



CARIBBEAN  
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# Are You GDPR Ready?



***EU General Data Protection Regulation (GDPR)  
Compliance Webinar for Caribbean Hotels***

***FREE WEBINAR  
Wednesday, April 4, 2018  
10:00am - 11:00am (EST)***

Sponsored by



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## SPEAKERS

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### **Brian J. Kent, CEO and Co-Founder, Flip.to**

Brian J. Kent is the CEO and co-founder of Flip.to, the advocacy platform that helps destinations and hotels reach, inspire and convert an entirely, new global audience every day. Brian is a Brooklyn-born, NYC-raised, half-time Orlando dweller who is as comfortable with hyphens as he is in design, engineering, product development, strategy and all-around good company-building.



### **Polly Pickering, Managing Director, eShore Ltd**

Polly Pickering is an IT security solutions and business continuity specialist as well as an offshore AML enthusiast. She is a founding member of the International Association of Certified Compliance Specialists (IACCS). As the Managing Director of eShore Cayman Ltd., she is familiar with the challenges surrounding disaster recovery, IT governance, security and data sovereignty.



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**WHAT IS GDPR?**







The background features the letters 'GDPR' in a large, bold, grey font. The letters are slightly transparent, allowing the dark blue background to show through. The 'G' is on the left, followed by 'D', 'P', and 'R' on the right. The text is centered horizontally and vertically.

**The European Union's General Data Protection Regulation (GDPR) law, which is set to take effect on May 25, imposes a strict set of requirements on how and why companies collect and use personal data. In many cases, people get to decide what information they share. Companies that don't comply are subject to potentially hefty fines.**

# Days left until GDPR:

050

Days

14

Hours

15

Minutes

01

Seconds

The beginning of the new era: **May 25th**

**WHAT ARE THE RISKS?**

LOWER LEVEL:

€10

MILLION

Or 2% of annual  
revenue

(\*whichever is **higher**)

HIGHER LEVEL:

€20

MILLION

Or 4% of annual  
revenue

(\*whichever is **higher**)



PLUS...

**Your legal  
counsel,  
security and  
compliance**

- OR -

**Your business'  
insurance  
providers**

...INVALIDATING YOUR  
DATABASE

# The “Fuzziness” of GDPR

- A lack of precedence
- The most far-reaching regulation yet
- Not many parallels exist today





# **GDPR FOR MY BUSINESS**

“While GDPR is a European Union initiative, its reach is worldwide. That means **global companies**, from small online retailers to tech giants that stockpile and use EU citizens’ data, **are subject to comply.**”



**‘GDPR is the single  
most significant  
regulation of digital  
advertising ever.’**

**Doug McPherson,**  
chief administrative officer and  
global counsel at OpenX



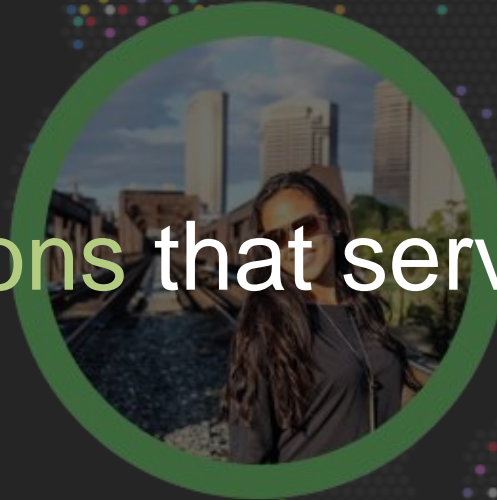


# Short-term wins:

- Save your database
- Be a good steward of personal data

# Long-term wins:

- Shift your thinking
- Personal conversations that serve the needs of travelers first





# How To Prepare Caribbean Tourism, GDPR May 2018

**eshore**

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# Introduction

eShore is a leading IT & Cyber Security provider in the Caribbean, Bermuda & Latin America markets.

