

DSAR Management



Since the GDPR came into force, we have seen a dramatic rise in the strategic use of Data Subject Access Requests (DSARs) at the pre-action stage of litigation, in employment disputes, and by privacy activists. Whilst some of these processes can be automated, document heavy DSARs can be burdensome and expensive, even with the use of technology.

We have looked at every stage of the DSAR process to determine where efficiencies can be made without sacrificing on accuracy and without increasing litigation/regulatory risk. We have broken the process down into six key stages and determined which stages can be outsourced and automated to deliver efficiency and cost savings. Our process and cost model for each stage is set out below. We are happy to agree fixed fees per DSAR based on this model and discuss monthly or annual retainers for this service.

Start ▶



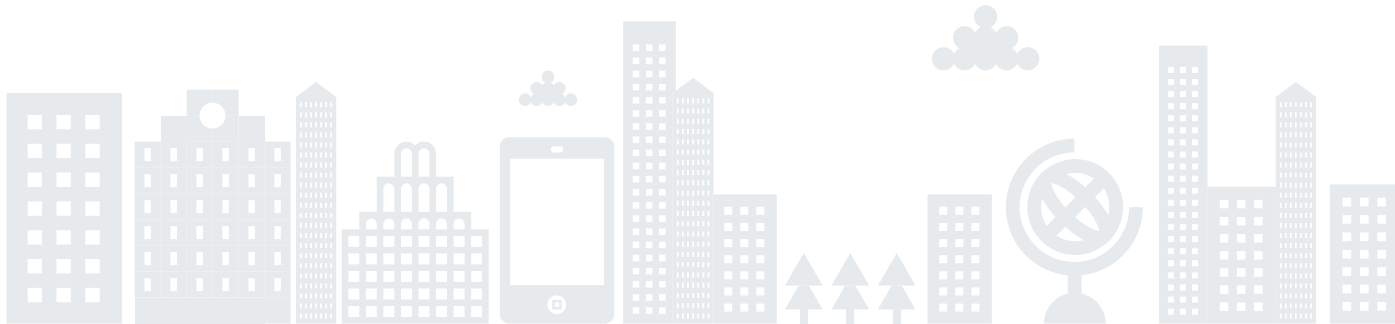
DSAR Management



The 7 Stages of a DSAR Response
Worked examples
Key benefits
Key contacts
About Osborne Clarke

Stage	Estimated Costs	Scope
1. Receipt of DSAR and initial analysis	Standard hourly rate	Background and context to DSAR, risk assessment, identity verification, scope of search, assessing timeline, overall strategic approach.
2. Data extraction	£0 (likely to be conducted in-house)	Our IT partner can assist with this process if necessary.

All estimates above are exclusive of VAT.



DSAR Management

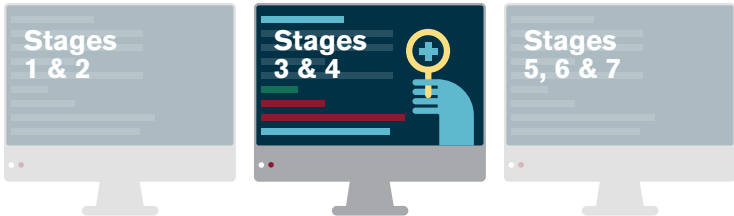


The 7 Stages of a DSAR Response
Worked examples
Key benefits
Key contacts
About Osborne Clarke

Stage	Estimated Costs	Scope
3. Upload of data to platform and analysis of data set	£2,750 (for data sets up to 20GB)*	Data is uploaded onto a secure online review platform to which you have access. We will use the online review platform to reduce the data set through the batch removal of unnecessary documents (e.g. duplicates, irrelevant calendar entries, false positives etc.), the use of keyword analysis, and strategic review of large Excel files. This stage often significantly reduces the number of potentially relevant documents and costs associated with the next stage of review.
4. First level review	£1,500 per day (estimated review and redaction rate of approx. 300 1-2 page documents per day)	Review of documents by Osborne Clarke DSAR paralegals including: redaction of non-personal and third party data; application of any applicable exemptions; and 'red flagging' of any critical documents from privacy AND employment/ disputes perspective in the context of the wider issue (grievance, disciplinary, tribunal, claim etc.). Supervision of process and quality control by Osborne Clarke lawyers.

All estimates above are exclusive of VAT.

*This is inclusive of the platform hosting fees for the calendar month in which data is uploaded. Platform hosting fees for subsequent calendar months are chargeable at £8/GB per calendar month (subject to a minimum charge of £80 per calendar month).



DSAR Management



The 7 Stages of a DSAR Response
Worked examples
Key benefits
Key contacts
About Osborne Clarke

Stage	Estimated Costs	Scope
5. Second level Osborne Clarke review	Standard hourly rate with 15% discount applied	Practical and strategic advice from Osborne Clarke data protection specialists to make decisions on disclosure set AND review of red flag documents in context of the employment issue/ dispute, e.g. disciplinary, grievance or employment tribunal by Osborne Clarke employment lawyers and/or a senior member of our specialist DSAR team. The cost of this review will depend upon the complexity, context and risk level of the DSAR.
6. Final response	£750	Agreed redactions are applied to the documents which are made available via a secure link for you/the data subject to download. This includes a first draft of a bespoke, GDPR-compliant cover letter.
7. DSAR: reflect and refine session	£1,500	On completion of your DSAR, we offer a 30-minute debrief session with an Osborne Clarke lawyer and a DSAR paralegal. Drawing on their knowledge of your matter, the session reflects on the key issues and challenges encountered, identifies practical improvements, and translates the lessons learned into concrete steps to strengthen your compliance framework and sharpen your readiness for future DSARs. The headline points will be captured in a one-page “DSAR: reflect and refine” document for your reference going forwards.

