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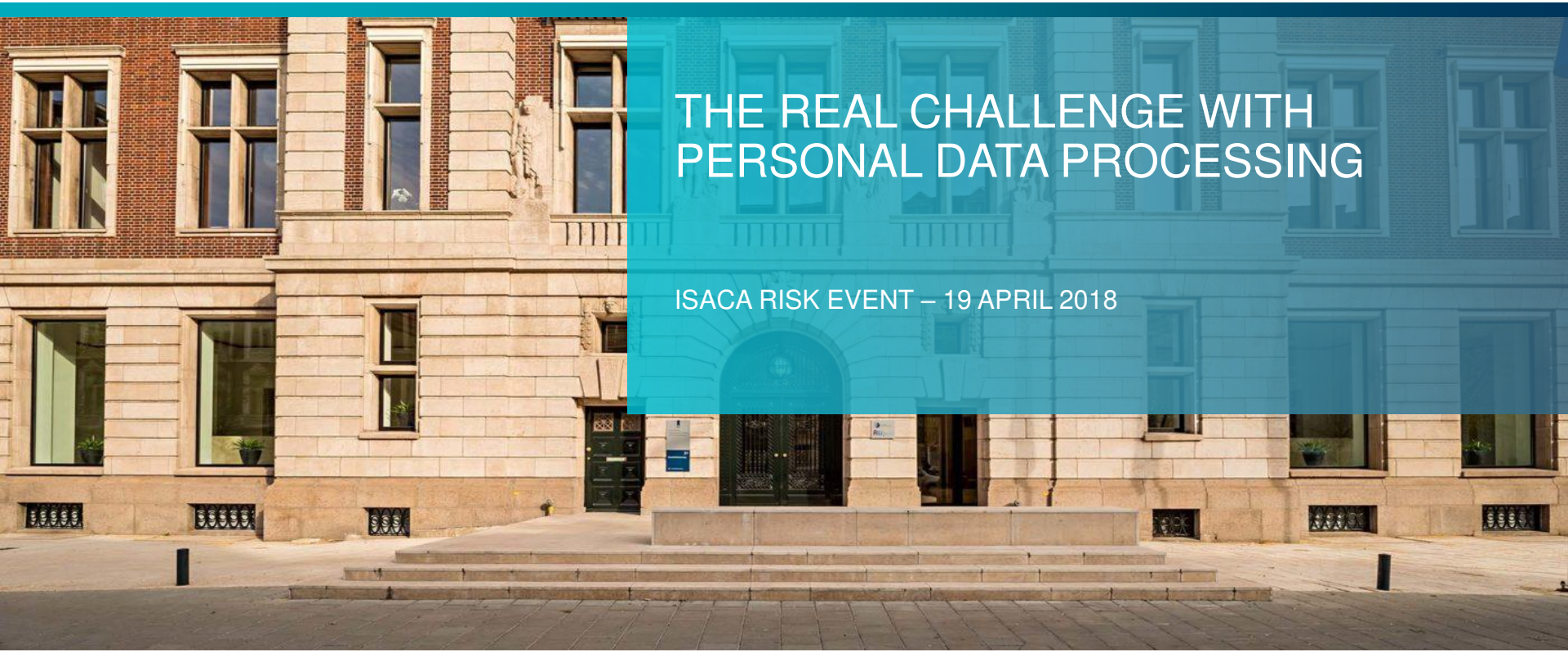


