EU GDPR – 300 days to comply!

A Personal Data Challenge

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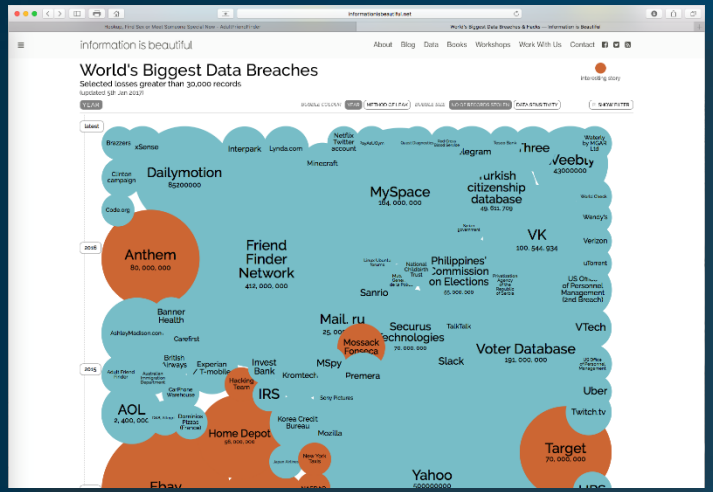
sas
THE POWER TO KNOW.

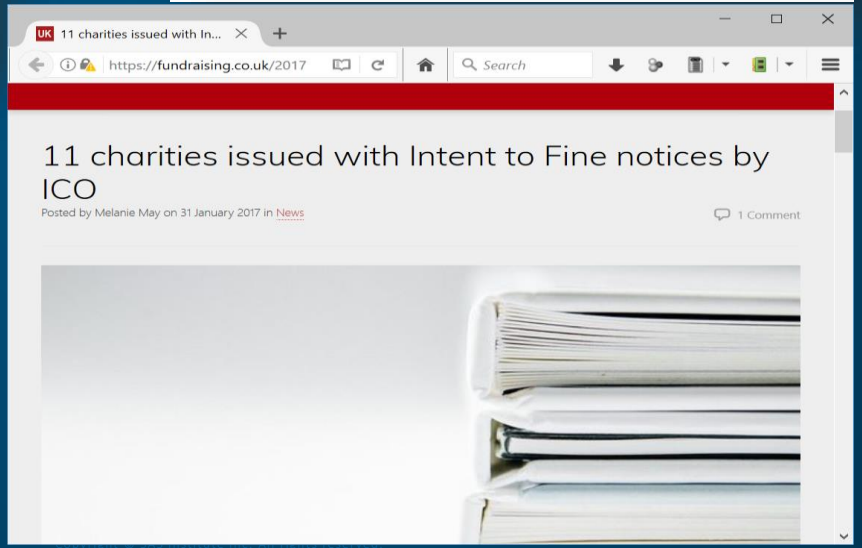
315 : 08 : 27 : 00

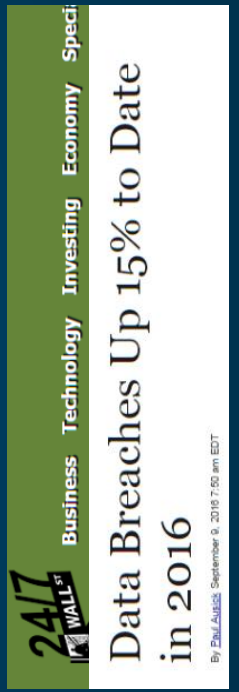
Business Days *Hours* *Minutes* *Seconds*



Ashley Madison – July 2015

- An infidelity website, got its 37 million users leaked to the public by hackers





EU GDPR

- The impact on your Data Strategy
- SAS Approach and Solution
- Where to start?

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66% of the 366 Global IT surveyed companies **were reviewing their business strategies** in Europe and **60% believe will be fined**, all as a result of GDPR !

Ovum, December 2015

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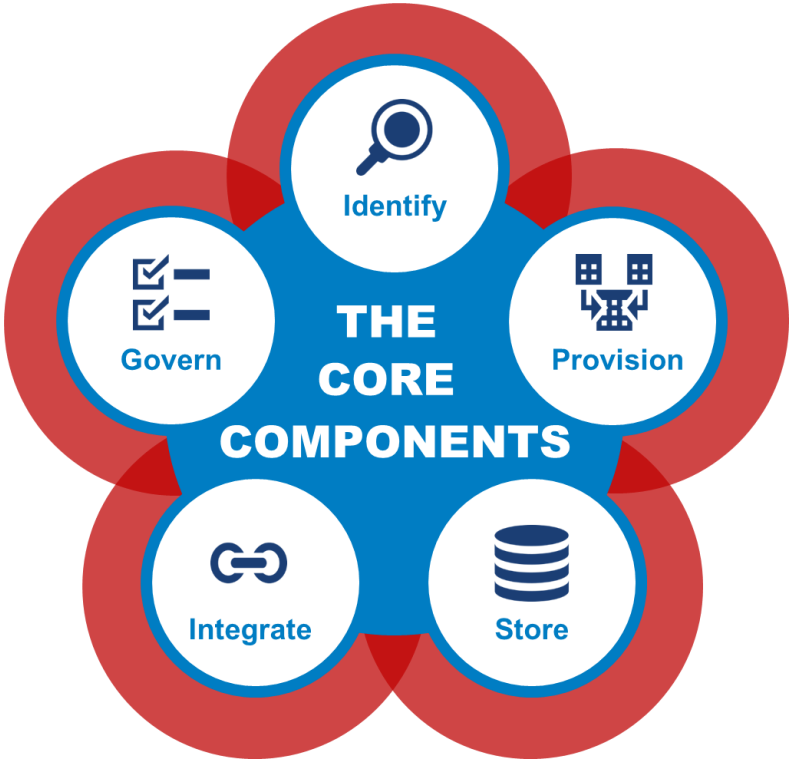
The 5 Components of a Data Strategy

The impact of the EU GDPR



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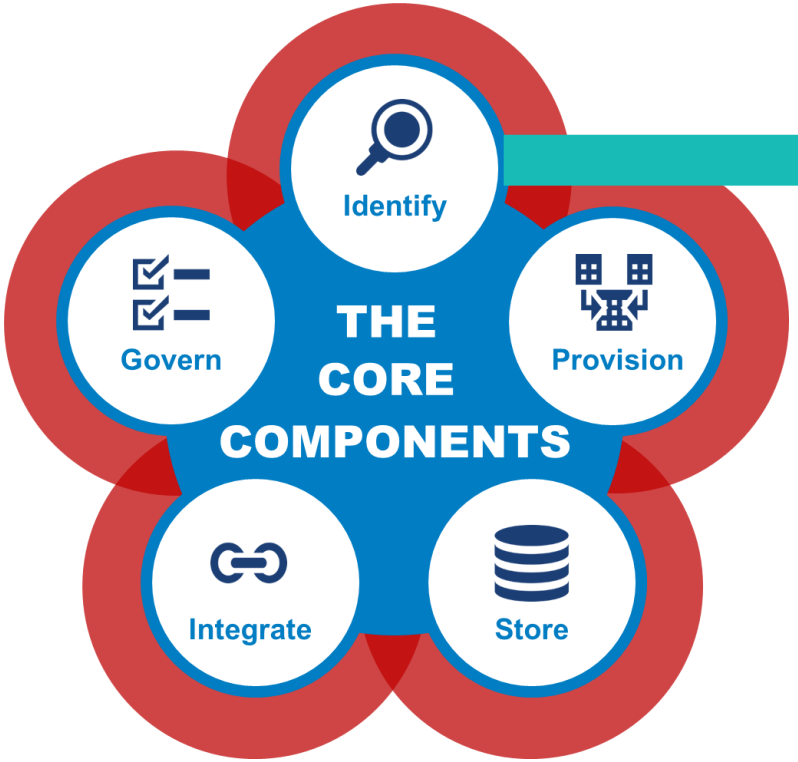
The 5 Components of a Data Strategy

The impact of the EU GDPR



- How to identify personal data across data sources?
  - Structured and un-structured
  - At rest and in motion
- How to assess risk exposure?

