



Data Privacy
& Security
Advisors LLC

CASE STUDY

Creating Unity Through The Data
Inventory:

Privacy Compliance Across
A Decentralized Organization



The Challenge



An international pharmaceutical company retained DPSA for a multi-phased engagement to **build a global privacy program able to adapt to the Company's strategy of growth through acquisition**, often of smaller and/or less data-sophisticated organizations.

With each new acquisition bringing a discrete line of business into the organization, the Company functions in a decentralized manner and the majority of **decision-making occurs at the local level**.

The Company's EU presence made the GDPR a pressing concern, and a key challenge was the **inconsistency of operations-execution and terminology**, diminishing the effectiveness of universal policies and data protection mechanisms. For example, offices across the EU had **different data protection policies specific to their location**, almost all of which were lacking core GDPR requirements.

The Solution



DPSA designed a **global privacy framework** that could readily absorb new offices – and new regulations – predicated on construction of a **unified lexicon of common terms for common business practices and normalized business processes for common business activities**, across offices and regions.

DPSA also embarked on a comprehensive **Data Inventory & Mapping** initiative, with a specific focus on meeting GDPR and the additional regional compliance requirements, and to better identify not only **internal data transfers** but also **external data transfer to vendors**, adding flags for each time data left the organization and whether it left the EU.

DPSA further enhanced the Data Inventory to flag processes where **Data Subject Request** identity verification would require additional steps versus processes where verification could readily be made with data the Company already processed; and to identify higher risk activities that should be routed to the Company's **Data Protection Impact Assessment (DPIA) program** that DPSA also designed.

To achieve this, **DPSA paired “Business Owners” with “Technology Owners”** streamlining the entire documentation workflow from building the Data Inventory to responding to Data Subject Requests through to completing DPIAs.

The Outcome



The Global Privacy Framework allowed the Company to **operationalize the Data Inventory & Mapping and DPIA initiatives**, creating the much-needed harmony between operational terms and leading to more consistent practices across offices that continue to operate in a regionalized manner – **there is now a collaborative sense of partnership-in-privacy.**

Teaming the Business and Technology Owners allowed each to provide critically necessary information from their area of expertise without placing an undue burden on either Company team – **the information collection was quicker and more accurate, requiring less clarification and clean-up.**

The Data Inventory & Mapping is the Company’s “**single source of truth**” for its **personal data collection operations** – documenting processing activities, data transfers, and key components of third-party risk, including flags for active Data Protection Agreements – so that effective data protection mechanisms can be universally deployed and maintained, **strengthening both the global Information Security and Privacy programs, despite the decentralized structure.**

About Data Privacy & Security Advisors LLC

With demonstrated expertise building actionable privacy and data security strategies to lead our clients through the changing regulatory landscape, Data Privacy & Security Advisors' ("DPSA") diverse group of experts bring more than 25 years' experience in delivering tailored programs and providing pragmatic strategies to help our clients protect the trust of their customers and mitigate financial and legal risks to their organization.

Unique in a boutique firm, our team is exclusively senior practitioners and includes former Corporate Privacy Officers, Corporate Information Security Officers, and Partners from the "Big 4" Consulting Firms – bringing a diversity of perspective from both in-house and external roles.

Our mission: to mitigate the pervasive feeling among our clients of "death by a thousand cuts" as new, always slightly different, privacy regulations are enacted.

Active thought-leaders in the Privacy Community, the DPSA leadership team has seats on the International Association of Privacy Professionals' ("IAPP") Advisory Boards and is frequently asked to speak at both IAPP and other industry events.

Our clients range from start-ups to multinationals, and include B2B businesses, higher education institutions, traditional and online media, mobile application developers, technology, and financial services companies.

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