

Timelines and budgets for GDPR compliance: A meta-analysis

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Perhaps no other law has received the attention that the EU General Data Protection Regulation has in recent years. Not only has the GDPR been the subject of conferences, white papers and news headlines, but also a significant number of surveys has been conducted on how well organizations are prepared for it, as well as how much of their budgets they are allocating to compliance efforts. Indeed, given the importance of the roll-out of the GDPR, organizations have been conducting surveys on GDPR compliance for several years.

This abundance of survey data about GDPR-compliance efforts over the past several years allows for a meta-level analysis of how organizations' attention and resources have been reallocated and expanded to meet the law's requirements. This study aggregates the results of surveys conducted on organizational GDPR-compliance efforts before and after the May 25, 2018, implementation deadline to gain the deepest insight possible into compliance efforts and costs at the organizational level on a global scale. This report presents the findings from that analysis.

Data and methodology

Twelve different surveys containing questions about the GDPR, conducted between September 2016 and July 2018, were examined in this study. One of the surveys was conducted in 2016, five were conducted in 2017, and six were conducted in 2018. When information about when the survey was conducted was not provided, the date the results were published online was used.

The IAPP conducted or was involved in the design of at least three of them.

The average number of survey respondents was 854, while the median was 400. The survey with the smallest sample size had 111 respondents; the survey with the largest sample size had more than 5,000 respondents. When presenting the aggregate statistics, the data from each survey was weighted based on its sample size.

In essence, this meta-analysis presents data collected from a combined total of 10,247 people around the world who completed a GDPR-related survey between September 2016 and July 2018.

Each survey contained a unique set of questions, each with a unique set of responses. In other words, no two surveys used the same question wording or response categories for any of the items examined here. While differences in question wording did not appear significant on the surface, differences in answer categories were. Thus, to make comparisons between survey results, response categories were combined in a way that sought to balance the desire to accurately reflect the underlying data with the desire to provide a concise, meaningful summary of the results. For example, on questions asking where the respondent's organization was located, a combined total of 20 different response options could be found. Moreover, no two surveys presented the exact same array of regional breakdowns – e.g., EU and U.K., European Union (not including U.K.), Non-EU Europe, and Europe were some of the response options given on various

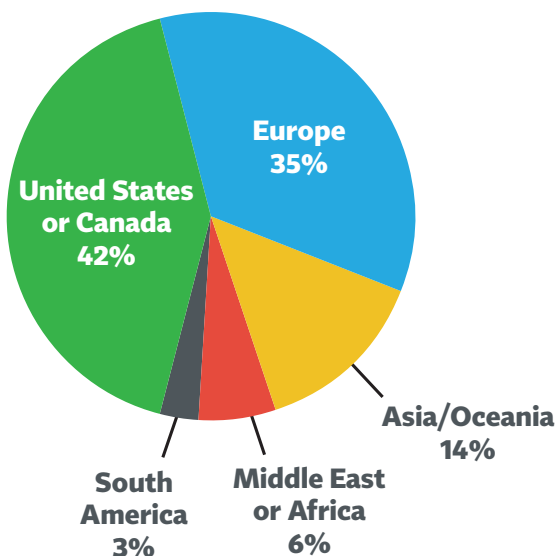
surveys. For the sake of clarity, similar response options were combined into a single overarching category (e.g., Europe) wherever possible. For each question, between three to five response categories were produced using this procedure.

Similarly, not every question was asked on each survey. Of the 12 surveys examined here, seven asked respondents about the region they were located in, six asked respondents about their role within the company, seven asked about the number of employees who work for the company, 10 asked about the company's timeline for compliance, and five asked about the size of the company's GDPR budget.

Results

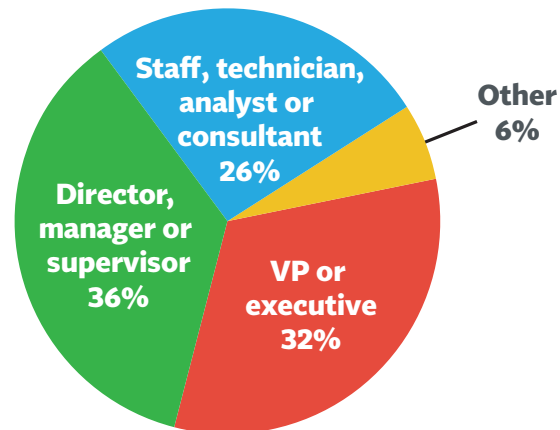
Region

Across all surveys, 42 percent of respondents reported they were located in the United States or Canada, 35 percent in Europe, 14 percent in Asia/Oceania (including Australia, New Zealand, Singapore, Hong Kong and India), 6 percent in the Middle East and Africa, and 3 percent in South America (including Mexico).