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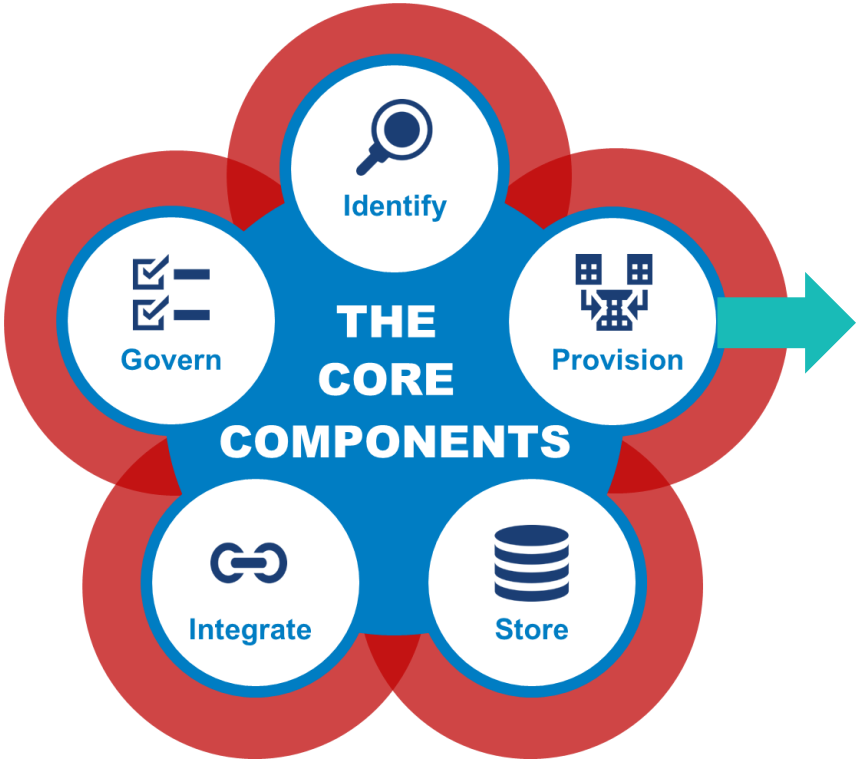
The 5 Components of a Data Strategy

The impact of the EU GDPR



- Who has access to what personal data? For what purpose? For how long?
- Do we have the consent of the individuals represented in data sets?
- How to protect the data based on users and context (anonymization, pseudonymisation, encryption)?

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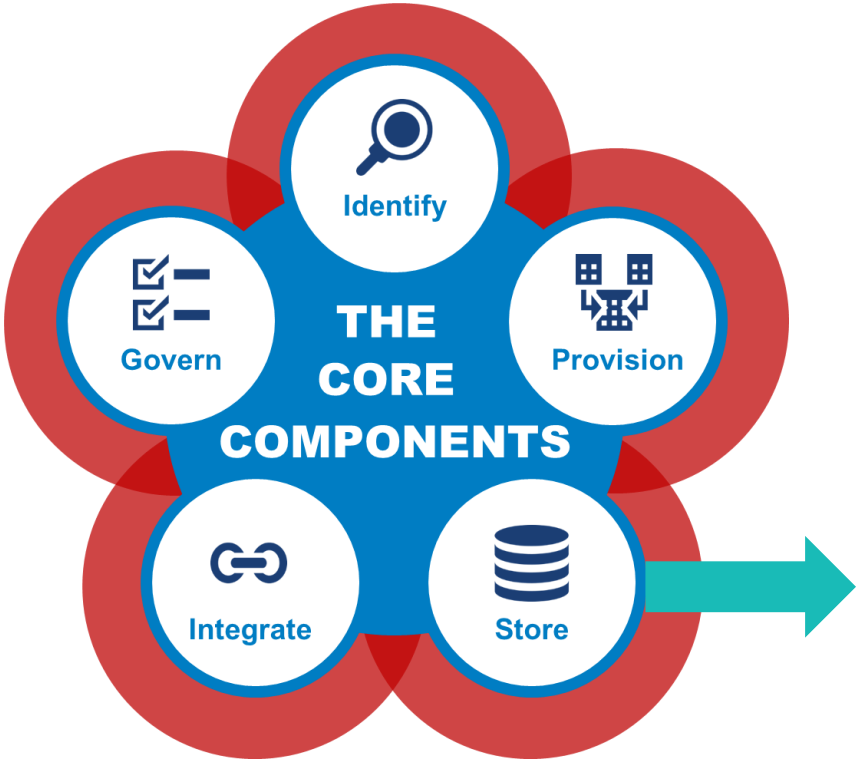
The 5 Components of a Data Strategy

The impact of the EU GDPR



- Where is personal data stored across data sources?
- What are the retention rules?
- What data is held about an individual?

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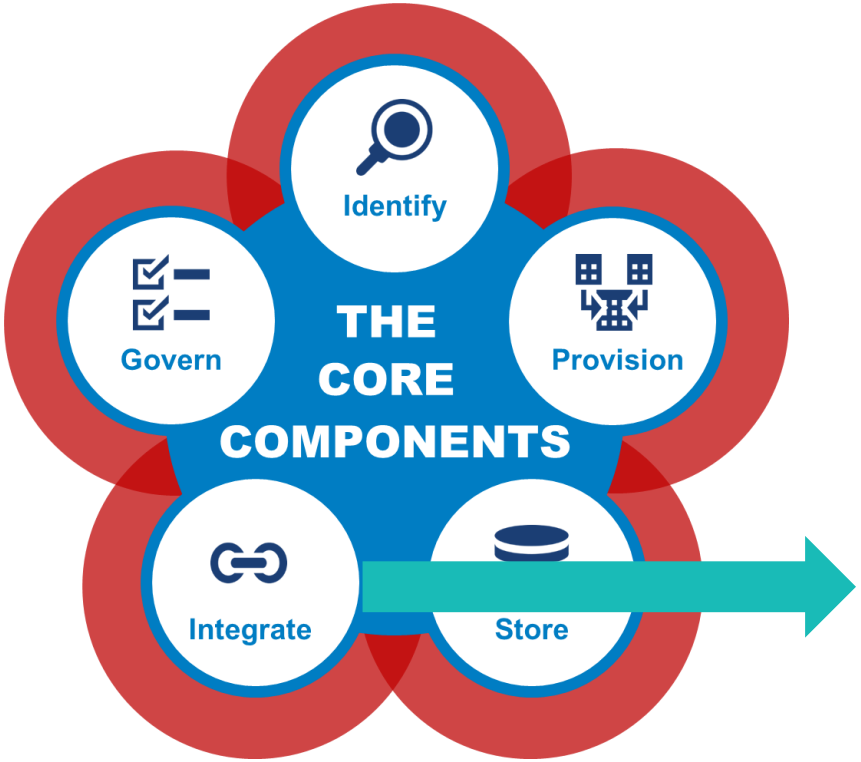
The 5 Components of a Data Strategy

The impact of the EU GDPR



- Where does personal data flow across systems/applications?
- How to ensure data portability?
- How to support right to be forgotten?