THE REAL CHALLENGE WITH PERSONAL DATA PROCESSING

ISACA RISK EVENT – 19 APRIL 2018

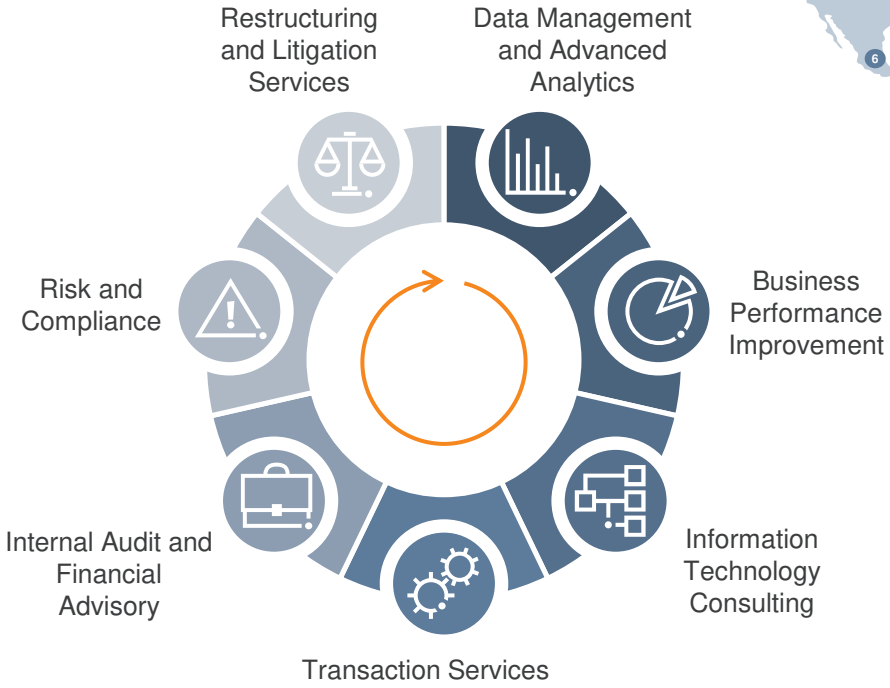
INTRODUCING PROTIVITI

Tjakko de Boer

Marcel Koers

About the presenters

INTRODUCING PROTIVITI



Protiviti services and global footprint

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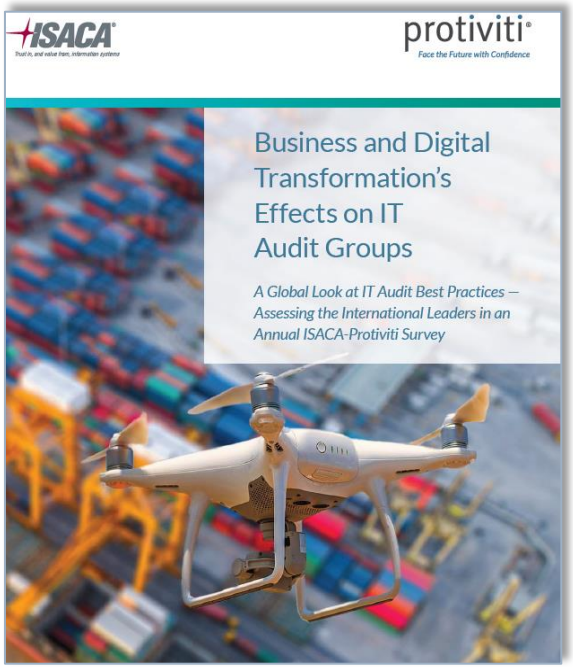
INTRODUCING PROTIVITI

