

DSARs & DATA GOVERNANCE IN THE AGE OF AUTOMATION A GUIDE FOR RETAIL LEADERS

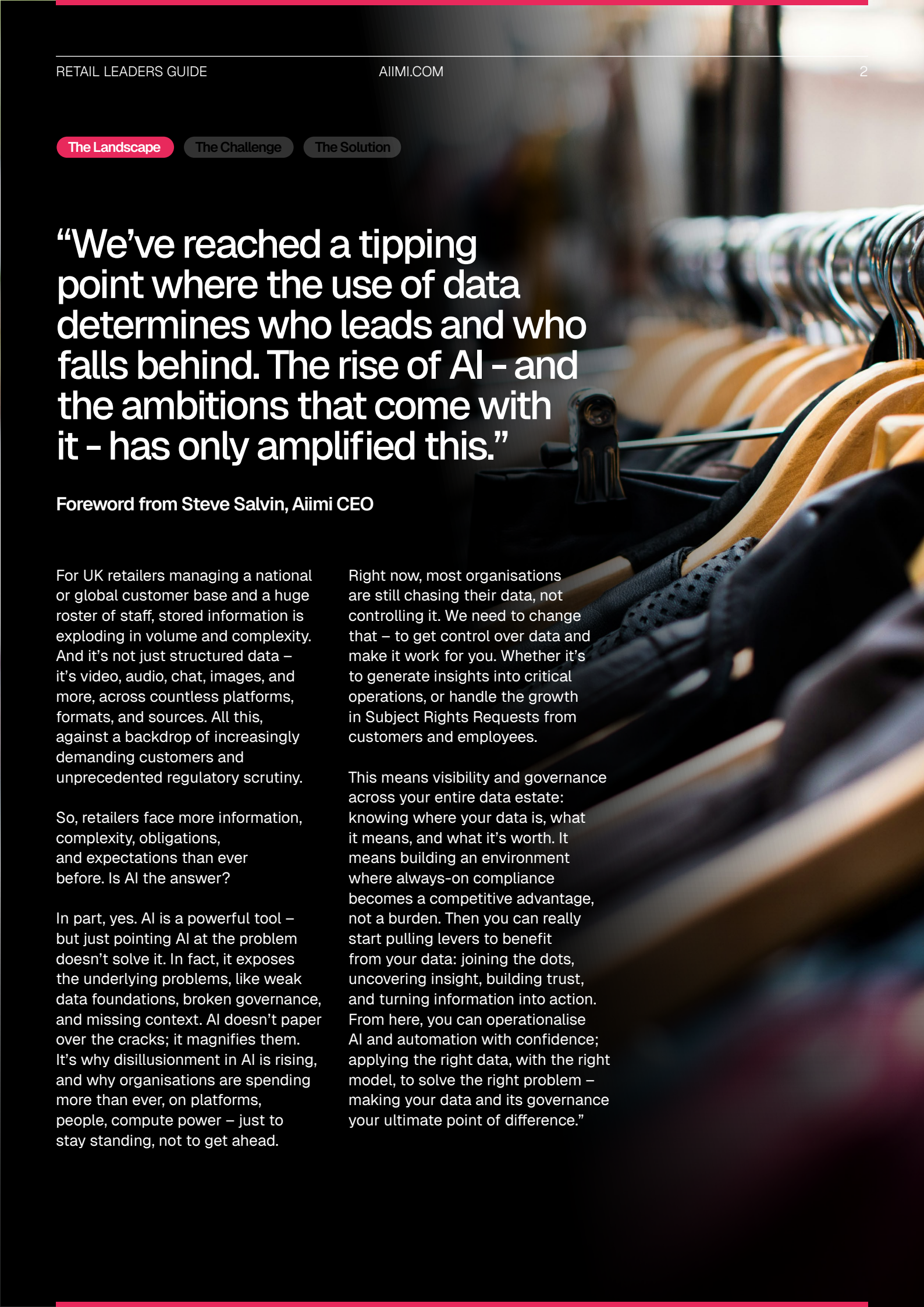
What's inside?

- How to handle rising Data Subject Access Requests (DSARs)
- Your ideal scenario for securing employee data
- Automating Data Governance and Compliance processes at scale
- Case Study: How international retailer Holland & Barrett saved 3,000 hours on DSARs.