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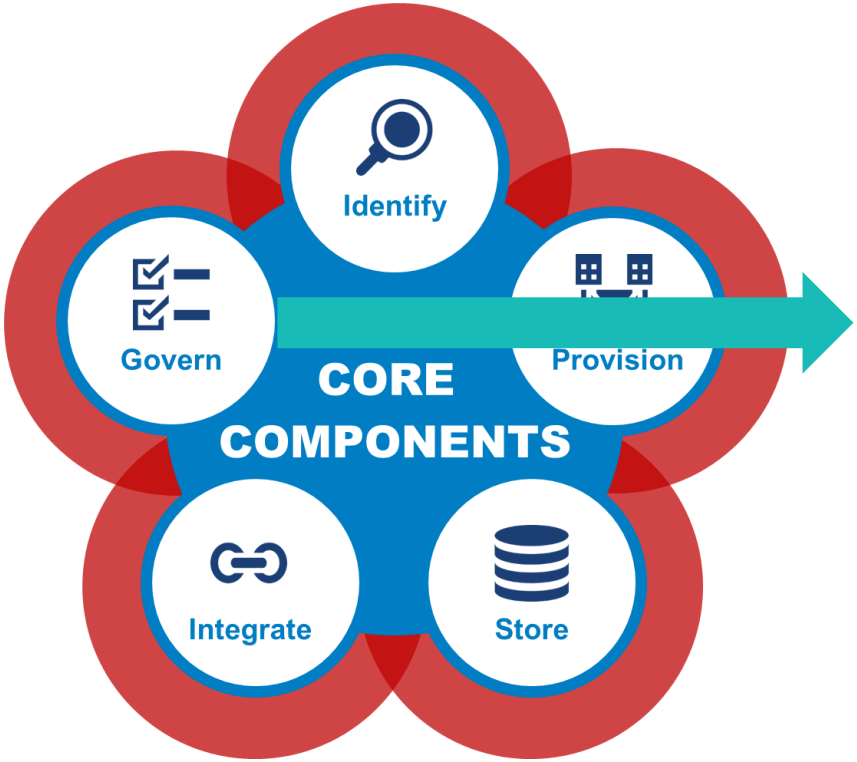
The 5 Components of a Data Strategy

The impact of the EU GDPR



- How to manage personal data lifecycle?
- What are the access rights for each user group?
- What consent do we have from individuals?
- How to report on compliance?

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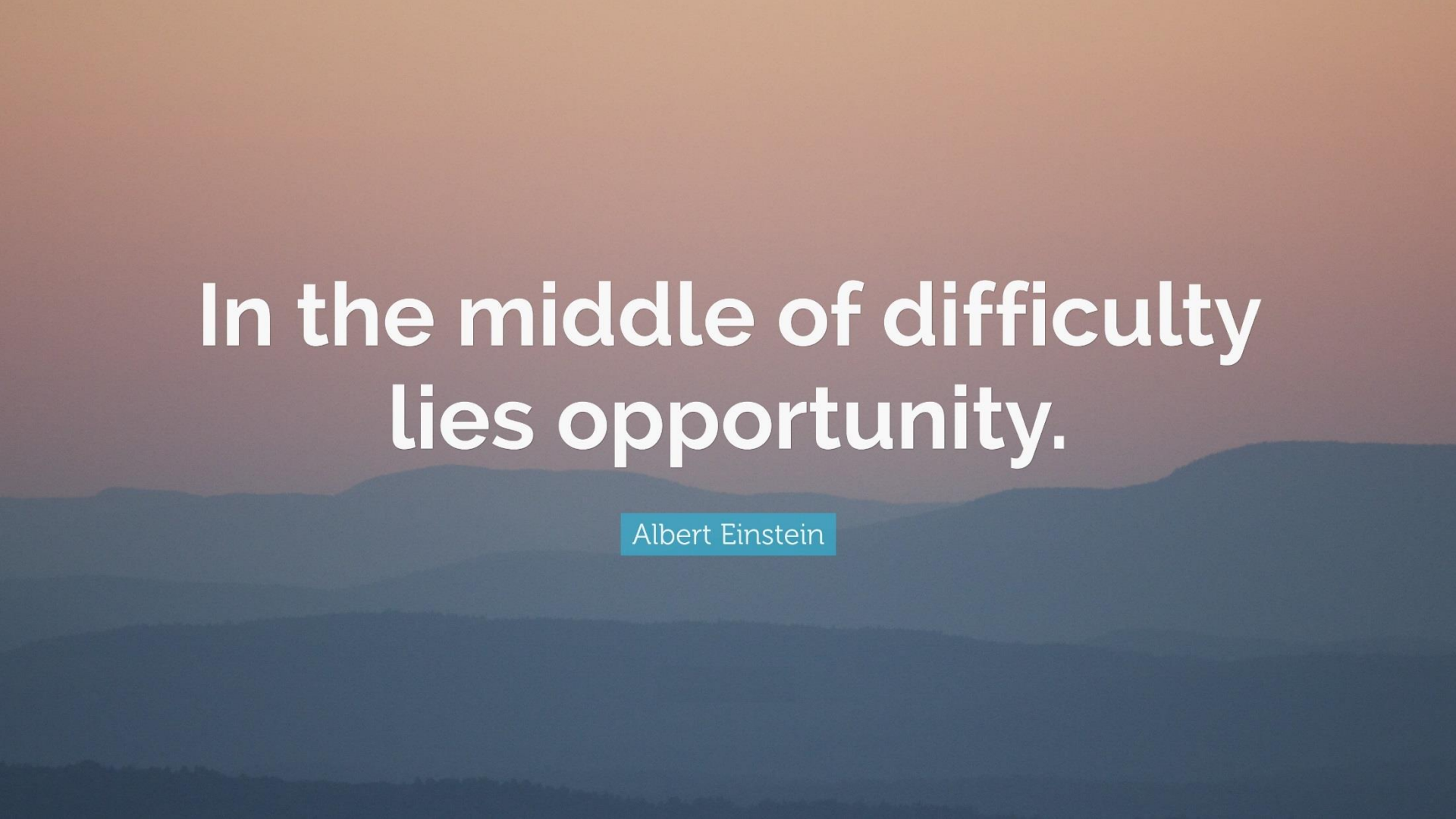
In the middle of difficulty lies opportunity.
Albert Einstein

5-Step Approach for Sustainable Compliance

ACCESS **IDENTIFY** **GOVERN** **PROTECT** **AUDIT**

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5-Step Approach for Sustainable Compliance

ACCESS IDENTIFY GOVERN PROTECT AUDIT

52% of all data stored is “dark data”

