

# GDPR EDGE

YOUR ENTERPRISE  
COMPLIANCE SOLUTION

# GDPR EDGE

POWERED BY INTEL

## Select IntraEdge Clients



MCKESSON  
Empowering Healthcare

LifeLock®

DHL

Yum!



intuit.



DISCOUNT  
TIRE

APOLLO  
GROUP

PETSMART

CHOICE  
HOTELS

AmericanAirlines



boingo

Blackboard  
transact



Banner Health®

SIRIUS XM  
SATELLITE RADIO

PEARSON

REPUBLIC  
SERVICES

# IMPACT DE L'AUTOMATISATION



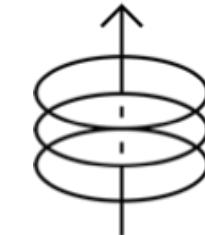
ÉLÉMENT DE SOLUTION

ÉTAPE 1



PORTAIL  
& REPORTING

ÉTAPE 2



CENTRALISATION  
DES DONNÉES

ÉTAPE 3



AUTOMATISATION DU BACKEND

\* Ceci est une approximation basée sur des exemples réels. Le pourcentage réel de surcharge par fonction varie en fonction des volumes de demandes, du nombre de sources de données, de la nature des demandes et d'autres variables.

# IMPACT OF AUTOMATION

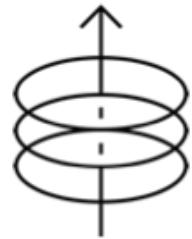
## ÉLÉMENT DE SOLUTION

ÉTAPE 1



PORTAIL & REPORTING

ÉTAPE 2



CENTRALISATION DES DONNÉES

ÉTAPE 3



AUTOMATISATION DU

RÉDUCTION EN POURCENTAGE

25%

40%

30%

FRAIS GÉNÉRAUX OPÉRATIONNELS  
DU DROIT D'ACCÈS DE LA PERSONNE CONCERNÉE



Validation de la demande



Validation d'identité



Gestion du flux de travail,  
Enregistrement et rapport



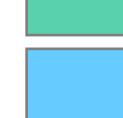
Recherche/Identification de données



Collecte/extraction de données



Emballage et présentation des données



Rejeter les demandes



Modifications de données  
(suppression, anonymisation,  
modification)



Ad hoc / Cas particuliers /  
Sources de données manuelles

\* Ceci est une approximation basée sur des exemples réels. Le pourcentage réel de surcharge par fonction varie en fonction des volumes de demandes, du nombre de sources de données, de la nature des demandes et d'autres variables.

# A REALISTIC SCENARIO



À: [privacy@brand.com](mailto:privacy@brand.com)  
DATE: 25/5/18

OBJET: [Demande de données](#)

Messieurs,

Je veux prendre connaissance des [informations](#) que vous avez sur moi car je voudrais le droit de les [modifier](#) ou de les [supprimer](#) en tout ou en partie.

En vertu du RGPD, vous avez [un mois](#) pour vous conformer.

Cordialement,

[Nancy Melbourn](#)



Comment puis-je gérer cela de manière à prouver que nous sommes poursuivis ou condamnés à une amende?

Quel genre de demande est-ce exactement? Comment est-ce que je le traite? Dois-je le traiter?

J'ai 80 systèmes backend. Comment trouver ses données dans chacune?

Comment puis-je lui transmettre ses données de manière à ce qu'elle puisse les comprendre?

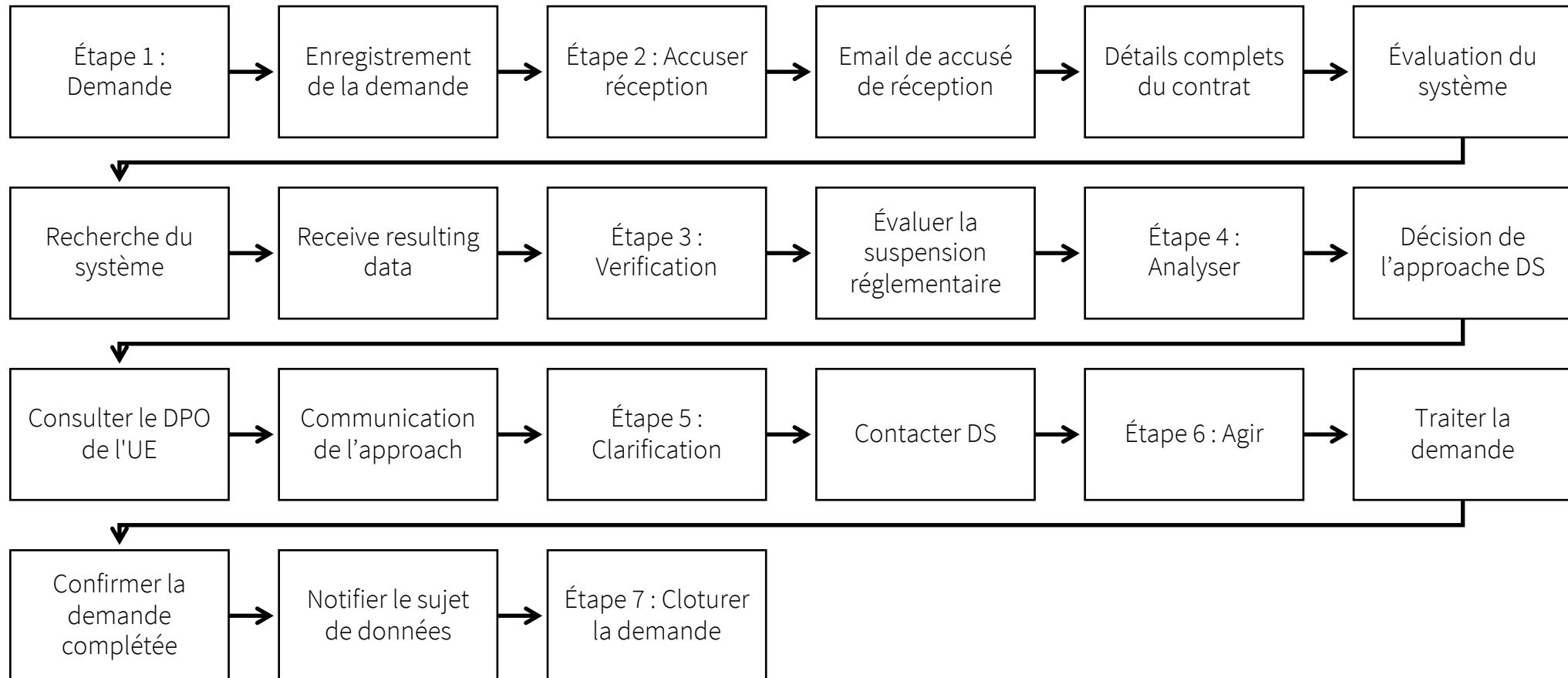
Comment pourrais-je supprimer ses données sur tous ces systèmes?

