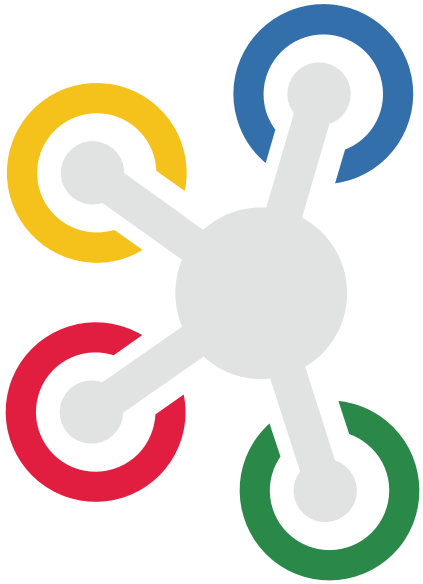

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Unlock the potential of your data

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> The first time from within the leisure sector this type of initiative has been developed for the leisure sector – a game changer
>
> **Phil White, Head of IT, Places for People**

DataHub PARTNERS

DataHub STEERING GROUP

The GDPR 2018

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- Introduction
- Legal Basis
- How it works
- What change
- Consequences

Introduction: Data by name

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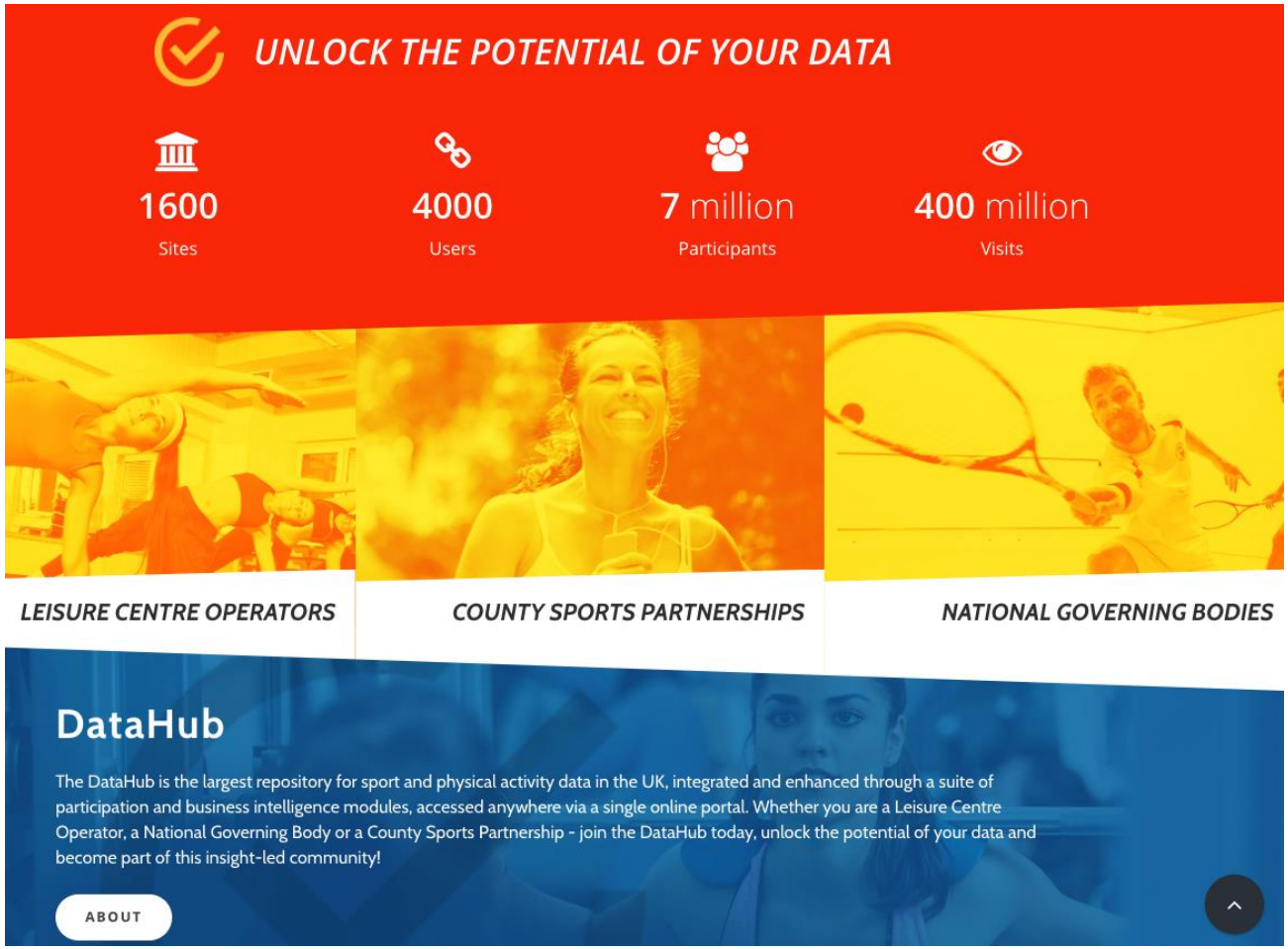