Source: Veritas

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Personal Data is in all kind of data sources

- Access to any kind of Relational and Non-Relational Sources
- Unstructured and Big Data Integration
- Apply Enterprise-wide Security Policies
- Simplify the Security & Governance effort

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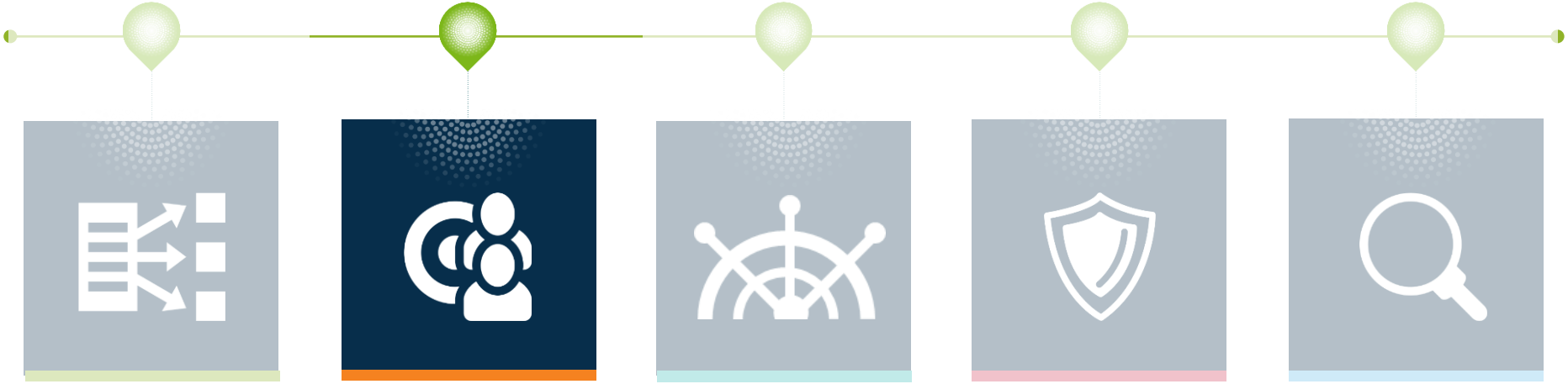
5-Step Approach for Sustainable Compliance



ACCESS **IDENTIFY** GOVERN PROTECT AUDIT

33% of all non "dark data" **is redundant, obsolete, or trivial**

Source: Veritas

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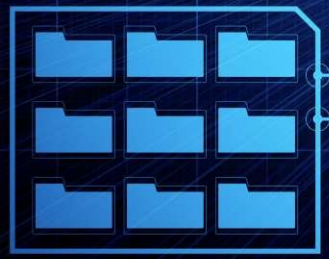
What is Personal Data

Confidential Data

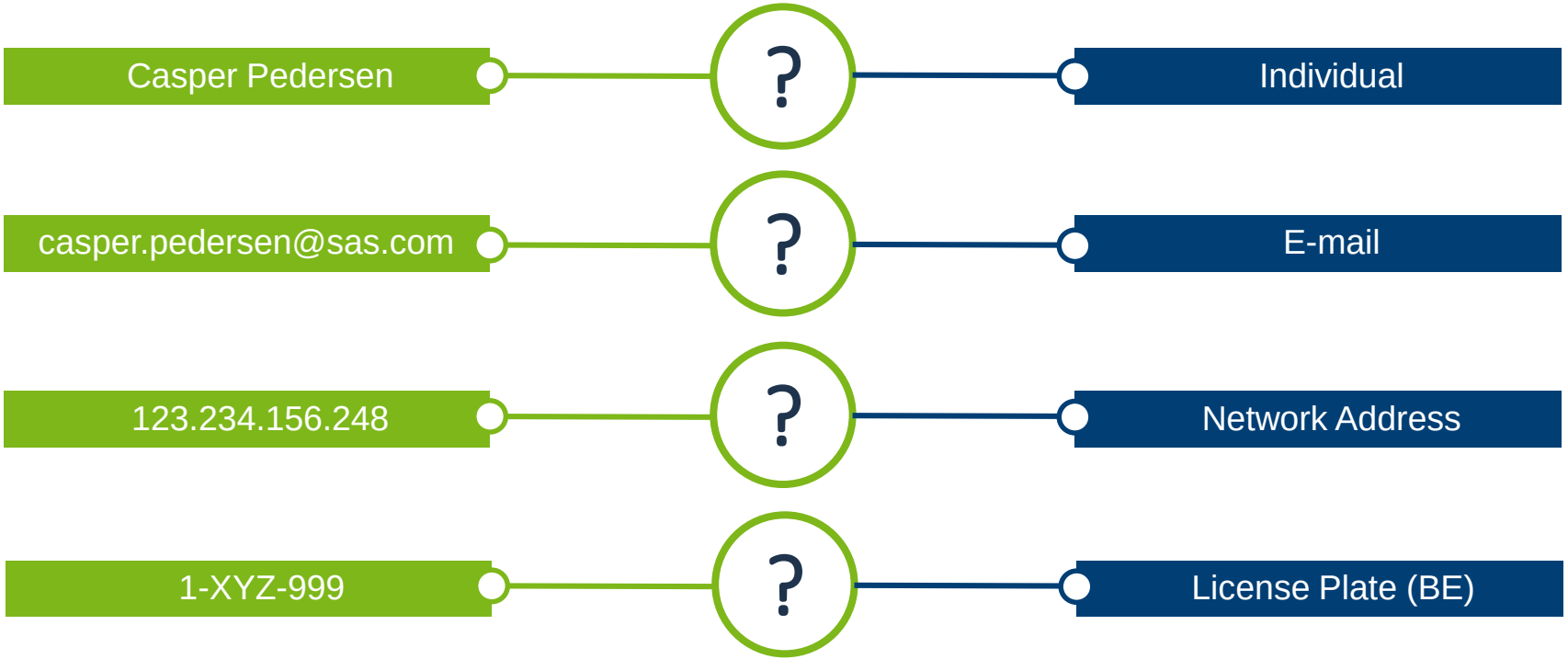


[Identify Person]

- Name
- Home Address
- Business Address
- Identity Card No
- Passport No
- Driving License
- Income Tax No
- Car Registration
- Other

