

Right now, or wrong later. Empowering organizations to meet their SARs obligations.

Reduced the
document review
population from
250,000 to 20,000.

Completed
first SAR in just
21 days.

Cut costs by 45%
versus in-house and
external counsel
baseline.

Subject Access Requests (SARs) have been around since the Data Protection Act was introduced in the UK in 1998, giving citizens the right to know what personal data companies held on them. With the implementation of 2018's General Data Protection Regulation (GDPR) in Europe, the time to respond to a SAR has gone from 40 days to one month. The Information Commissioner's Office (ICO) who oversees GDPR has also been given greater power to issue large fines to companies that fail to meet associated obligations.

The penalties and deadlines are steeper, but many organizations still struggle to deliver SARs on time.

At their core, SARs are about data management. While a small minority of companies are good at collecting and consolidating data — most are not. The vast majority store their data in multiple applications, file shares and clouds. In addition, a sizeable number do not have any reporting structures in place to monitor the progress of SARs and rely on manual labor to complete cases at great cost.

Challenge

All these factors were present when a major multinational packaging company got in touch with Conduent. "When they found out that we had managed projects for global financial institutions involving millions of documents, they asked us to come in and address these challenges," explained Alec Poole, Director of Client Services for Legal and Compliance Solutions at Conduent.

The global company identified well over a quarter million documents that could have been relevant to the SAR and were struggling to collect, process, review, redact and produce the information to comply with the request. "The company was not using its internal resources efficiently and was already five days into the process," Poole commented.

“What makes us unique is that we have the capacity to take on a project like this.”

Solution

We resolved the client's problem by bringing our expertise in digital interactions to bear on the request.

After consulting with the client and its external counsel, our teams, applied sophisticated analytics to expertly capture and cull the applicant's data using Conduent's proprietary Viewpoint digital platform.

“When we started this process, we had 250,000 documents,” explained Poole. “But with the targeted capabilities of our technology we had honed this down 20,000 documents by the end.”

The challenge became more complicated when the applicant expanded the scope of the SAR twice during the engagement to cover more dates. We rose to the challenge each time, delivering the material that the client needed in a timely manner. Throughout the process we worked constructively with all the parties involved: the company, its law firm and the applicant's representatives.

Our review team of highly qualified lawyers as well as our powerful software were key to the project's success. If the company had attempted to conduct the review itself, it would have had to employ dozens of legal reviewers at short notice and great cost.

For more information about Conduent legal and compliance solutions visit:

<https://www.conduent.com/legal-business-services/>

Results

During the project lifecycle, we:

- Deployed a team of qualified reviewers
- Reduced the total number of documents by 92% by applying innovative technology – with de-duplication, analytics and custom-search capabilities
- Redacted sensitive information before production
- Quickly scaled up activity when the client widened the scope of the project
- Actively demonstrated our skill and internal bandwidth as a digital interactions and data privacy expert to meet all the client's needs.

With Conduent's support, this international company was able to meet the SAR well within the one month deadline, delivering all relevant information and avoiding any negative outcomes.

By entrusting Conduent with this responsibility, the work was achieved faster and at a 45% lower cost than if the organization had used its traditional model of in-house resources and external counsel.

“Our capacity to take on a project like this makes us unique,” Poole commented. “We can scale up quickly and bring in additional people if necessary — we have a team of 200 qualified reviewers.”

