

Implementing EU GDPR with a consultant vs. DIY approach

Table of Contents

Introduction.....	3
1. The implementation with a consultant	3
2. The DIY implementation	4
3. What does a good EU GDPR documentation toolkit look like?	5
4. Time to make a decision. What works best for you?	7
5. Conclusion	8
6. Sample documentation templates	8

Introduction

Processing personal data in accordance with the EU General Data Protection Regulation (GDPR) and documenting your compliance is compulsory, and noncompliance or failure to prove compliance may lead to harsh fines (up to 4% of a company's global annual turnover or 20 million euros, whichever is higher).

One of the biggest problems is the fact that the average company doesn't even know what to expect from the implementation, what the deliverables are, or how much work it takes.

Not so long ago, whenever faced with a new regulatory challenge, companies would either use their internal resources and personnel to gather information from various sources, or they would hire a consultant to assist first-hand during the whole process of becoming compliant.

Today there are two basic options to build your GDPR compliance programme: (1) use a consultant, or (2) implement the standard with a do-it-yourself approach, by taking advantage of external know-how. In this document, you will find pros and cons for each choice to help you determine what works best for you.

1. The implementation with a consultant

Pros. With this option, you contract an expert from outside the company (usually, this is a local consultant or lawyer) who has experience with the GDPR and other similar privacy legislation. This person usually performs a gap analysis of your company's processes and processing activities related to personal data, conducts the interviews, writes a report and, based on the gaps in the report, amends your existing documentation or creates new documents to address the identified gaps. Here are some obvious benefits of hiring a consultant:

- A consultant can do most of the work for you, so it seems like you save your time for other things.
- The consultant ensures your compliance with the EU GDPR by reviewing and correcting all the documents.
- A consultant can share his experience and tell you what you might expect from your business partners, clients and regulators when it comes to the EU GDPR.

Cons. Consultants obviously aren't cheap, especially because, at least for now, there is quite a big demand on the market and not many experienced consultants. Further, you are opening access to almost all of your company secrets (e.g., how the company is organized, its main processes and key competitive advantages, who the most important people are, where the company is vulnerable, etc.) to an outsider.

When someone from outside is writing the documentation, you may find the documents to be somewhat generic, as consultants usually are not given enough time to become familiar with all of the processes within your company. Moreover, the employees might feel that those policies and procedures were imposed on them, and they might look for ways to bypass them.

Here are some additional drawbacks to this approach:

- Contracting a good consultant is expensive, due to the time they have to spend onsite in your organization. Unfortunately, bad consultant costs even more in the long run.
- An on-site consultant learns your weaknesses, knows your strategies, and has easy access to company secrets.
- At the end of the project, the consultant leaves – and takes all that expert knowledge with him. Often, employees don't even understand how to maintain the documentation, leading to declining use and eventual abandonment of all those documents you paid for.
- Consultant fees are usually fixed and encompass the entire project. If you don't like his work, you'll probably still have to pay for his services.

2. The DIY implementation

A do-it-yourself GDPR compliance programme means that you will be relying primarily on the work of your own employees and your own resources, but with the added advantage of external expert know-how. With this option, your employees are doing all the analysis, performing all the interviews, writing the documentation, etc., but the knowledge for all this comes from external experts and online documentation toolkits.

Of course, there is no “miracle” solution, and this method might not be right for every business. Actually, there is no solution that will do everything for you. Nevertheless, EU GDPR documentation toolkits can prove to be valuable for your EU GDPR compliance programme implementation, just without the high price of a consultant and the stress of not having everything under your control.

Pros. This is probably the most cost-effective option because documentation toolkits are far cheaper than hiring a consultant onsite, and you get the expert know-how without having someone from the outside learning everything about your internal processes or documentation. Finally, creation of your own documentation expands the engagement of your employees towards the required changes, and your employees get the chance to “personalize” the documents to be a perfect match for your business processes, helping to avoid conflicts with other documents from other business areas that may not be obvious to an external consultant.

Additional benefits of this approach are:

- EU GDPR toolkits have more extensive experience built into them and are usually meant to be cross-industry. Moreover, they are accessible worldwide and get valuable feedback from clients around the world.
- You keep all that knowledge inside your organization. Employees learn how to maintain the documentation, improve upon it, and use it on a daily basis.
- You pay only once, only for what you need, and you can use the templates as many times as you like.

Cons. Your employees will still need to learn about the EU GDPR and additional guidance documents, so this is not necessarily the speediest approach to tackle EU GDPR compliance. Likewise, this option does not resolve the issue if your employees are already overwhelmed with different tasks and have no time for anything new. Also, because your employees will be exposed to legal language, it may take some time to get accustomed to it as well as the possible legal implications.

3. What does a good EU GDPR documentation toolkit look like?

Much the same as consultants, EU GDPR documentation toolkits come in various shapes and sizes, and it can be difficult to figure out which will work best for you. The primary thing to be considered is what you get for your money – do you only get a bunch of documents, or does it include some extra support and/or additional useful information resources (articles, webinars, etc.)? Are the aforementioned documents and resources kept up to date, and do they keep pace with the best practice in the field of data protection?

