

GDPR

Creating Value with
General Data Protection
Regulation



La visión de IBM

Barcelona, 14 de Febrero



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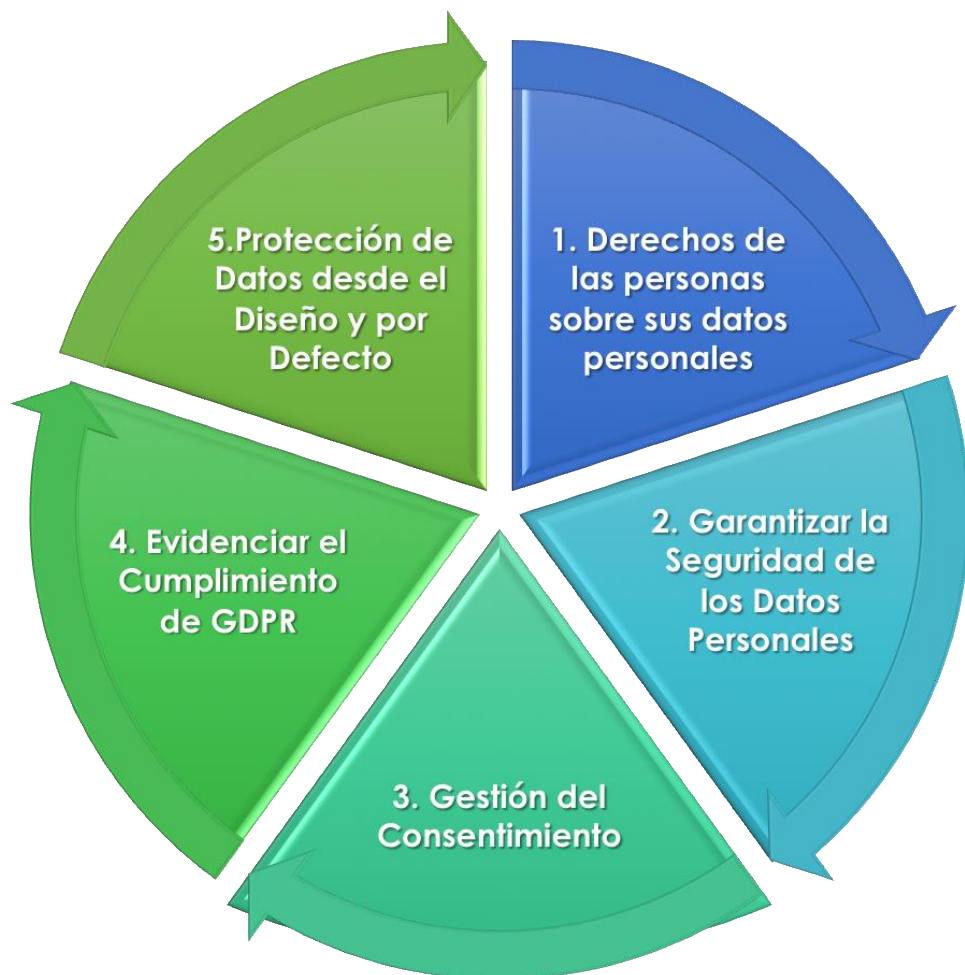
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- Any statements about project durations and prices are estimations without any legally binding effect and are subject to change or withdrawal without notice at IBM's sole discretion.

None of the statements contained herein constitutes legal guidance – it is process guidance only.

5 áreas clave de actuación ...



que impactan en todos los ámbitos de la organización



Gobierno



Personas, Comunicación & Reporting



Procesos



Gestión de Datos



Seguridad

Gestión del Consentimiento

- Obtención y
- Registro Histórico de cambios. No repudio
- Autoservicio para la gestión



Trazabilidad sobre los datos

- Quién
- Por qué / Para qué
- Cuándo / Dónde

Gestión de derechos ARCO + PL

- Acceso, Rectificación, Supresión ("olvido"), Oposición
- Portabilidad y Limitación de Uso



Ejecución de Derechos (Gobierno Dato)

- Catálogo
- Visión integrada de los datos
- Múltiples repositorios/entornos



Gestión de brechas de seguridad

- Registro de incidentes
- Coordinación con áreas de seguridad
- Auditoría & Forensics
- Resolución & Capitalización

Monitorización actividad de ficheros y bases de datos



Protección Auditoría, Monitorización y Trazabilidad

Protección



Bloqueo dinámico



Seudonimización



Concienciación



Evidenciar

Procesos

Gobierno / Dashboard

Medidas de Protección

Registro de Riesgos / EIPDs

Riesgos

Tratamientos

Registro de Tratamientos

Datos / Repositorios

Descubrimiento de datos

- Categorías de datos (multiidioma)
- Repositorios estructurados/ no estructurados y físicos
- Biblioteca de filtro de datos



"Por defecto" y "por diseño"

Análisis de Tratamientos

- Finalidad / Legitimación
- Información al titular
- Cesiones / transferencias
- Encargados / Proveedores
- Ciclo de vida / flujos

Análisis de Privacidad ...

