



Information Privacy and Security

GDPR is Just the Tip
of the Iceberg

by John Mancini and Andrew Pery

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AIIM has been an advocate and supporter of information professionals for nearly 70 years. The association mission is to ensure that information professionals understand the current and future challenges of managing information assets in an era of social, mobile, cloud and big data.

AIIM builds on a strong heritage of research and member service. Today, AIIM is a global, non-profit organization that provides independent research, education and certification programs to information professionals. AIIM represents the entire information management community: practitioners, technology suppliers, integrators and consultants.

AIIM runs training programs — including programs on privacy and governance — which can be found at <http://www.aiim.org/Training>

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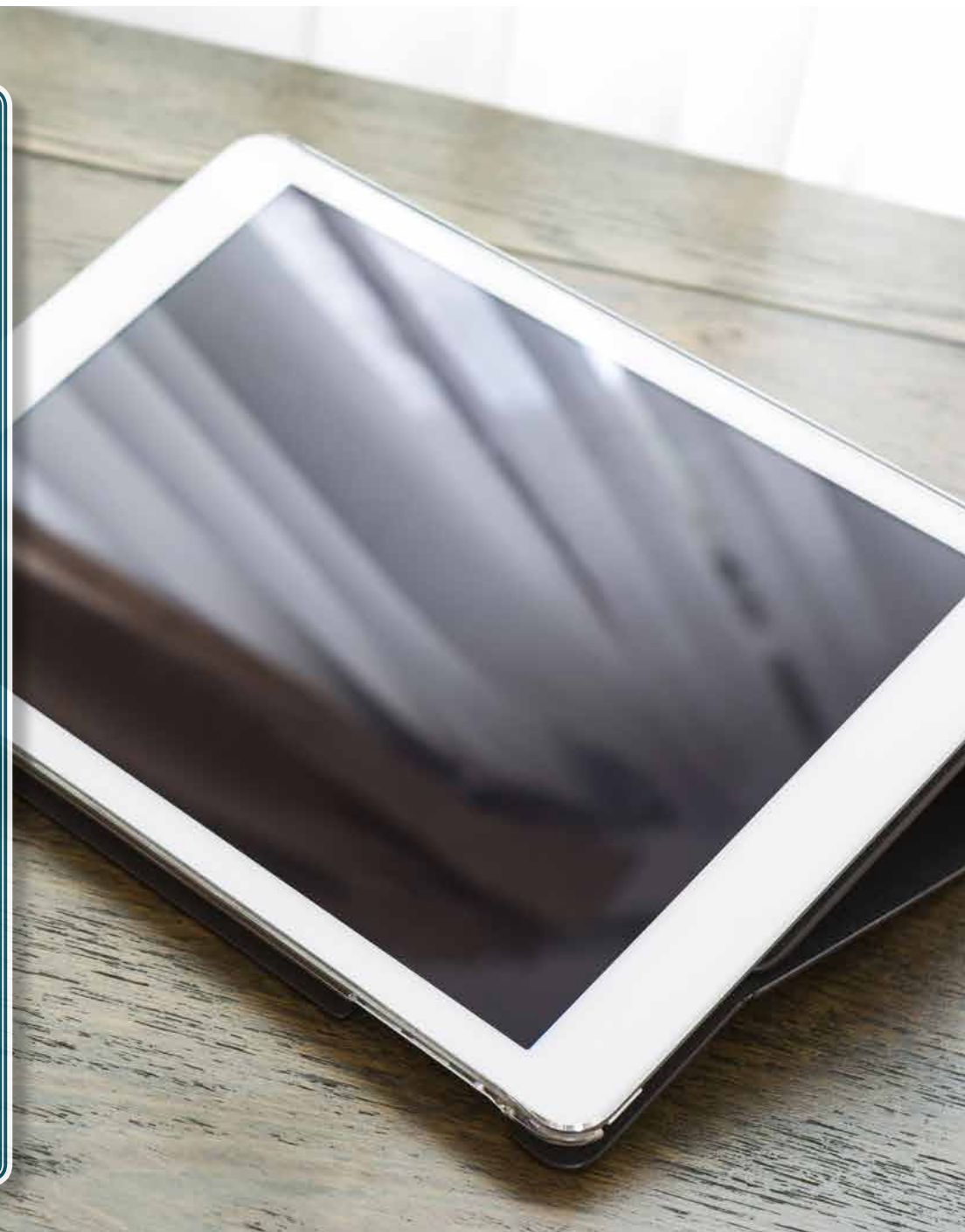
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CONTENTS



ABOUT AIIM	2
ABOUT THE AUTHORS	2
A NEW ERA FOR INFORMATION PRIVACY AND SECURITY	4
HOW HAS THE ENVIRONMENT FOR INFORMATION PRIVACY AND SECURITY CHANGED?	5
WHAT IS GDPR, WHY SHOULD YOU CARE, AND WHAT DOES IT MEAN FOR YOUR ORGANIZATION?	7
WHAT DOES “PRIVACY BY DESIGN” MEAN?	9
HOW WILL THE INTERNET OF THINGS (IOT) MAKE THE PRIVACY EQUATION EVEN MORE COMPLICATED?.	10
WHAT SHOULD YOUR ORGANIZATION DO ABOUT ALL OF THIS, AND WHAT ROLE WILL MACHINE LEARNING PLAY IN SOLVING THE PRIVACY PROBLEM?	11
ABOUT OUR PARTNERS	12