Here are some examples of criteria that can help you determine whether the solution is right for you:

- **Content of the documentation package** – This is the first thing to look at. Does the documentation package contain all mandatory documents? Furthermore, does it contain documents that may not be mandatory according to the EU GDPR, but that are useful for the implementation and operation of an EU GDPR compliance programme?
- **Quality of the documents** – This may not enter your thoughts until you begin filling in the documents and tailoring them to your needs. Is the document formatting consistent throughout the entire package? Do they seem logical to you?
- **Are documents appealing?** Do they include comments to help you navigate through the documents and help you fill them in?
- **Additional helpful tools and resources** – Need for such tools and resources often arises, and it is not entirely obvious at the moment when you are buying the package. Are your suppliers offering some extra tools that may help you when you stall out or want to make an estimate of the timeframe? Such tools might include a [Checklist of Mandatory Documentation Required by EU GDPR](#) or EU GDPR [webinars](#) that will help you understand the EU GDPR, as well as how to use certain documents in the toolkit.
- **Know-how for the implementation** – This is a fundamental criterion, because the EU GDPR is a relatively new piece of legislation and best practices are still developing. Do your providers offer online courses so your employees can learn about [EU GDPR basic requirements](#), as well as [more in-depth courses for your Data Protection Officer or the person in charge of data protection](#)? Are there any articles or webinars that explain different topics?
- **Personal interaction** – An online solution cannot fully replace the insight and experience of an EU GDPR expert. Does the online solution include expert help at critical stages in the process? Can you ask a question via email or [schedule an online consultation](#)? Can they review your documents so you are sure that your documentation is compliant with the standard? This feature can have a great impact on your decision, because it enables you to get the consultant's knowledge and advice at the moments when you need them the most, and to get the consultant's help only when you really need it.
- **Availability in your language** – Using a solution that is not translated into the language that your employees use might significantly expand the timeframe for the implementation. What every company wants to avoid is translation of the documents, especially when it comes to some professional matter where translation mistakes can have a profound effect – not to mention that translating the documents will increase your overall costs quite significantly.
- **Scalability of the online solution** – Although the requirements of the EU GDPR are almost the same for all companies, there may be some differences depending on the size of the company and the complexity of its processes, as well as the types and categories of personal data they are processing. Using documentation created for a big company in a small one, and vice versa, will most likely create confusion. Check if there are different [packages available for different purposes](#).

Considering at least some of the criteria above will ensure that you purchase a quality product that will help you to be successful in your EU GDPR compliance effort.

4. Time to make a decision. What works best for you?

How you choose to move forward depends on your unique situation, as well as the resources that are available to you.

So, to help you decide which approach is best for you, here is a quick guide to your options.

Get a consultant if:

- Time is a major concern for you. Hiring a consultant will help you achieve success in a short timeframe.
- You don't have people who can allocate time to an implementation project. A consultant can act as that person on the ground.
- Cost is not your primary concern.
- You're sure you will get a top-level consultant, as this is the best way to ensure they bring added value to the table.

Do it yourself if:

- You have enough time to put into your project.
- You want to cut the implementation expenses.
- You have some spare time, but don't want everyone's daily routines to be overly impacted.
- You want the knowledge related to the EU GDPR to be retained in-house and to have a truly personalized compliance programme tailored to your company's needs.

5. Conclusion

Before embarking on an implementation project, it's vital to choose the method that best suits your needs. And that very much depends on your unique situation. For some, hiring a consultant will be the best option; for others, the new online tools provide an attractive choice.

If you have concluded that a consultant is what better answers to your needs, you will rely on his/her experience and know-how to make your EU GDPR compliance programme successful.

One thing is certain, new online tools such as EU GDPR documentation toolkits, together with complementary resources such as online consultation sessions with experts, articles, webinars and training, are changing the landscape. They also provide a new, affordable way to get the best experience money can buy, as well as the necessary template documents.

6. Sample documentation templates

Here you can download a free preview of the [EU GDPR Documentation Toolkit](#) – in this free preview, you will be able to see the Table of Contents of each template, as well as a few sections from each document.

Because we feel like the EU GDPR goes together quite well with the ISO 27001 standard, we have bundled the documents together to help you become compliant with both the EU GDPR and ISO 27001, and created the [EU GDPR & ISO 27001 Integrated Documentation Toolkit](#).



Advisera Expert Solutions Ltd
for electronic business and business consulting
Zavizanska 12, 10000 Zagreb
Croatia, European Union

Email: support@advisera.com
U.S. (international): +1 (646) 759 9933
United Kingdom (international): +44 1502 449001
Toll-Free (U.S. and Canada): 1-888-553-2256
Toll-Free (United Kingdom): 0800 808 5485
Australia: +61 3 4000 0020

EXPLORE **ADVISERA**

