

Getting ready for the GDPR

Prepare your data to unlock greater opportunity



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Introduction

Without doubt, preparing for the General Data Protection Regulation (GDPR) is having significant impact on organisations in terms of costs and effort.

At Experian, we believe the GDPR presents a positive opportunity to transform the way you organise and process your data; increasing the value you derive from it and reinforcing customer-centric business practices that are essential in our data-driven age.

Adopting data best practices, in line with the GDPR, can only improve interactions between consumers and organisations and should build greater brand affinity and trust. Alongside meeting your regulatory obligations, best practice with data should also present opportunities to:

- Leverage a more complete view of people as data attributes will need to be linked
- Improve analysis from increased data integrity and quality
- Increase data Return on Investment (ROI) by having organised, relevant and usable data
- Employ best practices around data management for continuous data protection
- Respond quickly to both internal and external requests if and when you need to, as well as in the event of a data loss.

The data management processes that require implementation before the 25th May 2018 will enable you to work towards many of these benefits, essentially turning compliance into an opportunity for your organisation.

Why can Experian help?

Based on a combination of our experience, services and software we can provide a solid foundation to launch your GDPR readiness.

We have curated our most relevant software capabilities, bureau and consulting services creating a GDPR package that will help you be ready for May 2018.

Being both a data processor and FCA regulated, Experian knows first-hand what it takes to meet regulatory obligations. Taking all of this experience, packaged with our software, turn-key bureau services and expert data handling, we will help organisations with data management to support their compliance efforts:

- We are used to dealing with the day to day requirements of the DPA, FCA and now the GDPR
- We deliver single views of our customers through sophisticated de-duplication and pinning capabilities, combined with our unique reference data. This has been core to Experian's turn-key bureau services for over 20 years, helping both consumers and businesses alike to make responsible, accurate decisions
- We manage lots of data - our UK bureau houses over 2 billion data items and we manage monthly inputs of approximately 750 million records from over 600 different sources
- We respond to over 3 million requests a year from consumers requiring help to understand their credit information
- The FCA regulation means we take the fair treatment of consumers and the handling of consumer data very seriously.

“Only 24 percent of companies rate their level of readiness to comply with the GDPR as high. 59 percent say they do not understand what the company needs to do to comply with the GDPR.”

Ponemon Institute research report June 2017 Data Protection Risks & Regulations in the Global Economy

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Experian's GDPR package

To help you prepare for the GDPR we have designed four packages that can be taken separately or collectively depending on the depth of support you need to prepare and action your data. We believe that once a solid data

foundation has been laid for your organisation, it will help you manage other elements required by the GDPR including Subject Access Requests and Data Breach response.



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Data Discovery – Sensitive data landscape

Core to the GDPR is an increased responsibility to have comprehensive insight and control of all your data assets. To do so, you must know what personal data you hold, its provenance, location and all the ways in which it is being used.

Without visibility on all data held, whether in front, middle or back office environments it will become much harder and resource intensive to respond to the GDPR requirements, such as Subject Access Requests, Rectification and Data Portability. Under Article 17 of the GDPR, for example, the 'right to be forgotten' clause may, in some circumstances, require you to erase all applicable data associated with the individual in question within a one month timeframe.

Our approach

Experian can provide tools to aid the discovery of personal data, working in partnership with Waterline Data. Using federated search technologies your data systems are analysed and fingerprinted, tags being automatically added for the effective organisation and management of all your data sources.

Our data management platform, Experian Pandora, can then profile and compare each personal record made visible, and bespoke transformation rules can clean and

validate records. These, designed with the GDPR in mind, ensure that the data governance you have in place is effectively implemented. Results can be sent back to the source systems to ensure that compliance is maintained over time.

Compliance with the GDPR is not a one-off, and must live alongside the fluidity of your data capture and retention processes while taking into account your entire data landscape. This exercise will enable you to have the confidence that all disparate but related data points can be linked to an individual.

Identify and tag personal and sensitive data within your organisation

Rapid discovery of personal information can help you deliver compliant solutions for a range of the GDPR articles.

Experian and our partner Waterline Data can help you:

- Locate sensitive data and categorise through advanced 'fingerprint' technology
- Build rules designed with the GDPR in mind to help ensure that multiple records can be brought into a 'golden' record
- Showcase to the ICO a willingness to tackle all personal data within your organisation

Experian Pandora, and Experian's unique reference data, means that you don't need to build an expensive and time-consuming Master Data Management (MDM) system to meet the GDPR regulation.

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Data Readiness – Quality and integrity health check

As a data controller, you are responsible for taking steps to ensure personal data is accurate and up to date as outlined in Article 5 of the GDPR.