Comment vais-je réagir à la demande dans le temps?

Est-ce vraiment Nancy? Est-ce du spam? Est-ce une tentative de fraude?

Je viens de recevoir 1000 demandes. Comment vais-je gérer?

# UN EXEMPLE DE PROCESSUS MANUEL :



# PRINCIPES DIRECTEURS

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## SATISFACTION DU CLIENT

- ✓ Les sujets de données devraient être satisfaits par la rapidité, la clarté et l'éducation

## PRENDRE LE CONTRÔLE

- ✓ Il convient d'indiquer clairement aux personnes concernées ce qu'elles peuvent perdre et de toujours leur donner des options permettant d'abandonner ou de préciser une

## SÉCURITÉ

- ✓ Les identités des utilisateurs doivent toujours être validées et leurs données sécurisées

## AUTOMATISATION

- ✓ Les rapports et l'auditabilité doivent pouvoir être produits à la demande et les tâches courantes doivent être automatisées.



## DATA SUBJECT TOUCH POINTS



PHYSICAL & POINT  
OF SALE



WEBSITE  
& DIGITAL



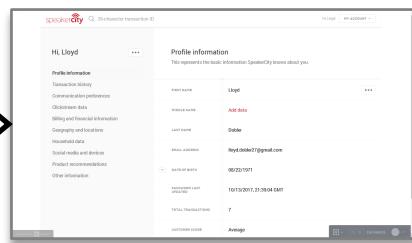
ANYWHERE...

SHOW ME MY DATA  
INSTANTLY

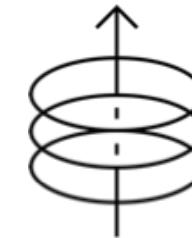
CHANGE MY DATA  
AT SCALE

MANAGE CONSENT  
ACROSS SERVICES

GDPR EDGE



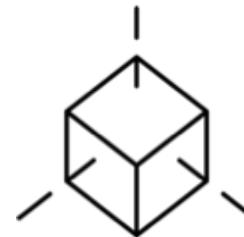
CONSUMER PORTAL  
ALL DATA IN ONE PLACE



DATA LAKE  
AZURE, POWERED BY INTEL®

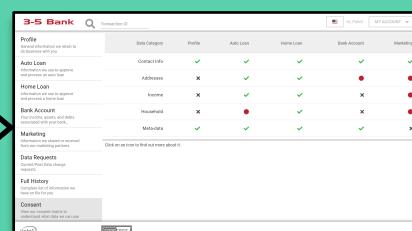
Forget  
Contest  
Transfer

DATA ACCESS REQUESTS  
AUDITABLE & AUTOMATED



BLOCKCHAIN LEDGER  
BUILT ON SAWTOOTH BLOCKCHAIN

NEW!



INGEST ALL DATA  
CENTRALIZED & AUTOMATED



COMPANY  
DATA SOURCES



MULTI-POS



ECOMMERCE



CRMS



ANALYTICS



ANYTHING...

*Intuitive Consent Management, detailed logging, version control, tied to a matrix of services and data elements. All logged to the blockchain for future retrieval and forensics. Presented in a straightforward way.*

# POURQUOI AUTOMATISER LA CONFORMITÉ?

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## REEMPLACER LES DEMANDES D'ACCÈS MANUEL

- ✓ Éliminer les SAR non structurés
- ✓ Valider l'identité de l'utilisateur
- ✓ Transfert d'informations sécurisé
- ✓ Intégration aux systèmes de ticketing et d'authentification existants
- ✓ Automatiser les rapports et l'auditabilité
- ✓ Gérer les rapports de consentement du client

## METTRE À L'ÉCHELLE ET AUTOMATISER LA CONFIDENTIALITÉ

- ✓ Automatiser 95% des droits individuels
- ✓ Créez une expérience utilisateur agréable et transparente
- ✓ Contrôler et influencer les droits à oublier
- ✓ Prise en charge de plusieurs cadres législatifs sur la protection de la vie privée, par zone géographique



# INDUSTRY LEADERS DEVELOP FIRST BLOCKCHAIN-BASED GDPR SOLUTION

[HTTPS://WWW.BDO.COM/NEWS/2018-MAY/INDUSTRY-LEADERS-DEVELOP-FIRST-BLOCKCHAIN-BASED-GD](https://www.bdo.com/news/2018-may/industry-leaders-develop-first-blockchain-based-gd)



FINANCIAL &  
TECHNOLOGY  
PARTNER.

