



Job Description

JOB TITLE: **Data Protection Officer**

LEVEL/BAND **MS30**

DEPARTMENT: **Compliance**

DIRECT REPORT: **Head of Compliance**

Overall Purpose of the Position

- To play a crucial role in assisting APS Bank as a Data Controller or Processor to fulfill its obligations under the data protection regulatory framework – acting independently whilst enjoying sufficient protection in performing data protection tasks. However, the DPO may not engage in other activities which may constitute a Conflict of Interest with DPO activities.
- To ensure that all matters emanating from the GDPR (impacting upon APS Group operations) and the connected implementation project are adequately project managed into business as usual mode – working in close liaison with the appointed Project Manager.
- To work with the Head of Compliance in order to ensure that the DPO continues to be involved properly and in a timely manner in all issues which relate to the protection of personal data.
- To provide consulting services for internal projects being implemented by the Data Controller / Processor - in order to ensure that the protection of client and staff identifiable data is given due consideration in all matters involving the collation / processing / updating / storage and erasure of records. The DPO will effectively operate as the Subject Matter Expert.

Operational Responsibilities

- To provide advice where requested by APS as a Data Controller as regards the carrying out and / or monitoring of a Data Protection Impact Assessment – a DPIA is to be carried out where a process (particularly those using new technologies) is likely to result in a high risk to the rights and freedoms of a natural person.
- To inform and advise the data controller / processor entity and its employees of their obligations under GDPR – paying specific attention when processes can be impacted by other EU member state data protection provisions.

- To monitor compliance with GDPR through (i) the required updates to internal policies and procedures, (ii) raising awareness and conducting training for staff involved in processing operations and (iii) completion of audit exercises to certify adherence to GDPR on an ongoing basis.
- To cooperate with the supervisory authority (IDPC) – acting as a central point of contact. The DPO will facilitate access by the IDPC to documents and information for the performance of tasks such as including but not limited to (i) enforcement and monitoring of adherence to GDPR (ii) submission of complaints / breaches.
- To supervise / handle directly (i) subject access requests (ii) requests for amendment or deletion of data sets (iii) requests for the right to be forgotten and (iv) the submission of breach reports to the regulatory body – all within the established timeframes. In all such cases, the DPO will be expected to carry out the necessary investigations prior to providing responses to enquiring clients or the regulator.
- To effectively manage the day to day working relationship with APS Bank Departments and Divisions by providing support but at the same time to rapidly and efficiently escalate to the Head of Compliance any issues which can potentially undermine meeting the set regulatory deadlines for the handling of data protection related issues / queries / reports.

General Responsibilities

- To discuss and agree with the Head of Compliance and the Regulatory Compliance Manager (i) the assignment of other duties related to FATCA and CRS covering the Bank, the SICAV and ReAPS – without creating any conflict of interest with DPO related duties / monitoring activity and (ii) the phased transfer of specific duties to other members of the Regulatory Compliance team / other employees / external parties.
- Demonstrate an ongoing interest in Continuous Professional Development.
- Champion the ongoing development of a Compliance culture within APS Bank by promoting adherence to policies, guidelines and procedures at all times
- To demonstrate team spirit by completing standard office tasks and any other duties (such as the Depositor Compensation Scheme) that may be reasonably assigned from time to time.

Qualifications, Skills & Competencies

	SKILL	EXPERIENCE	QUALIFICATION
MANDATORY	<p>Excellent verbal and written communication skills</p> <p>Accountable, Organised, Meticulous and able to handle tight deadlines</p> <p>Excellent analytical, troubleshooting and interpersonal skills</p> <p>Strong negotiating and relationship building skills</p>	<p>A minimum of two years previous Compliance experience – with sound knowledge of the local & EU regulatory tools implementing Data Protection requirements.</p>	<p>Relevant qualification in financial services, compliance or financial/economic crime.</p>
DESIRABLE	<p>Be computer literate with MS products and familiar with conducting research on the Internet.</p>		