



## Supporting on a complex Data Subject Access Request (DSAR)

**How BSI helped a national utility organization with a complex and time-sensitive DSAR that required the collection, processing, review, and redaction of a high volume of data.**

### **The challenge**

BSI's client was a national utility organization where a former high-level employee had made a Data Subject Access Request (DSAR) that required the collection, processing, review, and redaction of a high volume of potentially relevant data within the three-month period allowed by the applicable regulation.

In this instance, the initial volume of data that required analysis was approximately 2.7 Terabytes across 100+ custodians. The data was located within several different sources, such as Microsoft Outlook, Microsoft OneDrive, SharePoint, and multiple file share locations.

Additionally, the internal eDiscovery platform in use by BSI's client required both hardware and software upgrades before the collection, processing, and review process could begin.

The client was deeply committed to meeting all data protection and governance requirements regarding this DSAR request, including those specified under the General Data Protection Regulation (GDPR).

BSI was engaged to assist the client in meeting these requirements.

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## The benefit

The European GDPR allows individuals to request copies of any personal data held and used by an organization. These requests must be responded to within a given timeframe (typically one month, although this can be extended by a further two months for complex or repeat requests). Failing to respond to requests completely and within the allowed timeframe could result in adverse legal action and monetary penalties.

By meeting these legislative and legal requirements, the client provides assurance that they are a lawful, accountable organization and fully understanding of the need to properly govern and use personal data while it is in the custody of the company.

## The solution

The BSI data management and forensic technologies team collaborated with key stakeholders within the client organization to ensure that the DSAR was accurately actioned within the required timescale.

As part of this engagement, the existing on-premise eDiscovery system was upgraded to allow for the high volume of processing, searching, and document review required to meet the deadline.

This included the backup of previous eDiscovery cases already existing within the client organization, as well as the validation and testing of system functionality required for all aspects of the engagement after the upgrade had been completed.

### Disclaimer

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**bsi.**

BSI processed the collected data from the source locations into the now upgraded eDiscovery platform and facilitated review by a third-party review team. This involved not only the processing, initial searching, and validation of the data ingested, but necessitated the onboarding of the review team to the platform, the setup of relevant coding schemes for review, and demonstrations to the review team of how to use the platform itself.

Throughout the review period, BSI provided continual updates to the client regarding the data collection, processing, and the current review status. This allowed for adjustments to the collection order and the project timetable to best suit the workload and status at any given time.

Ultimately, from an initial collection and processing of approximately 10 million items, BSI was able to reduce this to approximately 30,000 items for the review team. Further review and redaction coordinated with the review team allowed for the final production of approximately 2,300 documents to the former employee who had made the data subject access request.

## The Results

As a result of the collaboration between the client and BSI, the client organization was able to compile and provision the data requested in the DSAR within the regulatory timeframe and fulfill their data subject rights obligations.

## Why BSI?

BSI was chosen to conduct this investigation for the client due to an ongoing relationship with in-house experts, specifically our Cyber Risk Advisory and Data Governance services. In this case, the client's internal team worked closely alongside the BSI Digital trust team, to deliver a comprehensive solution for their employer.