ARCHITECTURE,  
SECURITY, BLOCKCHAIN  
AND HARDWARE  
CONTRIBUTIONS

AN INTEL® IOT MARKET  
READY SOLUTION



GO-TO-MARKET  
PARTNER.

AZURE-HOSTED DATA  
LAKES AND BUSINESS  
INTELLIGENCE SERVICES



END-TO-END GDPR  
SPECIALIST.

RESELLER, GDPR AND  
DATA PRIVACY  
CONSULTING SERVICES  
IN 152 COUNTRIES.



STRATEGIC  
PARTNER.

TECHNOLOGY  
INTEGRATION AND  
SERVICES PARTNER



DEVELOPMENT &  
COMMERCIALIZATION.

BIG DATA AND SECURITY EXPERTISE,  
SOFTWARE DEVELOPMENT, AND  
COMMERCIALIZATION

# La Situation de la Conformité RGPD



the new TRUSTe

October 2018

## Consulting & Formation



## Validations des conformités



## Plateforme de Gestion



### Des Experts

- 300+ person global team
- CIPPs, former CPOs, world renowned experts
- Decades of experience at top brands across all industries
- Large engineering & support team

### Des Processes Validés

- 20+ years and 1000s of engagements used to inform and refine
- Based on key global standards: GDPR, FIPPs, OECD, etc.
- Developed by privacy experts
- Powered by industry leading technology

### Technologie Puissante

- 7 years experience operating platform at high scale
- 6 modules and growing
- Used by 1,000+ clients
- Powers consulting & certification services
- Purpose built for privacy
- Flexible SaaS architecture