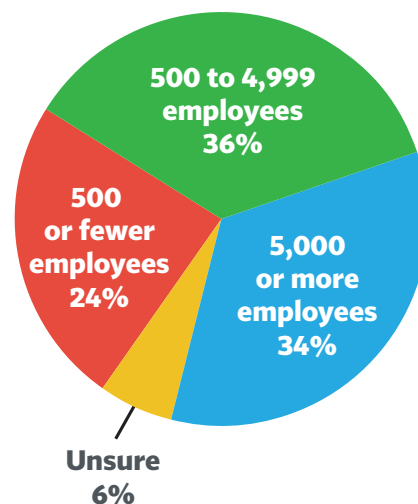
Organizational role

Approximately 32 percent of respondents across all surveys held an executive role within their organization, such as vice president. Meanwhile, about 36 percent held a supervisory position, such as director or manager. Finally, about 26 percent identified their organizational role as staff, technician, analyst or consultant.



Company size

Approximately 24 percent of respondents across all surveys worked at companies that employed 500 or fewer people, 36 percent worked at companies with 500 to 4,999 employees, and 34 percent worked at companies with 5,000 or more employees.



Timeline for GDPR compliance

To gauge how well organizations were prepared for the implementation of the GDPR, numerous surveys asked if they were currently in compliance with the law or, if not, when they expected to be. Examples of these types of questions included:

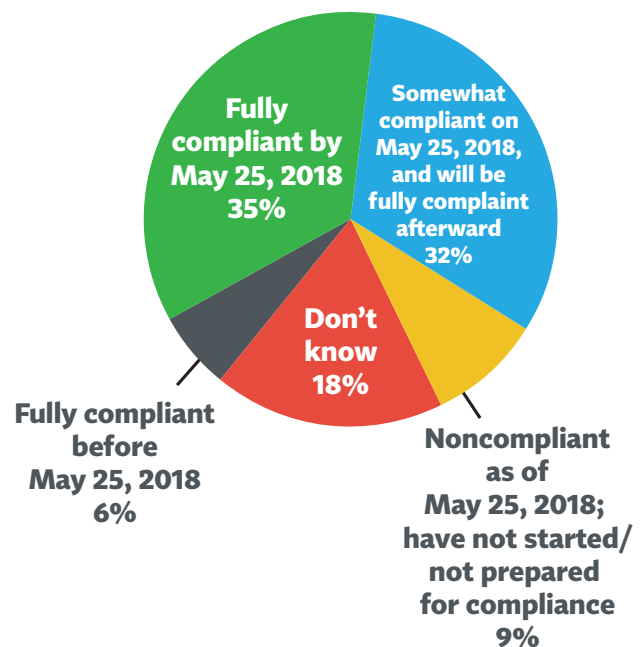
- When do you expect to be in compliance with the GDPR? (Ponemon)
- How confident are you that your company will be fully ready for the GDPR when the regulation kicks off? (Dell)
- How prepared is your organization in being GDPR compliant? (Compliance Week/Collibra)
- How prepared is your company to meet EU GDPR regulations by the deadline of May 25, 2018? (Cybersecurity Insiders)
- All things considered, when the GDPR comes into force in May 2018, will your company be... (IAPP)
- ... please think about ALL the various GDPR-compliance requirements that went into effect May 25. Where are you on the journey to be 100 percent compliant? (AIIM)

Across all surveys, a total of 28 unique answer choices were presented for these types of questions. These were grouped into four main categories and an “I don’t know” response. These four main categories were:

1. Fully compliant before May 25, 2018.
2. Fully compliant as of May 25, 2018.
3. Somewhat compliant as of May 25, 2018, and fully compliant afterward.