- Derechos y Libertades
- Análisis de Impacto sobre Privacidad



... y de la Seguridad

- Bases de Datos
- Aplicaciones
- Infraestructuras





Decisión Tecnología



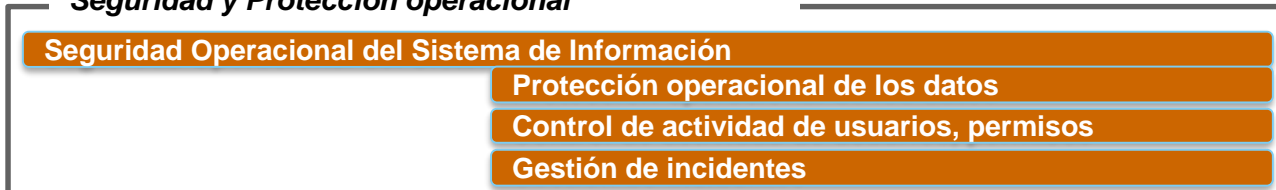
Gobierno, gestión del cambio, proceso

Inventario de conformidad – Registro de tratamiento & Plan de remediación/PIAs, Conservación de datos

Datos personales: análisis de riesgos y proceso de tratamiento



Seguridad y Protección operacional

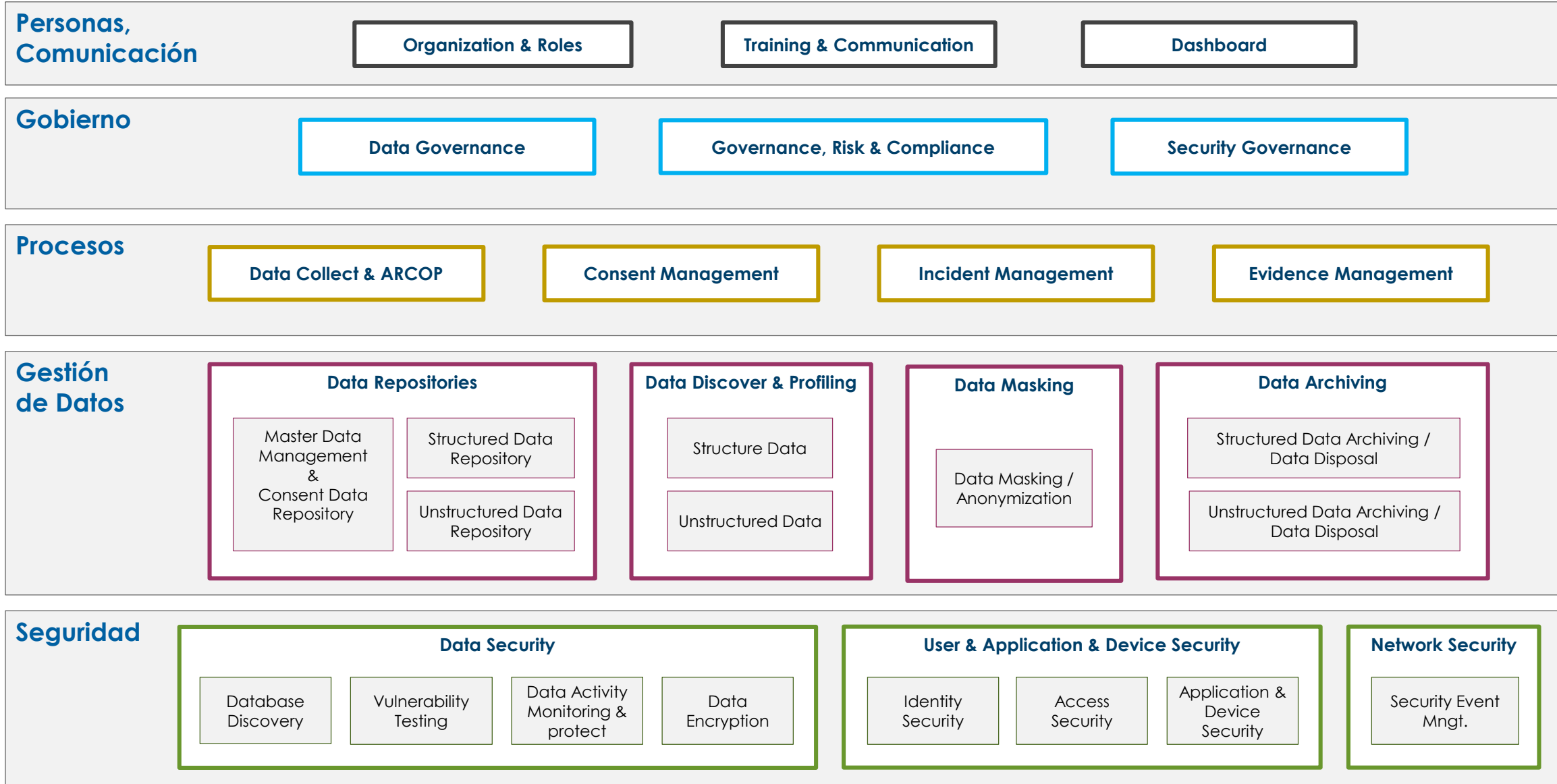


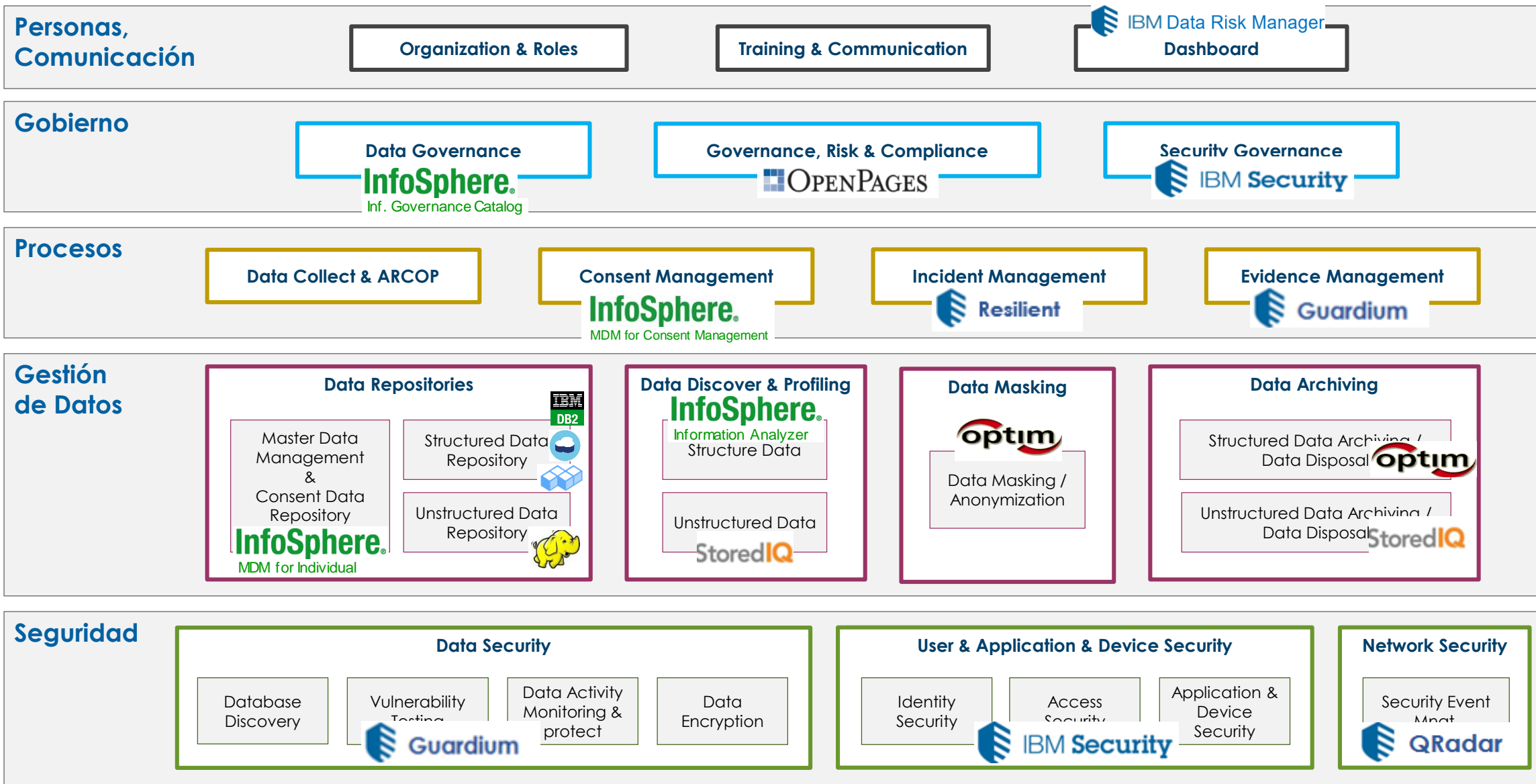
Consentimiento

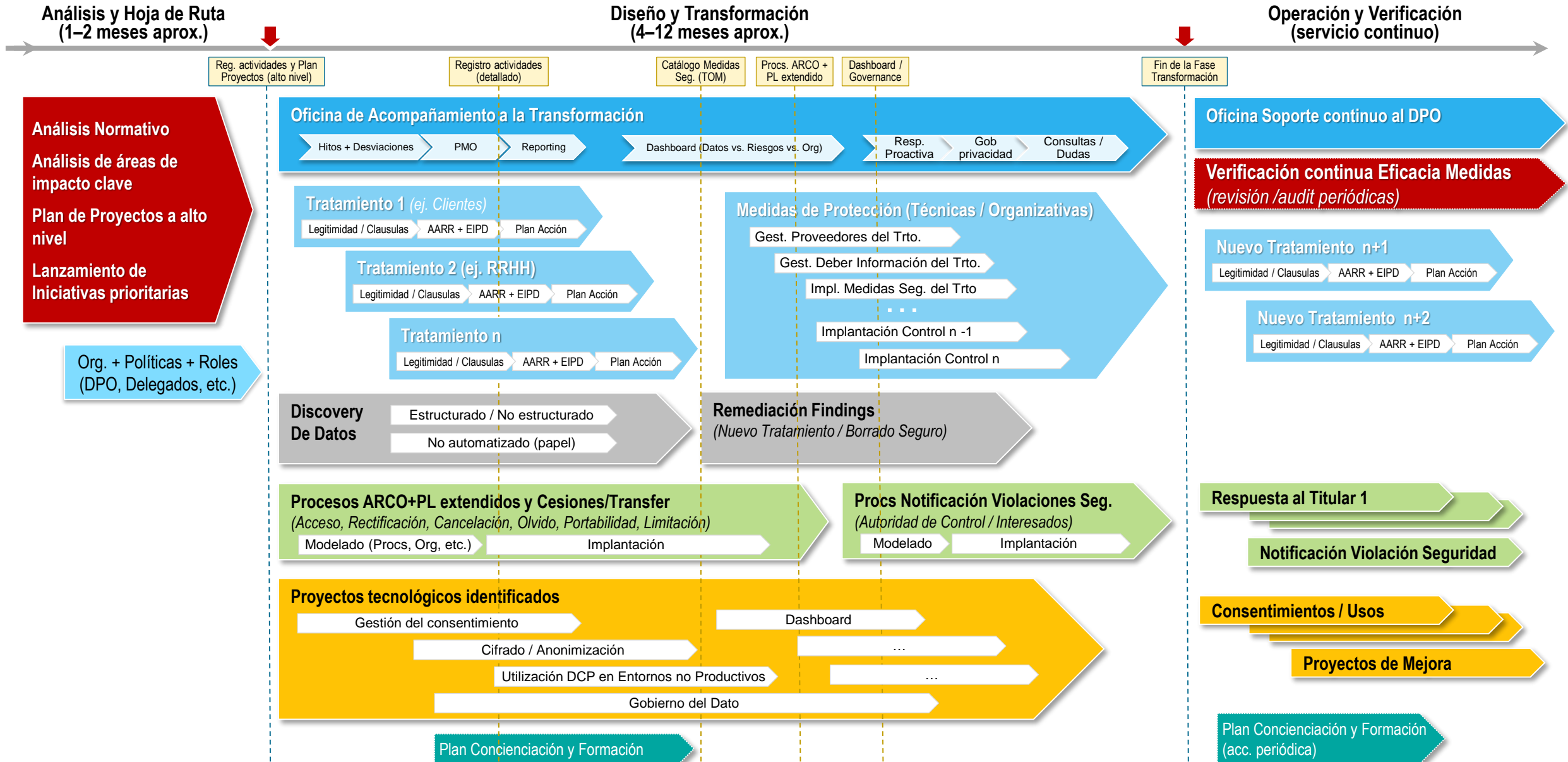


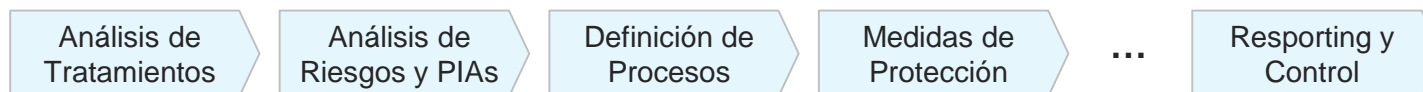
Privacidad por Diseño/ por defecto











- Y para comenzar, hay 4 puntos clave de actuación:



Localizar los Datos

- Descubrir, localizar y entender donde está la Información Sensible / P^{ersonal}.
- Estructurados y No Estructurados.