Personal Data Identification Analysis

Categorize the Information



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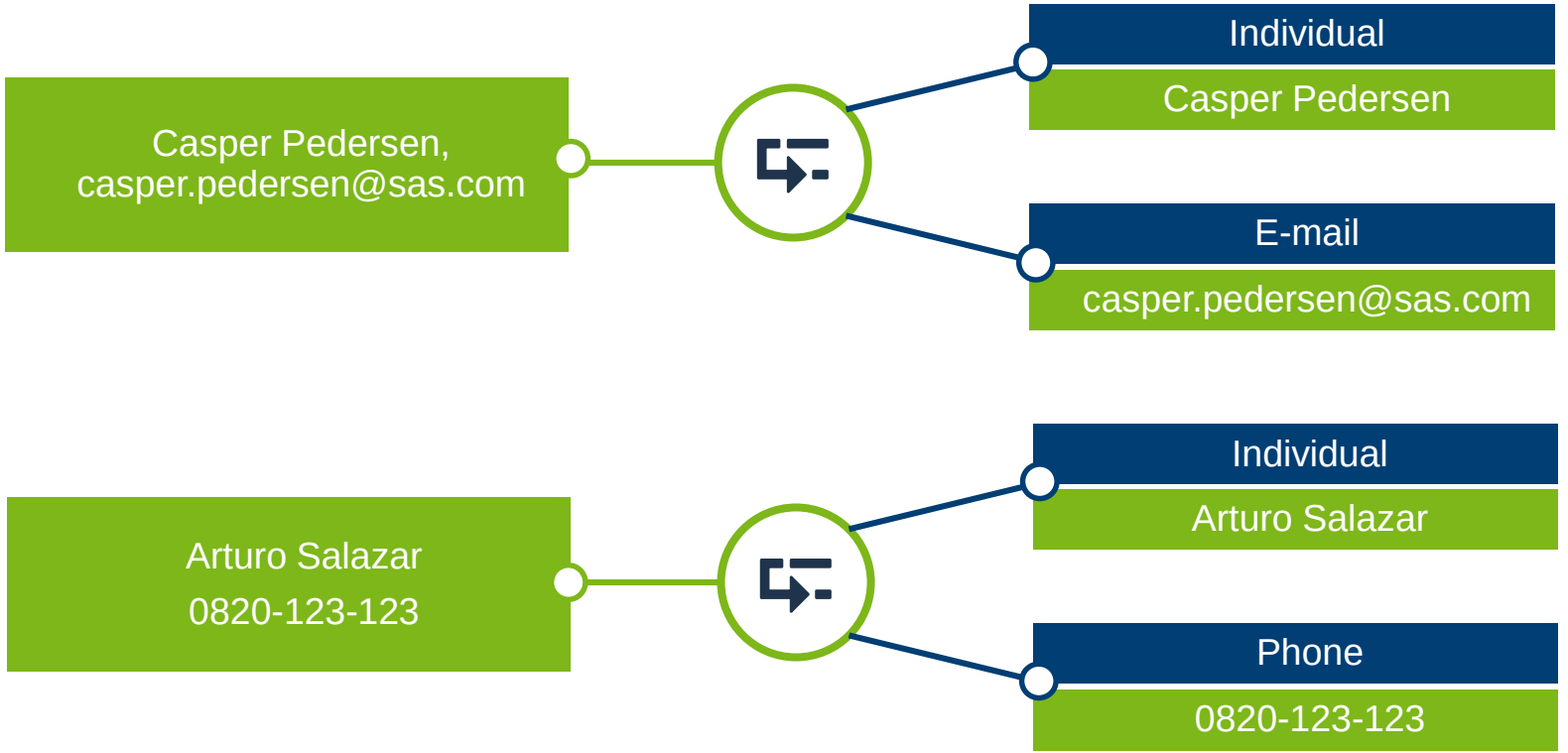
Personal Data Discovery

Extract Information to Personal Data Attributes



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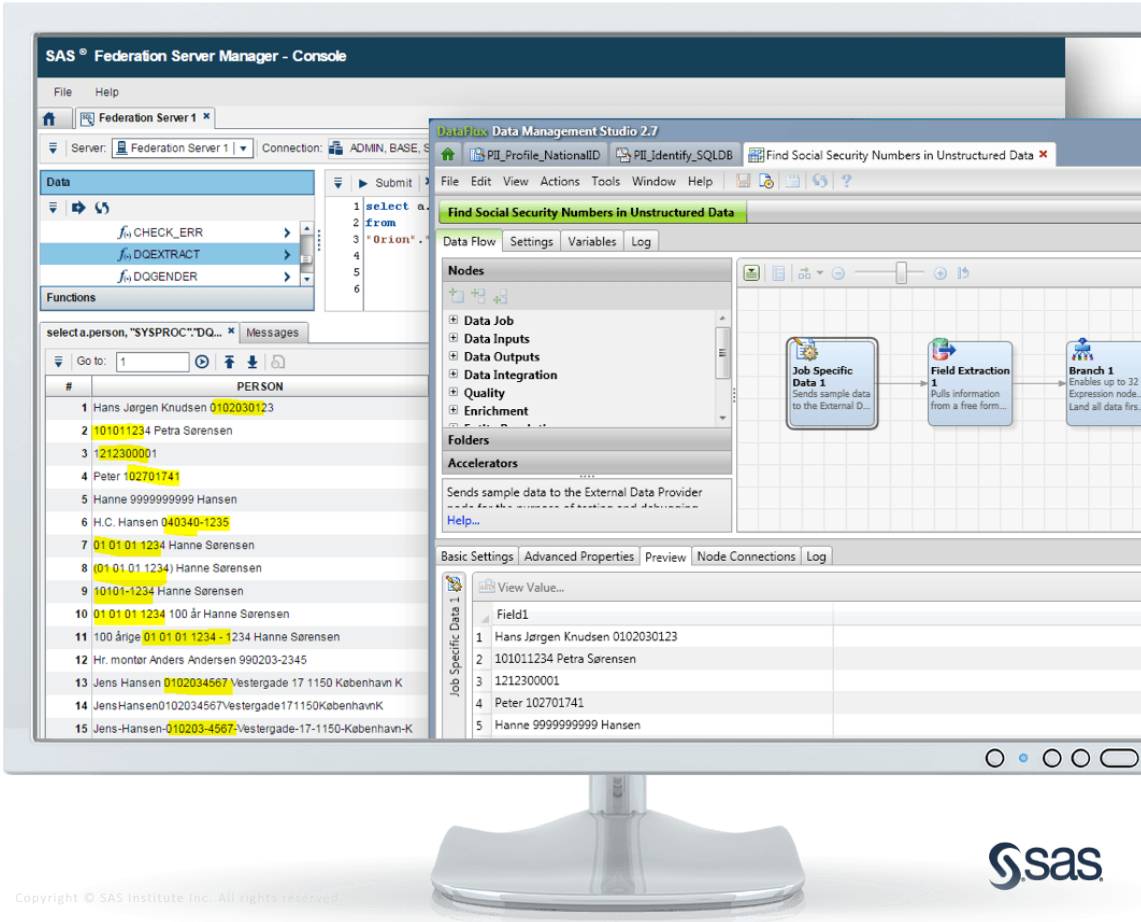
Personal Data Discovery

- Example: Extracting social security numbers using the Quality Knowledge Base for Personal Data.
- The same technique applies for **ALL** Personal Data Types …
- Easily find Personal Data where data is mixed and messy



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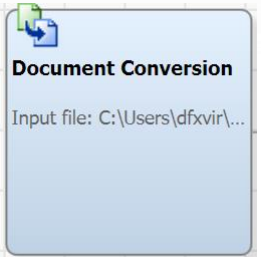
Find Personal Data in Unstructured Documents

Process

1

Convert Document into Readable Flow



2

Categorize & Extract Personal Data

3

Aggregate & Present Results

TAG	COUNT	FREQ	TOTAL
VEHICLE	1	0	22470
TITLE	164	0.73	22470
TIME_PERIOD	54	0.24	22470
PROP_MISC	9078	40.4	22470
PHONE	877	3.9	22470
PERSON	1356	6.03	22470
ORGANIZATION	520	2.31	22470
NOUN_GROUP	396	1.76	22470
MEASURE	4	0.02	22470
LOCATION	7915	35.22	22470
DATE	707	3.15	22470
COMPANY	410	1.82	22470
ADDRESS	988	4.4	22470