The Landscape

The Challenge

The Solution



“We’ve reached a tipping point where the use of data determines who leads and who falls behind. The rise of AI – and the ambitions that come with it – has only amplified this.”

Foreword from Steve Salvin, Aiimi CEO

For UK retailers managing a national or global customer base and a huge roster of staff, stored information is exploding in volume and complexity. And it’s not just structured data – it’s video, audio, chat, images, and more, across countless platforms, formats, and sources. All this, against a backdrop of increasingly demanding customers and unprecedented regulatory scrutiny.

So, retailers face more information, complexity, obligations, and expectations than ever before. Is AI the answer?

In part, yes. AI is a powerful tool – but just pointing AI at the problem doesn’t solve it. In fact, it exposes the underlying problems, like weak data foundations, broken governance, and missing context. AI doesn’t paper over the cracks; it magnifies them. It’s why disillusionment in AI is rising, and why organisations are spending more than ever, on platforms, people, compute power – just to stay standing, not to get ahead.

Right now, most organisations are still chasing their data, not controlling it. We need to change that – to get control over data and make it work for you. Whether it’s to generate insights into critical operations, or handle the growth in Subject Rights Requests from customers and employees.

This means visibility and governance across your entire data estate: knowing where your data is, what it means, and what it’s worth. It means building an environment where always-on compliance becomes a competitive advantage, not a burden. Then you can really start pulling levers to benefit from your data: joining the dots, uncovering insight, building trust, and turning information into action. From here, you can operationalise AI and automation with confidence; applying the right data, with the right model, to solve the right problem – making your data and its governance your ultimate point of difference.”

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Managing sensitive customer and employee data matters more than ever, if you want to harness AI automation.

Think beyond CRM and typical structured data sources. In most organisations, personal storage systems like email and OneDrive present significant compliance challenges. These platforms are typically locked down to individual users or those they explicitly invite, unlike document libraries or network drives that are governed at a much higher level. As a result, every person's OneDrive becomes a complex web of permissions, often used as a private workspace or a 'safe space' for work in progress.

Over time, however, people forget to delete old files, and these spaces can accumulate sensitive or customer information that should never have been stored there in the first place. This data can linger indefinitely, creating hidden risks.

The problem is compounded by the way information is shared. In the moment, a contract or sensitive file might be shared with a few colleagues for a specific business process. Years later, when that

information is needed – perhaps in the context of legal hold or export control – it can be impossible to locate, as permissions may have changed or access may have been revoked. These scenarios create powerful business cases for compliance and Data Security Posture Management (DSPM) initiatives that focus on cleaning up personal storage and ensuring sensitive data is properly managed. And this challenge extends to everything within the enterprise.



Smarter compliance automation that saves time and cost - and boosts accuracy - is ready and waiting.

Retailer Holland & Barrett reduced their manual effort in handling DSARs by more than 75% using Aiimi's automation solution.

