

DMA insight: GDPR and three questions to audit your data

The first step on the road to GDPR compliance is the audit. A data audit tells you what data you hold, where it is, and how you could pass it on. These are the three essential questions you have to answer for a successful audit.

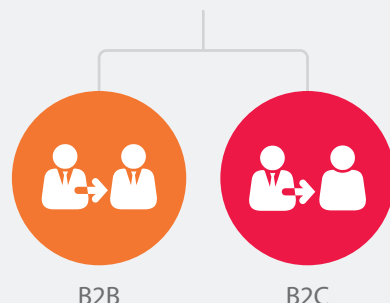
Without the audit your business will not know what to delete, re-permission or abandon in May 2018 when the GDPR comes into force. Consider your audit against the six principles for processing set out in [Article 5 of the GDPR](#) and consider how your business collected data, where it is stored, in what format and so on – the entire pathway from initial contact onwards.

1

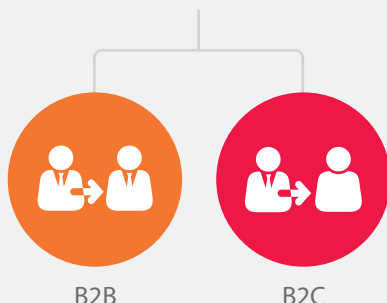
What?

What personal data does your business hold? This could be:

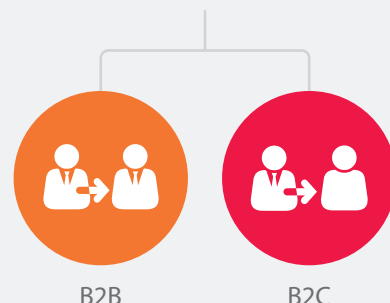
Prospect data (potential customers)



Current customer data (existing customers)



Lapsed customer data (former customers)



Where?

Where did this personal data come from?

2



Customer data
(for example transaction data)



Bought in list
(third party data)



Online data
(cookies etc.)



Data from profiling
(matched data, augmented data)

3

How?

How does personal data leave your business, if at all?



You sell the
personal data to
third parties

You share
personal data
with data
processors

You store the
personal data
in a non-EU
country

Conclusion

Once you've formed a comprehensive picture of what personal data you store and process, you can begin to tackle the many other compliance challenges presented by GDPR.

Auditing your personal data is a first step.

Now you will need to decide your legal basis for processing personal data or whether, in some cases, you may need to delete personal data you currently hold.

Our next DMA insight piece will help you through this process and explain the different legal bases for processing personal data and in what context you will be able to make use of them.

There are six legal bases for processing personal data under the GDPR:

- Consent
- Legitimate interest
- Contract
- Legal obligation
- Public interest
- Vital interests of the data subject

Marketers will mostly make use of Consent and Legitimate interest as a legal bases so the next piece will focus on these.

For further information about Consent and Legitimate interest read the [ICO's draft consent guidance](#) and the [DPN's legitimate interest](#) guidance respectively.

About the DMA

The DMA provides guidance and support to help its members put their customers at the heart of their one-to-one communications to give them the rich benefits of a much more relevant, welcomed and effective relationship with each individual customer.

The DMA aspires to facilitate its members' marketing evolution with the opportunities, advice, support, networks and tools to be able to reach the sensitivity and sophistication of marketing to build their future prosperity – along with the success of the industry as a whole.

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