

# THE CUSTOMER ATTUNED GDPR READINESS ASSESSMENT



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## GDPR - risks, challenges, and opportunities.

New European data protection regulations (GDPR) take effect in 2018. Whilst compelling most data driven organisations to tighten up their processes and activities, used correctly, they also provide new opportunities for businesses.

Customer Attuned offer their help to companies needing to evolve their data management processes and procedures to ensure they work within the new regulations and ensure they gain the best advantages from them.

## Executive Summary

The General Data Protection Regulation (GDPR) is a reform of the current data protection rules. It is currently being written into UK law and will apply to all organisations who hold personal data from 25 May 2018.

It will bring with it several new and different requirements for data management, affecting organisations involved both in processing and 'controlling' data.

Penalties for non-compliance will be severe, the Information Commissioner's Office (ICO) can administer fines of up to 4% of global annual turnover or 20 million Euros - whichever is higher.

Achieving compliance will take time and money, but if managed correctly there are steps that present opportunities and can be linked to other business objectives that provide a return on investment.

## Challenges

The GDPR enshrines within its regulations the most recent data protection principles, including but not limited to: -

- the right for individuals to opt in to communications they choose to receive
- a 'right to be forgotten'
- a right to receive a detailed data report on information held upon him or her

as well as a general tightening of regulations concerning the handling of personally identifiable information (PII).

The regulations will affect both the technical data management functions of organisations and the marketing and communication activities, that is those who use the data in the organisation.

Because of the new legislation, the way we view personal data is going to change - organisations will be custodians of much of the data they hold, not owners. The challenges around GDPR are therefore far-reaching and diverse.

The regulation applies to current, legacy, and new data as it's collected and stored.

### **To comply with the GDPR you must:**

#### **KNOW "your" data**

Personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary

#### **MANAGE "your" data**

Personal data must be:

- Accurate and, where necessary, kept up to date

- Kept for no longer than is necessary

#### **PROTECT "your" data**

Personal data must be:

- Processed in a manner that ensures appropriate security

Accountability runs throughout the principles listed above and organisations have explicit responsibility to be able to demonstrate that they comply; the measures you take must include:

- Implementation of appropriate technical and organisational measures
- Documentation of processing activities
- The appointment of a Data Protection Officer (DPO) where appropriate
- Data Protection, measures for which could include:
  - Data Minimisation
  - Pseudonymising
  - Continual security improvements
- The use of Privacy Impact Assessments (PIA's) where appropriate

Whilst the fines and liabilities for non-compliance are difficult to ignore, one should also note the reputational damage that could result from the publication of a breach and/or non-compliance.

## How Our Services Help

Customer Attuned has identified that many organisations are slow to prepare for the new regulations, and has developed an audit process which will help both the IT and business functions to establish how their current processes fit against the new regulations, and hence the gap that needs to be filled for the organisation to be compliant.

Customer Attuned works to a proven template focused on the three key stages of Assess, Recommend, and Implement.

In our GDPR audit we will:

- Assess your organisation's capabilities against the current view of GDPR
  - Company-wide technical and business
  - Specific CRM / communications focus
- Recommend actions
  - To mitigate or eradicate risks
  - To take advantage of opportunities
- Provide you with a route map and offer assistance with implementation

## How our GDPR Readiness Assessment will help you

### Assess

We'll perform a detailed readiness assessment, the output of which will identify gaps in your current practices and grade them according to their risk-level; this will provide you with a solid starting point for your journey to compliance.

### Recommend

As CRM experts, we'll not only make recommendations on how to mitigate and/or eradicate the risks identified in the readiness assessment, but will also identify opportunities with real business value.

### Implement

We can continue to work with you to provide a route map to compliance in both technical and business areas, and to help you exploit the opportunities identified in our recommendations and therefore gain competitive advantage from the GDPR.

## The Team

Gary is a director of Customer Attuned with extensive commercial leadership experience across healthcare and FMCG sectors.

Geoff is a CRM and data management expert with extensive experience in CRM programmes.

Matt is a GDPR Practitioner with a background in Corporate and Consulting IT disciplines.

## Outcomes

Dependent upon your specific areas of activity, and our findings, the report provided will include detailed recommendations for action. These typically include: -

- GDPR Readiness Assessment with gap and risk analysis
- Recommendations for mitigating and/or eradicating risk
- Recommendations for technical and system upgrades required to enable more effective data handling under the regulations, for example;
  - the need for consistent management and linking of PII data
  - any updates required to ensure a 'Single Customer View' of an individual's data can be made available to reply to Data Subject Access requests
- Recommendations for changes to sales, marketing and communication practices covering in/opt out, seeking permissions, and utilising stored data
- Identification of opportunities with real business value

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