

REDACTION AS A SERVICE · RAAS

Redaction that holds up in front of a regulator — and a judge.

Attorney-performed redaction for DSAR responses and evidence disclosure. Carried out in-house by Cyberlegis lawyers — optionally with an independent Redaction Quality Check Confirmation and a GDPR Redaction Certificate issued by an attorney at law in Munich.

DSAR

REDACTION AS A SERVICE

WHITELIST FEATURE

What we offer



SERVICE 01

DSAR

End-to-end handling of data subject access requests: identity check, scope definition, search, the Art. 15(3) copy and the redaction it needs — inside the one-month Art. 12(3) deadline.



SERVICE 02

Redaction as a Service

Attorney-performed redaction on demand or on retainer. Legal assessment and technical execution in one hand, with a written protocol and a page-level redaction log.



SERVICE 03

Whitelist Feature

You supply the names, entities and terms that must stay visible. Whitelisted items are never redacted — your own staff, matter references and agreed counterparties survive the pass intact.

The Whitelist Feature



CLIENT-CONTROLLED

Names you supply are never redacted.

Over-redaction is its own failure. Before the pass begins you hand us a whitelist — individuals, entities, matter references, internal identifiers, agreed counterparties. Those terms are protected from redaction across the entire production and the protection is logged, so the result is reproducible and auditable.

- ✓ Supplied as a simple list, spreadsheet or export
- ✓ Variants and spellings matched, not just exact strings
- ✓ Reviewed by an attorney against the Art. 15(4) balance
- ✓ Applied consistently across every document in the set
- ✓ Recorded in the redaction protocol and the pagelevel log
- ✓ Amendable mid-matter, with the change tracked

The exposure nobody budgets for

Redaction is where two obligations collide. Release too much and you have caused a personal data breach in writing, with the evidence already in the recipient's hands. Release too little and your Art. 15 GDPR response is incomplete, your production is challenged, and the redactions themselves become the dispute.

Most redaction failures are not judgment calls. They are **black boxes drawn over text that is still selectable** — mechanical failures a review of the printed copy will never catch. Cyberlegis performs the redaction itself: legal assessment and technical execution in one hand, by lawyers who do data protection and cyber law for a living.

HOW REDACTIONS LEAK

- Black boxes drawn over text that remains selectable underneath
- Metadata and document properties naming the author and the matter
- OCR layers that survive flattening and stay fully searchable
- Comments and tracked changes left inside the delivered file
- Hidden rows, columns and worksheets that travel with the spreadsheet

Typical matters

 DSAR responses Art. 15(3) copies containing third-party data	 HR & employment files Investigations, works council matters	 Evidence & exhibits Court filings, discovery productions	 Whistleblower reports Identity protection (HinSchG, EU 2019/1937)
 Regulatory submissions Authority requests, Art. 33 notifications	 Cyber incident files Forensic reports for insurers and counsel	 Trade secrets GeschGehG / DTSA protection in filings	 Transactions Data rooms, board minutes, diligence packs

Three levels of assurance

01 CORE	02 CORE+QC	03 CORE+QC+CERTIFICATE
Redaction Service ✓ Scoping call and document intake ✓ Written redaction protocol: categories, legal basis, decision rules ✓ Client whitelist — names and terms you supply are never redacted ✓ Attorney assessment of third-party data, privilege and trade secrets ✓ Irreversible redaction — text ✓ Metadata, comments, tracked changes and hidden layers stripped ✓ Page-level redaction log per document ✓ Encrypted delivery, agreed deletion schedule For teams that need the work done properly and defensibly your DPO, your board or your client.	+ Redaction Quality Check Confirmation ✓ Independent second-pass review by a second Cyberlegis reviewer ✓ Technical leakage tests: text layer, OCR layer, metadata, embedded objects ✓ Consistency check across the whole document ✓ Over-redaction check against the Art. 15 disclosure duty ✓ Written Quality Check Confirmation with findings and remediation record Four-eyes assurance you can put in front of your DPO, your board or your client.	+ GDPR Redaction Certificate ✓ Issued and signed by Robert Niedermeier, Attorney at Law, Munich ✓ Documents the redaction methodology actually applied ✓ States the legal basis per redaction category — Art. 15(4), Art. 5(1)(c) and (f), Art. 6, Art. 24, Art. 32 GDPR ✓ Records the QC steps performed and the date of issue ✓ Accountability evidence for supervisory authorities, courts and counterparties Where the redaction decision itself may have to be justified.

A redaction that can be undone is not a redaction. It is a disclosure with a delay.

CYBERLEGIS—REDACTIONASASERVICE

How an engagement runs

01	02	03	04	05
Scope Volume, formats, deadline and recipient are fixed. NDA and, where required, an Art. 28 GDPR data processing agreement are in place before any file moves.	Protocol We agree the redaction categories and the legal basis for each one in writing. Your whitelist of names and terms that must stay visible is agreed here.	Redaction Cyberlegis lawyers apply the protocol document by document. Judgment calls and borderline items are logged, not silently decided.	Quality check Levels 2 and 3: independent second reviewer plus technical leakage testing. Defects are remediated and the remediation is recorded.	Delivery Redacted set, redaction log, QC Confirmation and — at Level 3 — the signed GDPR Redaction Certificate. Source files deleted on the agreed date.

Why a law firm rather than a tool

Privileged handling

Your material sits with a German law firm bound by professional secrecy (§ 43a BRAO, § 203 StGB) — not with a service bureau.

Defensible, not just done

Every redaction category is tied to a written basis, so the response survives a complaint, an audit or cross-examination.

No subcontracting

The redaction is performed by Cyberlegis lawyers and legal staff.

Technical safeguards

True content removal — redacted text is deleted from the file, not masked



OCR and hidden text layers verified after flattening

Image and scan review for handwriting, stamps and signatures

Encrypted transfer and storage; EU or US processing location on request

The hard calls are legal calls

Whether a name in a DSAR file is third-party personal data or part of the requester's own data, and where Art. 15(4) stops disclosure, is a legal assessment. A tool cannot make that call and will not stand behind it.

One team, both sides of the Atlantic

GDPR and US disclosure practice handled together, with no hand-off between vendors.

Metadata, document properties, comments, tracked changes and revision history cleared

Embedded objects, hidden rows, columns and worksheets checked

Page-level audit log, exportable with the production

Defined retention and verified deletion at the end of the matter

Rush matters. DSAR clocks and disclosure deadlines do not move. Expedited handling is available for the one-month Art. 12(3) deadline, court dates and Art. 33 GDPR notification windows.

Engagement models



Per matter

Fixed fee based on volume, format and complexity



Per page

For large, homogeneous production sets



Retainer

Standing capacity for recurring DSAR and disclosure workload



Add-ons

QC Confirmation and GDPR Redaction Certificate quoted separately

Fees are quoted in advance in writing. Please contact us for a quotation.

Who signs the certificate

Robert Niedermeier

Attorney at Law (Rechtsanwalt)
CIPP/E · CIPT · CIPM · FIP
Owner, Cyberlegis — Munich

In practice since 1990 as attorney-at-law, counsel and external data protection officer, working across the legal, technical and organisational side of data protection and IT security. Member of the board of directors of the European Institute for Computer Anti-Virus Research (EICAR).