# Enquête RGPD TrustArc / Dimensional

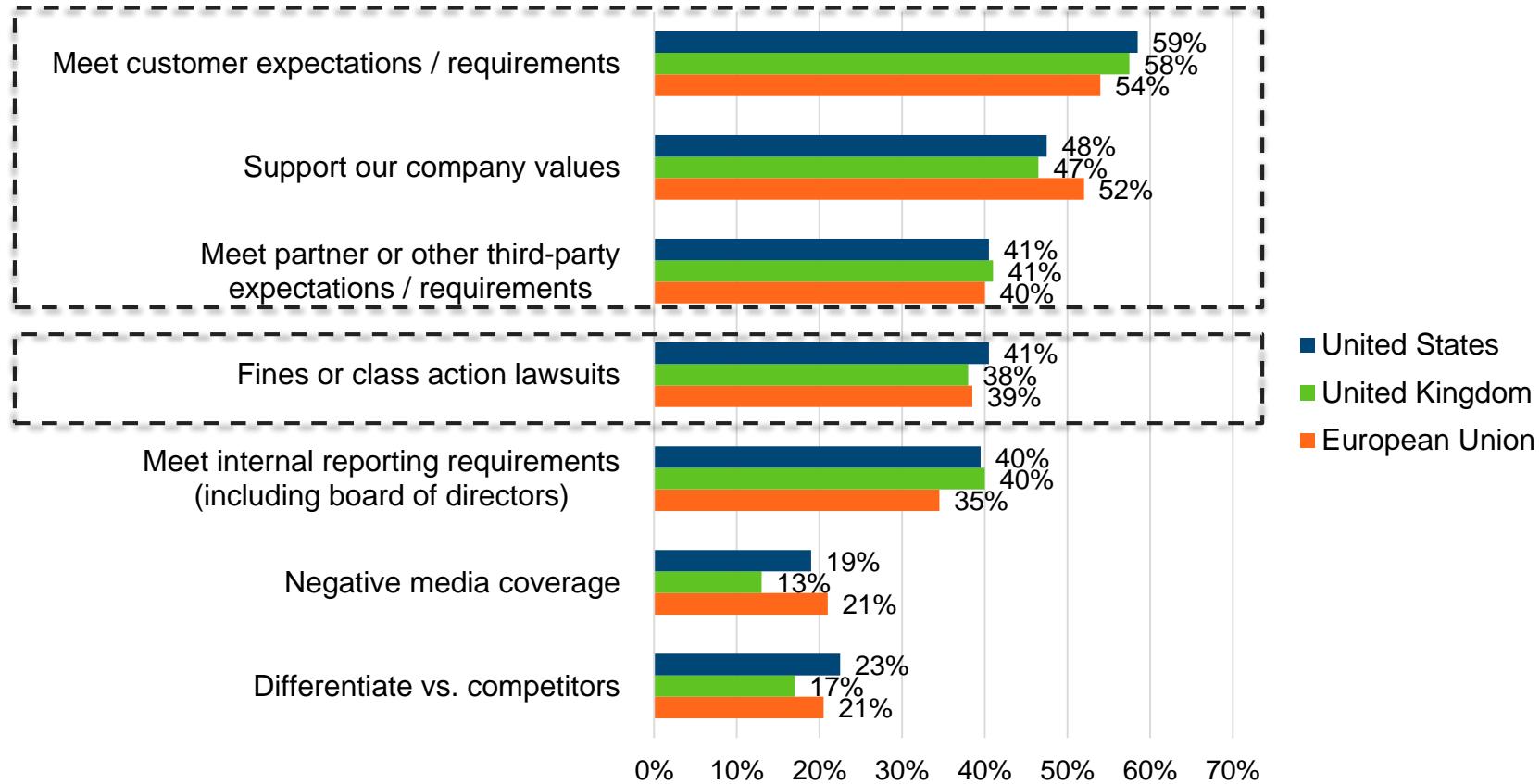


- TrustArc partnered with Dimensional Research to survey GDPR compliance status and plans
- June 2018, post the May 25<sup>th</sup> deadline
- 600 respondents
- Equal mix of US, UK, Other EU
- 50% in IT, 50% in Legal
- Mix of executive, manager and individual contributors
- Minimum of 25% focus on privacy
- Over 500 employees
- Mix across wide range of regulated and non-regulated industries
- See report for full demographic breakdown

# Quelles sont les Motivations des Entreprises?

Motivated more by values and customer and partner expectations than fear of fines

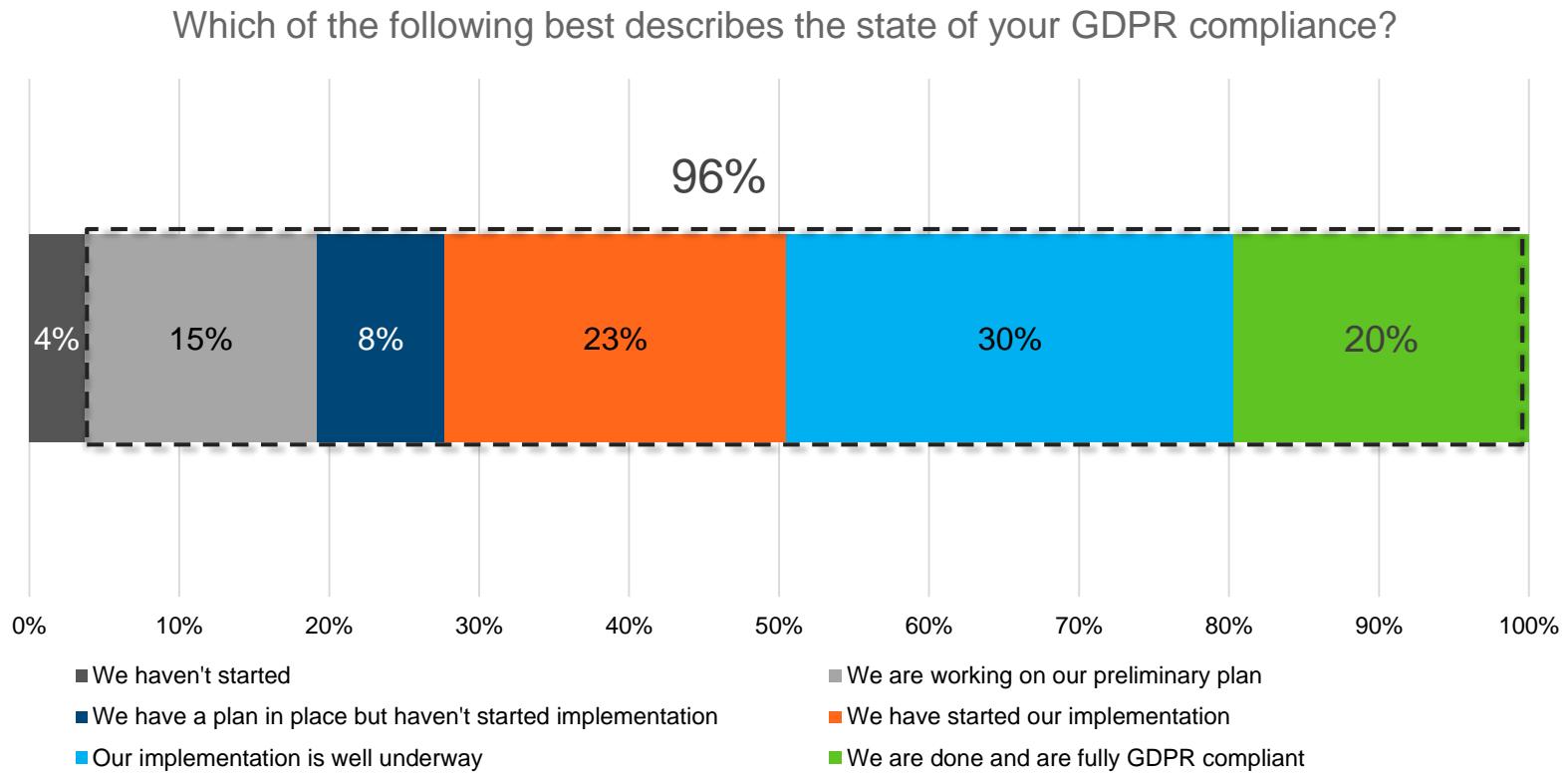
What are your primary reasons for investing in GDPR compliance?