Information Privacy and Security:

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By John Mancini and Andrew Pery

The case for more rigorous cybersecurity and the protection of personally identifiable information is compelling. Consider the following:

- The [Identity Theft Resource Center](#) found that data breaches have increased 40% from 2015 to 2016, reaching an all-time high of 1,093 in the U.S. alone.
- The average [cost per breach](#) in 2016 is pegged at \$4 million, up 29% from the year prior.
- The [2016 Telstra Cybersecurity Report](#) found that nearly 60% of organizations surveyed lack sufficient cyber security and privacy staff to handle increasing legal compliance demands and new information security best practices.
- In September 2017, credit bureau Equifax — the very place where many customers go to determine whether their identity has been compromised — revealed that private information for 145.5 million customers had

been compromised. At a recent [Congressional hearing](#) to determine the cause of the breach, the former Equifax CEO testified that it was due to a combination of human and technical failures. Equifax was notified earlier this year by the Department of Homeland Security to fix a potential vulnerability in their disputes portal. However the patch was not applied in a timely fashion due to internal communications failures within Equifax. This led to an initial breach on May 13, a full three months before the company notified consumers on August 15.

These troubling trends are prompting regulators to bolster data security and privacy legislation to impose stricter obligations on businesses and data controllers. [Europe's new General Data Protection Regulation \(GDPR\)](#) is the most immediately visible evidence of what will soon be a tidal wave of national and industry information privacy and security regulations.

Organizations cannot hope to meet this coming wave of regulation by approaching information privacy and security as an afterthought or by applying outdated and manual approaches to a set of problems that simply must be automated.

In this e-book, we focus on five key questions that should be on every C-level executive's list of priorities:

- How has the environment for information privacy and security changed?
- What is GDPR, why should you care, and what does it mean for your organization?
- What does "Privacy by Design" Mean?
- How will the Internet of Things make the privacy equation even more complicated?
- What should your organization do about all of this, and what role will machine learning play in solving the problem?



1 How has the environment for information privacy and security changed?

In an 1890 [Harvard Law Review article](#) — yes, 1890 — the authors coined the phrase “the right to be left alone” as a key tenet of privacy law

This definition of privacy was conceived for the analog world. Today, consumers are subject to unprecedented incursions to their privacy. The juxtaposition of big data, cloud computing, predictive analytics and the Internet of Things enables organizations to collect and process vast amounts of information. Taken together, these create a digital fingerprint of behaviors that may expose personally identifiable information. There seems to be a sense of capitulation that in this digital age, privacy rights are destined to erode.

The [amount of personal data stored by companies and governments](#) has ballooned, and the value of that data has multiplied as more and more personal business is transacted on the internet. Identity theft has become

far more prevalent. In addition to the disruption to businesses and the impact on customer loyalty that data breaches create, many jurisdictions are looking to bring their data protection legislation in line with the new, internet-based world — although unfortunately, not into alignment with each other.

However, there is a fundamental transformation underway. In the digital economy, information is the currency of exchange and information knows no boundaries. Harmonization of regulations that fosters the free flow of information — while strengthening privacy and security rights — is an imperative for policy makers.

Take the EU and US trading block as an example. The total value of goods and services between the two largest trading blocks is estimated at \$5.5 trillion, employing 15 million people. Cross border flows between the EU and the US are estimated to be 50% higher than any other trading block. 65% of US investment in information technology is in the EU. Harmonization of privacy regulations is needed to foster consumer confidence, harness information for sustainable competitive advantage and to strengthen corporate reputation as responsible stewards in the management of personally identifiable information.

There are a number of vexing challenges associated with the inevitable shift toward harmonization of privacy regulations. In the US, privacy is industry specific and enforcement is largely dependent on the sensitivity and commercial value of the information to be protected (e.g. Health Insurance Portability and Accountability Act, Fair and Accurate Credit Transaction Act). However, US regulatory agencies are now adding more teeth to privacy enforcement actions. This can be seen in the [Federal Communications Commission](#) levying a fine of \$25 million against AT&T for the unauthorized disclosure of 280,000 customer records in 2015.

Historically the EU has had a high bar for privacy protection. Privacy is considered to be a fundamental human right and [Article 7 of the EU Charter of Human Rights](#) stipulates that “everyone has the right to respect...private and family life, home and communications.” EU Privacy initiatives — including the EU Privacy Directive that preceded the European General Data Protection Regulation — are based on the preservation of privacy rights as an immutable principle.

The [General Data Protection Regulation](#) (GDPR) was a response to: 1) advances in digital technologies such as big data, cloud computing and predictive analytics; and 2) revelations of bulk data collection and profiling by intelligence services. The result is a comprehensive overhaul of privacy legislation and a considerable strengthening and expansion of privacy rights.

The scope of GDPR includes [more rigorous consent](#) requirements, data anonymization, the right to be forgotten and breach notification requirements. Violations could lead to fines of up to €20 million or 4% of global annual turnover for the preceding financial year — whichever is the greater — being levied by data watchdogs. For other breaches, the authorities could impose fines on companies of up to €10m or 2% of global annual turnover — whichever is greater. For the average Fortune 500 company, that puts fines in the range of \$800-900M.