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Personal Data Extraction from Unstructured Documents

A very simple example

5-Step Approach for Sustainable Compliance

ACCESS | IDENTIFY | **GOVERN** | PROTECT | AUDIT

60% of the organisations <u>believe they will be fined</u>, all as a direct result of GDPR

Source: OVUM, Dec. 2105 (366 Global IT organisations)

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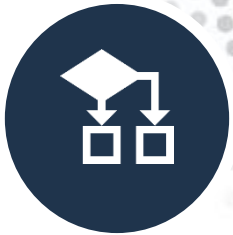
GDPR requires to leverage Personal Data as a corporate asset through the formal orchestration of

People

DPO, Processor, Controller, Subject, Accountability

Processes

Data Acquisition, Transfer, Analysis, Breach, Alteration, Destruction, Retention, Minimization, Consent Management



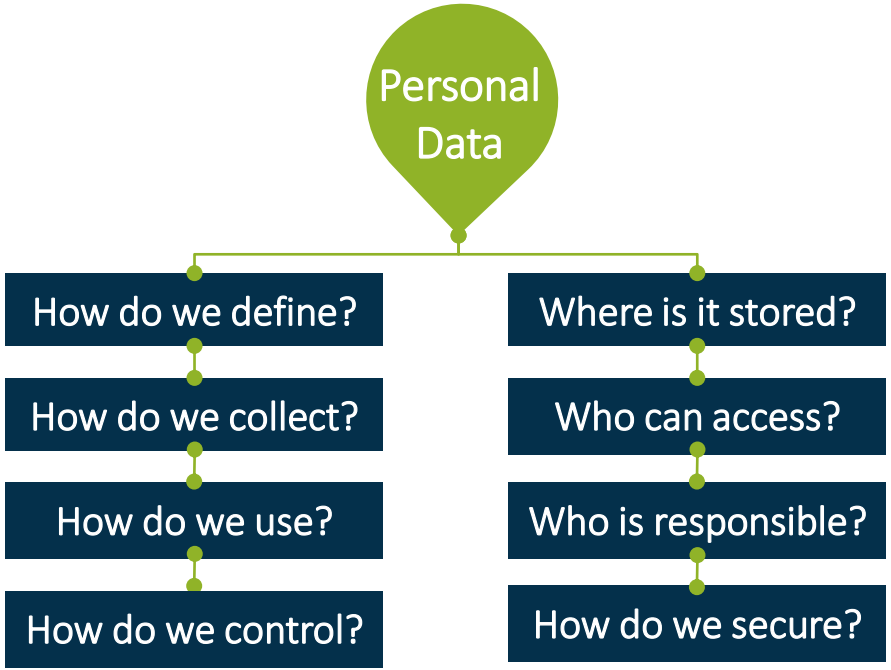
Technology

Data Access
Data Quality
Data Governance
Risk Management

sas

Defining Enterprise-wide Personal Data governance standards

- Document Personal Data and GRC terms definition and concepts between Business, Legal & IT
- Browser-based application to manage & document data standards
- Assign roles and responsibilities
- Collaboratively define business terms & data quality standards
  - Term hierarchies
  - Custom term attributes
  - Search terms
  - Security and authorizations
  - Versioning & roll back
  - Email notifications
  - 3rd Party Software Integration



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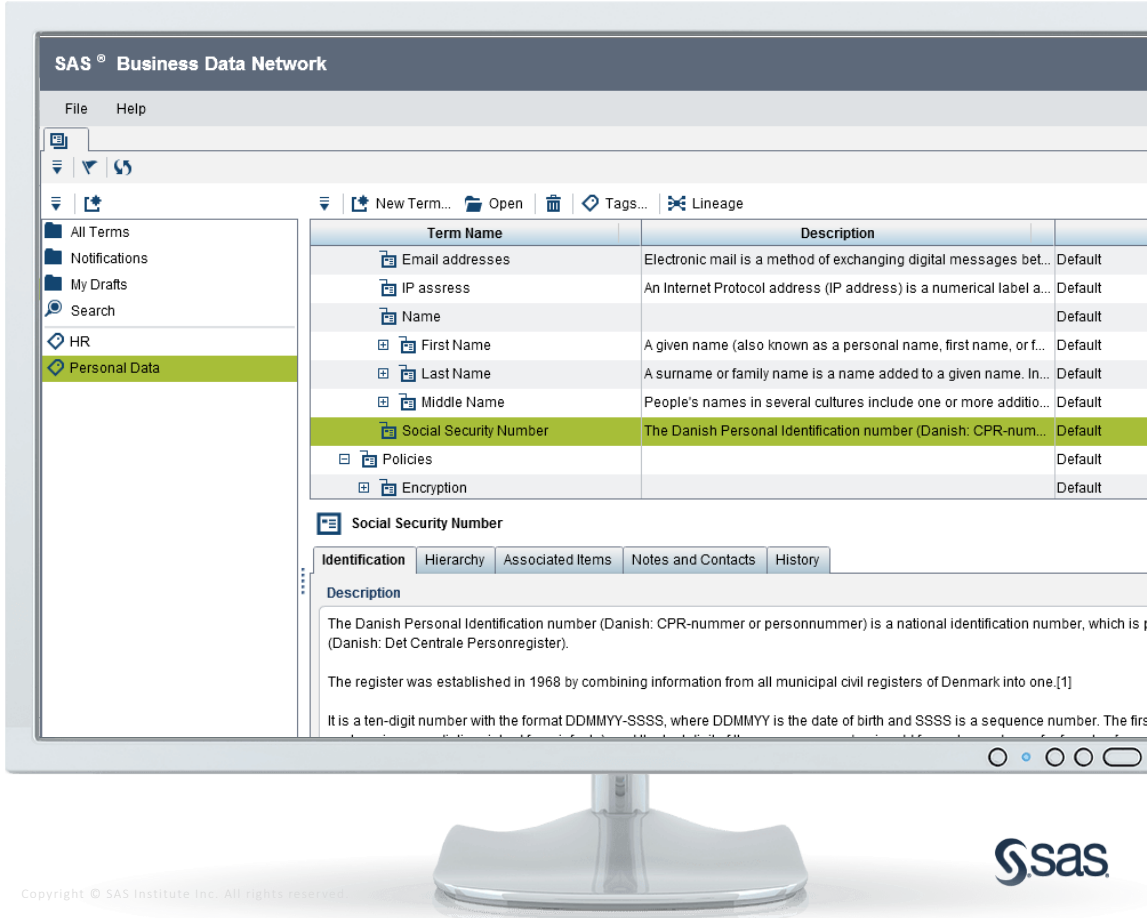
Defining and Govern What's Personal Data

- Automated Personal Data glossary
- Define Business Terms in order to align Business & IT
- Get a clear overview on roles & responsibility!



