

## Case Study

# Data Privacy Framework Enhancement



**Client** **Asset Management Subsidiary of Global Financial Services Organisation**

**The Work** A global data privacy programme initiated at group level filtered down to their subsidiaries with a number of high level requirements for the protection of personal identifiable information (PII). Subsidiaries were given autonomy in implementing the programme to suit their local regulatory environment. We were engaged to assess the current environment at one of the subsidiaries and establish a repeatable way for monitoring compliance with the local data protection regulation while also ensuring alignment with the group requirements.

**How We Helped** We defined the approach for mapping the flow of the client's PII throughout the organisation. We piloted the approach on three business processes which resulted in identifying a number of control gaps and provided an integrated approach for monitoring and reporting that was aligned to their existing regulatory risk management framework. Training was then provided to enable the organisation to roll out the framework across their wider business processes, this included production of templates and step by step guides, as well as walkthroughs of the completed work and acting as a QA function during the roll-out across the business.

**Value Added** Our approach to this emphasised on ensuring knowledge was transferred throughout the engagement, this allowed the client to carry on with the work post pilot stage while we then acted as a QA function, therefore reducing the cost. Having seen the value and simplicity of the approach implemented, a number of the group subsidiaries then adopted the same approach for mapping their data and reporting on their data protection controls.

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