

The ROI of Privacy: Telecom Company Achieves Multimillion-Dollar Risk Reduction

Following a competitive bidding process, a leading US-based global cloud communications provider selected BRG to conduct an in-depth assessment of its data protection compliance. This engagement was initiated partially in response to a multimillion-dollar regulatory fine and significant, ongoing concerns from key business partners regarding perceived inadequacies that posed a considerable risk to the provider's commercial revenue streams. The executive team needed immediate, actionable recommendations and requested that BRG:

- Conduct a gap assessment and develop a risk-based, prioritized remediation plan to close identified gaps
- Update the client's records retention and management policies and schedule
- Identify opportunities for personal data deletion through a complex information technology environment
- Perform business-critical data protection impact assessments (DPIAs) and properly implement OneTrust modules
- Provide updated data protection and privacy policies and procedures and improve cookie and other tracking technology website consent management
- Prepare General Data Protection Regulation (GDPR) Article 30, Records of Processing Activities (ROPA)
- Update online privacy notices and data processing agreements
- Develop related training and awareness materials for employees
- Derisk the use of personal data in artificial intelligence tools and products

Lack of Centralized Coordination and Proactive Planning

Prior to BRG's involvement, the client handled privacy concerns "as needed." Privacy efforts primarily were triggered by external factors rather than strategic risk management, internal processes, or proactive planning. The client's privacy program was reactive, tactical, and uncoordinated. The organization had a focus on commercial privacy contracts and online customer-facing materials, but significant compliance gaps were pervasive.

BRG's gap assessment identified more than €700 million in potential fines from global privacy regulators.

Results



BRG's gap assessment identified more than

€700M

in estimated fines from global privacy regulators.



Reduced assessed risk by

~€400M

in 9 months



3 FTEs

Supported approvals for hiring three new privacy staff global privacy regulators.

FOR A DEEPER DISCUSSION OR TO SCHEDULE A PRIVATE CLIENT BRIEFING, PLEASE CONTACT BRG.



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BRG's Approach

BRG reviewed the client's privacy program and discovered a lack of comprehensive documentation, few privacy risk assessments, no standardized risk framework, and inadequate or missing policies, procedures, and other standard governance documents. To better understand the client and learn more, BRG:

- Conducted fact-finding interviews with approximately forty stakeholders throughout the organization, using technological tools to identify consent failures; conducted extensive document review; and identified privacy training champions from the interviews to help with change management.
- Conducted full-scale gap assessment of the client organization benchmarked against both US and European privacy law. This included an analysis of competitors in the marketplace to ensure an accurate risk assessment. The findings were shared with an executive readout to the head of Risk, Regulatory and Compliance and the chief executive officer.
- Developed a detailed, risk-based remediation plan aligned with the assessment findings that would also account for the estimated effort, including the number of hours required for each action. This was tailored to the client's needs, prioritizing remediation efforts based on the speed at which they could demonstrably lower the identified risk levels. These findings were presented to the executive team to secure buy-in.
- Updated the client's outdated records retention schedule to align to current business needs and new regulatory requirements as required by a regulatory consent order. Supported implementation of the updated schedule to ensure alignment with stated retention periods.
- Partnered with the client to close identified gaps as prioritized in the remediation plan, including activities such as documenting DPIAs; drafting, implementing, and providing training on policies and procedures; building out an Article 30 ROPA; and establishing Privacy by Design.

Impact

Work continues to strengthen the client's data privacy program by executing against the BRG remediation roadmap approved by the executive leadership team. To date, BRG has significantly reduced the client's exposure from an estimated €720 million to approximately €340M; with the current roadmap and support of the executive leadership team, this is expected to continue to decrease.

Following the client's approval, BRG is executing a tailored, full-scale change management initiative. This comprehensive approach includes internal communications, guest speakers, and development of a privacy resource center on the intranet to house resources like playbooks, videos, and frequently asked questions. Through gamification, BRG has successfully driven adoption and engagement throughout the organization.

The effort has also resulted in the firm hiring three full-time privacy team members who work closely with BRG to implement and track value-based key performance indicators that factor into consideration impact and resources required. This allows for more effective and meaningful collaboration between the privacy and executive leadership teams. By aligning this work with the firm's strategic direction and operationalizing these initiatives, BRG is building a more sustainable data privacy program.

BRG combines world-leading academic credentials with world-tested business expertise, purpose-built for agility and connectivity, which sets us apart—and gets our clients ahead.

Our top-tier experts include experienced industry leaders, renowned academics, and leading-edge data scientists. Together, they bring a diversity of proven real-world experience to economics, disputes, and investigations; corporate finance; and performance improvement services that address the most complex challenges for organizations across the globe.

Our unique structure nurtures the interdisciplinary relationships that give us the edge, laying the groundwork for more informed insights and more original, incisive thinking from diverse perspectives that, when paired with our global reach and resources, make us uniquely capable to address our clients' challenges.

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