Peer Response

Thanks for your post, Zihaad, this post has clearly identified the breach of articles in the General Data Protection Regulation (GDPR). In addition, provided solutions and processes to mitigate employee human errors.

This case is one of the examples showing that the Data Protection Commissioner decides to prosecute based on the offence’s history of the company even it was traded under another company. It mentioned that there were twenty similar unsolicited marketing offences for this company before this complaint case (Data Protection Commission, 2020).

As the “Do Not Call” requests were received by phone in this case, part of the process must be done by the employee. Besides strict policies and training for employees, the workflow for the opt-out process is critical. The employee should be recorded when and how the consent gets including the type of messages its covers. Keep the opt-out user information accurate and audit the call records regularly to make sure that will not end up back on the marketing list by accident (ICO, N.D.). Except for the mark as the opt-out process, the reminding process should be automatically done by the system opt-out mechanism, such as updating the “do not contact” list and filtering those contact in the future.

Other than GDPR, Virgin Media Ireland Limited website provided online purchasing that accepts credit cards payment, Virgin Media is compliant with Payment Card Industry Data Security Standard (PCI DSS) (PCI Security Standards.org, N.D.) for card payment security on their website as well (Virgin Media, N.D.). To secure critical cardholder data, companies will not keep the data, this reduces the risk of fraud affecting the consumers.

References:

Data Protection Commission (2020) Case Study 12: Virgin Media Ireland Limited. *Pre-GDPR*. Available from: https://www.dataprotection.ie/en/pre-gdpr/case-studies#201712 [Accessed 31 January 2022].

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