DataHub: The GDPR

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- Driven by
  - Partner collaboration
  - Sector Steering group
  - Drive to reduce inactivity by delivering insight

Partner specialists allow DataHub to exist and grow into the go to resource for the leisure sector

- Salvatore are our chosen partner for GDPR compliance
  - Challenges faced by DataHub
    - Volume of data
    - Complexity of data
    - Variety of sources of data
    - Transparency while protecting commercial integrity
    - The rights of the data subjects
    - Technical capabilities
    - Compliance!!

DataHub GDPR Partner

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Rafael Bloom – Director

Expert in regulatory change management

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GDPR Summary

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Why do we need the GDPR?

Current EU data legislation is from 1995

This introduced the concepts of data controller and processor, established certain data subject rights (access, correction, deletion, block processing)

Much has changed - data volumes, categories, processing, personal devices, cloud etc.

The GDPR is a major change, one of the most heavily lobbied pieces of legislation ever

GDPR Summary

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What is it, legally speaking?

It is a **regulation** as opposed to a **directive**

Pan-EU adoption with no need for national government to pass a local law

However, the GDPR provides guidelines for local structures, competent authority

The UK has tabled the Data Protection Bill – no variance from the GDPR

Brexit will have no impact on the UK's approach to personal data

The GDPR comes into effect well before the UK will leave the EU

The UK Government has little to gain by diluting law around personal data

GDPR Principles

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6 main principles, applying to EU resident citizens' data of a personally identifiable nature:

- Data processing shall be lawful, fair, transparent etc.
- Data collection shall be performed for reasons made explicit to individual
- Data shall only be collected for specific, necessary and relevant purposes
- Data shall be accurate and kept up-to-date
- Means shall be provided for individuals to change details, be forgotten, data portability etc.
- Data shall be kept for no longer than necessary

+ the one overarching principle: **Accountability**

GDPR: PII

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What is Personal Identifiable Information? (PII)

Person	Name Date of Birth NI Number Marital/Partnership Phone Numbers Passport Copy (Face, Handwriting) Driving License / License Plate Ethnic Origin CV
Electronic/Online Identifiers	IP Address Email Address Web Cookies Login Name Digital Identity
Financial	Bank Account Details Payroll Credit / Debit Card
Well-being	Medical Records Health Records Genetic Information Hobbies/Activities
Other	Past Convictions Religion Philosophical Political Opinions Trade Union Membership

