



Everton Football Club chooses SureCloud to help meet its GDPR obligations

CASE STUDY

The Challenge

Everton Football Club based in Liverpool is one of the 12 Founder Members of the Football League and spent more seasons in England's top division than any other Club (115).

In December 2017, the Club was seeking an automated solution to manage its data and GDPR compliance.

The scale and diversity of the data handled by Everton's Data Protection team is extensive. Information on over 32,000 season ticket Members, a database of over 600,000 registered fans, as well as details on players, agents, suppliers, employees, and individuals associated with the Club's Academy, its official charity Everton in the Community and the Everton Free School, is all held and processed centrally, and much of this information is highly sensitive.

This data and all of the processes associated with it were being manually managed and tracked in a series of spreadsheets. With the number and complexity of requests increasing, the Club's Data Protection Officer was unable to 'up-scale' this system to record and manage smaller ad-hoc queries, incidents, and tasks.

With GDPR due to mandate much tighter restrictions on how the Club processed, managed and shared its data – as well as on the reporting of any incidents that did occur – the Club needed a more comprehensive and reliable tool in place before the 25th of May 2018.

The Solution

To help address this, the Club approached its long-standing risk mitigation advisor NCC Group to find a solution. NCC Group recommended the SureCloud GDPR Suite, delivered on the SureCloud platform. After SureCloud had successfully demonstrated the ability to provide full visibility for management and automation of GDPR processes across the organization, Everton selected the cloud-based suite of solutions.

The Football Club chose to deploy five applications within the GDPR Suite. The **GDPR Program Tracker** was selected to enable the Club to map all its disparate data and workflows using intelligent risk-based questions. **GDPR Management** provided Everton with all its mandatory GDPR business-as-usual processes, including the tracking of all data transfers, logging and maintaining processing records, facilitating Data Protection Impact Assessments and collecting and managing subject requests. **Information Asset Management** was selected to record and maintain the Club's entire data inventory, and **Compliance Management** for GDPR was chosen to help Everton speed up their process of attaining compliance and the on-going remediation of risks as they occur. Finally, **Incident Management** for GDPR was added to meet the GDPR requirement of logging, tracking and notifying the ICO of any data breaches, should there be a need to report an incident.

At a glance...

Customer:

Ian Garratt,
Data Protection Officer

Industry: Sport & entertainment**Headquarters:** Liverpool, UK**No. of employees:** 450 substantive employees and 1,100 casual staff**Annual turnover:** £190m**Benefits:**

- Managing GDPR obligations confidently
- Able to demonstrate efforts of working towards GDPR compliance at the click of a button
- Automated auditing of previously untracked data processes
- All known data flows mapped and risk-assessed
- Dashboards giving a real-time status of data mapping, transfers, incidents, and requests

“The SureCloud GDPR Suite isn't just a compliance tool; it's a comprehensive management tool. We now have a continuous, real-time status of where we are and what we need to be doing in terms of data processing, documentation and risk management. It would have simply been impossible to achieve this manually. SureCloud has not only helped us to work towards GDPR compliance they have optimized our internal processes and positioned us strategically for the future.”

Ian Garratt

“We are now tracking and recording every single data request in a centralized way. With NCC Group's support, SureCloud's solution has brought a comprehensive clarity to our data processing that was impossible to achieve with manual spreadsheets.”

Ian Garratt, Data Protection Officer at Everton

In partnership with NCC Group, SureCloud worked closely with Everton to determine the data and systems they used and which third parties they shared information with. This was an extensive task that involved working with various departments within the Club, but the SureCloud GDPR Suite helped to streamline it.

“Each time you add an information asset, it means that a lot of the information is already in the system when you move on to mapping, and then to processing,” said Ian Garratt, Data Protection Officer at Everton. “Essentially, it got quicker and easier to crunch the numbers and populate the appropriate fields the more we used the platform.”

Now, all of Everton’s disparate data are mapped, risk-assessed and tracked in a single centralized system. All changes and requests are automatically tracked so that activity records and data audits can be produced at the click of a button.

Instant incident reporting

Once Everton has noticed an incident like a suspected data breach, it is identified and reported immediately to the DPO. The Club’s Data Protection team will then log it into the platform and select which asset has been affected. This immediately determines the severity of the incident and whether it needs to be reported to the ICO via the platform. Should it need to be escalated, the report is available instantly. “Things are under control now so that if the worst does happen, we can understand it quickly and comprehensively,” said Garratt. “We can also demonstrate all the processes we have in place to protect this massive amount of data. It’s prevention rather than cure.”

An evolving system

SureCloud is currently adapting the Incident Assessment tool to meet Everton’s specific requirements: “At the moment all incident assessment is based on the information asset characteristics, such as number of records and data types. In reality, an incident could affect only a fraction of that data and the specific circumstances of each incident affect its risk, such as if a similar incident has occurred before, whether it is a cyber-attack or if the information has been recovered without damage caused,” Garratt explained. “Being able to tailor the system as we get more used to it is really useful; it means that we’re developing the platform around our needs and are able to react to the changes in how the legislation is regulated.”

“The penalties for not achieving GDPR compliance are severe – up to 4% of our revenues. It was imperative that we got a solution in place that could not only help us achieve GDPR compliance, but would also make it quick and easy for us to demonstrate that compliance at any point, on request. SureCloud’s GDPR Suite fit the bill.”

Ian Garratt, Data Protection Officer at Everton

About Everton

One of the 12 Founder Members of the Football League, Everton has spent more seasons in England’s top division than any other Club (115) and been crowned champions on nine occasions.

Founded in 1878 as St Domingo, the Club has also lifted the FA Cup five times and, in 1985, added the European Cup Winners’ Cup to its prestigious haul.

www.evertonfc.com

About NCC Group

A global expert in cybersecurity, privacy, and risk mitigation, working with businesses to protect their brand, value and reputation against the ever-evolving threat landscape. Headquartered in Manchester, UK, with over 30 offices across the world, NCC Group employs more than 1,500 people and is a trusted advisor to 15,000 clients worldwide.

www.nccgroup.trust/uk/

Why SureCloud

SureCloud is a provider of cloud-based, integrated Risk Management products and Cybersecurity services, which reinvent the way you manage risk. SureCloud connects the dots with integrated Risk Management solutions enabling you to make better decisions and achieve your desired business outcomes. SureCloud is underpinned by a highly configurable technology platform, which is simple, intuitive and flexible. Unlike other GRC Platform providers, SureCloud is adaptable enough to fit your current business processes without forcing you to make concessions during implementation; meaning you get immediate and sustained value from the outset.

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