Protiviti is Partner of ISACA

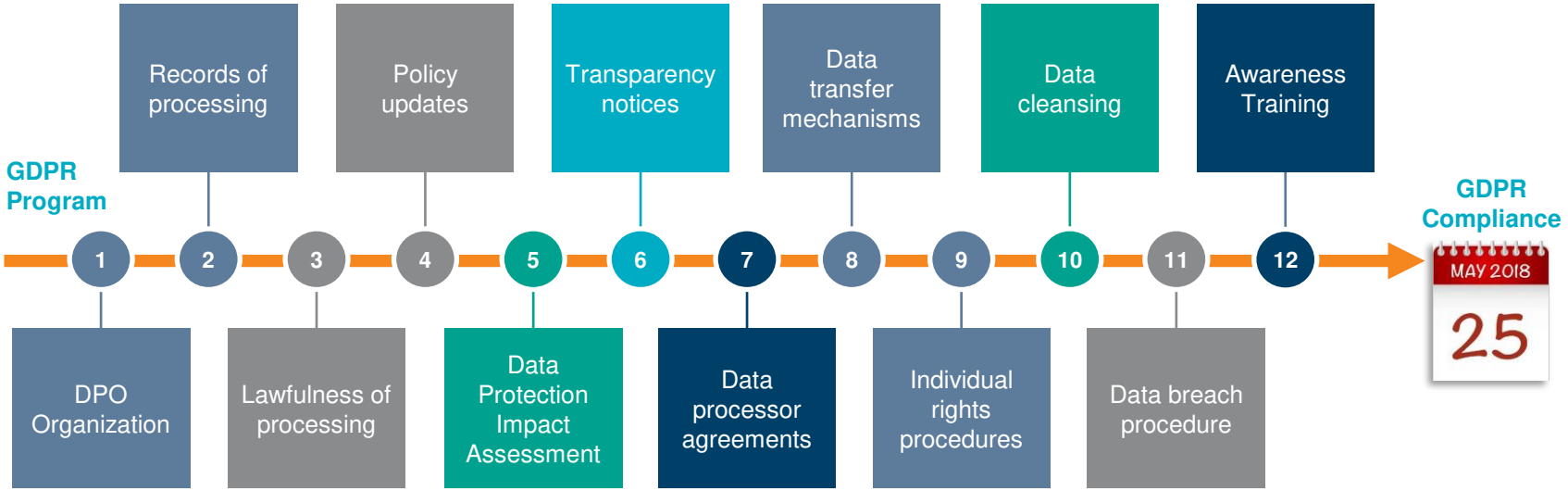
IT audit benchmarking survey

- Privacy, data and security are shaping IT audit plans
- Increase of designated IT audit directors
- IT audit professionals should strengthen collaboration with IT compliance groups
- IT audit involvement is necessary in entire IT implementation lifecycle
- Organisations are starting to co-source the IT audit function as workload increases



https://www.protiviti.com/US-en/insights/it-audit-benchmarking-survey

ROAD TO GDPR COMPLIANCE



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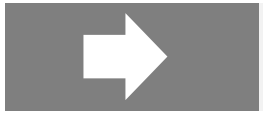
CHALLENGES AFTER MAY 25TH 2018

Potential root causes of Complaints and Breaches

… no clarity on “appropriate organizational and technical measures”



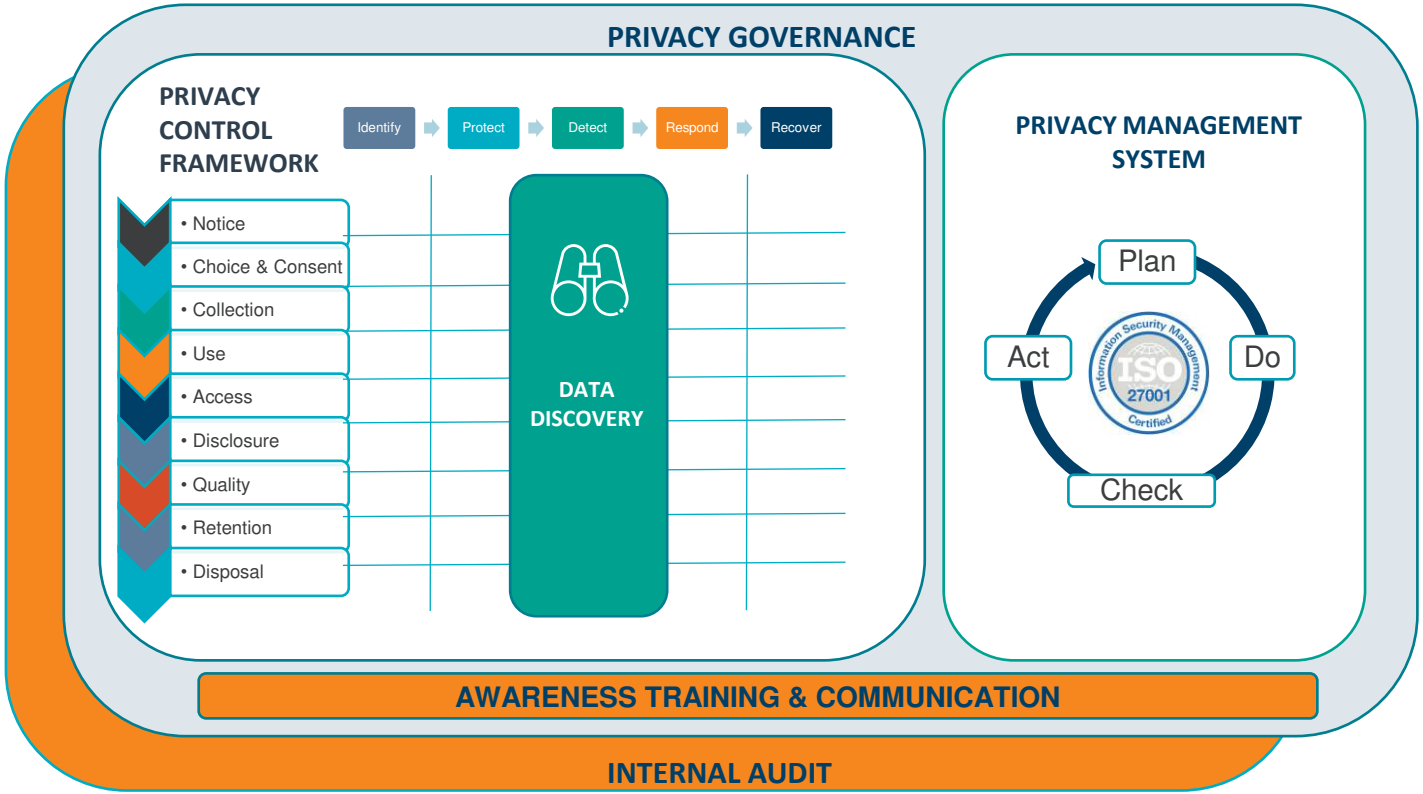
… inability to adapt to change and demonstrate compliance

