

Virtual Data Protection Officer (vDPO) & GDPR Support

Service Definition – G-Cloud 15

Comet Business Global Solutions Ltd

Company Number: 07662630

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1. Service Overview

Comet Business Global Solutions Ltd provides a high-tier Virtual Data Protection Officer (DPO) as a Service (DPOaaS) for organisations with complex, high-risk data processing environments. Our service is delivered by senior privacy professionals, including Fellows of Information Privacy (FIP) with Security Clearance (SC).

We act as an independent, authoritative function for senior leadership, operational teams, and Regulatory Authorities. Our expertise spans cross-regulatory environments including UK GDPR, EU GDPR, Data Protection Act 2018, and BCBS 239, supporting sectors such as Central Government, NHS, and Fintech.

2. Core DPO Mandate (Article 39 GDPR)

Mandate Area	Service Description
Inform & Advise	Expert guidance to controllers, processors, and staff on GDPR and data protection obligations.
Monitor Compliance	Independent oversight of policies, training programmes, and internal compliance audits.
DPIA Advisory	Professional risk-based advice and assurance on DPIAs for new or high-risk processing, including with the use of AI
Regulator Liaison	Primary point of contact with the ICO and other supervisory authorities.
Data Subject Rights	Trusted contact point for DSARs, complaints, and regulatory correspondence.

3. Service Features

- Accountability Framework aligned to latest ICO expectations
- Privacy by Design embedded into digital and ICT programmes
- Multi-standard auditing (ICO, ISACA, NIST Privacy, DSPT)
- End-to-end personal data breach management and reporting
- International transfer assessments (TIAs, SCCs, IDTAs)
- Supply chain and third-party processor due diligence
- FOI & EIR advisory on data protection exemptions
- SC Cleared personnel for sensitive and classified data environments

4. Key Deliverables

Deliverable	Outcome
Standardised DPIA Framework	Consistent, regulator-ready DPIA templates and workflows
Data Mapping & RoPA	Comprehensive Records of Processing Activities
Compliance Action Plan	Strategic roadmap for GDPR maturity and improvement
Quarterly Compliance Reports	Independent assurance for Boards and Audit Committees
Audit Representation	Support during CQC, GIAA, ICO, and other external audits

5. Service Levels & Customisation

We offer a flexible Fractional DPO model, tailored to organisational size, complexity, and risk profile. This service can be integrated with Regulatory Compliance or Information Governance leadership to provide a unified Governance, Risk, and Compliance (GRC) capability.

Professional Certifications	Response Times	Deployment	Engagement Model
CISM, CISSP, CISA, CRISC, CCSP	Standard queries within 1 business day; urgent breach support within 4 hours	SC Cleared DPO onboarded within 5 working days	Fractional, retained, or project-based

6. Offboarding & Data Extraction

At the conclusion of the engagement, clients receive a comprehensive Compliance Handover Report. All Records of Processing Activities (RoPAs), DPIAs, breach logs, and supporting documentation are returned in open, standard formats (CSV/PDF) to ensure continuity with successor DPOs or internal teams.