

CASE STUDY



Pritchetts

ADVISING ON NEW PROCEDURES TO HANDLE DSARS AND OTHER INDIVIDUAL RIGHTS REQUESTS

Challenge

Our client, a Top 10 UK building society, required advice on their GDPR compliance programme. We provided strategic advice around consent and establishing legal bases for processing; updated a significant suite of data protection policies and procedures; and advised on compliant outsourcing to data processors.

A particular challenge that the building society faced was how to handle data subject access requests (“DSARs”) and other individual rights requests in the most efficient way possible. These kinds of requests are of utmost importance to the individual data subjects who are exercising their rights, but they can be incredibly time-consuming for organisations to handle.

Solution

We drafted bespoke guidelines on individual rights requests for our client to implement. These contained procedures to be followed both by staff generally, when a request is received, and by data protection champions and Data Protection Officers (“DPOs”) helping to oversee the processes.

We built client-specific sign-off processes into the guidelines, along with a raft of useful templates. These covered everything from holding letters to be sent when a request was received through to template response forms and databases to track effective management of such requests and ensure that they were carried out well within statutory deadlines.

We also incorporated into the guidelines the ICO’s guidance on handling all such relevant requests.

Impact

Financial institutions hold significant personal data in relation to their clients as well as their employees. Much of that data is financial data, which is highly sensitive. If this data is not handled appropriately, there is a high risk of an adverse impact on individuals through exposure to fraud.

Financial services are also increasingly focussed on interacting with, or marketing, their broader services. The GDPR and the proposed E-Privacy Regulation present an even greater burden on demonstrating compliant marketing activities. Financial services must be at the forefront of instilling a culture of good data protection practice, which builds trust among individuals.

**A Top 10 UK
building society**

Legal directory extract

“Stephanie and Ben are such extremely experienced exponents of this area of law that they are our go-to advisers. They both offer sensible, pragmatic, realistic and solution-based advice.”

**Quoted in The Legal
500 UK 2021**

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