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THE COMPETITION FOR TRUST GOES BEYOND YOUR CUSTOMERS

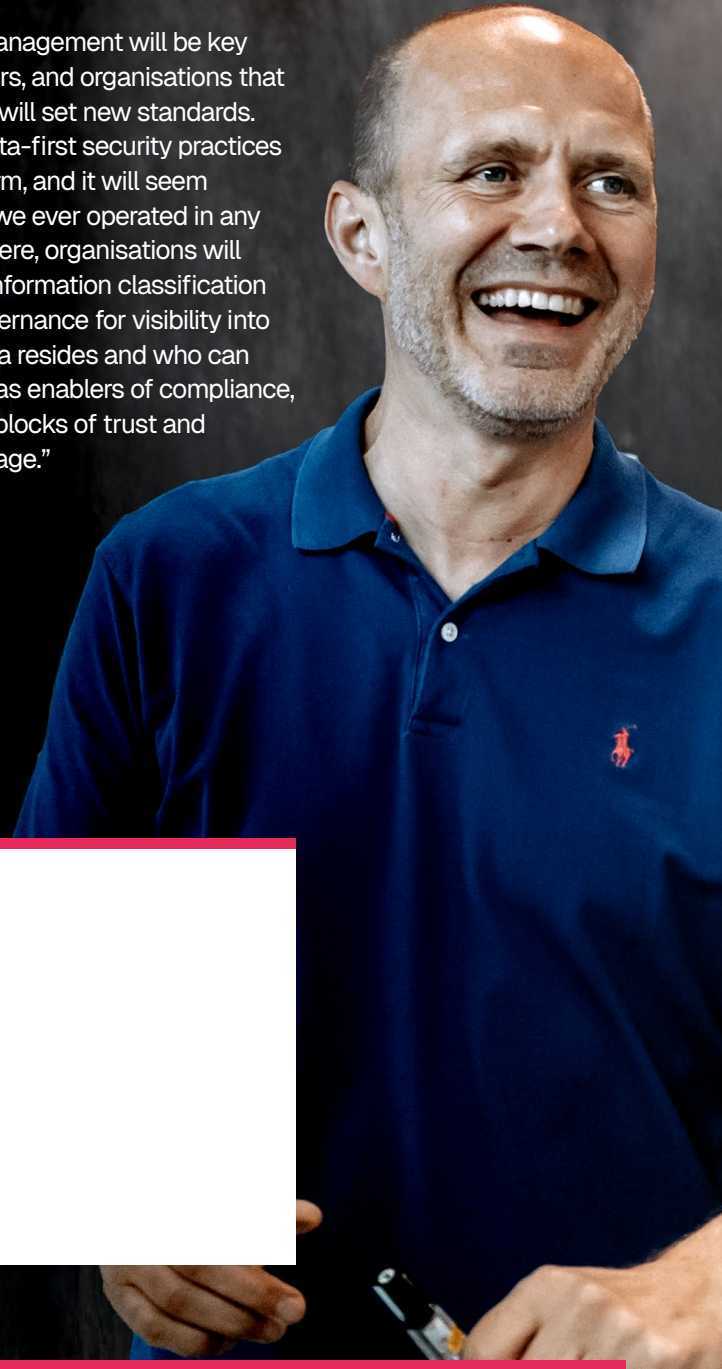
“Over a decade ago, I worked with the CEO of a major global bank who’d been hired to lead a transformation towards a more customer-centric retail experience. His vision was to create a welcoming space that broke away from the cold, transactional feel of traditional banking – replacing reinforced glass with cosy sofas and staff bending over backwards to look after you.

To deliver consistently excellent customer service, the CEO believed that every piece of information held about a customer, and every conversation with or about them, should be seen as the customer’s property. He encouraged his employees to imagine the customer sitting on their shoulder, listening and watching, whenever they were resolving an issue or completing a task on their behalf. Without this mindset, he said, customer service would always fall short.

This vision is now closer than ever to being a widespread reality. Today, if a business holds information on a customer or employee, then why shouldn’t that individual have real-time access to it? This will be the foundation for

maturity in data privacy and compliance – a dynamic, live ‘case file’ that is always up to date and accessible to the data subject at any time. This isn’t just a technical aspiration; as regulatory demands and customer expectations outgrow manual processes and patchwork solutions, it becomes an absolute necessity. And it’s not just about people; we should look for these live, gold-standard collections of data wherever they add value – physical assets or premises, for instance.

Privacy and data management will be key market differentiators, and organisations that lead in these areas will set new standards. Over time, these data-first security practices will become the norm, and it will seem inconceivable that we ever operated in any other way. To get there, organisations will depend on robust information classification and automated governance for visibility into where sensitive data resides and who can access it – not just as enablers of compliance, but as the building blocks of trust and competitive advantage.”



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Aiiimi CEO

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From manual to agentic.

Today, we already have the capability to classify complex data, create collections, and audit and manage risk within source data - for example, migrating information to a secure location during a clean-up operation, or redacting sensitive information that should not be disclosed, while still allowing relevant information to be shared. Some parts of those processes already harness AI. But the future vision is for intelligent AI Agents to handle the entire process end-to-end, delivering fully automated data management.

Currently, automated redaction is supplemented by human review to ensure compliance with legal and staffing requirements. The goal is to further systematise this process, so that over time, more of the review can be handled by intelligent agents with a high degree of confidence. Eventually, this could lead to a scenario where, for example, a Data Subject Access Request (DSAR) is fulfilled almost instantly: the system assembles and redacts the relevant information, a human reviewer gives final approval, and the data is released – all within minutes.