**Founded in 2005, we are trusted by a large number of Financial Centres, Law Firms and Government entities across the Caribbean to manage their IT & Cyber Security. We also specialize in SBE (small business) including Tourism to offer low cost IT and Compliance Solutions**

**eshore**

25th of May

2018



**GDPR is here,  
are you ready?**



# Ready for the General Data Protection Regulation (GDPR)?



# 3 Myths

<https://eshoreltd.com/blog/the-top-3-myths-of-gdpr-in-the-caribbean/>

## Myth #1

**“We’re a Caribbean-based company so the GDPR doesn’t apply to us.”**

Even if Caribbean-based companies have no physical presence in the EU, they can still be subject to the GDPR if they process an EU resident or visitor’s personal data in connection with goods or services offered to those individuals.

## Myth #2

**“My data is stored with my cloud service provider so it’s not our responsibility to remain GDPR compliant.”**

Controllers and processors of data share responsibility for meeting GDPR requirements. Businesses utilising personal data for business purposes cannot pass the duties to their cloud or security providers that are processing or storing personal data on their behalf – the data controller still be held responsible for compliance with the GDPR.

# Myths cont'

## Myth #3

**“Our personal data is in the parent company database so we’re not subject to the GDPR.”**

GDPR applies to all data, meaning all collected data connected or associated with a person in the EU will be considered under GDPR protection based on the person’s name, ID number, or physiological, genetic, or other factors.





