist in some jurisdictions.

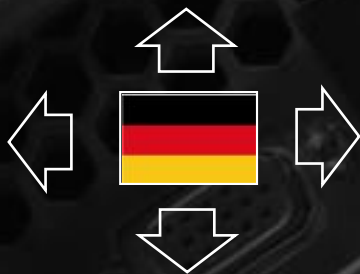




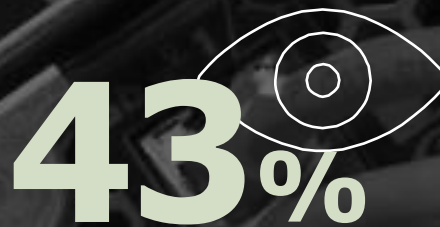
10% of countries required a consumer oriented business to appoint a Data Officer



6 countries required a consumer oriented business to appoint a data privacy or security officer



Germany has arguably the broadest requirement to appoint a data privacy officer



In the countries that require a Data Officer, 43% of appointments are responsible for privacy only and have no data security responsibilities.

IN ALL COUNTRIES IT IS NOT NECESSARY FOR THE DATA OFFICER TO...



Be a full time role



Hold specific qualifications



Be located in-country



BCLP's Data & Privacy practice

Bryan Cave Leighton Paisner has an internationally recognized data privacy and security team composed of experienced attorneys in France, Germany, the United States, and the United Kingdom. BCLP advises companies across the world on European and United States data privacy and security law, and practical business-oriented best practices. Outside of the jurisdictions in which we practice, BCLP maintains a network of data privacy and security specialists at well-respected local law firms that work together to share information and resources.

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