… lack of personnel awareness on data processing requirements

… no visibility on unstructured data

RESPONSE TO THE CHALLENGES

- … no clarity on "appropriate organizational and technical measures"
- … inability to adapt to change and demonstrate compliance
- … lack of personnel awareness on data processing requirements
- … no visibility on unstructured data



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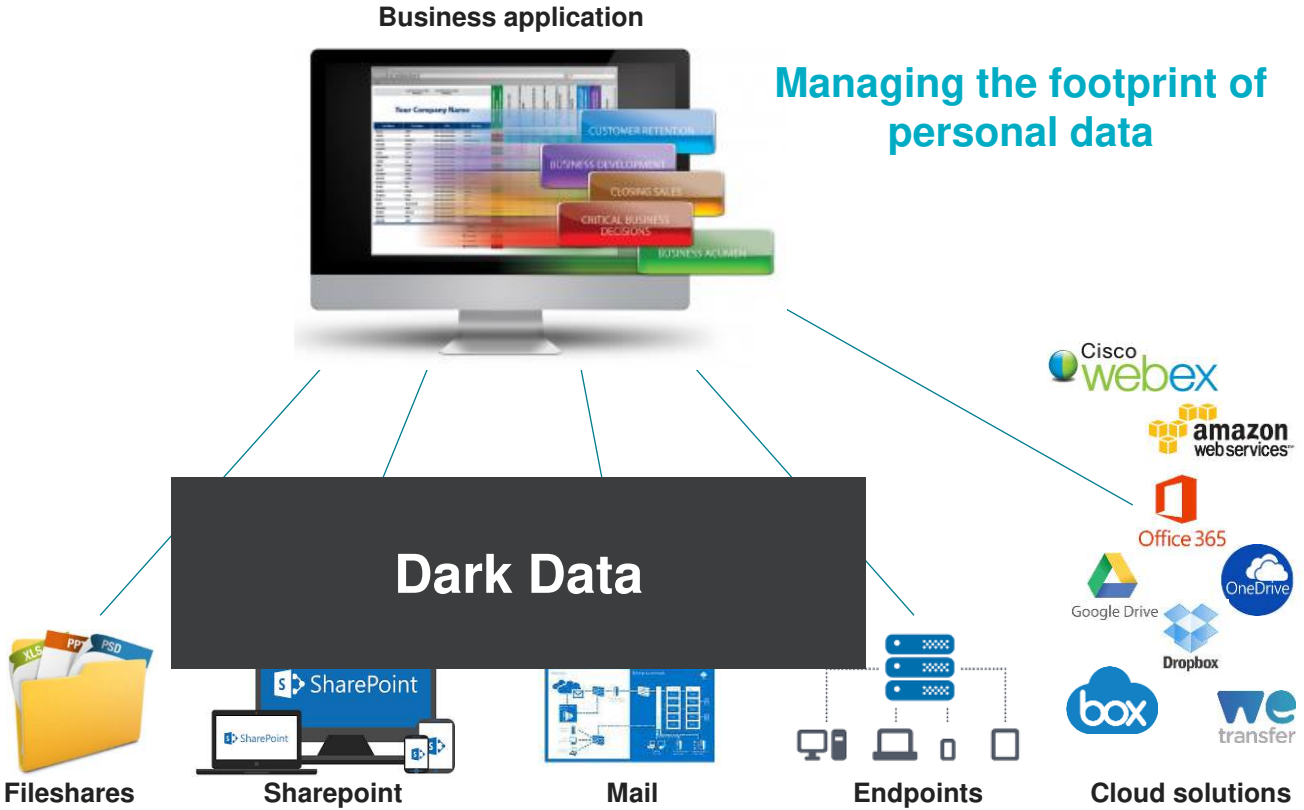
UNSTRUCTURED DATA