All estimates above are exclusive of VAT.



The 6 Stages of a DSAR Response

Worked examples

Key benefits

Key contacts

About Osborne Clarke

Some worked examples are set out below. We do not operate on a “cost per DSAR” basis because in our experience the volume and complexity of the work involved varies enormously.

DSAR 1 – Low grade employee, newly appointed, with a minor grievance

Estimated cost: £10,100

A DSAR is received from an employee that has not been with the company long, and has a grievance. The initial analysis is carried out with Osborne Clarke support (£600) and data set extraction is carried out in-house. A data set of 10,000 emails (4GB) is uploaded and then analysed by Osborne Clarke (£2,750). As a result of the initial analysis, the first level review is reduced to 800 documents.

During the first level review using our Osborne Clarke DSAR paralegals (£4,000), 50 documents are flagged as needing strategic input around disclosure. These documents are subject to second level review by an Osborne Clarke employment/data protection lawyer (£2,000) before a bespoke covering letter and disclosure pack containing 45 documents is prepared to send in response (£750).

DSAR 2 – Key employee, 10 years of service, employment claim issued

Estimated cost: £14,500

A DSAR is received from a senior employee of 10 years that has issued claims for constructive dismissal, discrimination and whistleblowing. She has requested all personal data related to her. The initial analysis is carried out with Osborne Clarke support (£2,000) resulting in a reduction in scope of the request to a shorter time period. Data set extraction is carried out in-house, following which 25,000 emails (10GB) are uploaded and then analysed by Osborne Clarke (£2,750). The first level review is carried out by an Osborne Clarke DSAR paralegal on 2,500 documents (£5,000).

During the first level review, 40 documents are flagged as needing strategic input around disclosure. These documents are subject to second level review by an Osborne Clarke disputes/data protection lawyer (£4,000) before a bespoke covering letter and disclosure pack containing 100 documents is prepared to send in response (£750).



DSAR Management



The 6 Stages of a DSAR Response

Worked examples

Key benefits

Key contacts

About Osborne Clarke

Improved response times

Our in-house team has multiple reviewers, who can be brought in to assist with review exercises very quickly. Even if DSAR deadlines are fast approaching, we can support you in working towards compliance with your GDPR obligations.

Risk mitigation

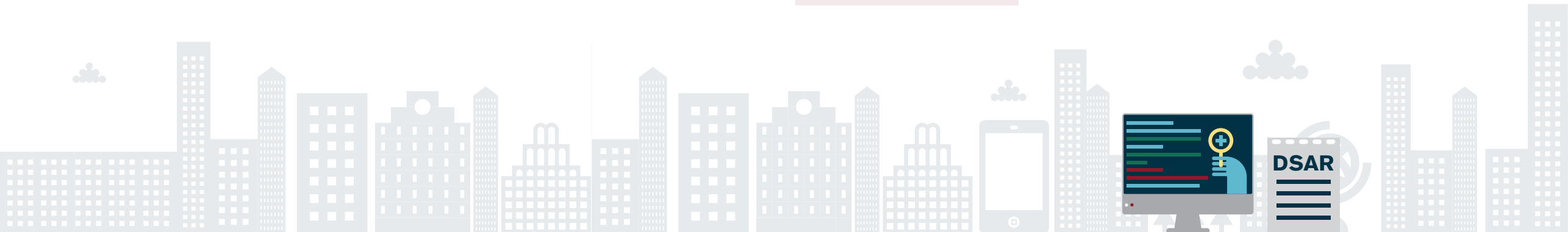
From the outset, we take into account data protection law considerations and the wider employment and/or commercial context relevant to each individual DSAR as 'part and parcel' of our DSAR review. This enables us to quickly identify risks and propose strategies to mitigate these, typically resulting in reduced litigation risk, reduced business exposure and reduced costs.

Flexibility

Our approach to DSAR management is flexible and can be tailored to your needs. We can provide comprehensive end to end support from receipt of DSAR through to disclosure of the DSAR documentation and responding to any follow up queries, or we can assist at specific stages only, such as assisting with strategic decisions on the data set following review.

Project management

We provide clear strategy and regular updates to ensure that each DSAR response is completed within agreed deadlines and budgets.



The 6 Stages of a DSAR Response

Worked examples

Key benefits

Key contacts

About Osborne Clarke

Employment



Olivia Sinfield
Partner

T +44 20 7105 7480
olivia.sinfield@osborneclarke.com



Amy Moylett
Associate Director

T +44 118 925 2140
amy.moylett@osborneclarke.com

The 6 Stages of a DSAR Response

Worked examples

Key benefits

Key contacts

About Osborne Clarke

Osborne Clarke in numbers

1340+

talented lawyers

working with

350+

expert Partners

in

27

international locations*

advising across

8

core sectors

with insight into

3

transformational trends

driven by

1

client-centred approach

Our locations around the world

Europe

Belgium: Brussels

France: Paris

Germany: Berlin, Cologne, Frankfurt, Hamburg, Munich

Italy: Busto Arsizio, Milan, Rome

Luxembourg

The Netherlands: Amsterdam

Poland: Warsaw

Spain: Barcelona, Madrid, Zaragoza

Sweden: Stockholm

UK: Bristol, London, Reading

USA

New York, San Francisco

Asia

China: Shanghai

India*: Bengaluru, Mumbai, New Delhi

Singapore

Osborne Clarke is the business name for an international legal practice and its associated businesses. Full details here: osborneclarke.com/verein/

*Services in India are provided by a relationship firm

These materials are written and provided for general information purposes only. They are not intended and should not be used as a substitute for taking legal advice. Specific legal advice should be taken before acting on any of the topics covered.

osborneclarke.com