

Data Protection Solutions

Are you worried about any aspect of your Data Protection Compliance? We offer **5 Easy Steps** to avoid the following costly management headaches.



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1. Subject Access Requests

Check you can say yes to these questions:

- ✓ Our staff have been trained to recognise when requests for information are Subject Access Requests and what to do next.
- ✓ We have standard procedures for dealing with Subject Access Requests.
- ✓ We understand the requirements and searches we must undertake.
- ✓ We understand how to comply and how to deal with third party privacy rights where they are impacted.

Our Solution

For £500 plus vat we can:

- ▶ Provide an internal check list for use in staff training to help recognise Subject Access Requests.
- ▶ Provide an internal flow chart/check list for dealing with Subject Access Requests.
- ▶ Provide a suite of template letters and a template response form.
- ▶ Provide a short-form guide to dealing with some of the more tricky issues which arise.

Risk Example

The Information Commissioners Office (ICO) took enforcement action against First Choice Selection Services Limited when they refused to comply with a request for information from a former employee during employment Tribunal proceedings. This was a breach of his Subject Access Rights.

2. Electronic Marketing

Check you can say yes to these questions:

- ✓ Our marketing team understands the key legal principles involved in legal compliance where electronic marketing is used.
- ✓ We have documentary evidence of our compliance.

Our Solution

For £750 plus vat we can:

- ▶ Provide bespoke internal training to your marketing team and/or your management team on the Privacy and Electronic Communications Regulations, providing an overview of the do's and don'ts.
- ▶ Audit your current compliance with electronic marketing and prepare a report on any compliance gaps.

Risk Example

The ICO has fined We Buy Any Car Limited £200,000. It sent 191.4 million marketing emails and 3.6 million marketing SMS messages to individuals without fully satisfying the requirements of the soft opt in, resulting in 42 complaints to the Commissioner, over a period of twelve months.

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3. Record of Processing activities

Check you can say yes to these questions:

- ✔ We understand whether we are required to have An Article 30 Record of processing activities.

Where we need/wish to have a record.

- ✔ We have a record of all our processing activities.
- ✔ That record is comprehensive, complete and up to date.
- ✔ That record includes and records categories of “special data”.
- ✔ That record includes where personal data came from and who it is shared with.
- ✔ That record demonstrates the legal bases for all processing.

Our Solution

For £500 plus vat we can:

- ▶ Audit your current record of processing activities and identify any compliance gaps.

For £900 plus vat we can:

- ▶ If you do not have a Record of Processing Activities, we can assist you to complete one.

Risk Example

An ICO audit of Wakefield Council found missing compliance documentation. In particular the appropriate legal bases for processing were not incorporated into the compliance document and there was a compliance gap as to the bases for processing special category data.

4. Security and Risk Management

Check you can say yes to these questions:

- ✔ We understand our data security risks.
- ✔ We have policies on the use of computers, mobile devices and other equipment where personal data can be processed.
- ✔ These policies include personal use of our IT infrastructure and also the processing of personal data on staff members personal devices.
- ✔ We have a standard procedure when a staff member leaves us to minimise data protection breaches or breaches of security.
- ✔ We have an incident and response plan and the team know exactly what to do and the strict time limits involved.
- ✔ We have user-friendly breach reporting forms and all staff know how to complete them.
- ✔ We have a central log of all data breaches and near misses.
- ✔ We use our central log to improve and manage future risks.
- ✔ We have pre-populated incident reporting forms to the ICO so that we can act quickly.
- ✔ The incident and response team know exactly what to do if an incident arises and understand when to report to the regulator.

Our Solution

For £750 plus vat we can:

- ▶ Provide bespoke policies on the use of computers, mobile devices and other equipment including personal use and use of employee’s own equipment.
- ▶ Provide a standard checklist and “leaving letter” for departing employees.

For £750 plus vat we can:

- ▶ Work with you to set up an incident and response plan.
- ▶ Provide a written team sheet and plan.
- ▶ Provide user-friendly internal reporting forms suitable for your organisation.
- ▶ Provide a central log to record breaches.
- ▶ Help the team to understand types of incident and reporting issues and assist with training on the incident and response plan.

Risk Example

The ICO has fined British Airways (BA) £20m for failing to protect the personal and financial details of more than 400,000 of its customers.

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5. Risk Management

Check you can say yes to these questions:

- ✔ Do you feel comfortable that you are data protection compliant?
- ✔ Do you know what your personal liability is for non-compliance?
- ✔ Are you comfortable that no areas in the organisation pose a serious data protection business risk?

Solution

From £900 plus vat we can:

- ▶ Provide a bespoke desk-top audit of your business and compliance.

Quoted separately:

- ▶ We can also provide individually tailored training packages.
 - ▶ For the designated data protection compliance personnel.
 - ▶ For any sector of your business.
 - ▶ For all staff.

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