GDPR: PII

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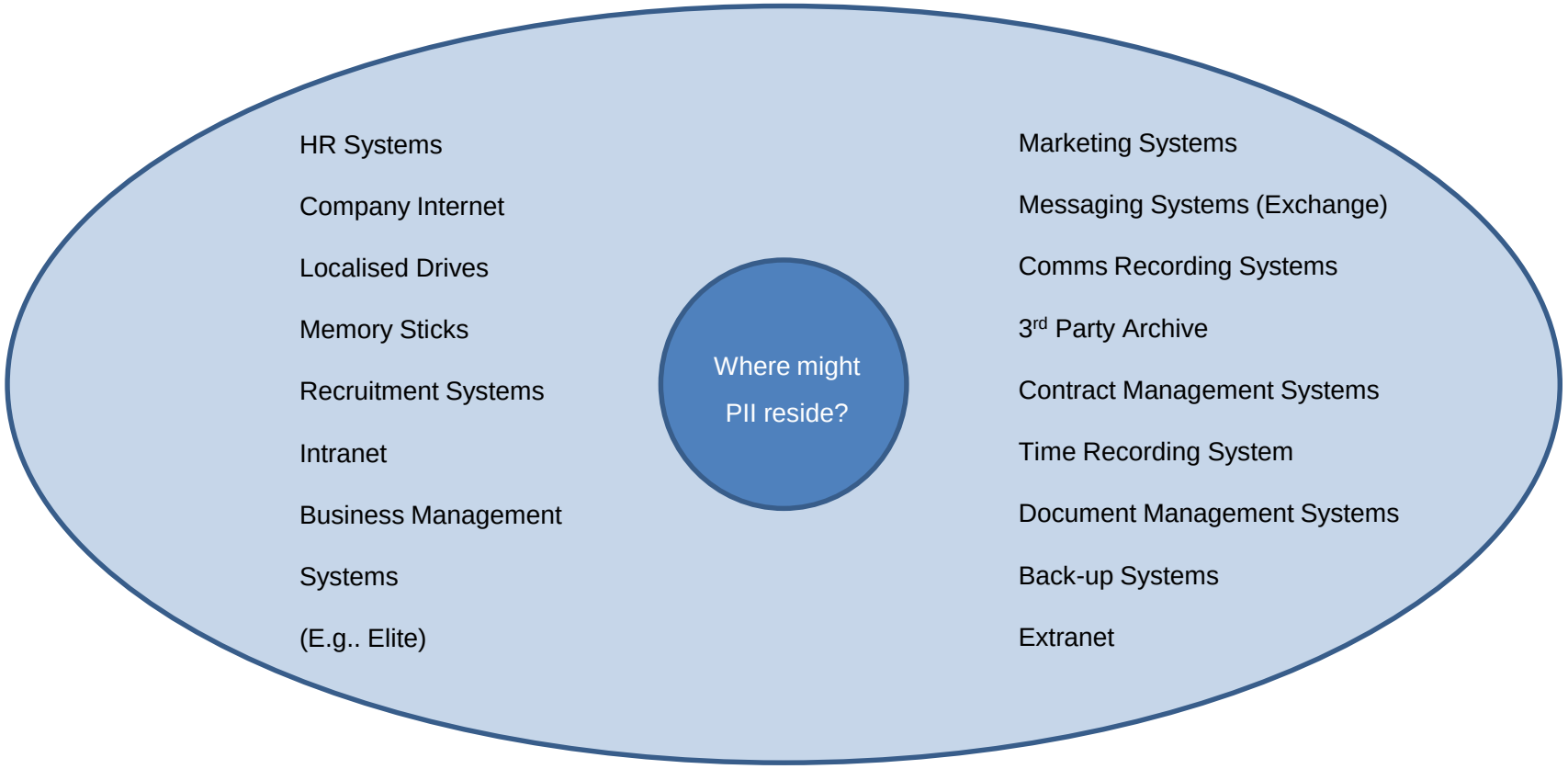

The PII Data Trail

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- Example of home automation device like ‘Alexa’
- PII implicit in service rapidly reaches wide, growing net of 3rd parties

Media	Automation	E-Commerce	Information
Spotify	Google Calendar	Uber	Dropbox
Amazon Prime	Nest / Hive	Just Eat	Wikipedia
Deezer	Tesla	Amazon Prime	BBC News
Tidal	Ring	eBay	Weather
BBC iPlayer		Ocado	NetMD

- Privacy and Security risks grow exponentially

How PII can be abused

- Example of airline booking systems
- Easily guessable Passenger Name Record ‘PNR’
  - Sequential
  - Too simple e.g. Air India 4 digits + one digit for airline
- Poll for common last names and recent PNRs
- Combine with email address, log in to Frequent Flyer, access C/C info

- Things to go wrong:
- Weak Access control
- Weak Authentication
- No ‘rate limiting’ – susceptibility to ‘brute force’ attacks
- No logging – records of access to PII etc. need to be kept!

PII Business Stakeholders

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- The UK Data Protection Bill / EU GDPR has ramifications that cross business silos
- With overall accountability needing to be shown, a data protection board or similar is necessary
- Stakeholders in the board responsible for creating a living culture of personal data protection

Key questions for the Data Governance Board

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- Which data have you defined as sensitive?
- Where is it in your enterprise?
- How is it collected?
- How does it move across systems in your enterprise?
- How are you currently protecting it?
- Who accesses it, how and when? Include 3rd parties
- What applications, scripts, models access it, how and when?
- Have you audited what and who accesses and manipulates data?
- Is it possible to aggregate sensitive data from multiple separate systems?
- What policies are in place to protect this data?
- Where are the risks right now and which are the most severe?
- Who holds ultimate accountability for the data?