The key steps in this journey are:



Moving from semi-manual data discovery processes to automated, agent-driven processes.



Transitioning from manual redaction to automated data protection systems, with human oversight.



Gradually increasing the confidence and capability of automated systems, reducing the need for manual intervention.



Exploring innovative techniques to ensure accuracy and security, such as using one AI to redact and another to review or challenge the redactions.

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3 ways retailers must prepare for rising DSARs.

Brand trust matters more than ever in a challenging retail landscape – the way you handle DSARs, and the trust you have in your own data, sets the tone for the trust your employees and customers place in you.



1

Evidencing your DSAR search scope:

2025's new Data Use and Access Act (DUAA) clarifies that organisations only need to conduct "reasonable and proportionate" searches when responding to DSARs. A welcome addition to policy, but retailers must be able to evidence how they scoped and conducted the search. For complex employee requests, this adds another layer of process and a need to truly understand what data you're storing – and where.



2

Retaining HR records, ready for requests:

December 2025's new Employment Rights Act provides vital day-one rights for employees, but it also introduces new requirements for organisations to record and report sensitive employment data accurately. Employment records, including holiday entitlement and pay, should be retained for at least six years – with criminal penalties for failure. This is a material shift from the prior more general obligations and means retailers must formalise and often digitalise record-keeping, rather than relying on informal HR processes. In short, you need complete, audit-ready, compliant employee records, ready to retrieve as needed for requests like DSARs.



3

Preparing for rising employee DSARs:

DSARs have been on the rise for some time. We've seen one UK retailer experience an 83% year-on-year increase across customer and employee DSARs from 2023 to 2024. But employee DSARs are a particular challenge. Whereas retailers can usually handle rapid customer data access requests through contained CRM systems, employee requests are complex and span file stores, personal drives, email records, and more.

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Best next steps for compliance:

To move forward, organisations should prioritise auditing and cleaning up data, ensuring sensitive data can be found and is properly managed. Automated tools enable accurate classification, redaction, and governance at scale, and transparent data practices will make real-time information accessible to data subjects by default. Fostering a culture of data ownership and transparency prepares teams for the shift to real-time, agent-driven compliance processes.



Prioritise data audits and clean-up, with proper management of sensitive information



Use automated tools for scalable classification, risk-scoring, redaction, and governance



Encourage data ownership and transparency in readiness for agent-driven, real-time compliance and accessibility



Holland & Barrett

CASE STUDY

Saving an international retailer 3,000 hours with 4x faster Disclosure Requests.

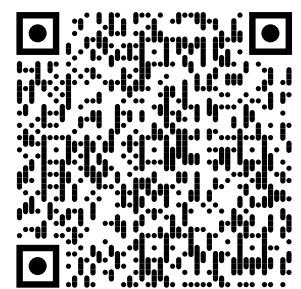
International retailer Holland & Barrett faced a surge in complex DSARs, with manual processes taking up to 90 days and straining resources. Aiimi's Workplace AI Platform transformed their approach, automating setup, redaction, and data discovery across systems. DSAR setup now takes 15 minutes, average delivery times are down to a week, and the retailer is saving 3,000 hours annually – all while returning accurate, trusted data.



“I don't know where we'd be without the Aiimi platform – it's been a lifesaver. The difference it's made to our delivery timeline is incredible. And, crucially, we're pulling data we can trust and which enables a data subject to receive their data more quickly.”

Hollie Mela
DPO Holland & Barrett

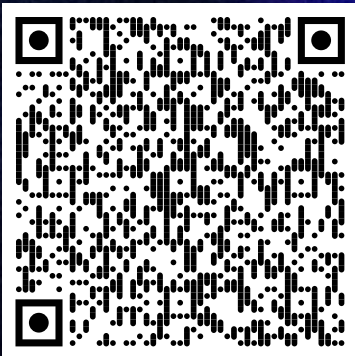
Read more about
this case study:



BOOK A DEMO

See DSAR automation in action.

Book a demo →



Aiimi is the platform that's built for challenging DSARs.

- End-to-end DSAR management solution, from discovery to disclosure
- Connect to all sources, leaving data in situ
- AI and ML pinpoint personal data with confidence
- Redact in bulk, cutting review time by 85%
- Secure, auditable two-way comms with data subjects

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