Today, data subjects face daunting challenges in providing informed consent to the data controllers and processors who are collecting their personal information. A [report by the World Economic Forum](#) found that, on average, data subjects have to invest 250 working hours, or 30 working days each year, just reading privacy notices in order to provide informed consent. Given the challenges associated with providing affirmative and informed consent, there is an emerging school of thought based on the use model which aims to shift away from the traditional notice and consent model to mandating that data controllers and processors guard against “harmful” uses of personally identifiable information. Implicit in the use model is increased accountability and transparency by data processors and controllers as well as more rigorous enforcement measures in the event of infringement.

Then there is a growing tension between protection of privacy rights and national security interests. Balancing privacy rights and national security interests is an on-going concern for policy makers. A [2016 survey by Pew Research Center](#) found that while 56% of survey participants want more to be done to keep the country safe, 52% remain seriously concerned that the [scope of surveillance programs](#) may intrude upon their privacy, particularly when it comes to monitoring of internet search habits, email messages and social media interactions.

This tension between privacy and national security came to prominence when the [Department of Justice sought for Apple to create a backdoor for the FBI to bypass iPhone encryption](#) in order to access information that would potentially uncover activities of two terrorists who killed 14 people in San Bernardino. [Apple, in their filing, put forth a passionate defense for preserving privacy rights](#) on both technical and legal grounds. Apple’s position was reinforced by the [Electronic Frontier Foundation](#), arguing that “It would be great if we could make a backdoor that only the FBI could walk through. But that doesn’t exist. And literally every single mathematician, cryptographer, and computer scientist who’s looked at it has agreed.”

The bottom line is that in the absence of harmonization, digital commerce may be adversely impacted. In many ways the EU is leading the way toward a fundamental overhaul of privacy protection that brings it in line with the realities of digital commerce. Resistance may be both futile and counterproductive to the promotion and growth of digital commerce.

Action Item: Universally accepted privacy principles, based the [OECD Guidelines for the Protection of Privacy](#), include:

- *Specifying the purpose associated with the collection of personally identifiable information;*
- *Informed consent;*
- *Limiting use to the specific purposes to which data subjects consented;*
- *Transparency;*
- *Data quality; and*
- *Security, auditing and accountability.*

The OECD Guidelines have been codified in various Privacy legislations across the developed world, including in the US.





2 What is GDPR, why should you care, and what does it mean for your organization?

A new set of European rules and standards related to privacy and data protection (the [General Data Protection Regulation](#), or [GDPR](#)) has set in motion a mad compliance and security scramble not only for European companies, but also for any company doing business in Europe or with European customers. The regulation is designed to harmonize privacy across the EU, codify more rigorous privacy rights and strike a balance between privacy and security and create an explicit obligation for both data controllers and processors to demonstrate compliance with GDPR. The clock is ticking – the regulation goes into effect on May 25th, 2018, and the potential penalties for non-compliance are significant (organizations found to be in breach of GDPR may be fined up to 4% of annual revenues or 20 million Euro, whichever is the greater).

[This is not just a problem for European-based companies](#). If your organization does business in the EU, offers goods and services to EU citizens, or processes EU citizen data, then all the provisions of GDPR apply, including:

- [More rigorous data security measures](#) to protect the confidentiality, integrity and availability of personal information, including provision for technical measures such as encryption. Data controllers and processors must limit collection to only the purposes for which consent was obtained.
- [A higher bar for obtaining consent](#), which must be in the form of a clear affirmative action. This higher standard contrasts with the previous EU Directive, which allowed for implicit opt in consent. This higher bar extends to tracking cookies designed to identify a device and/or individuals across the web.
- [New breach notification provisions](#) with considerably more teeth, rendering fines that may potentially be as high as (or even exceed in the case of smaller companies) 4% of annual revenues. The definition of “data breach” is a “breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.”
- The need to offer a choice by which data subjects may opt out of the disclosure or use of data, particularly when the intended disclosure or use is inconsistent with the original purpose for which the data was collected.
- The ability for the data subject to access, correct and delete any inaccurate information, including a “[right to be forgotten](#).”
- [New governance over data and data processes](#), including specific [appointments of a Chief Privacy Officer \(CPO\)](#) and specific recommendations and provisions for Board of Director responsibilities to comply with the privacy regulation.
- Cross border transfer of EU citizen data must be subject to the adequacy standard. Furthermore, as a direct response to the Snowden revelations relating to the bulk collection of personal data, the European Commission and the US Department of Commerce have jointly developed a new framework for onward transfer under the [EU-US Privacy Shield Framework](#), which supplants the previous Safe Harbor provisions.

Information Privacy and Security: GDPR is Just the Tip of the Iceberg

The new Privacy Shield considerably strengthens the privacy rights of EU citizens relating to onward transfer of personal information. Key provisions of the [Privacy Shield](#) require adherence to the core privacy principles of notice, choice, security, integrity, access, enforcement and accountability for onward transfer.