Structured
- Organized
- Formatted
- Normalized
- Annotated
- Standard processing
- Controlled
- Secured

Exchange

Unstructured
- Text-heavy
- File-based
- Many formats
- Not normalized
- Not annotated
- End-user computing
- Uncontrolled
- Not secured



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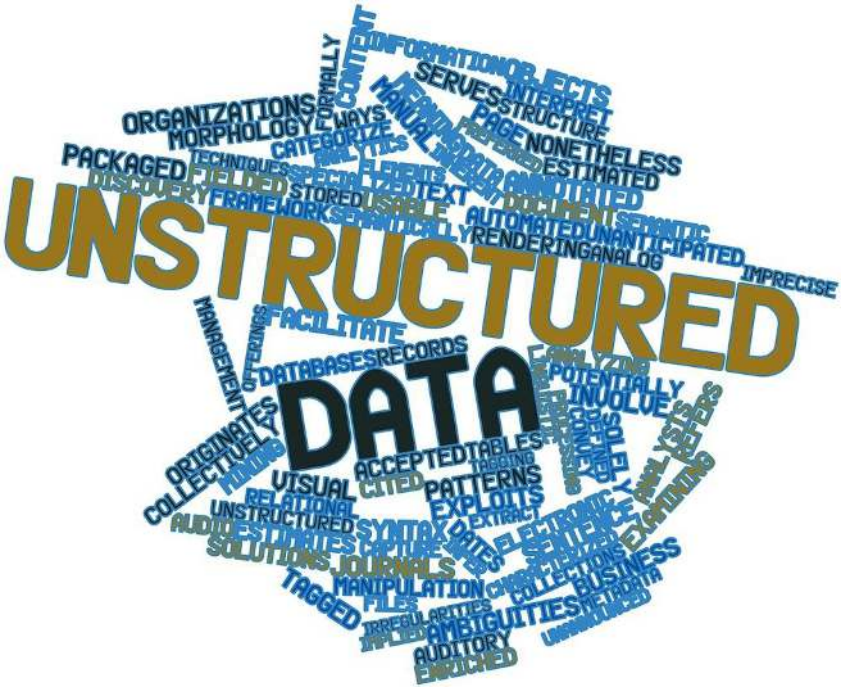
UNSTRUCTURED DATA

The real challenge with personal Data processing is unstructured data

- Where is it? Who has it? What format?
- Was it not transferred outside the company?
- Are retention periods being maintained?
- Is the personal data well secured?
- Is the data still valid? Not outdated?
- How can we execute the data subject' rights?
- Was it not breached?