Key actions for the Data Governance Board

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- Perform due diligence
  - Audit Data flows and understand who has access, 3rd party risks, supplier risks etc.
- Take a Data inventory
  - Understand what types of data are being processed
  - Establish the purposes for which data is being processed
- Build Controls
  - Provide clear and accurate notice of data usage internally via policy and process
  - Provide clear and accurate notice of data usage externally via notification and T&Cs
- Communicate
  - Communicate the organisation's data policy across the organisation, to vendors and to customers
- Rebuild Consent
  - Where consent is the justification for processing PII, it must be renewed to the standards required by the GDPR
  - Empower Marketing to start this process immediately

GDPR Silo Approach: Scope Impact

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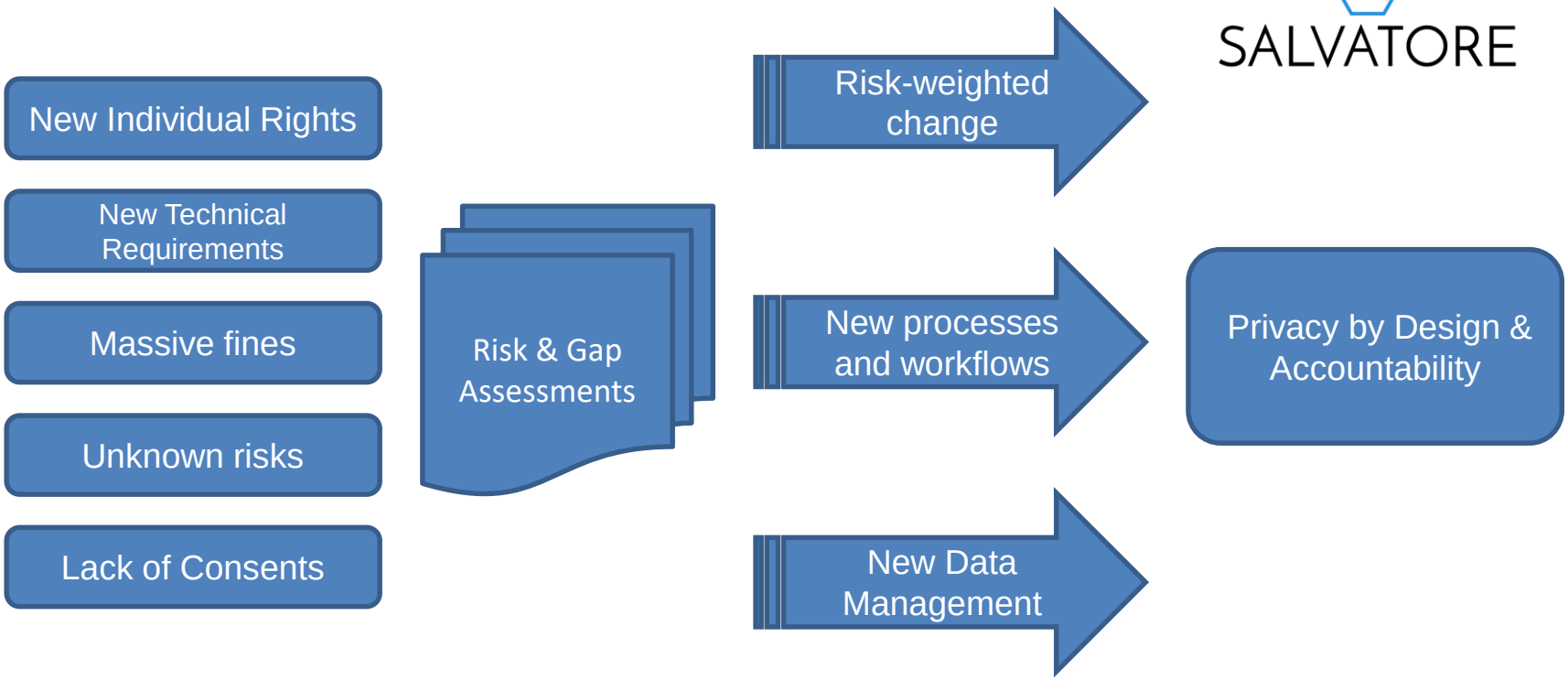