InfoSphere.
Information Analyzer
Governance Catalogue

StoredIQ

Asegurar los Datos

- Monitorizar accesos: Quién, Qué, Cuándo.
- Securar los datos: bloqueo, cifrado, etc.
- Vulnerabilidades en repositorios

 **IBM Guardium**

Gestión Consentimiento

- Captura
- Granularidad
- Propósito / Finalidad
- Derechos ARCO

InfoSphere.
MDM for Consent Management

1. Localización y Descubrimiento de Datos Personales



InfoSphere.
Information Analyzer
Governance Catalogue

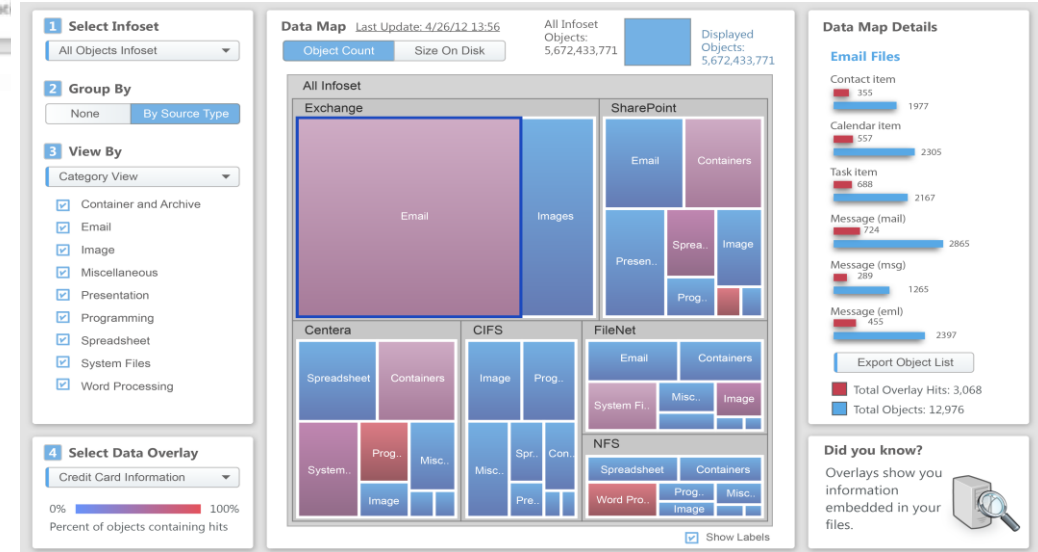
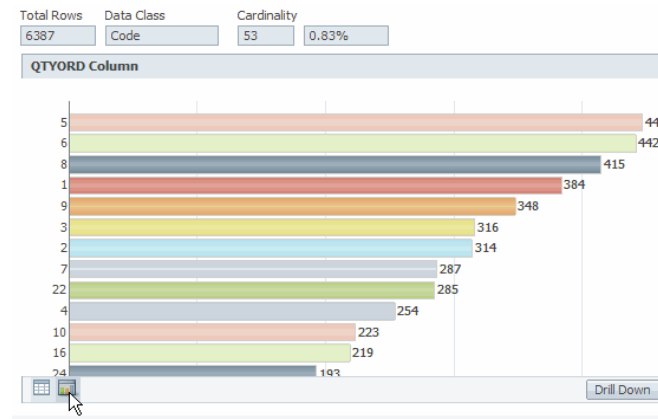
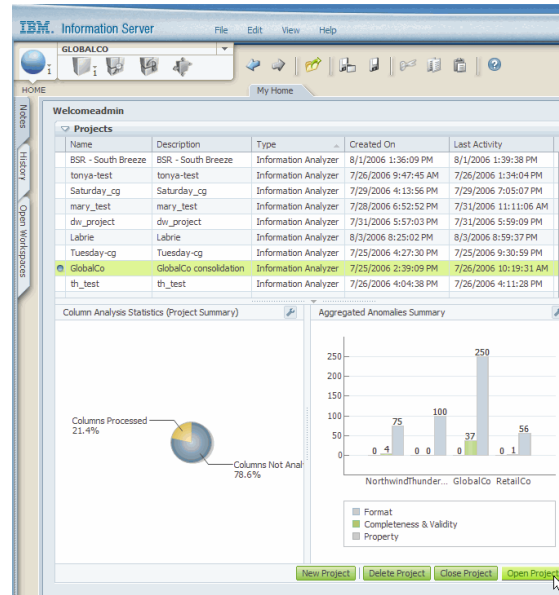
StoredIQ

GDPR Outcome

Rapidly discover the most common Personal data in all the usual places, avoiding internal time and resources trying to define and manage these rules; Ensuring IT can help other stakeholders reduce Risk and Cost of Discovery.