Accurate data is a fundamental requirement of today's DPA, further enhanced through the GDPR. This is further exacerbated when having to respond to both Subject Access Requests (SARs) and in communicating with data subjects and regulators in the event of a breach incident.

Our approach

Our expert data consultants will work with you to assess the quality, accuracy and integrity of your data. This will identify where issues exist, highlighting exposure to GDPR's regulatory principles.



Data accuracy: accuracy of data is measured against unique Experian reference sets, providing indicators of inaccuracies, gaps and duplications. This helps demonstrate to the Information Commissioner's Office (ICO) that appropriate steps have been taken to implement a set of checks and balances to measure and meet this particular requirement whilst providing the GDPR program with a quantitative understanding of the Accuracy principle risk.



Data integrity: over 200 quality attributes such as uniqueness, completeness, frequency of values and formats, further enriched with our unique 'best of' bureau reference data are combined with the earlier accuracy scores to understand the relationships between data and any gaps that might exist.

Turn-key Bureau Service

Using our turn-key bureau service, we will process your data at one of our secure data centres, providing you with a fast and detailed assessment on the quality of your data, your known risks and recommended steps to rectify any issues identified.

Adopting such an approach helps you form the basis of your journey in developing the path to data management maturity and implementing privacy by design. However, it can also be taken as a one-off service to help you get started on your GDPR journey before you decide what technology solutions you may wish to implement.

These solutions can be delivered swiftly without need for extensive infrastructure projects either through a deployed or bureau service, enabling you to better manage your own data management requirements.

Accurate and complete personal data

Organisations are required under the GDPR to maintain accurate personal data as described in Article 5.

Furthermore, the ICO requires demonstration that organisations have implemented measures to maintain accuracy and taken reasonable steps to erase or rectify any inaccurate personal data.

Our expert data consultants will work with you to assess the quality, accuracy and integrity of your data, after which corrections and enhancements can be made to drive:

- A timely response to subject access requests and data loss events
- Greater ROMI through operational efficiencies and an improved customer experience

According to Experian's latest research, on average, 23% of all the data organisations hold is inaccurate and out of date. Understanding the accuracy of your data is critical to ensure you build the right data foundation.

Experian Global Data Management Research 2016, quote in Experian Whitepaper: #7for17, Seven views on the future of marketing, Embracing challenges and change.

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Data Match – Creating a single, consistent representation of your data subjects

The importance of implementing a single view of each of your data subjects is far greater from a GDPR perspective.

The GDPR will empower people by giving them far greater control over the way in which their personal data is stored and used. From May 2018, an individual can request access to all personal data you hold on them; to request rectification of their data; the right to restrict processing; the right to erasure and the right to data portability.

The expectation is that you will be able to comply quickly and effectively to these requests, within one month rather than the current forty days as stipulated by the 1998 Data Protection Act. GDPR removes the ability to charge individuals for access requests, unless the request is “manifestly unfounded or excessive”. Therefore, you must be able to manage this cost effectively. Failure to comply with these rules could damage your brand as well as incur financial penalties.

Our approach

Experian can support you in addressing the complexities associated with generating a fully transparent view of each individual data subject. Utilising a unique combination of linkage, matching and data management tools and services, Experian can deliver a consistent, single view of each of your existing individual data subjects with access via a single tool.

The implementation of keys creates a linked view of each individual without the traditional and costly reliance on the IT function. Experian’s Data Match service for the GDPR assigns a unique 10-digit personal identification number, known as an ExPin match key, to everyone in the UK based on billions of reference data points. By matching each of your records to the right ExPin match key, you can see which records belong to the same person.

ExPin uses over 2 billion pieces of data, 25% of which is refreshed each month, to continually re-evaluate matching decisions and link identities together.

We can also highlight records that cannot be matched, due to lack of input data giving you an opportunity to cleanse or enhance your database. In one example deployment, Experian identified 2.5% more duplicate records than a company’s own solution; that was 150,000 additional duplicates out of 6 million customer records.

Once you accurately understand how many individuals you have and who they are, you will be able to respond more quickly and effectively to Subject Access Requests (SARs) as outlined in Article 15 of the GDPR.

For many organisations, understanding the full extent of the data held on an individual will help evaluate whether this data is still relevant to the needs of the business.

