



**Do your data practices
need a “health check”?**

A Privacy Review helps to ensure your data practices are aligned with your data strategy and privacy obligations.

PRIVACY REVIEW

Objectives

We will tailor our Privacy Review to best fit your data sets and practices, as well as your key objectives for the review.

The key objectives are typically to ensure that your collection, use, storage, access and disclosure of data:

- 1 COMPLIES**
WITH YOUR PRIVACY AND OTHER LEGAL OBLIGATIONS
- 2 SUPPORTS**
YOUR DATA AND DIGITAL STRATEGIES
- 3 ENHANCES**
YOUR CORE BRAND VALUES SUCH AS INNOVATION AND TRUST

In some cases, a **specific project** is an additional key driver for a Privacy Review, such as launching a new loyalty programme or Privacy Policy, updating your data strategy, satisfying GDPR compliance obligations or preparing for the anticipated changes under the new Privacy Act.

Privacy review process

STEP 1 UNDERSTANDING YOUR DATA

Our Privacy Review is typically supported by a core working group covering all relevant parts of your organisation, such as legal, technology, digital and employment. We design an initial questionnaire, with follow up meetings, to ensure that we fully understand your data strategy and practices and have the information required for our review

The questionnaire and meetings will discuss the full “lifecycle” of information, including collection, storage, security, anonymisation, updates/accuracy, use and disclosure and destruction, as well as individuals’ access rights and unique IDs. It will also cover practices such as the use of Privacy Impact Assessments, as well as employee awareness and training.

STEP 2 DATAFLOW DIAGRAMS

We will develop data flow diagrams for you. Clients tell us these are one of the most valued outputs of the review. They show, in a clear one-page snapshot, how customer and employee information is collected, used and disclosed in practice. These can highlight crucial areas for internal training purposes, or be used to demonstrate to boards of directors how you are managing your data.

STEP 3 POLICIES AND CONTRACTS

We will review your key internal policies and external customer policies that relate to the handling of personal information. We will also review contracts with third parties that you collect information from, or share information with, such as partners and suppliers.

STEP 4 EMPLOYEE INFORMATION

Our review of employee information will be a separate and self-contained process, but it follows the same steps as those set out above.

STEP 5 REMEDIAL ACTION

We will provide a list of key action items to support your objectives for the Privacy Review. Remedial action that is commonly required includes:

- Data protection provisions in supplier and partner contracts (this can be a key risk area for data leakage and privacy breaches)
- Implementing a Data Breach Response Plan
- Implementing internal protocols for the sharing of data with third parties
- Addressing material “gaps” between your practices and authorisations obtained to comply with the Privacy Act (in some cases this highlights new use-cases for data)
- Updating your Privacy Policy to ensure that it supports your data and digital strategy.

Scoping your Privacy Review

We will work with you to determine the scope for your Privacy Review. For example, it may include either or both:

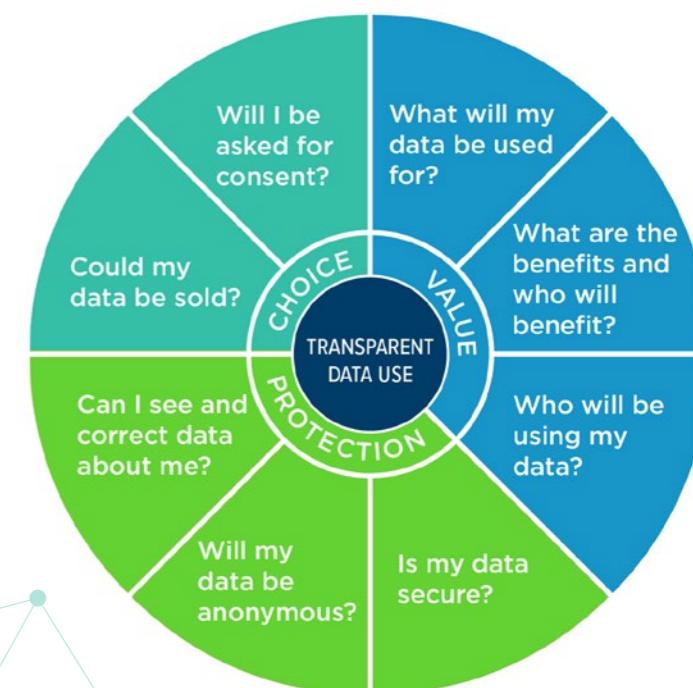
1. Customer Data
2. Employee Data

We will undertake the Privacy Review on a **fixed fee basis**, within the agreed scope.

Example Data Use Dial

(Data Futures Partnership)

Below is an example of an interesting way to present a Privacy Policy, based on research from the Data Futures Partnership. However you choose to present your Privacy Policy, the key issues that it needs to address can generally be grouped into Value, Protection and Choice.



Our Privacy team

Bell Gully's privacy and data team brings together expertise from privacy, consumer, commercial, e-commerce, technology, employment, intellectual property, insurance, banking, public law and litigation.

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