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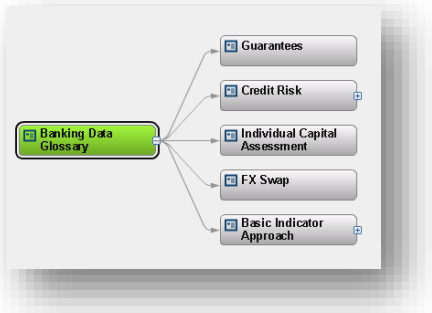
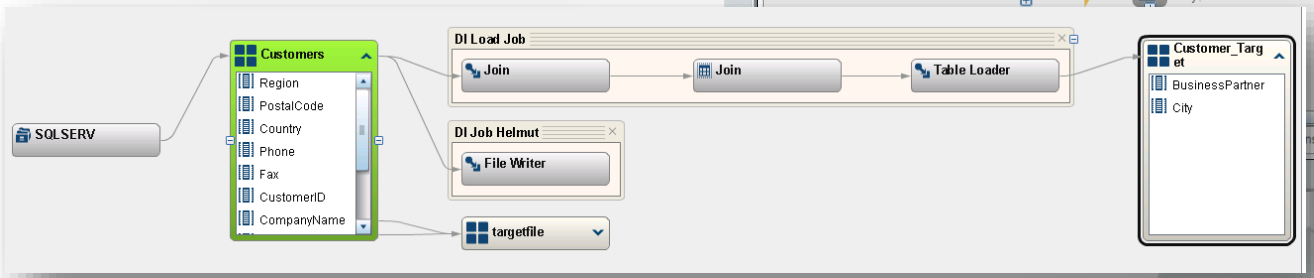
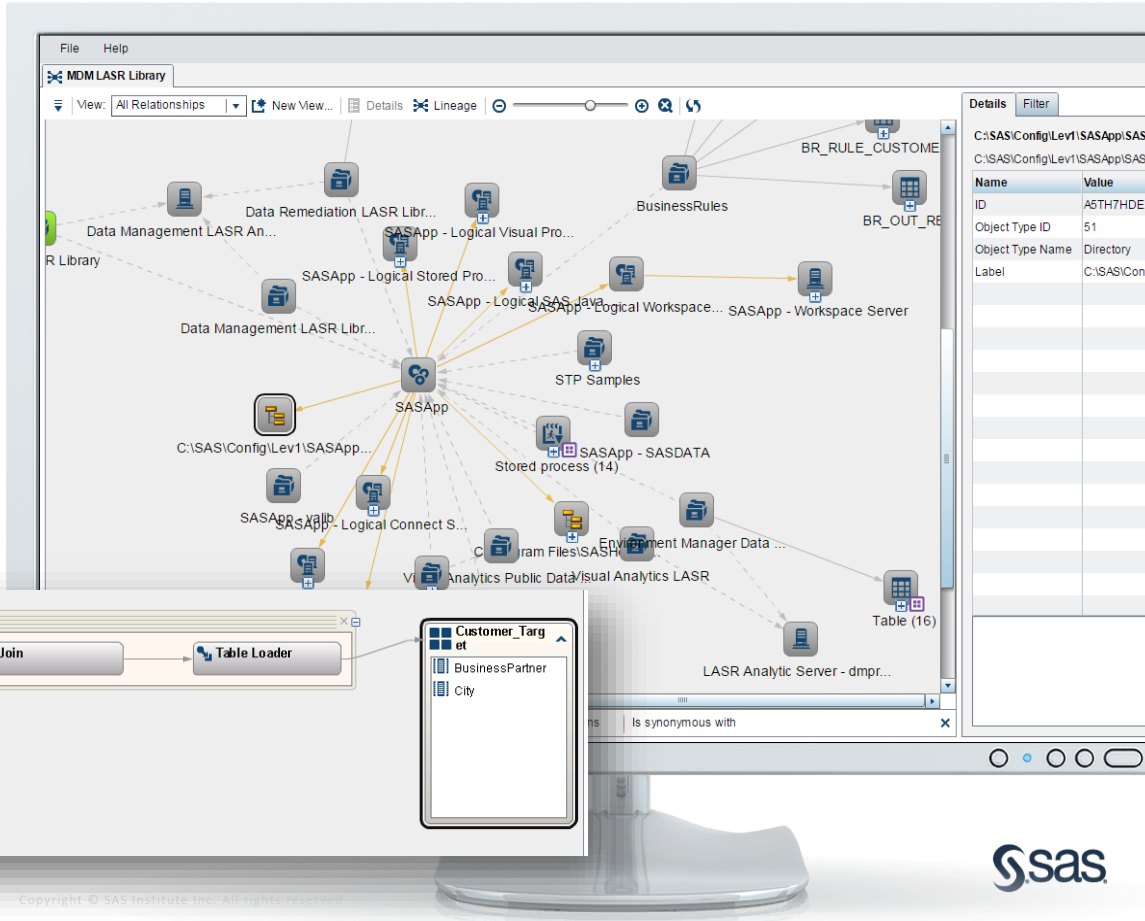
Defining and Govern Where's Personal Data

- Link Systems, Processes and Business Owners in data flows







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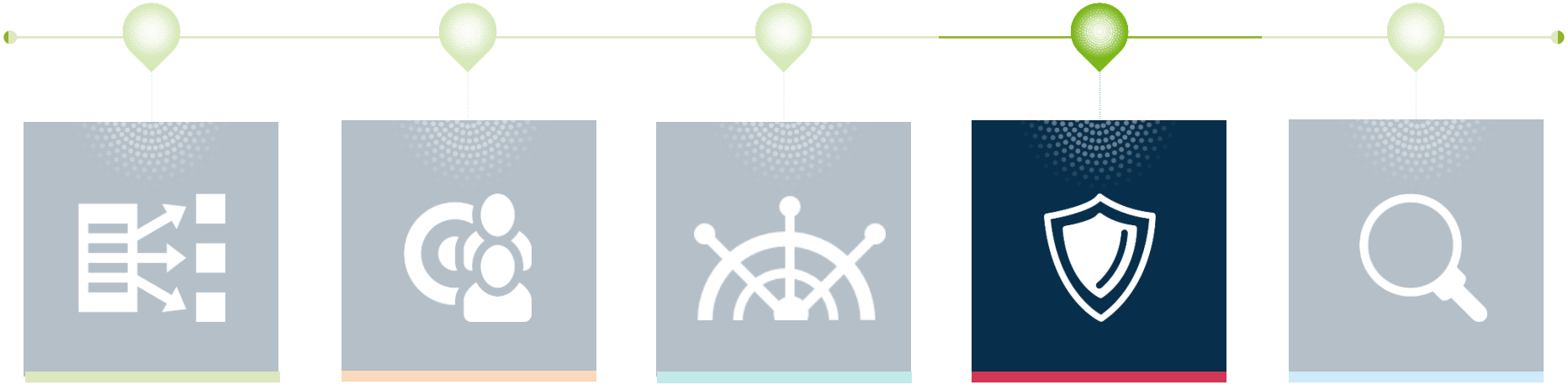
5-Step Approach for Sustainable Compliance



ACCESS IDENTIFY GOVERN **PROTECT** AUDIT

Among companies experiencing data breaches**, internal actors were responsible for more than 43% of data loss, nearly 50/50 between intentional and accidental**