TrustArc – Dimensional Research July 2018

# La Conformité RGPD Juste en Cours...

96% have started, but only 20% are fully compliant



TrustArc – Dimensional Research July 2018

# **Les Challenges de la Gestion de la Confidentialité des Données**

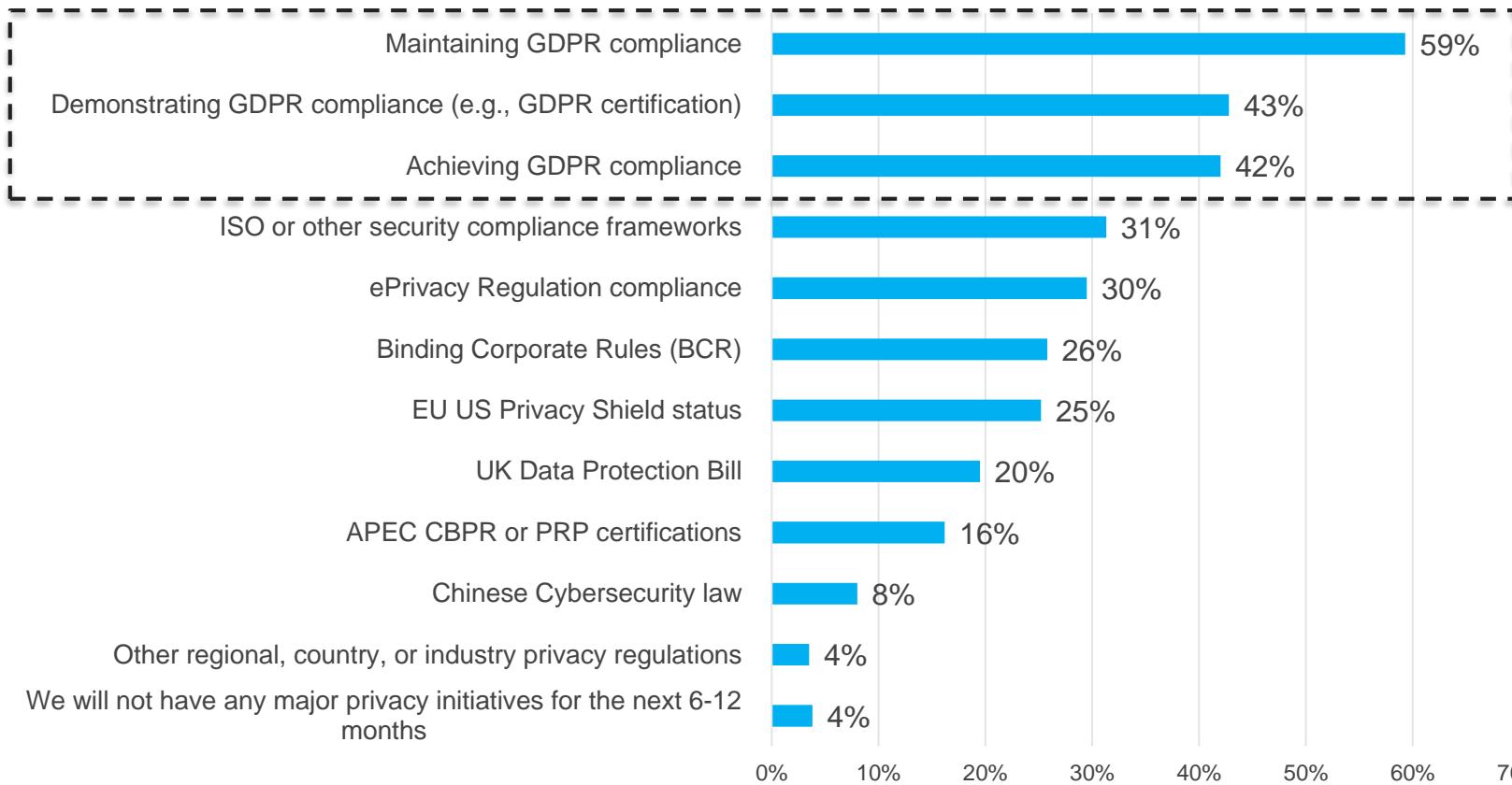


# Top Privacy Challenges for 2H18 – 1H19

**GDPR. GDPR. GDPR.**

Security compliance, ePrivacy, BCRs and Privacy Shield also on radar

What will your top privacy initiatives be for the next 6-12 months?

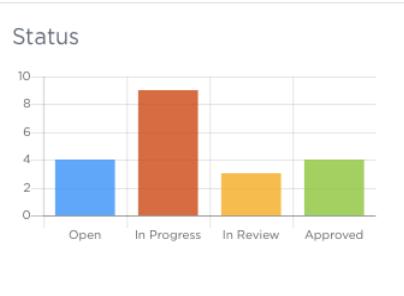


TrustArc – Dimensional Research July 2018

# Importance de la Visibilité Temps Réel et des Rapports de Conformité Automatisés

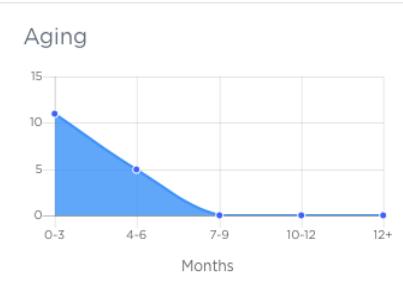
### All Assessments

#### Status



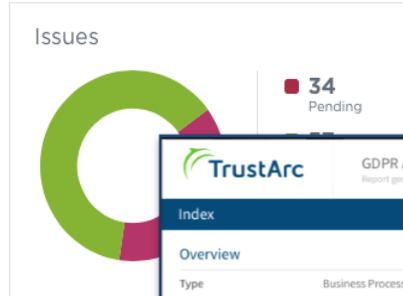
Status	Count
Open	4
In Progress	9
In Review	3
Approved	4