Respond to Subject Access Requests with confidence

Organisations are required under the GDPR to:

- Provide individuals access to data held on them upon request, without delay (Article 15)
- Provide individuals with the ability to have data about them rectified upon request, without undue delay (Article 16)
- Erase personal data held on individuals where certain grounds apply, without undue delay (Article 17)
- Restrict the processing of personal data held on individuals in some circumstances without delay (Articles 18 & 21)
- Transfer personal data held on individuals under certain circumstances upon request (Article 20)

Working with Experian you can:

- Locate personal records across systems with ease and confidence
- Leave your data where it is, no need to migrate, simply apply a match key to each individual customer record using ExPin to link records
- Create a single customer view solution without the costly reliance on the IT function

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Data Breach – Preparing and managing for loss of customer data

The data breaches of tomorrow are set to become increasingly complex, as the necessity for individuals to share data is intrinsically becoming part of everyday life.

Whilst the breaches that make the headlines are usually the result of hacking activity, a breach could be as simple as someone leaving their laptop on a train with an individual's personal data stored on it or someone sending an email to the wrong person.

The GDPR imposes an obligation to organisations to notify the ICO in the UK within 72 hours (of being made aware of the breach). Where a personal data breach results in high risk to the rights and freedoms of individuals, organisations will also be required to notify those individuals affected. Response to a breach must be swift, confident and with the appropriate incentives for customers to regain trust.

Our approach

Minimise business risk by working with Experian to maintain readiness before a breach even occurs. We will work with you to prepare your data and create a bespoke plan tailored to the type of personal data loss, the volume and the demographics of affected individuals. We discreetly partner with you prior to an incident to create a comprehensive readiness plan and when required, rapidly support to deliver the crucial components of the plan during a live data breach incident.

Working with Experian will allow you to;



Know: Our expert consultants will work with you to determine the right approach and help you to prepare a tailored data breach response plan. We will also work with you to improve the quality of your contact data, ensuring swift contact is possible.



Prepare: We will align the right resources tailored to your business scenario and create pre-determined communications which are stored ready for a live incident.



Recover: When a live incident occurs, we work with you to finalise and activate the notification fulfilment, call centre support and web/credit monitoring services to affected individuals.

Business readiness for a data breach

Be acutely aware of your risk of a data breach and how to mitigate these risks (Article 32) with support from Experian:

- Understand your ability to contact customers - Poorly maintained contact data will result in increased costs after a data breach and likely delays in ability to notify those affected
- Know your Risks - Assess financial impact, analyse threats and vulnerabilities, and measure how contactable your customers are in the event of a breach
- Prepare your Response - Experian will assist in preparing your organisation so that your response is swift, uses clear and concise templates and FAQ's, and provides your customers the right incentives to maintain their trust – such as credit report services
- Recover with Confidence - Fulfil notifications to individuals with ease. Minimise business disruption and put data subjects at ease using Experian's dedicated service management

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Summary

People are increasingly prepared to share data with organisations they trust in return for convenience and value.

In fact, recent research found that 49% of consumers are prepared to give their data to brands they trust¹.

But that doesn't mean businesses can get away with anything less than the highest standards when it comes to managing personal data. To support your road to compliance Experian has designed four GDPR packages that can be taken separately or collectively depending on the depth of support you need to prepare and action your data:



**Data
Discovery**



**Data
Readiness**



**Data
Match**



**Data
Breach**

Our four pillars will help you lay a solid data foundation within your organisation and once complete will help you manage other elements required by the GDPR plus wider benefits that will help your business grow and thrive in our data-driven economy.

We know that meeting the requirements of the GDPR are challenging and so recommend taking a Data Readiness Assessment today as the first foundational step.

By understanding the quality, accuracy and integrity of your data, you can begin to plan the related tasks.

For more information contact us:

Telephone: 0844 4815 888

Email: gtmcontactus@experian.com

Information notice:

It is important to note that whilst we can support businesses with their data management preparations for the GDPR, we cannot offer legal counsel or compliance advice.

¹Experian/Data IQ GDPR, Data Preparation Report (May 2016)



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About Experian

Experian unlocks the power of data to create opportunities for consumers, businesses and society.

At life's big moments – from buying a home or car, to sending a child to college, to growing your business exponentially by connecting it with new customers – we empower consumers and our clients to manage their data with confidence so they can maximise every opportunity.

We gather, analyse and process data in ways others can't. We help individuals take financial control and access financial services, businesses make smarter decisions and thrive, lenders lend more responsibly, and organisations prevent identity fraud and crime.

For more than 125 years, we've helped consumers and clients prosper, and economies and communities flourish – and we're not done. Our 17,000 people in 37 countries believe the possibilities for you, and our world, are growing. We're investing in new technologies, talented people and innovation so we can help create a better tomorrow.

Learn more at www.experian.co.uk



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