



Data Accuracy Principle

Today I'm going to talk about the data accuracy principle – one of the six principles under GDPR. The precise wording of the principle states that “personal data shall be accurate and, where necessary, kept up to date.” It goes on to say that “every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.”

So what does this all mean in practice? Well, at its heart, the principle is fairly simple in that companies should make sure information held about someone is accurate and up-to-date.

In reality, however, it's not that simple. The reason for this is that often a company won't know if the information it holds is accurate. If a staff member moves house or a customer changes their phone number, a controller will not immediately know this but appears to be obliged to keep personal data accurate and up-to-date. So, how does one comply?

The ICO acknowledges this dilemma and has issued guidance which states that where the source of the information held has come from the data subject, there is difficulty knowing if the information is accurate or if it has changed. In these circumstances the business should ensure that the information provided is accurately recorded and should take “reasonable” steps to keep it up to date. Reasonable steps would likely include things like making updates when the individual provides new information or removing old email addresses where a bounce-back is received.

It is also practical to include information in, for example, a staff privacy notice requiring staff members to update you if their information changes.

On the other side, if a business is compiling information themselves and not collecting directly from an individual, then the expectation is that all measures should be taken to ensure that the information collated is accurate and up-to-date.

So, that was data accuracy. Essentially, record information accurately and update it as and when you learn or reasonably suspect that the information is no longer accurate or out-of-date. And if you are compiling information without taking it directly from the individuals, you should be extra-vigilant.