#### Aging



Months	Count
0-3	10
4-6	5
7-9	0
10-12	0
12+	0

#### Issues



Status	Count
Pending	34

Filter Date: Select ... By: Published Date Template: All Status: All

Search Assessments Advanced Search View 25 rows Configure Columns Download Re

<input type="checkbox"/> Id	Name	Template	Owner
<input type="checkbox"/> PID00100021	Marketing GDPR Vendor Assessment	GDPR Vendor Assessment (v3)	Nicki Sroka

**TrustArc** GDPR Article 30 Business Process Report  
Report generated 29 June 2017 Page 2 of 2

#### Index

Type: Business Process Title: UK HR Recruiting Process Owner: Created: Toby Chrod Updated: 18 Dec 2016 5 May 2017

#### Processing Description

This BP describes the Human Resources process for the UK offices of Global Corp starting in 2017. Personal Information is collected in order to Qualify job applicants and facilitate the interview process.

#### Data Collection

Processing Purpose: Employee Hiring  
Data Subject Types: Employee, Prospect, Job Applicant  
Data Element Collected: Name, Initials, User name, Street Address, Postal Code, Telephone Number, Device ID, Email address, IP address, Social media account name

#### Processing Entities

Controller: Global Corp. Inc (UK)  
Processor: Greenhouse (UK), Amazon Web Services (UK)

#### GDPR Article 30 Related

High Risk Data Processing: Yes, this business performs high risk data processing  
Legal Basis for Processing: Legitimate interest  
Data Retention Period: 5 years  
Security Controls: Transmission encryption; Access management Procedures; Comprehensive Information Security Policy  
Internal Data Transfer: None

#### Data Flow



25

TrustArc Inc – All Rights Reserved, 2018



# TrustArc Etudes de Cas: Technologie

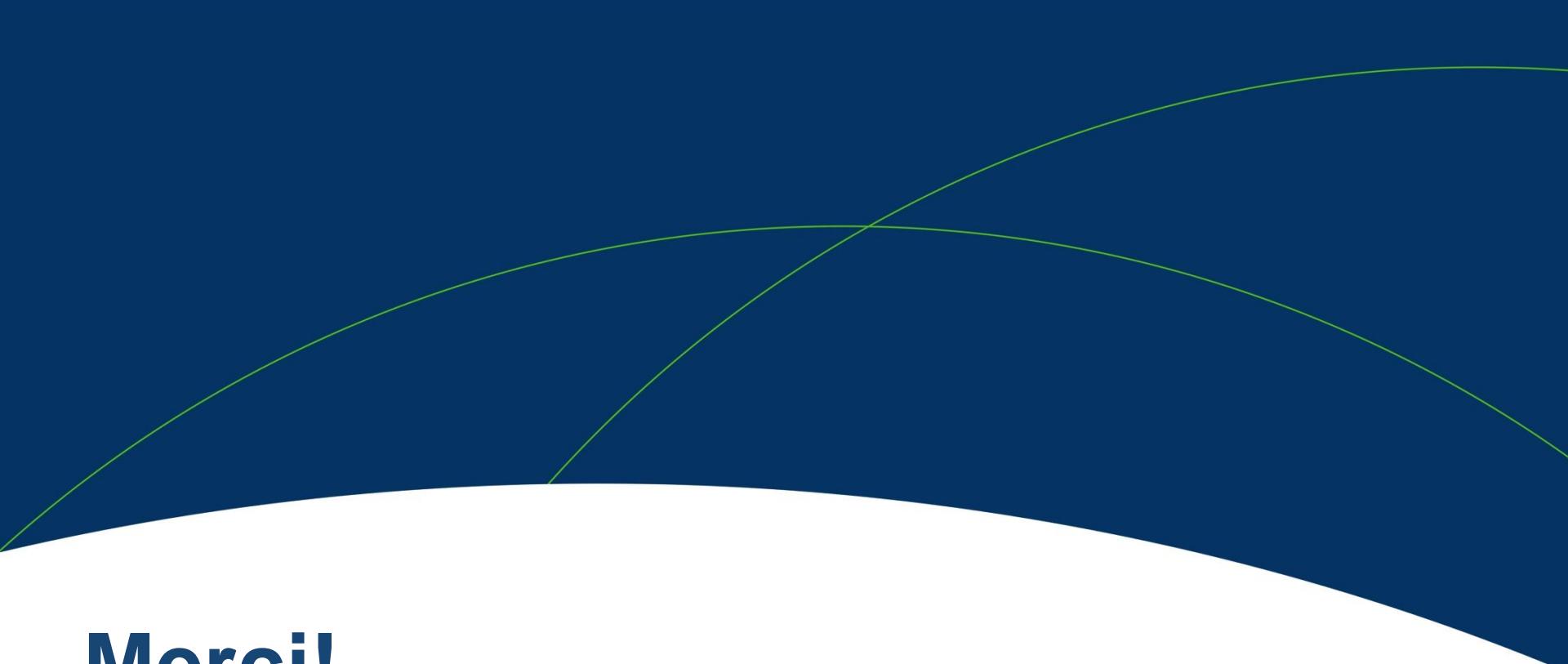
Company	Overview/Challenge	TrustArc Solution
	<ul style="list-style-type: none"> <li>F- 50 global hardware &amp; software technology company</li> <li>Legacy in-house assessment solution was hard-coded, difficult to modify and too manual to scale</li> <li>Also limited in terms of producing audit trails and not enabled for auto-tasking - compliance issues relating to privacy rules could not be auto-flagged</li> </ul>	<ul style="list-style-type: none"> <li>Assessment Manager to automate PIAs, DPIAs, and other risk assessments, incorporating custom-designed privacy rules, resulting in automatic flagging of issues and an increase in number of users by 60% to over 8,000 and a 300+% increase in number of privacy assessments generated per year</li> <li><i>"TrustArc is a trusted IBM partner"</i>: Anick Fortin-Cousens, CPO</li> </ul>
	<ul style="list-style-type: none"> <li>SaaS Machine Data Analytics for DevOps and Security</li> <li>Needed to demonstrate GDPR compliance, both as controller and processor to customers, partners and 3rd parties</li> <li>Needed a competitive GDPR differentiator</li> </ul>	<ul style="list-style-type: none"> <li>Assessment Manager to automate PIAs, DPIAs, and produce Article 30 reports</li> <li>Data Flow Manager to map business processes</li> <li><i>"TrustArc's got a lot of great things"</i>: Jen Brown, DPO</li> </ul>
	<ul style="list-style-type: none"> <li>Video conferencing and telehealth services</li> <li>Needed to demonstrate GDPR compliance, both as Controller and Processor to customers, partner and 3rd parties</li> <li>Needed to continue demonstrating compliance with HIPAA</li> <li>Wished to adopt a "zero cookie load", explicit consent approach for EU visitors to the Zoom website</li> <li>Needed a competitive GDPR differentiator</li> </ul>	<ul style="list-style-type: none"> <li>GDPR Readiness Assessment to identify gaps and develop action plan</li> <li>Data Flow Manager to map business processes</li> <li>Assessment Manager to automate PIAs, DPIAs, and other risk assessments</li> <li>Cookie Consent Manager to collect user consent on websites</li> <li>Website Monitoring Manager to id use of trackers</li> <li>Guidance creating privacy framework, internal / external policies, retention schedule, and incident response processes</li> </ul>

