



dnata

case study

Helping to keep a global travel company on the right side of Data Protection Law

dnata Travel is a Dubai-owned travel company, operating with twelve subsidiaries in the UK, including the Travel Republic brand.

When dnata approached Pathfinder, each subsidiary had its own compliance processes, retaining Personal Data for both its global customers and employees in different ways.

The primary need was to ensure Data Protection across **dnata** was standardised and represented best practice.

Testimonials

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... Pathfinder's considerable knowledge, experience and pragmatism was invaluable. They adapted quickly to a complicated company group structure and drove the project forward in all aspects, liaising well with senior stakeholders, IT Teams, the Legal Team and the wider business alike to find sustainable and workable solutions to cross-group compliance needs...

Matthew Vaggers
Senior Legal Advisor, dnata Travel

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... Pathfinder conducted a GDPR compliance audit that was thorough and in-depth. They then backed that up with recommendations and a project plan that was both comprehensive and covered all the issues to hand. They were a pleasure to work with and I'd recommend their services to other companies worried about GDPR compliance...

Bruna Bonomi
IT Programme Director, dnata Travel

dnata initially contracted with Pathfinder for a Data Protection Audit, but the contract was extended to include full remediation after the quality of Pathfinder's delivery.

Project Challenges

- **Subsidiary Practices**
Functional areas and travel brands processing Personal Data showed widely different practices and compliance levels.
- **Third-Party Contracts**
Many supplier contracts had no provision for Data Protection compliance and many critical suppliers were not monitored to ensure they were following GDPR requirements.
- **Lack of Internal Resource**
No dedicated Data Protection compliance function despite the company size and amount of Personal Data being processed
- **Limited Visibility**
No overall visibility of where Personal Data was being stored, who it belonged to or why it was being collected.

Project Deliverables

- **Data Protection Audit** producing data flow diagrams, showing the gaps and recommending improvements.
- **Data Protection Awareness Training** for all staff, as part of onboarding and annual refresher training.
- **Data Processing Impact Assessment Process developed** which included training for all IT Project Managers and ongoing support.
- **A Comprehensive Data Protection Governance Framework** improving compliance at all levels in the organisation.
- **Policies and Guidance** both designed and deployed by Pathfinder across the entire group.
- **An Information Asset Register and Records of Processing Activities** showing what Personal Data existed, where it was being held and how it was being secured.