Perhaps the most important aspect of the Privacy Shield is more rigorous access, monitoring and enforcement mechanisms that were lacking in Safe Harbor. According to the [European Commission's statement](#), "for the first time, the US has given the EU written assurance that the access of public authorities for law enforcement and national security will be subject to clear limitations, safeguards, and oversight mechanisms and has ruled out indiscriminate mass surveillance of European citizens' data." By virtue of these strengthened enforcement mechanisms, EU citizens will be able to:

- *Seek redress for alleged privacy rights against companies who are obliged to resolve such complaints within 45 days;*
- *Gain access to an Independent Dispute Resolution at no cost;*
- *Work through EU Data Protection Authorities, who are empowered to work with the US Federal Trade Commission (FTC) to ensure that EU citizen complaints are addressed and remedied;*
- *Opt for arbitration should their complaints not be resolved through the independent Dispute Resolution mechanism; and*
- [Rely on Presidential Policy Directive No 28 \(PDP 28\)](#), which extends privacy protections to foreigners.

It remains to be seen how recent developments within the EU and US will impact implementation of the new Privacy Shield. [The European Parliament remains concerned](#) about the efficacy of the Privacy Shield, and the current US Administration's [resolution](#) designed to roll back privacy protections relating to browser history collected and sold by internet service providers is a cause for concern among EU regulators. Recently, officials from the US Government and the EU Commission and Data Protection Authorities [met in Washington](#) to review the status of the Privacy Shield, which governs the transfer of EU data to US data controllers and processors. The results of the review are pending. This review is considered pivotal for the continued legal framework for trans-border data flows that constitute a significant dimension of commerce between these two large trading blocks.

In the meantime, the Irish High Court recently referred the high profile [Schrems](#) case to the Court of Justice of the EU, assessing the validity of standard contractual clauses for the transfer to EU personal data to jurisdictions outside the EU, in particular the US. [Schrems is a landmark decision](#) that invalidated the Safe Harbor provisions for trans-border data transfers given the bulk collection practices of US law enforcement agencies. The decision by the Irish High Court to refer the validity of standard contractual clauses further muddies the waters as to the conditions under which EU personal data may be transferred to data controllers and processors in the US.





3 What does “Privacy by Design” Mean?

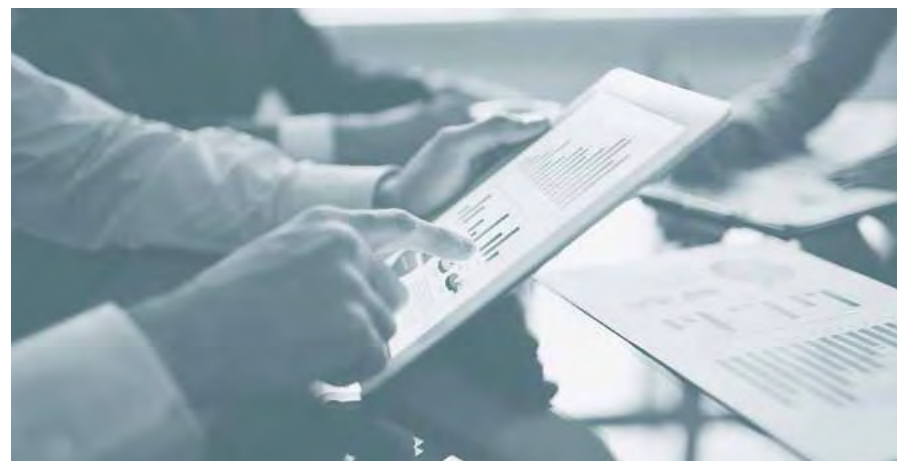
Organizations must consider the concept of [Privacy by Design](#) moving forward, which attempts to embed privacy principles within privacy best practices, systems and software.

Formulated by the Privacy Commissioner for the Province Ontario, Privacy by Design encompasses [seven foundational principles](#) for embedding privacy within systems and software. Privacy by Design principles were espoused by International Conference of Privacy Commissioners “as a holistic concept that may be applied throughout the organization, including its technology and business practices.”

GDPR has entrenched Privacy by Design, requiring data processors and controllers to “implement appropriate technical and organizational measures for ensuring that by default only personal data necessary for each specific purpose of the processing are processed.”

One of the key foundational tenets of Privacy by Design is that privacy rights ought to be protected and enforced by *default* in order to proactively mitigate privacy risks. From a software and process design perspective it means that Privacy by Design should encompass:

- **Data Minimization:** to restrict collection to the minimum amount of personally identifiable information required for processing;
- **Data Classification:** to ensure that personally identifiable information is tagged and assigned the appropriate level of protection from exposure;
- **Data Pseudonymization and Encryption:** to ensure the ongoing confidentiality, integrity, availability and resilience of personal data and data systems, and to preserve privacy through the processing of personal data in ways that can no longer be attributed to a specific data subject;
- **Data Aggregation:** to provide for tools to aggregate personally identifiable information to the highest level;
- **Auditing and Control:** to provide data subjects with agency over their personal information and which empowers data processors to demonstrate compliance; and
- **Intuitive User Interface Design:** to enable users to easily understand privacy notices, to provide affirmative consent (since under GDPR implied consent is no longer permissible) and to withdraw consent by providing intuitive access to privacy settings including simple to understand [privacy icons](#).