- Plug-in discovery accelerators to find a more extensive set of EU citizen personal data
- Maximising the use of RegEx strings
 - Leveraging Machine Learning Annotators to auto-discover personal data *entities* such as Names, Addresses, Countries that can't be defined or found by RegEx
 - Tailorable & extensible by clients

- Proven enterprise-scale capability to assess in-place the common sources and types of unstructured information
- Heatmap view to prioritise Where Personal information has been found
 - Actionable outcomes and exports of specific data types and files for remediation & mapping



2. Aseguramiento de los Datos Personales



GDPR Outcome

Monitor and audit access to personal data, detection and alerting of non-compliant access.

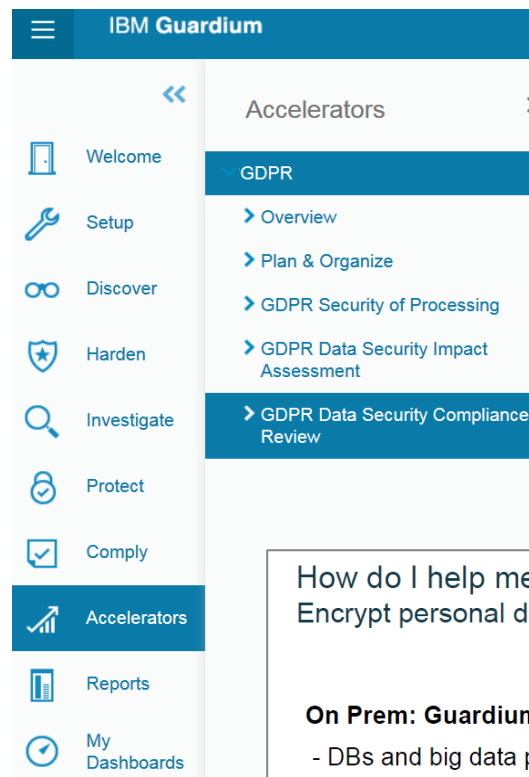
IBM® Security Guardium® Data Activity Monitor prevents unauthorized data access, alerts on changes or leaks to help ensure data integrity, automates compliance controls and protects against internal and external threats.

Continuous monitoring and real time security policies protect data across the enterprise, without changes or performance impact to data sources or applications.

Guardium Data Activity Monitor protects data wherever it resides, and centralizes risk controls and analytics with a scalable architecture that provides 100% visibility on data activity.

It supports the broadest set of data source types, and it is the market leader for big data security solutions.

- Monitor and audit all data activity—for all data platforms and protocols.
- Enforce security policies in real time—for all data access, change control and user activities.
- Create a centralized normalized repository of audit data—for enterprise compliance, reporting and forensics.
- Support heterogeneous data environments—all leading databases, data warehouses, files applications and operating systems, including big data environments (Hadoop and NoSQL).
- Feeds into QRadar , to allow correlation of data repositories and content store access events with infrastructure and application for a holistic view of system access.



Base de conocimiento predefinida mapeada con las obligaciones GDPR (Artículos) que incluye:

- Descubrimiento y clasificación de datos personales
- Identificar y remediar vulnerabilidades
- Informes de monitorización y auditoría en tiempo real para datos personales GDPR
- Políticas y grupos predefinidos para datos personales GDPR
- Flujos de procesos para cumplimiento
- Paneles para auditores, controllers y DPOs

How do I help meet GDPR Article 32, Security of processing? Encrypt personal data with Guardium Encryption

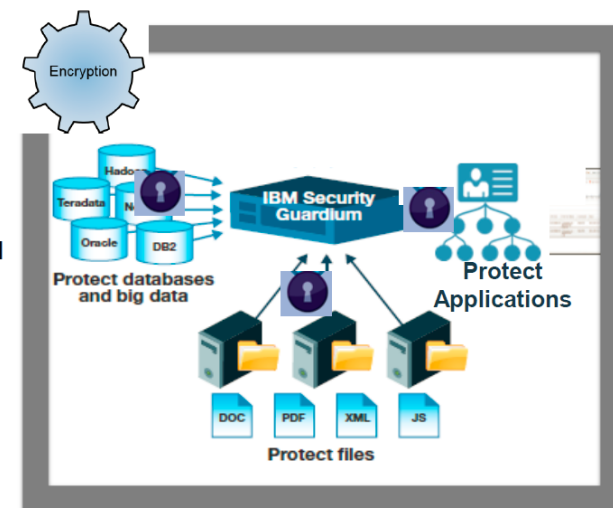
On Prem: Guardium Data Encryption

- DBs and big data platforms
- Files and folders
- Applications
- Supports separation of duties

