

# CASE STUDY



## DATA PROTECTION FACT FINDER

*“But how do we know what to put in privacy notices?  
Can’t we just copy someone else?”*

### Challenge

Namco is part of the global \$50 billion games and entertainment company, Bandai Namco Group. Namco provides amusement machines for revenue-share opportunities across the UK and internationally. It also operates multi-leisure family entertainment facilities, including bowling and arcade venues.

As part of its GDPR compliance project, Namco wanted to update its customer privacy policy on its website. In theory, it should be easy to tailor precedents to ensure that much of the information required under the GDPR is presented to customers in this form. However, it is often trickier to properly understand a client’s actual use of that personal data. There isn’t a “one size fits all” to this – and nor should there be. These notices need to be tailored to the actual use made of personal data by the organisation across its sales channels.

### Solution

Without the expense of carrying out detailed data-mapping exercises or [data protection audits](#), we have found that it is often cost-effective for clients who need a quick solution to improve their compliance to consider their data-processing activities by using our [fact-finder process](#). This operates as a mini-audit for those who don’t currently have the time or budget to take a more in-depth look at these processes.

We gleaned the necessary high-level information about our client during earlier calls, and then tailored our fact-finder questionnaire to our client and their industry. Our client completed the questionnaire, requesting our support with answering the questions as required. By following this process, we secured the information that we needed about our client, so that we could understand their processing better and make them aware of their risks and how to mitigate them. It also helped to ensure our client’s compliance with various legal obligations:

- **Legal basis obligations under the GDPR.** We helped our client to assess their lawful bases in relation to their various data-processing operations, and to explain these to customers via their privacy policy.

(continued...)



**Namco UK, part of Bandai Namco Group, a global \$50 billion games and entertainment company**

### Testimonial

*“We asked Pritchetts to help us with our GDPR compliance. To set the ball rolling, they helped us to complete a Data Protection Fact Finder, to best understand how we process personal data as a business as well as how we could ensure best practice. We provide our services to individual consumers and it was important to us to ensure that we developed a tailored and understandable customer-facing privacy statement – to protect us and more importantly those who visit our operations. We really enjoyed working with the Pritchetts team to help us to achieve that.”*

**Rob Cook, UK Operations Manager, Namco UK Ltd**

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

## Solution (continued)

- **The GDPR's transparency obligations.** We drafted a GDPR-compliant, customer-facing privacy policy for our client, ensuring that the policy reflected the organisation's operations.
- **Accountability obligations under the GDPR.** We helped our client to consider their current [accountability measures](#) and the processes and procedures that needed to be established as time and budget permitted.
- **The GDPR's security and confidentiality obligations.** Through our fact-finder approach, we helped our client to consider their current data security processes and to explain these to customers in their privacy policy.
- **Requirements under the GDPR in relation to third-party data processing, data sharing, international transfers of data, etc.** We reviewed these with our client and supported them in explaining the relevant elements to customers in their privacy policy.
- **The GDPR's requirements around handling individual rights requests and sharing information about individual rights.** We reviewed these with our client and helped them to explain these to customers in their privacy policy.

## Impact

With the updated and stricter requirements under the GDPR – particularly around transparency and accountability – **businesses must ensure that they are telling customers how their personal data will actually be used.** It is not enough simply to copy and paste solutions from other providers, who may be doing things very differently.

It is crucial that businesses take the time to reflect accurately what their data-processing activities really are and to reassess these regularly. In this way, businesses can use their outward-facing privacy notices to adequately update and communicate how those processing activities affect individuals' personal data.

Privacy notices on websites are, of course, accessible by anyone, including regulators. They are the outward-facing manifestation of an organisation's data protection and accountability measures, so it is crucial to adopt a bespoke approach.

Our fact-finder process helps to provide businesses with more compliant and accurate privacy notices, in a cost-effective manner.