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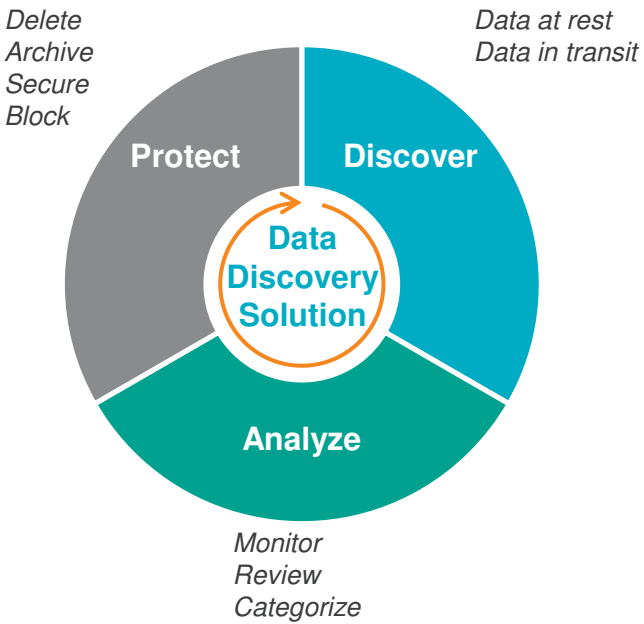
DATA DISCOVERY SOLUTIONS



Specifications

- operates within company network and the cloud
- operate on all environments and file types
- easily deployable and configurable
- resource utilization can be scheduled and maximized
- volumes, velocity, impact
- can utilize different scanning techniques
- has data analytics techniques and can visualize results
- can present discovery results in metadata only
- can demonstrate compliance

Two types of data discovery solutions:

Cloud Access Security Brokers (CASB).
Endpoint Detection & Response (EDR).

DATA DISCOVERY

Cloud Access Security Brokers (CASB)

- Monitor network traffic on personal data to cloud applications
- Consolidated view on cloud usage and data transfers
- Fingerprint based
- In-line, SPAN or Replay

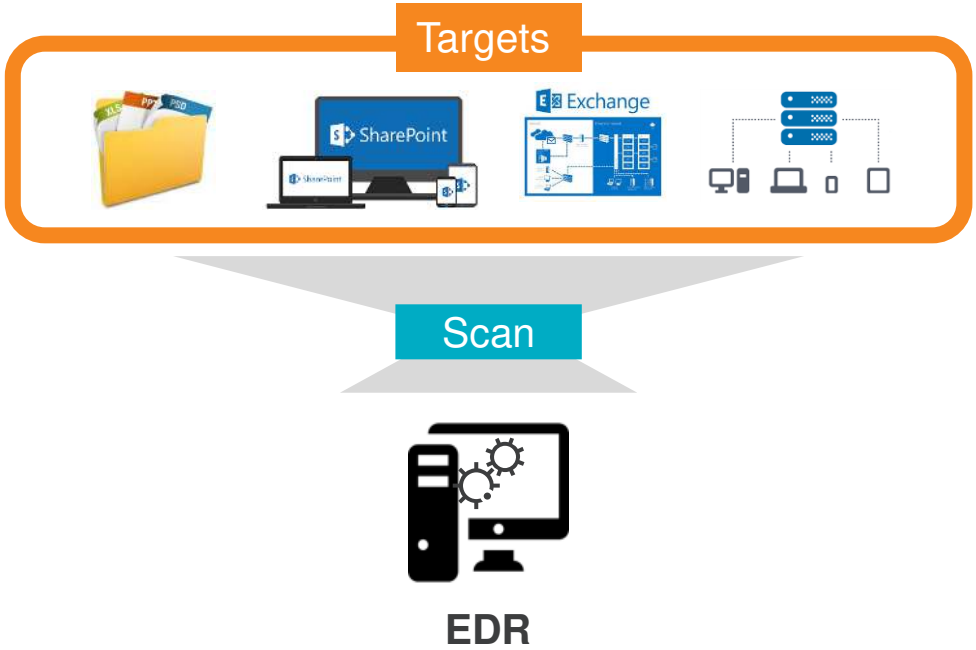
- Identify shadow and sanctioned IT
- Enforce data-centric security policies
- Prevent unwanted devices to access cloud services
- Demonstrate compliance with regulations

DATA DISCOVERY

Endpoint Detection & Response (EDR)