4. Noncompliant as of May 25, 2018, and have not started/not prepared for compliance.

Aggregating across all surveys, 6 percent of organizations were fully compliant or expected to be fully compliant before the GDPR enforcement deadline of May 25, 2018. The largest group, 36 percent of all respondents over the two-year period, was fully GDPR compliant or expected to be fully GDPR compliant. The second-largest group, however, was 32 percent of respondents who were somewhat compliant or expected to be somewhat compliant on May 25, 2018, and fully compliant sometime afterward. Approximately 9 percent of respondents were noncompliant or expected to be noncompliant as of May 25, had not started the compliance process, or were not prepared for compliance. Moreover, about 17 percent of respondents over the two-year period said they did not know when their organization would become compliant.



GDPR budget

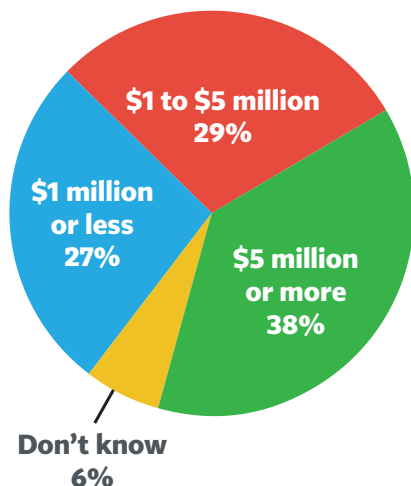
Another frequently included item on GDPR surveys was the size of the budget that organizations were allocating to GDPR

compliance. Examples of this type of question included:

- Approximately what is the total expected cost to your organization to become GDPR compliant? (ISACA)
- What initial budget have you allocated to become GDPR and ePrivacy compliant? (Evidon/Forrester Consulting)
- Approximately, what is the dollar range that best describes your organization's annual budget for compliance with the GDPR? (Ponemon)
- What kind of budget does your organization have for GDPR compliance? (AIIM)

The 24 unique response categories were combined into three main ones: (1.) \$1 million or less; (2.) \$1 to \$5 million; and (3.) \$5 million or more, along with an "I don't know" response.

Across the five surveys that asked about GDPR budget size, approximately 27 percent of respondents reported that their organization was spending \$1 million or less to become GDPR compliant, 29 percent reported that their organization was spending between \$1 million and \$5 million on compliance, and 38 percent



reported their company's GDPR budget to be more than \$5 million. About 6 percent reported that they did not know the size of their company's GDPR budget.

Conclusion

This study consisted of a meta-analysis of GDPR-related survey items, spanning from September 2016 to July 2018. These aggregated statistics provide more comprehensive and robust insights into global GDPR-compliance efforts than any individual survey. By aggregating responses over an almost two-year timeframe, it also overcomes the limitations of assessing compliance at a single point in time that may have been months or years in advance of the GDPR implementation date. These results are also more dynamic than any given survey, in that they account for changes in organizational expectations about compliance as the deadline approached and passed. The aggregate statistics reported here thus provide one of the most accurate pictures to date of organizational GDPR-compliance efforts.

Several surveys examined here also warrant special attention for their high quality. Among the surveys included in this study, several had sample sizes that were large enough to adequately account for sampling error and thus were most likely to independently provide reliable population estimates. These included surveys by Dell/Dimensional Research, IAPP-TrustArc, IAPP-EY, McDermott Will & Emery/Ponemon, ISACA/TITUS, and Cybersecurity Insiders/Crowd Research Partners. Finally, the survey conducted by Ponemon and sponsored by McDermott Will & Emery was exceptional in terms of transparency, being the sole survey examined here to report the total sampling frame, total survey returns, rejected surveys, final sample and the response rate.

Sponsor/organization	Completed surveys	Date conducted
Dell/Dimensional Research	821	September 2016
Paul Hastings	200	July 2017
Compliance Week/Collibra	111	August 2017
IAPP-TrustArc	498	October 2017
IAPP-EY	548	October 2017
Evidon/Forrester Consulting	263	December 2017
McDermott Will & Emery/Ponemon Institute	1,003	February 2018
SAS	183	February 2018
Netsparker	302	April 12, 2018
ISACA/TITUS	5,525	April 23, 2018
Cybersecurity Insiders/Crowd Research Partners	531	May 2018
AIIM	262	July 2018
Total	10,247	
Average	854	
Median	400	