# TrustArc Etudes de Cas: Services Financiers

Company	Overview/Challenge	TrustArc Solution
	<ul style="list-style-type: none"> <li>Multi-national technology services company (F- 500 company)</li> <li>Issuer of credit, debit and pre-paid charge cards</li> <li>Operates in over 210 countries and territories, including Asia Pacific</li> <li>Needed to demonstrate GDPR &amp; APEC CBPR compliance, both as controller and processor to customers, partners &amp; 3rd parties</li> <li>Needed a competitive GDPR differentiator</li> </ul>	<ul style="list-style-type: none"> <li>Assessment Manager to automate PIAs, DPIAs, and other risk assessments</li> <li>Data Flow Manager to map business processes</li> <li>Conducted a large number of PIAs and DPIAs across MasterCard's worldwide systems</li> <li>Guidance creating privacy framework, internal / external policies</li> <li>Assistance achieving APEC CBPR certification, demonstrating compliance as a controller under the APEC CBPR Framework</li> </ul>
	<ul style="list-style-type: none"> <li>Insurance for smartphones, tablets, consumer electronics, etc. (operates in over 14 countries)</li> <li>Needed compliance assistance with Canadian privacy rules, including PIPEDA</li> <li>Needed to demonstrate APEC CBPR compliance</li> </ul>	<ul style="list-style-type: none"> <li>Completed Readiness Assessment mapped against Canadian privacy laws and developed remediation action plan</li> <li>Website Monitoring Manager to id use of trackers</li> <li>Assistance achieving APEC CBPR certification, demonstrating compliance as a controller under the APEC CBPR Framework</li> </ul>
	<ul style="list-style-type: none"> <li>Dealer and customer financing, insurance, and related services for AB Volvo trucks, buses and construction equipment in 45 countries</li> <li>Needed to demonstrate GDPR compliance, both as controller and processor to customers, partners &amp; 3rd parties</li> <li>Needed a competitive GDPR differentiator</li> </ul>	<ul style="list-style-type: none"> <li>Assessment Manager to automate PIAs, DPIAs, and other risk assessments</li> <li>Supported assessments in customer's many markets and lines of business</li> <li>"The TrustArc privacy platform has been very helpful in supporting VFS's unified approach ... and to help us prepare for GDPR readiness." – Alexia Maas, SVP &amp; General Counsel</li> </ul>

# TrustArc Etudes de Cas: Media

Company	Overview/Challenge	TrustArc Solution
 <b>CBS</b> Interactive	<ul style="list-style-type: none"> <li>Online content network for information and entertainment</li> <li>Division of CBS and home of CBSNews.com, CBSSports.com, CNET</li> <li>Needed to manage requests from EU residents exercising individual rights under GDPR in automated fashion, with minimal employee effort and with needed information being easy to find and manage with respect to the individual requests to delete, correct, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Assessment Manager to automate PIAs, DPIAs, and other risk assessments</li> <li>Data Flow Manager to map business processes</li> <li>Individual Rights Manager to automate handling of Data Subject Access Rights under GDPR</li> <li>Consulting assistance to deploy Individual Rights Manager and other TrustArc Platform modules</li> <li>Consulting Assistance to train personnel on requirements of GDPR</li> </ul>
	<ul style="list-style-type: none"> <li>Professional American football league</li> <li>Needed 360 degree view of the privacy practices of the organization</li> <li>Needed to demonstrate compliance with GDPR as a controller, with a particular focus on the operations of the UK office</li> </ul>	<ul style="list-style-type: none"> <li>Consulting on privacy policies and procedures and delivery of a privacy gap analysis with remediation recommendations</li> <li>Conducted GDPR Strategic Priorities Assessment and developed a GDPR action plan</li> <li>Assisted customer in demonstrating overall privacy compliance through achievement of TRUSTe Enterprise Privacy Certification</li> </ul>
	<ul style="list-style-type: none"> <li>Business magazine (bi-weekly)</li> <li>Issuer of Forbes Global 2000 list</li> <li>Needed to demonstrate compliance with the GDPR, particularly iconsent management requirements</li> </ul>	<ul style="list-style-type: none"> <li>Cookie Consent Manager to collect user consent on websites</li> <li>Website Monitoring Manager to id use of trackers</li> <li>Ads Compliance Manager to comply with DAA, EDAA and related standards</li> <li>GDPR Strategic Priorities Assessment</li> <li>Assisted customer in achieving EU-US Privacy Shield Certification</li> </ul>

