



STAR II

SUPPORT SMALL AND MEDIUM ENTERPRISES ON THE DATA PROTECTION REFORM II
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Report on the awareness-raising campaign

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1 Background to the STAR II project

The EU data protection reform, largely comprised of the General Data Protection Regulation (GDPR or Regulation), was concluded in April 2016, and the GDPR became applicable across the EU on 25 May 2018. This has left a short period of time for small and medium-sized enterprises (SMEs) to adapt to the new regulatory environment. The novelties it brings to the fore, such as specific provisions concerning SMEs [e.g. recitals 13, 132; Art 30(5)], data protection by design (Art 25) and data protection impact assessment (DPIA; Art 35), only add to this complication.

SMEs often need external assistance to understand the gravity of the new Regulation; they need guidance on how to follow their respective Member State national legislation giving full effect to the GDPR; they need to adapt their routine practices; they need to acquire information, solve new or hitherto unnoticed issues and follow trainings on the new legislation; they often need to create and execute an action plan to apply the new framework. In addition, a considerable number of SMEs will need to appoint a data protection officer (DPO), who should immediately become the locus of knowledge and expertise on the GDPR and assist them in the implementation of the new regulatory framework requirements.

There are pressing needs to assist EU data protection authorities (DPAs) in raising awareness among businesses, especially SMEs, on the new EU legal framework for personal data protection, particularly the GDPR, and assist these SMEs in ensuring compliance therewith. Some 22 million European SMEs – the core of EU enterprise policy – not only face distinctive challenges from data protection law, but also – despite specific, often protective regulation – rarely can afford professional legal advice. Thus, they merit special support from public authorities. The STAR II project will directly address these needs and will:

- 1) review the state of the art in DPA awareness-raising activities,
- 2) analyse SMEs' experience within first months of the functioning of the GDPR,
- 3) run an awareness raising campaign for SMEs,
- 4) establish and operate an e-mail hotline (12 months) to respond to SMEs' questions, measuring its performance and the most frequently asked questions,
- 5) prepare a digital guidance for DPAs on good practices in running an e-mail hotline and raising SME awareness, and
- 6) draft an innovative, FAQ-based handbook (digital and printed) for SMEs on EU personal data protection law.

These results will be prepared in consultation with stakeholders (especially via validation workshops and the External Advisory Board) and widely disseminated. The outputs will be freely available, openly accessible and copyright-unrestricted, thus easily reusable and adaptable. STAR II is addressed to 40+ EU DPAs and millions of EU SMEs. It will deliver tangible and long-term results to SMEs, directly assisting them in compliance with the GDPR (by hotline and guidance material) and – indirectly – to DPAs, to assist in their awareness-raising mission.

2 The awareness-raising campaign

2.1 The aim of the awareness-raising campaign

The campaign aimed to reach out to SMEs to raise their awareness regarding the GDPR and to draw more attention to the new regulatory framework on personal data protection. The campaign also explained the particular forms of assistance STAR II will provide, namely the trial hotline for SMEs in the first place, and – subsequently – the handbook for SMEs and a guidance for DPAs. The campaign reached out the target group widely and has risen the awareness of the SMEs in Hungary about the need to comply with the new data protection framework and encouraged them to take the necessary measures.

2.2 Establishment of the awareness-raising campaign and broadcast of materials

The communication channels (radio), the length of the campaign (one month), the frequency of broadcasting (two plus one spots per day) were based on the experience gained in the ARCADES project. A one-month-long campaign with three spots (50 seconds) per day was deemed to be appropriate to deliver the message for a significant number of people, including that the target audience – SMEs representative

2.2.1 Text of the radio spot

The Consortium drafted the text and the scenarios of the radio campaign in English and in Hungarian. The final text and the scenarios for the following radio spot was recorded in Hungarian language on 20.12.2018. It included the following message:

“Do you know that small and medium-sized enterprises represent 99% of all businesses in the EU?

Rules and obligations of the new EU data protection regulation (coming into force as of May 2018) affect generally these data controllers, too and there are also some specific rules of the GDPR which apply to SMEs.

For more information please, contact the National Authority for Data Protection and Freedom of Information, which has set up a special hotline: kkvhotline@naih.hu

This PSA has been prepared upon the request of NAIH and co-financed by the Rights, Equality and Citizenship Programme of the European Union under the supervision of the DG JUST of the Commission.”

2.2.2 Broadcasting and statistics

The radio campaign was broadcasted by Petőfi Rádió, a countrywide available public radio that has the most listeners per day among the entire adult population in Hungary. According to the data published by the National Media and Infocommunications Authority, Petőfi Rádió has had about 1,3 million listeners per day in average in the first quarter of 2019.

The radio spot was broadcasted 86 times between 15.03.2019 – 15.04.2019 (17 times in the morning hours, 37 times in the afternoon hours and 32 times in the evening hours).

2.2.3 Public appearances and events

The President of the NAIH was invited to a radio programme on the Orient Rádió to present and discuss the Annual report of the NAIH. On the radio programme the President drew attention to the STAR II project and especially to the launch of the SME hotline.

The President and other representatives of the NAIH presented the project and the launch of the SME hotline on several conferences (Hungarian Decision maker Think Tank Conference, Infoszféra conference, Data Protection Case Handling Workshop).

To further advertise the STAR II project and the SME hotline the NAIH published the following announcement on its website on the launch and operation of the SME hotline on 14.03.2019.

“Email hotline guidance for small and medium-sized enterprises (SMEs) on the new EU data protection regulation (GDPR)”

The STAR II project (Support small And medium enterprises on the data protection Reform II) is a European Union funded project coordinated by the National Authority for Data Protection and Freedom of Information (NAIH) in partnership with the Free University of Brussels and a consultancy and research and development firm, Trilateral Research Ltd, Ireland. The STAR II project aims to support small and medium enterprises throughout the EU to comply with the General Data Protection Regulation.

Under the STAR II project, the National Authority for Data Protection and Freedom of Information will operate the email hotline from March 15, 2019, providing SMEs general information on the GDPR.

If you are running an SME and have questions concerning the new EU data protection regulation, please, feel free to contact the NAIH at the following e-mail address: kkvhotline@naih.hu. Please, note that the hotline provides only general information and guidance on the GDPR. If you require assistance from the Authority on complaint submissions, notifications of data breaches or any other specific issue, please, use the usual channels given on the website.

Further information about the project: https://www.naih.hu/files/2018-01-24-STAR_2_kozlemany.pdf.”

2.2.4 Effectiveness of the campaign

The NAIH has experienced a great interest among the SMEs during the hotline’s operation so far. The majority of the SMEs contacting the NAIH via the hotline refers to the information available on the website of the Authority, a smaller part refers to the radio campaign. Based on the increased interest of the SMEs on their GDPR compliance, the awareness raising campaign has successfully reached its goal.