**So How Can You  
Protect Your Business  
& Your Customers?**



# Tourism Compliance Evolving

**Your Members need to think about in terms of personal Data:**

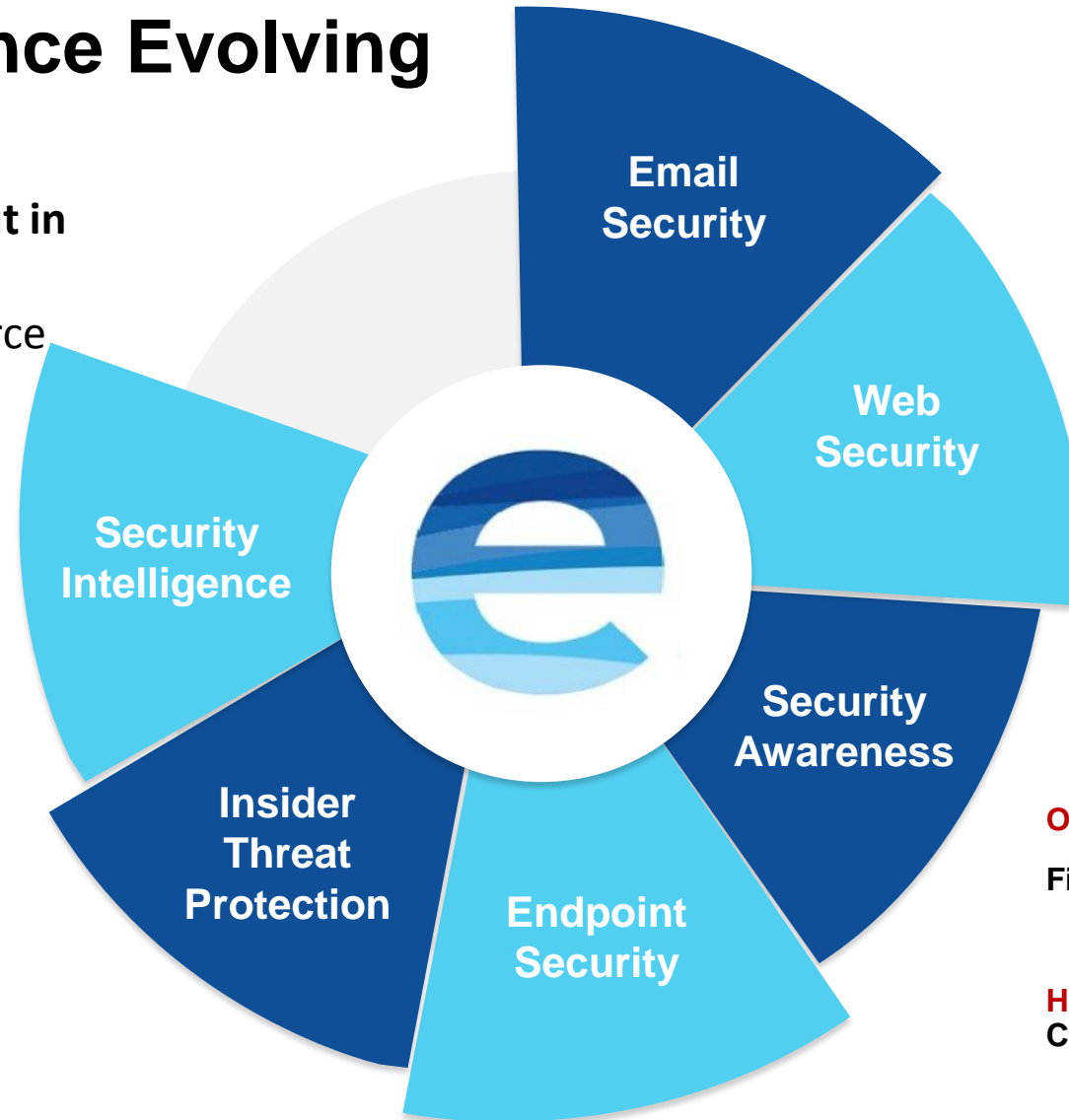
Travel Sector- Data Types And Source

- **ID/ PASSPORT DETAILS:**

- Names
- DOB (adults and children)
- Postal addresses
- Race/ethnic origin (special category)

- **CONTACT / MARKETING:**

- Email addresses
- Telephone numbers
- Personal preference/ travel patterns



**COMPLAINTS:**

Health (special category)  
Photographs / videos

**OTHER SENSITIVE DATA:**

Financial and payment information

**HR RECORDS:**

Current and former employee details

# How to Handle Marketing Data?

## 5 aspects of consent in the GDPR which are KEY to marketers

- 1. Unbundled:** Consent requests must be separate from other terms and conditions. Consent should not be a precondition of signing up to a service unless necessary for that service.
- 2. Active opt-in:** Pre-ticked opt-in boxes **are invalid** – use unticked opt-in boxes or similar active opt-in methods
- 3. Granular:** Give granular options to consent separately for different types of processing wherever appropriate.
- 4. Named:** Name your organization and any third parties who will be relying on consent
- 5. Easy to withdraw:** Tell people they have the right to withdraw their consent at any time, and how to do this. **It must be as easy to withdraw as it was to give consent.** This means you will need to have simple and effective withdrawal process.



# How to Handle Marketing Data?

## *MISC...*

**Brands need to maintain records of the consents they have** – i.e. what users were told and how they gave consent.

### **Coupons and Offers:**

If you're just sending offers, dynamic content (nothing personalized on browsing behavior) and you're not collecting, storing and processing ancillary data, then you simply need marketing consent, as is currently the case.

Done payments.incisivemedia.c

Mail ☐ Phone ☐ Email ☐

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☐ Yes, I understand and accept the [Terms and Conditions](#) and [Privacy Policy](#) and consent to my information being used as above.

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## Handling Data Breaches Gracefully

It may prove impossible to eradicate data breaches completely, but every organization has the power to lessen the blow by handling the aftermath correctly. ***Equifax gave us a masterclass in how not to handle a data breach earlier this year.*** By delaying disclosure, misdirecting potential victims, and failing to patch a known vulnerability, it made a bad situation much worse. We can only hope this proves instructive for others in the year ahead.

**GDPR asks that Tourism (simply) adheres to policies, create an action plans to answer how you handle EU Citizen's PII (Personally identifiable information (PII))**



## Contact Us

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# QUESTIONS & ANSWERS

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