

# Responding to Data Subject Access Requests



# Our solution to reduce the burden of Data Subject Access Requests

At KPMG, we offer an efficient end-to-end solution that is designed to help your organisation meet its obligations under Data Protection Regulations. Organisations are seeing a steep rise in the number of Data Subject Access Requests (DSARs). Due to the ever-increasing amount of digital information and personal data stored by organisations across multiple sources, responding to DSARs can often be a significant financial and administrative challenge. Furthermore, DSARs need to be answered accurately and on a timely manner, failing to do so can expose your organisation to regulatory and legal risks.

## What is a DSAR?

Under Article 15 of The General Data Protection Regulation (GDPR), data subjects are entitled to be furnished with any or all personal data relating to them. These requests are commonly referred to as DSARs.

Your organisation, as the data controller, is legally obliged to respond to the request, without charge, within one calendar month.

### Our Approach to DSAR management:

Our efficient and cost effective DSAR Managed Review Service is designed to help your organisation meet their obligations under Data Protection Regulations. We will:

- Enable your organisation to respond swiftly and accurately to DSARs.
- Remove the costly and burdensome tasks associated with DSAR deliveries.
- Manage the DSAR process from request receipt through to final delivery.
- Provide scalable technology and human review resources to appropriately deliver each request.
- Provide guidance and progress reports at each stage in the delivery.
- Adopt a standardised approach across all DSAR deliveries.
- Work with our legal experts to ensure full compliance with the GDPR.

## Why KPMG

With our team of experts, KPMG provide end-to-end support and guidance ensuring a smooth DSAR process from start to finish.



**Market Leading Technology:** Utilising a suite of market leading AI integrated technologies, we can support your organisation throughout this complex process. Our technology means you can trace the DSAR from receipt to closure and maintain an audit trail.



**Specialist Review Teams:** Our team of dedicated document review specialists are on hand to relieve the resource burden and provide expert and cost effective advice and solutions to resourcing DSAR deliveries.



**Customisable and Scalable:** We understand that every business is unique. Our solution is fully customisable to align with your specific requirements. Whether you are a small business or an enterprise level organisation, our solution is scalable to accommodate your needs.



**Legal Advice:** Our Legal team can support you handling the response to any complaints received by the DPC by providing you with holistic legal advice and liaising with the supervisory authority as required.

# About our services

“DSARs can be a substantial administrative and financial burden for organisations as there are multiple challenges to be addressed from the outset. Our approach means those challenges are consistently managed to ensure you meet the requirements every time.”

Andy Glover  
Director  
KPMG Managed  
Services



## Recognition & Processing

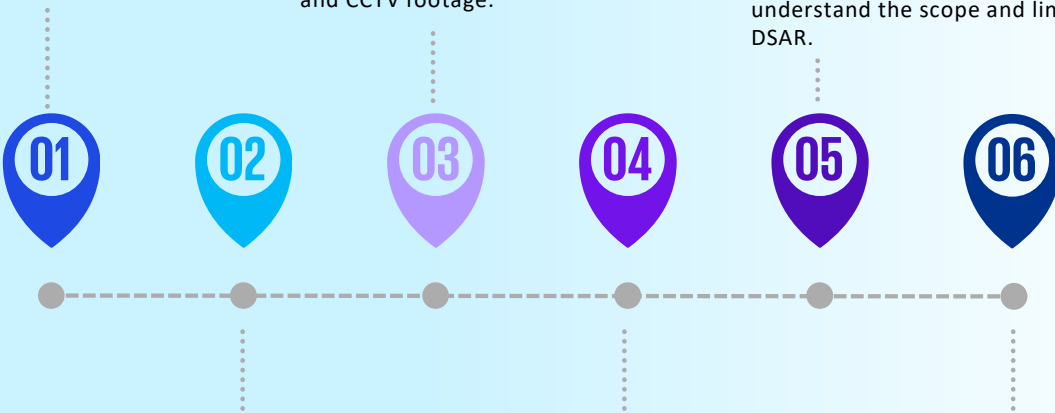
Sometimes it is difficult for companies to identify and manage all of the DSARs that they have received. If KPMG are appointed as the single point of contact, we would ensure that each DSAR is logged upon receipt and the nature of the request is validated.

## Data Sources

KPMG will work with your IT team to understand your IT infrastructure and to ensure that all the appropriate data sources are searched and collected. This may include hard or soft copy client/employee files, Outlook mailboxes and fileshare systems. Other forms of electronically stored information may be subject to disclosure, including messaging applications, audio recordings and CCTV footage.

## Data Review and Legal Support

We can provide a team of data review specialists to review and redact all necessary documents which means your team does not have to undertake this task. This process involves two levels of review with quality assurance controls in place throughout the process. Your organisation will be kept up to speed on progress with daily reports provided. In addition, our team of legal experts in KPMG Law can support your organisation by helping you understand the scope and limitation of a DSAR.



## ID Verification

It is imperative to verify the identity of the requester and assess whether or not the request is valid at the outset of any DSAR received. KPMG will verify the identity of the data subject and also enquire as to whether the requester's data is being processed by your organisation.

## Data Solutions

Often there are a variety of data types to be collected and processed which can lead to increased data volumes for review. Our suite of technologies reduces the burden of this by applying powerful data culling techniques including de-duplication, email threading, date range and keyword filtering. This solution allows end users to review and redact the relevant information quicker and easier.

## Data Delivery

Our technology solution can formally disclose relevant documents to the data subject in a digital format. This means there is a full audit trail of the actions taken should it be required. We will liaise with the data subject to agree the most suitable delivery method and will also provide a copy of the delivery to you if required.

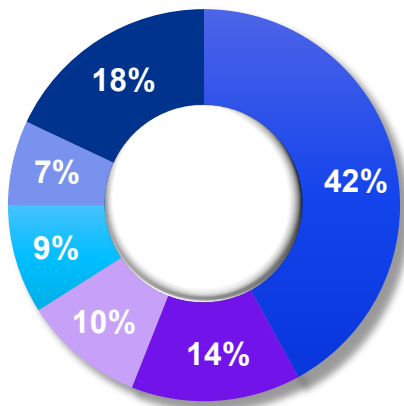
# About KPMG Law

Our data protection and privacy team has vast experience supporting organisations liaising with EU Supervisory Authorities and can provide your organisation with a holistic legal approach.

In 2022, DSARs continued to be the main source of complaints received by the DPC. 42% of the complaints received by the DPC originated due to the failure of organisations handling the DSARs appropriately and on a timely manner.

Complaints raised by Data Subjects can often lead to the DPC raising other privacy concerns such as unauthorised disclosure of data, breaching of the data retention period or a lack of a valid legal basis for the processing of personal data, amongst others.

## 2022 DPC Complaints



- DSAR
- Fair Processing
- Right to Erasure
- Direct Marketing
- Disclosure issues
- Other

### How KPMG Law can help?

- Liaising with the DPC and other EU Supervisory Authorities, as required.
- Providing a holistic legal approach, ensuring any other privacy concerns raised by the DPC are addressed appropriately.
- Provide guidance to understand the scope and the limitations of the right of access.
- Ensure all the relevant information is provided to the DPC as well as the valid legal and regulatory rationale.
- Enable your organisation to demonstrate compliance with data protection laws.
- Support your Legal Team and provide our privacy expertise.





# Get in touch

For more information on how we can help you please contact:



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