4 How will the Internet of Things (IoT) make the privacy equation even more complicated?

A recent [Gartner report](#) estimates that by 2020 the number of connected devices such as sensors and wearables will reach 21 billion, up from 6.4 billion in 2016. Such an unprecedented level of connectedness is expected to transform virtually every facet of our lives, largely in beneficial ways.

There are increasing concerns as to how pervasive use of IoT devices will impact privacy rights. It's not just the [volume of data generated](#), but also the variety of information collected, such as geolocation, internet search habits and preferences which, taken together, may infringe upon privacy rights. A recent [Ponemon report](#) found that while there is no real standard governing IoT privacy, there is a preference for some form of "labeling" associated with IoT devices that communicate in plain language the information they collect.

Is obtaining informed consent practical when it comes to the world of IoT? There is an emerging school of thought that holds that the traditional consent model ought to be supplanted by a [use model](#) given that "ensuring individual control over personal data is not only an increasingly unattainable objective of data protection, but in many settings it is an undesirable one, as well." The rationale for this proposed overhaul of traditional notions of privacy is that "there are compelling societal benefits to the collection and use of personal information as long as it is anonymized and aggregated so as to preclude identification of the data subject."

This includes de-identification of personally identifiable information and adherence to higher accountability standards, including payment of fines in the event of infringement causing harm. The use model acknowledges the impracticality of obtaining informed consent. Rather, it places emphasis on the benefits associated with de-identified personal data that delivers social utility, such as [health-care prevention](#), more efficient transportation, environmental protection and education. While privacy in the age of the IoT is nascent, the legal framework based on informed consent has been considerably strengthened with the ratification of GDPR. The onus is clearly on organizations to implement and adhere to rigorous [information governance](#) best practices that empower them to capture, classify and use personally identifiable information in accordance with privacy regimes based on informed consent.

There are a number of new initiatives that show promise in balancing privacy rights and social utility. For example, the [2013 World Economic Forum](#) report proposes that personal data be tagged, and includes terms under which such data may be used, including an audit function that verifies compliance. There is a potentially useful technical initiative — ["eXtensible Access Control Markup Language" \(XACML\)](#) — designed to embed privacy settings by tagging data with privacy preferences. The [Federal Trade Commission Staff Report](#) recommends the use of QR codes that provide details as to information collected by IoT devices and a provision for privacy choices during device installation. Finally the [Online Trust Alliance](#), a consortium of IoT device manufacturers, proposes rigorous disclosure policies prior to purchase, including ability to control privacy settings.



intelligent capture and classification to digitize incoming information, identify patterns in data collected, and organize, preserve and protect data — must be a key part of the solution.

Technologies such as document capture, pattern recognition and knowledge management are widely used to automate the digitization of documents without human intervention and with a high degree of accuracy. And finally, organizations need to better align data and document security policies with information governance. These regulations require more flexible and persistent privacy protections throughout the information management lifecycle that must be built into the systems themselves.

With the advent of big data and cloud computing, machine learning is pushing toward the next stage — [deep learning](#). Deep learning is an advanced form of machine learning technology, the objective of which is to simulate the human mind. Current applications of deep learning such as fraud detection engines and predictive analytics are the first wave of the technology, and empower organizations to gain granular insight into consumer sentiments and behavior, and make decisions without human intervention.

While deep machine learning creates compelling commercial benefits, it also elicits a new set of privacy concerns. [The U.S. supreme Court decision in Riley has recognized the potentially adverse consequences of profiling based on the collection of metadata](#). GDPR anticipates the inherent challenges associated with deep learning technologies, and empowers data subjects with a [right to object profiling](#) based on automated processing of metadata collected from browsing history.

The [EU ePrivacy legislation](#), which was amended and incorporated into GDPR, requires affirmative consent to place tracking cookies on consumer's internet browsers. These amendments prohibit opt in consent to collect personal information by tracking cookies, including pre ticked boxes. Applications must provide settings that enable users to:

- *Prevent the storing of information by third parties for tracking purposes;*
- *Control the degree to which tracking cookies may be stored; and*
- *Provide such options in clear, concise and transparent manner.*

There are proven instances of machine learning that can help organizations with GDPR compliance. Intelligent Document Capture (IDR) uses advanced document recognition and classification algorithms.

5 What should your organization do about all of this, and what role will machine learning play in solving the privacy problem?

Your organizational strategy needs to start with a commitment to sound information governance policies and practices. Having in place a well-defined and clearly articulated set of [information governance best practices](#) empowers organizations to not only mitigate risk, but also to leverage information assets for competitive advantage.

Many organizations stop there, and make the mistake of assuming the old approaches based on a paper paradigm will be sufficient. Information management and privacy challenges created by an explosion in the volume of information cannot be solved by the old manual approaches. Machine learning technologies — such as

Information Privacy and Security: GDPR is Just the Tip of the Iceberg

With this technology, incoming documents are analyzed based on their content and metadata, and then automatically classified without human intervention. Through such document understanding, personally identifiable information embedded in documents may be identified, tagged, classified and assigned the requisite level of privacy settings and protection.