Source: Intel, 2105

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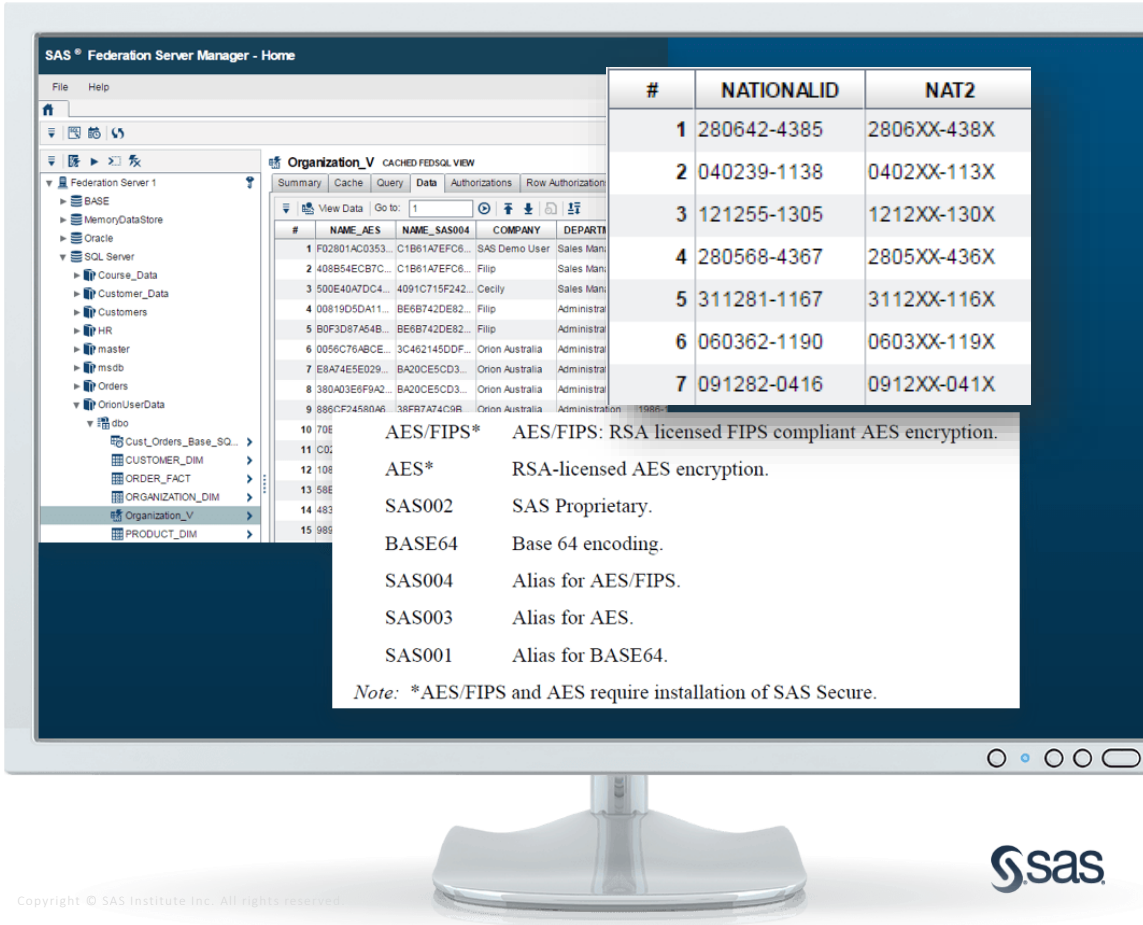
Securing Personal Data abstracting the data source

Implementing a Data Access Gateway providing:

- Anonymization (removing PD)
- Pseudonymization (replacing PD)
- Encryption (encoding PD)



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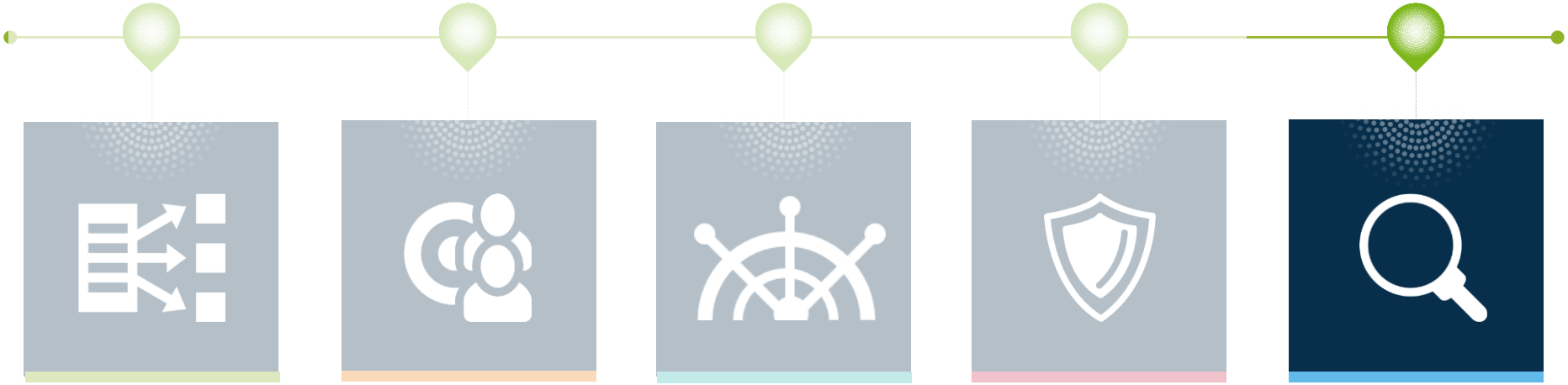
5-Step Approach for Sustainable Compliance



ACCESS IDENTIFY GOVERN PROTECT **AUDIT**

72 hours, is the time organisations have to report a breach.
A failure to report a breach, when required to do so, could result in a fine in addition to the fine for the breach itself.

Source: EU GDPR

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Monitoring and Reporting on Personal Data Access

- Log and monitor usage of personal data.
- Audit usage of personal data to demonstrate compliance with privacy controls.
- Managing Data Quality to ensure the effectiveness of compliance measures and processes.

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Monitoring and Reporting on Execution

- Monitor, Analyze and report on the effectiveness of compliance processes and controls
- Monitor, analyze and report to prove that personal data is not at risk.
- Monitor, analize and report on systems access, to detect eventual data breaches.

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5-Step Approach for Sustainable Compliance

ACCESS **IDENTIFY** **GOVERN** **PROTECT** **AUDIT**

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SAS for Personal Data Protection

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SAS for Personal Data Protection - Accelerator

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Why SAS?

Time & Cost	Open	Complete & Integrated	Solid DQ Foundation	Beyond compliance
• Pre-built GDPR assets based on proven technology • Quick Start Services & Partners	• Connect to any source, anywhere, anytime • Not a black box – the GDPR accelerator is expandable	• Centralized security management • Virtual user-based data access across many sources	• Proven Quality Knowledge Base available in most languages • Single view of individuals for effective consent management, right to be forgotten	• Building the foundation for sustainable data governance • Supporting data-driven initiatives for new business benefits

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What's next?

- **Resources**
  - SAS for GDPR Solution Brief
  - SAS 5-Step for GDPR Whitepaper
  - Webinar

- **Hands-on workshop**
  - Formalize needs
  - Identify challenges & gaps
  - Raise internal awareness
  - Experiment with SAS solution
  - Identify way forward

- **PS Quick Start Offering**
  - Kick-Off Workshop
  - Installation & basic configuration
  - Implementation for 1 data source
  - Coaching of your resources

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Thank you for your time and attention...

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