

CASE STUDY



Pritchetts

DATA PROTECTION AUDIT AND GDPR COMPLIANCE ADVICE

Challenge

The Information Commissioner's Office ("ICO") imposed a monetary penalty notice on this organisation. The company engaged us to carry out a **wide-scale data protection audit** and **advise on preparations ahead of an ICO regulatory audit**.

As with all organisations in the insurance sector, our client processes a large amount of personal data and has significant data protection compliance responsibilities. Our client also required **bespoke advice** on aspects of their GDPR compliance implementation programme. This included **updating their data-sharing procedures**, both among their own group companies and also among other organisations within the insurance eco-system, such as online aggregators and online insurance platforms.

Solution

Audits of this level are a significant undertaking, and it was important to work with our client to understand how best to **conduct the audit work within their available budget and time**. We worked hard to update our questionnaire templates to ensure that they covered all of the ICO's most recent guidance on its compliance and accountability expectations, and to **focus on key areas already identified as higher risk**.

To keep client spend to a minimum, the client chose to ask their staff to complete the template audit questionnaires that we provided. Some clients prefer us to carry out the interviews with staff, which can help to ensure a greater level of independent scrutiny and aid understanding of the underlying issues.

After the questionnaires had been completed, **we reviewed the responses in tandem with the organisation's existing policies and guidelines**. We carried out a **gap analysis** and worked hard to provide our audit report in a manner that could be most easily interpreted by the client's operations teams and Data Protection Officer, alongside a **clear list of priority actions and risk levels**.

Our client has continued to engage our expertise in various data protection compliance areas.

Impact

The approach that we adopted enabled us to produce **comprehensive audit and gap analysis reports**, as well as **practical recommendations for best practice compliance**. We always endeavour to do this at the right level for each client so that we can work within their particular budget and deadlines.

Our advice should help mitigate unquantifiable, but significant financial and reputational risk, including risks under the GDPR of further fines of up to €20 million or 4% of annual global turnover.

Insurance broking and claims management company

Legal directory extract

"Pritchetts Law is a specialist data protection firm, founded by Stephanie Pritchett in 2009. She advises clients including FTSE 100 and FTSE 250 businesses on issues including GDPR, freedom of information and data privacy, working alongside partner Ben Wootton, who draws on in-house experience at Heathrow Airport and Air New Zealand. The firm ... has recently advised a range of clients in the financial services, education, tech and travel sectors on GDPR compliance and privacy policies."

The Legal 500 UK 2020

You can find out more by [emailing us](#), or calling us on 0117 307 0266