On Cloud (NEW!): Guardium Multi-Cloud Encryption (MDE) <http://ibm.biz/Bds7jt>

- Safeguards data from misuse on single cloud, multiple clouds, or hybrid environments

For Key Management: IBM Security Key Lifecycle Manager (SKLM) securely distributes keys across complex encryption landscapes



3. Gestión del Consentimiento



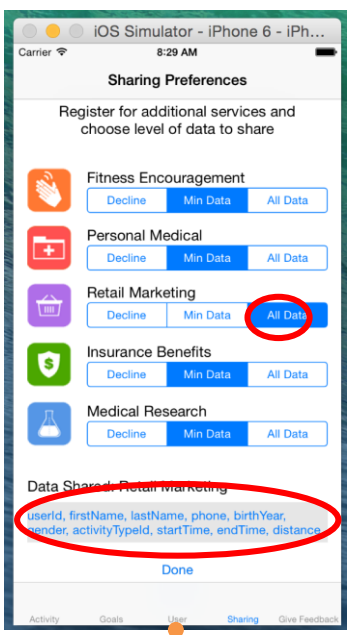
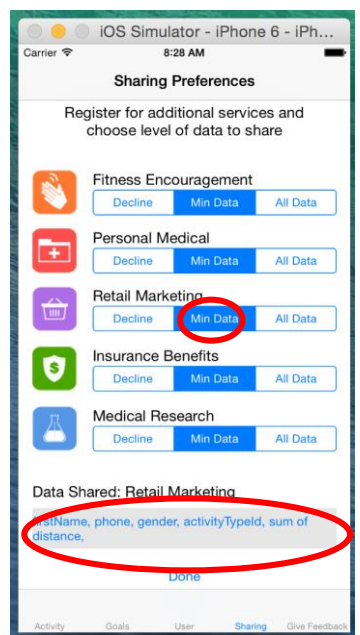
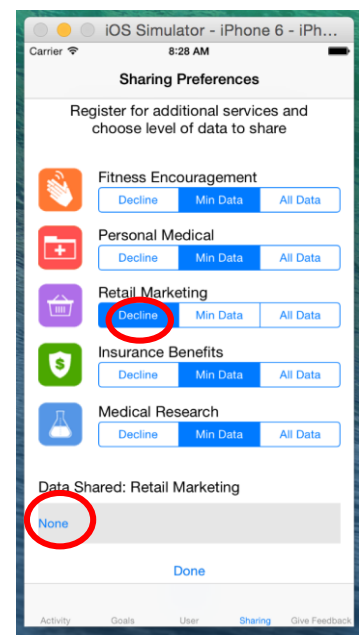
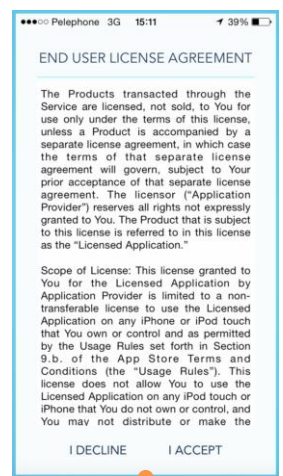
InfoSphere.
Consent Manager Asset
MDM for Consent Management

GDPR Outcome

Where required, explicit transparent Purposeful Consent of any personal data categories is available for citizen and processors to trust and understand how it can be and is used.

Consent Service providing framework for obtaining, maintaining and applying where specific consent is required for some GDPR data processing, away from the current blanket single consent commonly imposed.

Supports any categories of Consent or Sharing preferences for citizens, flexible and changeable by them at any time. Each is more granular, specific for each Purpose and clearly conveys What data is related to that consented purpose.



Grouping of global vs. detailed consent, by consent type, consent type hierarchies and/or combinations

Grouping of global vs. detailed consent, by consent type or combinations

InfoSphere MDM Consent Management

Search criteria > Search results > Malcolm Johnson

| | | | |
|---------------------|---------------------------------|-----------------------------|----------------------------------|
| Given name: Malcolm | Home telephone: +1 212 645 2367 | Gender: Male | Primary residence: 51 5th Avenue |
| Middle name: | Business email: johnson@ibm.com | Date of birth: Jul 06, 1952 | City: 10003 New York |
| Surname: Johnson | Social Security: 345-22-5689 | Marital status: Married | State / Province: New York |

Person

Marketing

Purpose: Provide marketing material to customers via emails, telephone calls or mail. This description could be very long and contain a lot of details which we can't fully display here, that's why we provide the link to the full spec in IGC here. [Open the full specification in IGC.](#)

Consent granted: Yes No
 Granted from: Jun 13, 2107
 Granted until:
 Last updated on: Jul 02, 2017
 Updated by: John S.