Concept Searching (Semantic Analysis) is an advanced machine learning technology that finds and relates documents based on their content and the subject matter of the document, paragraph, or sentence. Concept searching enables organizations to “discover” their information holdings across multiple disparate repositories, such as email, file shares, and social media, then identify documents that may contain personally identifiable information and apply appropriate rules to govern their collection, use and disposition.

The bottom line: compliance with GDPR is a strategic imperative to effectively compete in digital economy.

Some Suggested Resources:

A useful starting point to consider is the [Information Governance Reference Model](#) (IGRM). The IGRM model is an extension of ARMA's [Generally Accepted Recordkeeping Principles](#).

The Information Governance Reference Model is based on three key pillars:

- *Managing information as a strategic competitive asset;*
- *Accessibility of information to ensure IT efficiency; and*
- *Compliance with legal and regulatory frameworks, including records retention, disposition, data privacy and security.*

In order to ensure adherence to these information governance principles, organizations ought to apply end-to-end information life cycle processes that encompass:

- *Information capture and classification;*
- *Protection of personally identifiable information;*
- *Control of the collection and use of personally identifiable information;*
- *Detection of data breaches;*
- *Response to and mitigation of infringement of privacy rights; and*
- *Reporting and analytics to measure compliance with privacy regimes.*



About ABBYY



ABBYY creates technology and solutions to action information. We are a global company setting the standard in content capture and innovative language-based technologies. The SaaS-based ABBYY Text Analytics solution platform leverages these core strengths to extract intelligence from any text-based content and deliver analytic intelligence to connect business documents to business value. In the new world of GDPR the solution provides targeted risk analytics to empower enterprises to make the hard decisions necessary to understand and manage their data privacy obligations proactively, as well as react quickly and appropriately when reacting to data breaches – all based on a deep, granular understanding of obligations, commitments, and relationships embedded within their contracts.

ABBYY Group comprises offices in 13 countries with headquarters in North America (Milpitas, California), Western Europe (Munich), Eastern Europe (Kiev) and in Russia (Moscow). ABBYY is also present through its own offices in Australia, Canada, Cyprus, France, Japan, Spain, Taiwan, the UAE, and the UK.

ABBYY solutions, products and technologies are available in more than 200 countries and regions via a wide partner network.

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About ASG Technologies



technologies™

ASG Technologies brings peace of mind to every enterprise with information access, management and control within legacy and leading-edge environments. Even during this time of increasing regulations, many Fortune 500 companies trust ASG to optimize their IT investments and help them remain compliant.

You can be confident in your compliance with GDPR when you take the proper steps to prepare your business. Reducing risk of non-compliance and gaining confidence in your data with ASG Technologies will save you time and money and provide peace of mind for your business.

ASG Technologies offers proven solutions to prepare businesses for GDPR compliance. ASG's Mobius provides a policy driven content services solution to manage the lifecycle of personal data while capturing and managing proof of the individual's consent. More importantly ASG's Enterprise Data Intelligence solution scans through your data estate and reports the important source and use — known as lineage — of data.

Key areas of the GDPR can be met with the following capabilities from ASG:

- Cascading PII Lineage illustrating the PII flag to other hops in lineage.
- Powerful search of metadata to identify PII items within data stores
- Policy management for compliance
- Information governance and data management to meet reporting requirements
- Inventory or catalog of protected data
- Output management for privacy notifications and data delivery
- Zero Gap data lineage to trace and track sources and processing of data

Enterprise Data Intelligence gives companies deep insights into critical business data. Achieve regulatory governance and compliance requirements with zero gap data lineage analysis, which has allowed customers to see more than 200% savings on time and effort. Our solution provides quick, reliable data intelligence to drive your business forward.

Learn more about ASG Technologies' regulatory solutions by visiting:
asg.com/GDPR or talk with a representative or request a demo by visiting
asg.com/Company/ContactUs

About DocuWare



DocuWare is a software manufacturer with headquarters in Germany and the USA. DocuWare is also the name of the flagship product developed by the company.

DocuWare the product is broadly defined as document management and workflow automation software, often categorized as ECM (enterprise content management) or content services. As of January 2017, DocuWare is used by 16,000 customers in 70 countries. The DocuWare product is developed as both on-premises and cloud-based SaaS versions, with a focus on design and feature parity. The software is available in 16 languages. DocuWare is distributed via a global network of 500 authorized DocuWare partners (ADP) as well as directly to key accounts.

On October 27, 1988, DOCUNET AG was founded in Germering, Germany (near Munich) by President Jürgen Biffar. Since 1990, Mr Biffar has been managing the company with his colleague, Thomas Schneck, currently President of Sales. DOCUNET AG was renamed to DocuWare AG in August 2000. Since 1999, DocuWare has outsourced parts of its development to Sofia, Bulgaria. As of 2016, the Nemetschek OOD consisted of 42 employees working on the DocuWare product. DocuWare GmbH holds a 20 percent stake in Nemetschek OOD.

Subsidiaries:

- | | |
|--|---|
| ■ DocuWare Corporation (New Windsor),
founded January 1, 2001 | ■ DocuWare SARL (Paris), founded
September 1, 2008 |
| ■ DocuWare Ltd (Nottinghamshire), founded
April 1, 2005 | ■ DocuWare S.L. (Barcelona), founded July
1, 2009 |

In April 2012, an investment agreement was signed between the company and Morgan Stanley Expansion Capital LP, a Morgan Stanley Investment Management private equity fund. Its aim was promoting and accelerating the global growth of DocuWare. The legal form, AG (Public Holding Company) changed to GmbH (limited liability corporation).