- Scans servers, workstations for personal data
- Consolidated Insight where personal data is located
- Requires agents installed on host systems
- Fingerprint based
- Files information on scans centrally for analysis

- Endpoint visibility on malicious activities

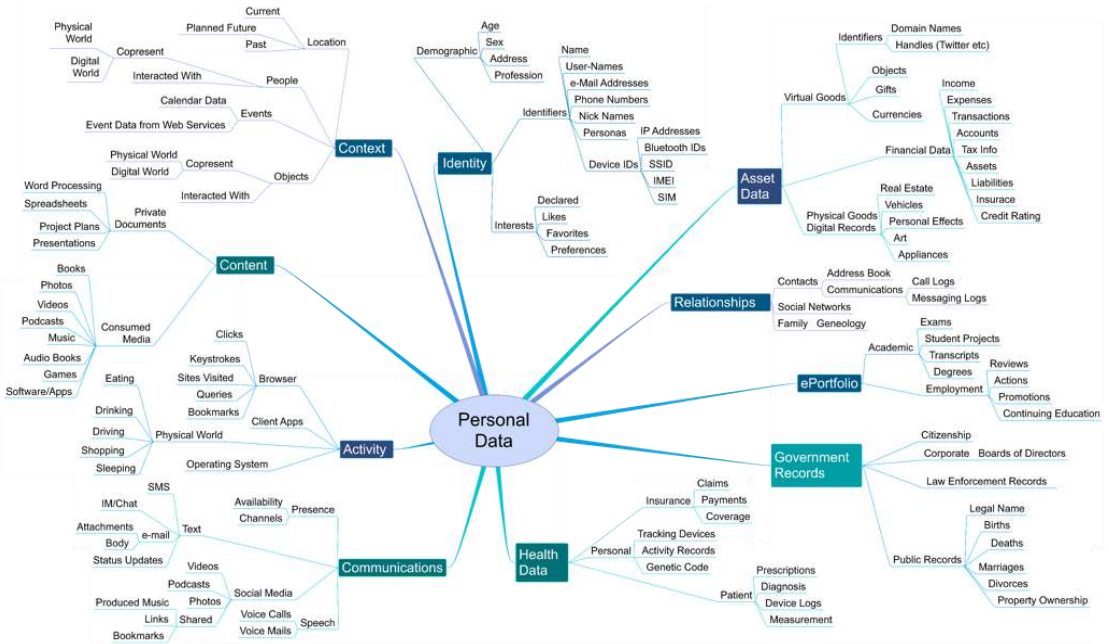


PERSONAL DATA FINGERPRINTS

Information related to an identified or Identifiable natural person (‘data subject’).

- Full name
- Home address
- Email address
- Social security number
- Passport number
- Driver’s license number
- Credit card numbers
- Bank account numbers
- Date of birth
- Telephone number
- Log-in details
- IP Addresses
- MAC addresses
- Curriculum Vitaes
- Medical files
- Client identification number
- ….
- ….
- Specific words as well

Personal Identifiable Information (PII)



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DATA DISCOVERY ASSESSMENT

Discover personal data

DATA DISCOVERY ASSESSMENT

1 Plan

Plan

- Select data discovery solutions
- Investigate targets and endpoints
- Investigate on exclusions
- Set fingerprint library
- Agree with Work council
- Draft data clean-up protocol

Step 1

DATA DISCOVERY ASSESSMENT

Prepare

- Deploy CASB and EDR
- Prepare targets and endpoints
- Configure fingerprint library
- Configure exclusions
- Trial-run to assess impact
- Investigate on false positives
- Refine data clean-up protocol
- Reduce unstructured data
- Determine final planning

Step 2

DATA DISCOVERY ASSESSMENT

Scan

- Perform CASB analysis
- Perform agent-based scan
- Analyze data discovery results
- Investigate on last false positives
- Agree on data discovery outcomes
- Draft data discovery report

Step 3

DATA DISCOVERY ASSESSMENT

Curate

- Identify custodian
- Perform data curation
- Execute data clean-up protocol:
  - Classify personal data
  - Dispose data where required
  - Condone where permitted
  - Enhance security where needed
  - Execute retention policy

Step 4

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