Regulated by: European GDPR US National Privacy Regulations

Analytics

Purpose: Use and users' location data to discover usage patterns. This description could also be very long and contain a lot of details which we can't fully display here, that's why we provide the link to the full spec in IGC here. [Open the full specification in IGC.](#)

Consent granted: Yes No
 Granted from: Jun 13, 2107
 Granted until:
 Last updated on: Jul 02, 2017
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Applied conditions:

Restricted to: Contract type

Description: This consent allows to use geolocation services tied to the Weather Company app on my mobile phone to do real time marketing based on geolocation information. See full description.

Valid from: Jun 13, 2107 Valid until: Jun 13, 2107 Last updated on: Jul 02, 2017 Updated by: John S.

Restricted to: LOBs Download related CSV file.

Description: This consent condition contains the list of LOBs for which the consent has been approved for. See full description.

Valid from: Jun 13, 2107 Valid until: Jun 13, 2107 Last updated on: Jul 02, 2017 Updated by: John S.

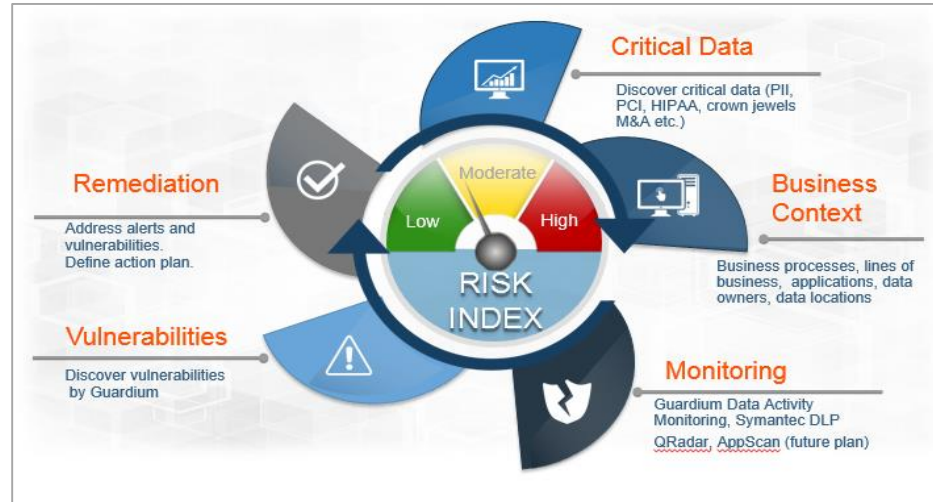
- A Consent Management Solution hence is comprised of 3 building blocks:**
- Define GDPR including consent
 - Capture and maintain consent for individuals
 - Enforce consent in application systems

4. Data Risk Dashboard



GDPR Outcome

iDNA – an Integrated Platform for Business Data Risk. The IBM Data Risk Manager provides visibility to potential risks enabling proactive measures to be applied.



What you don't know *can* hurt you:

- the i-DNA solution provides visibility to potential risks and enables proactive measures to be applied.
- the i-DNA have visibility into critical data.

Visibility into critical data, its residency, controls in place, business usage and potential risks.

... in addition to providing insight into roles and responsibilities across the data lifecycle and ability to view data flows

Prevent, detect and respond to advanced threats:

- Allows early visibility into potential risks to sensitive data
- Identifies specific, high-value business-sensitive data at risk from internal or external threats
- Provides a complete view of sensitive data
- Delivers value and meaning to business executives with a unique, easy-to-understand dashboard
- Enables the right conversations with IT, Security, and LOB teams to improve business processes and mitigate risks

RW Sensitive Data Discovery and Classification

Information Asset Portfolio: Customer Information

Infrastructure: MySQL (Alerts: 480)

Consumers: AutoPro MRP, ClaimPro

Stakeholders: Ed Donahue, Frank O'Connor

Business Context and Data Flows: Claims Registration Data Flow, Claims Analytics

Message Dashboard: Incidents, Notifications, Tasks

Which lines of business have the highest risk?

Are the "Crown Jewels" classified & protected?

Where does critical data reside? – Data centers and Geo's

What applications & processes access & use them?

Who are the owners of sensitive data?

What compliance issues do we have & remediation action items?