The company acquired U.S.-based Westbrook Technologies Inc., developer of Fortis ECM software in August 2013. In 2014, Westbrook Technologies Inc. was merged into DocuWare Corporation.

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About Everteam



Everteam is a global software vendor specializing in information governance, content management and process automation solutions centered around big data & analytics technologies. With over 25 years experience and innovation in the field of Enterprise Content Management, Everteam works with mid to large enterprise customers across the world, including Florida Blue, First Financial Bank, Orbitz, St. Gobain, Singapore Airlines, BNP Paribas, Safran, British Sky Broadcasting and Slate Street. Everteam is headquartered in Lyon (EU) and Boston (USA), with regional offices in Beirut, Dubai, and Paris.

Everteam's mission is to help organizations reduce costs, minimize risks, and ensure compliance with norms and regulations including the new European regulation, GDPR (General Data Protection Regulation) and cybersecurity.

Everteam's Enterprise Content Management suite allows rapid deployment of applications that connect people, process, and content. A sleek user interface and advanced business process management capabilities combine with complete document management functionality to enable complex workflows in a seamless solution that users adopt quickly. Add in transparent, automated, enterprise-wide governance functionality including retention management and you have a system that maximizes information value while minimizing risks.

Everteam's information governance solutions help you connect, discover, extract, manage and analyze all your organization's information. These solutions can be used together or separately to address key areas of information governance including connecting to and analyzing the content of information stores, archiving inactive content, implementing retention and access management and analyzing stored content to extract actionable business insights.

Developed as a portfolio of connectable micro-services, our enterprise content management, process management solutions, and information governance solutions work together to enable new business processes rapidly and dramatically reduce time-to-value.

For more information visit <https://www.everteam.com/>

About FileFacets



FileFacets is an online privacy compliance and enterprise analytics platform that makes it easy for businesses to locate and action content from multiple sources across the entire organization to help protect sensitive data and mitigate risk. The platform performs sophisticated data discovery and content search of structured and unstructured content within corporate networks, servers, enterprise content management systems (ECMs), email, desktops and laptops.

GDPR Planning for Data Protection - The first step in understanding what personal data an organization holds is to understand exactly *how much data* they have, where it is, and what it is. FileFacets gives businesses a unified view of all their content across the entire organization, arming them with the tools and the methodology to help them comply with the data protection and information management requirements of the European Union's General Data Protection Regulation (GDPR) – from planning through to execution of a business' GDPR strategy.

Data Subject Access Rights - FileFacets can easily locate, identify, audit and action files containing the personal data of an individual regardless of its location within an organization's data stores, including emails and desktops. This capability allows businesses to meet the requirements of Chapter 3's Subject Access Requests (SAR) articles including the *Right to Access and Portability*: where an individual requests to view and retain a copy of all of their personal data, and the *Right to be Forgotten*: where an individual requests to have their personal data removed from a business' data stores.

Reporting for Transparency & Accountability - FileFacets audit and reporting capabilities allows for transparency and accountability for internal governance: by auditing users' decisions on the requests and actions of files and file types; for an individual's *Right to Notification*: with the ability to report on compromised data in the case of a breach of their personal data; and to external Data Protection Authorities (DPA) by identifying all documents and records containing personal data that may have been affected in the event of a data breach.

For more information on how FileFacets can help your organization with GDPR planning, readiness and compliance, download our whitepaper:

[FileFacets for GDPR – Solution Overview for Compliance.](#)

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About Gimmel



Gimmel provides the solutions organizations need to find information, govern content, improve business processes, and ensure records are in compliance, wherever they are stored. A prerequisite for effective compliance with GDPR, or any information management regulation, is the ability to easily enforce governance and compliance policies. You need a solution that covers all your systems – and isn't a burden – so that you have time for what really matters.

Proactive Protection and Audit Ready Reporting– Gimmel Workplace Governance and Compliance let you manage policies on content "in-place" proactively so you don't need to burden users. This proactive policy enforcement provides defensible audit trails and reporting. Improved governance makes your information easier to find and more relevant.

Data Portability & Right to be Forgotten – Use Gimmel Workplace Compliance to ensure all personally identifiable information stored across systems is managed according to the proper policy. Associate data from business systems with enterprise content to drive event-based retention so you can produce information on demand in accordance with applicable regulations.

Centralize Policy Management and Make it Easy – GDPR compliance initiatives can only be successful to the degree that policy is consistently applied to all of the relevant information. Reduce friction between information silos and avoid the problems of nonstandard platforms by managing rules across all of your content repositories from a single interface.

We believe organizations deserve to spend time on what really matters to them. We help our customers focus on their core missions by simplifying the management of information, no matter where it exists. Our software establishes a new standard for productivity by providing the ability to manage information anywhere.

With Gimmel, your team will be able to ensure regulated information is managed using the right policies, and can be found, deleted, or packaged for transfer when necessary.

Learn more at www.gimmel.com.

