Nemko Digital

CASE STUDY

GDPR Readiness for an EV Charging Platform

Supporting European Expansion Through Privacy Governance

Section 01

01

Situation

As the Client prepared to expand their public charging services across the European market, they wanted to assess whether their existing privacy governance framework adequately supported GDPR compliance. The framework included policies, procedures, and operational documentation covering the complete lifecycle of personal data processing. The Client needed assurance that their governance framework aligned with GDPR requirements and reflected current regulatory expectations to support ongoing operations within the European market.

In response to the uncertainty around GDPR requirements, **Nemko Digital was asked to provide guidance on GDPR regulatory expectations**. This involved a comprehensive review of the privacy governance framework, followed by practical recommendations for improvements in GDPR compliance maturity.

> *"The Client needed **assurance that their governance framework aligned with GDPR requirements** and reflected current regulatory expectations to support ongoing operations within the European market."*

Section 02

02

Challenges

The current regulatory scrutiny and the strict requirements of the GDPR have raised questions about what constitutes an adequate level of compliance. The Client's existing privacy documentation already addressed a broad range of governance areas, including Records of Processing Activities (RoPA), data flow mapping, data classification, Data Protection Impact Assessments (DPIAs), access controls, incident response, and data subject rights. However, despite this foundation, **the Client was uncertain** whether their existing controls and documentation were sufficient to meet regulatory expectations and **sought an independent assessment** of their overall compliance posture.

Governance Areas Already Documented

RoPA | Data Flow Mapping | Data Classification | DPIAs

Access Controls | Incident Response | Data Subjects Rights

Section 03

Our Approach & Solution

Nemko Digital carried out a **structured review of the Client's privacy governance documentation** from both legal and operational perspectives. This ensured a robust framework, aligning with requirements / expectations from both EU authorities and end customers. The engagement began with a detailed review of the Client's privacy governance documentation, including a variation of data policies and documents, such as:

01 Data flow diagrams

02 A data assests list

03 Records of Processing Activities (RoPA) and RoPA management system

04 Privacy and deployment specifications

05 A data classification and grading policy

06 Employee data security documentation

07 An access control and privilege management policy

08 DPIA applicability analysis

09 Data subject rights response procedures

10 A data breach incident response plan

Each document was assessed against applicable GDPR requirements, EDPB guidance, and recognized privacy governance practices. While exciting controls provided a foundational framework, several controls required a hardening fit.

Section 03

03

The primary focus was on **assessing consistency across the privacy documentation** and evaluating its alignment with operational processes and GDPR obligations. The review also examined gaps in accountability, ownership, and governance, identified areas where policies required additional detail to meet regulatory expectations, and assessed the coherence of technical, organizational, and legal controls across the documentation framework.

Based on the findings, **recommendations were developed** to strengthen legal compliance, governance processes, and the overall quality of the privacy documentation. The recommendations addressed identified gaps and opportunities to improve transfer governance, enhance regulatory readiness, and support greater operational maturity in the client's privacy management framework.

An important part of the engagement was **reviewing the Client's international processing model**. Certain processing activities located outside the EU require an assessment of the applicable GDPR requirements, relevant guidance, and the governance measures in place to support compliance and manage risk.

Section 04

Value Delivered

04

The review provided the Client with an independent assessment of their GDPR governance framework and identified opportunities to strengthen both legal compliance and operational implementation. By evaluating the documentation as an integrated governance framework rather than a collection of standalone policies, **Nemko Digital helped improve consistency across privacy processes, strengthen governance, and support the continued maturity** of the Client's GDPR compliance program.

This provided the Client with a **stronger foundation for managing data privacy at scale** by identifying where documentation could be clarified to reduce ambiguity and where compliance efforts should be prioritized to more effectively mitigate risk. The review of the Client's international processing model also provided greater clarity on the application of GDPR Chapter V and identified additional measures to further strengthen the organization's accountability and regulatory posture.

As a result, the Client gained:

- **Greater confidence** in the maturity of its GDPR governance framework
- **Clear visibility** into documentation gaps and governance improvement opportunities
- **More consistent** and comprehensive privacy documentation
- **An independent legal assessment** of international data processing activities
- **Reduced risk** of inconsistent interpretation through clearer documentation
- **A prioritized roadmap** for strengthening GDPR compliance and mitigating regulatory risk


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