



Over the last 6 months many organisations that consider themselves “lower risk” have been contacted by their global clients with increasingly comprehensive and demanding questionnaires and, in some cases, requests for site visits. A supplier’s ability to demonstrate good Privacy practices is now an “entry level” requirement. If you are unable to meet that minimum standard you are likely to be excluded from the procurement process and will lose opportunities.

Parcadian has been working across a number of industries and with varying scales of business and we are seeing consistent themes where companies could improve.

Here are the most common together with suggestions to reduce risk.

- 1 Data Privacy was fixed last year – Many organisations ran a Privacy project and then went back to business as usual. The changes did not embed across the company and now no one is challenging the status quo because everyone is busy.

Response – A simple question needs to be asked at the senior management table. “What are the top 3 Privacy risks that we have risk accepted and what are the top 3 we are managing down?”

- 2 Sustainability in BAU – In 2015/16 GDPR experience was in demand and every CV suddenly included GDPR. Privacy is a complex and far reaching. It requires a real understanding of processes and operating models. In many cases the organisation’s operating models were poorly designed and unusable without a sizable programme team to support them. This has led to major initiatives losing relevance and degrading over time and the whole approach being side lined.

Response – Review and simplify your Privacy design. You should also look at the document set and stop unnecessary tasks. A successful Privacy framework is defined by where you focus your resources and what you do not do.

- 3 Privacy Risk Reports – An organisation should be able to look across its Privacy risks and highlight where you are within appetite and where you still have

further work to complete. If an incident occurs you should have identified the possibility that it could happen and be able to explain if you knew work was required or why you felt none was necessary and the risk was acceptable.

Response - A basic risk management framework can be established very quickly or Privacy can be built into your existing risk procedures. This will facilitate the creation of a Privacy report that will allow management to make choices.

- 4 Privacy Knowledge & Support – Privacy is a complex discipline and for many companies it is not viable to invest in full time experts to manage and maintain their Privacy risk position. An alternative is to identify experts to support their activities at key points in the year and to advise on high risk issues as they arise.

Response – Identify experienced people you trust and retain them to assist in the more complex areas. Also, discuss what would happen in the event of a data incident.

- 5 Brexit – The impact of Brexit should be assessed as you will be asked by your customers if you are processing data legally following a no deal exit from the EU. Establishing a process is not as hard as people think and so working through this problem allows you to continue to transfer data.

Response – Focus on your contracts, your Records of Processing Activity and an addendum to your data transfer agreement to allow you to respond positively to your customers on Brexit.

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