- Collection and processing of PII, not so much technical or legal: A business challenge

- Data ingest: Indexing, validation: Master Data Source
- Data storage: Security, sovereignty, retention management, accessibility
- Data egress: E-discovery, export, audit trails
- HR, Marketing & Customer Service working in a compliant manner

Enterprise Risk Heat Map

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	Client data	HR Data	Access (Discovery, Retention / Erasure	Consents	Export?
Legal & Compliance	PII Policy Definition, legitimate interests	Legitimate Interests, Consents, Retention	Master Data Management, Audit Trails	3rd party data controllers / processors	Data Sovereignty
IT / Data Security	Identify data sets, Security, Privacy, Management	Security, Privacy, Management	Management, Tooling	Management	Tooling
Customer Insight	Access, Processing		Security, Privacy	Process	Customer journeys, Process Optimisation
Marketing / Sales	Consent, 3rd parties, Security	Process	Process	Process	Tooling

Data Privacy / Security Governance

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- Requires all the PII Data Business Stakeholders
  - Due Diligence
  - Data inventory & risk identification
  - Build Controls
  - Communicate and Manage Change
  - Re-build PII structure if necessary but start now
  - Overall change management

PII Governance: Data Management

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- Legal framework behind DM
- Works by maintaining the data protection principles
  - Fair and lawful
  - Purposes
  - Adequacy
  - Accuracy
  - Retention
  - Rights of Data Subjects
  - Security
  - Processing
- Privacy by Design
  - Data flow analysis
  - 3rd party, sovereignty risks
  - Encryption
  - Data Minimisation
  - Pseudonymisation / Tokenisation
  - SAR tooling
  - Audit Trails
  - Breach Reporting – 72h

Marketing / HR

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- Investment in PII is key to compliance & continued customer engagement

- New levels of required consent have major impact
- Improperly-gained consent treated as non-consent
- Major risks with 3rd parties (bought PII data)
- Marketing & Advertising processes bring risk
- Transparency and proactivity are key
- Governance
- Major intersect with legal

Marketing Consent

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- Institutions are required to have a legitimate reason to hold / process PII
- Individuals can ask for data to be corrected / erased / restricted but there can be obvious reasons to refuse – a bank would not be required to erase an individual's financial history!
- This is 'legitimate interest'
- But in Marketing, PII is typically used with individuals' consent serving as justification
- Under GDPR, consent has changed substantially
- PII used without proper consent will breach the GDPR

PII Customer Journeys

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- Task: Map the customer journeys and associated processes required for fulfillment of individuals' rights

  - The right to be informed
  - The right of access
  - The right to rectification
  - The right to erasure
  - The right to restrict processing
  - The right to data portability
  - The right to object
  - Rights related to automated decision making and profiling

Customer Journeys: Data Breaches

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- Task: Create an action plan for data breaches
  - First response, incident triage
  - Single Point of Contact for breach procedures
  - Internal and External plans
  - Notification to the ICO
  - Notification to Customers
  - PR
  - Incident recordkeeping

Customer Facing

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- Investment in customer-facing employees is key to long-term customer trust

- New Types of Customer Service Requests relating to PII
- Requires agents to reach new understanding of rights
- New Customer journeys
- New Processes
- New Reporting

- Also worth investing in board-level data approach

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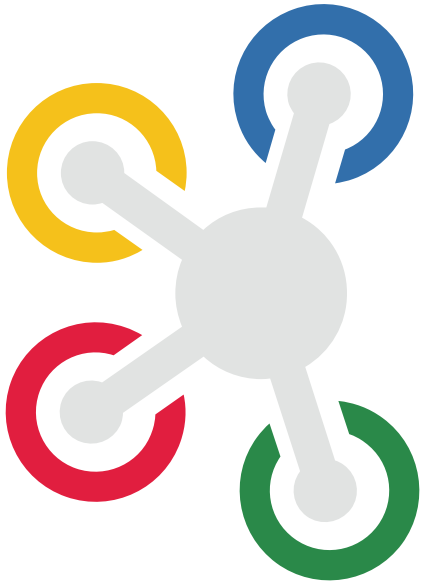
Phil White, Head of IT, Places for People



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