About OnBase by Hyland



Hyland is a leader in providing software solutions for managing content, processes and cases for organizations across the globe. For over 25 years, [Hyland](http://Hyland.com) has enabled more than 19,000 organizations to digitalize their workplaces and fundamentally transform their operations. Named one of Fortune's Best Companies to Work For® since 2014, Hyland is widely known as both a great company to work for and a great company to do business with. For more information, please visit Hyland.com.

OnBase is a single enterprise information platform for managing content, processes and cases deployed on-premises or in the Hyland Cloud. Providing enterprise content management (ECM), case management, business process management (BPM), records management and capture all on a single platform, OnBase transforms organizations around the globe by empowering them to become more agile, efficient and effective. To learn more about how more than 15,700 organizations are digitizing their workplaces to transform their business operations, visit OnBase.com.

Organizations can use the OnBase enterprise information platform to create solutions that support their GDPR compliance initiatives. A variety of out-of-the-box functionality, flexible configuration options and built-in security controls offer the agility needed to help navigate the changing data privacy landscape.

Visit OnBase.com/compliance to learn more.

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About OpenText



As the leader in Enterprise Information Management (EIM), OpenText™ is committed to helping our customers along their journey to GDPR readiness and compliance. EIM technologies are some of the most important tools for helping organizations meet regulatory requirements, and should be central to an overall GDPR compliance and data protection strategy.

OpenText offers solutions and services to help our customers in their efforts to comply with GDPR obligations in key areas such as:

- Information Management and Governance
- Information Security
- Discovery
- Data Protection

OpenText Enterprise Content Management (ECM) solutions directly address the mandates within the new GDPR by providing a single robust platform to manage and secure all enterprise information, including content with PII. OpenText ECM provides governance via access permissions, audit trails, advanced search, automated policy enforcement, and customizable notifications and reports.

Utilized by the largest and most innovative companies and governments in the world to transform and drive their digital business, OpenText EIM solutions are available and deployed on-premises and in private and public clouds.

Learn more about OpenText GDPR solutions at: www.opentext.com/gdpr

- [Get a Foothold on GDPR Compliance](#)
- [GDPR – How does it impact Enterprise Information Management?](#)
- [GDPR Misconceptions vs. GDPR Readiness](#)
- [Five Compliance Challenges Facing Your Organizations in 2017](#)
- [GDPR: An Opportunity More than a Threat for B2B Companies?](#)
- [The GDPR and Why Digital Marketing Will Never be the Same](#)
- [How We're Using Discovery Analytics to Solve GDPR Challenges](#)

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About M-Files



M-Files provides a next generation intelligent information management platform that improves business performance by helping people find and use information more effectively. Unlike traditional enterprise content management (ECM) systems or content services platforms, M-Files unifies systems, data and content across the organization without disturbing existing systems and processes or requiring data migration. M-Files breaks down silos by delivering an in-context experience for accessing and leveraging information that resides in any system and repository, including network folders, SharePoint, file sharing services, ECM systems, CRM, ERP and other business systems and repositories. Thousands of organizations in over 100 countries use M-Files for managing their business information and processes, including SAS, Rovio and NBC Universal. For more information visit www.m-files.com.

M-Files GDPR is a highly-scalable, flexible and intelligent information management solution that enables organizations to better manage personal data and Personally Identifiable Information (PII) by controlling and tracking such information, including that handled by third-party data processors. A critical aspect of GDPR compliance is the ability to quickly demonstrate the steps taken to meet GDPR requirements. M-Files GDPR makes this fast and easy with powerful audit and reporting capabilities that allow companies to efficiently produce the documentation and other information necessary to respond to auditors' requests. For more information about M-Files GDPR, [click here](#).

For more information about M-Files visit www.m-files.com

About Vera



Vera helps companies across the Fortune 500 [protect sensitive information, no matter where it's shared](#). With robust policy enforcement, strong encryption, and strict access controls, Vera's data-centric security solution enables employees to collaborate freely while ensuring the highest levels of security, visibility and compliance.

For organizations looking to comply with complex data privacy and protection regulations like the [New York Department of Financial Services](#) (NY DFS) cybersecurity laws, or the GDPR, Vera provides the tools necessary to:

- Encrypt personal information at rest, in transit, and in use
- Build privacy and strong data protections into any application
- Dynamically define and enforce access controls to controlled data
- Establish a clear audit trail for data use internally and externally

We work with companies like General Electric, Viacom, and NASDAQ to help them not only secure sensitive information shared with customers and partners, but also to comply with the five key areas of the GDPR: the expanded global scope, the requirements for personal data visibility and control, protection by default, breach notification, and risk mitigation.

We believe that taking a data-centric approach to encryption and anonymization is critical to success – when GDPR-sized fines are looming, it's not enough to deploy device or full-disk encryption. To limit the damage and scope of a breach notification, individual records should be protected uniquely, preventing a single attacker or identity getting access to the entire dataset.

To learn more about how Vera's data-centric approach to security can help not only with GDPR compliance but also with broader data management, tracking, and disposition tasks, visit www.vera.com.

You've just downloaded and read the latest AIIM Intelligent Information eBook on GDPR.

What now?



Take your skills to the next level by learning how to map, design, capture and automate operational processes using a combination of strategies, and technologies with AIIM's Training Courses

Learn more, visit: www.aiim.org/training



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