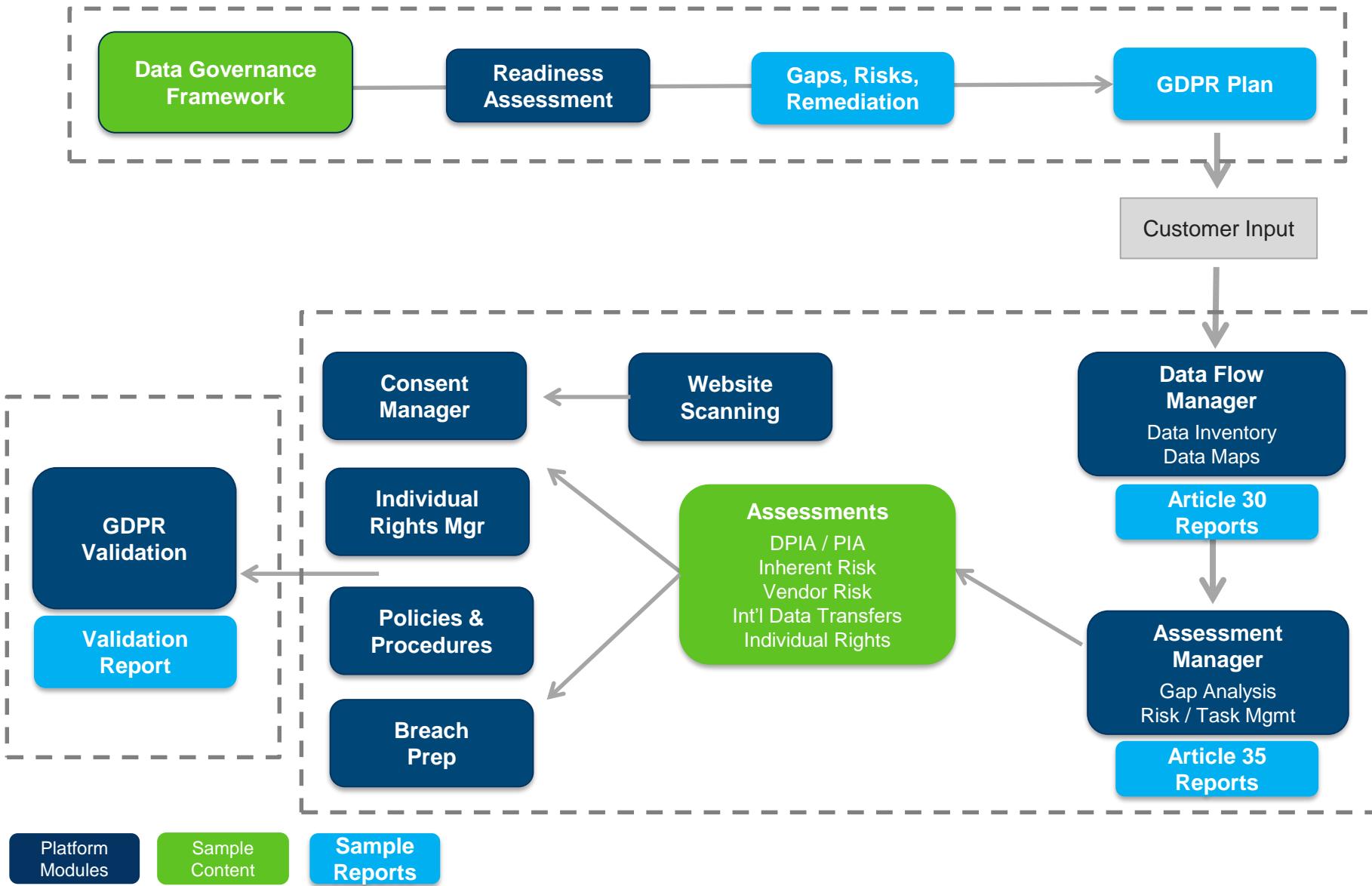


**Merci!**

Questions?



# TrustArc Privacy Solutions – GDPR Example



# Sample Engagement to Prepare for GDPR Started in Fall, 2016

- Global medical device company
  - GDPR assessment plus EU/US Privacy Shield
    - Add in HIPAA assessment
    - Roadmap (started in spring 2017)
      - Data inventory and mapping (Article 30)
      - Policies and procedures (GDPR plus HIPAA)
      - DPIA / PIA process (engineering resistance)
      - Vendor management (including contracts and due diligence process)
      - Individual rights (HIPAA, too)
      - Incident response plan and testing (privacy v. security v. combined)
      - Employee training
      - PLUS
        - » HiTRUST certification readiness
        - » Global comparisons (Canada, Latin America, Switzerland, APAC)
        - » Now CCPA education