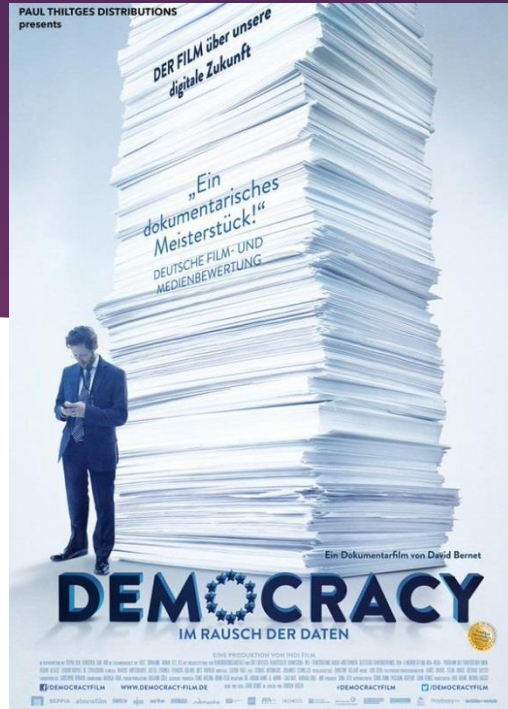


# IBM and GDPR

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# Democracy at work



# Firstly...

- ▶ No one can or should state or claim they are GDPR compliant, certified or anything else.
- ▶ There is no such formal status, certification program, certification body or process.
- ▶ It is a journey - from May 25th, as the regulators formalize and start interpreting, actioning, imposing and influencing what one should or must do for each of the 99 GDPR Articles.

# Some Observations

- ▶ Few everything from the **Data Subjects perspective** – customer centricity
  - ▶ Stopping Discrimination – in all its varieties
  - ▶ Handing back ownership – Facebook information/Cambridge Analytica
- ▶ Be **transparent** – why not?
- ▶ Talk to the DPA, very open
- ▶ At least, know your (why, how, etc.) **Personal Data**,
  - ▶ customers and employee data...especially sensitive data
- ▶ **Have a plan**, a detailed plan



# Some myths

- ▶ **You need 're-consent'...**
  - ▶ Legitimate Interest, not consent, is the way to go - managing consent is tough **MINIMISE DATA**
- ▶ **Direct Marketing/Emailing is Dead**
  - ▶ Not life and death situation, relax
- ▶ **Data Transfer out of EU is not possible**
  - ▶ Data Transfer ok, if model clauses/BCR used properly.
- ▶ **Have to have a DPO**
  - ▶ Good idea, but not needed - <250, personal data processing not core
  - ▶ DPO has special status...
- ▶ **Article 30, onerous...**
  - ▶ <250 and not core, no need.
- ▶ **DPIAs all the time, huge burden**
  - ▶ Not true - only if high risk to data subject
  - ▶ but a good practice anyway

# Key to Success

- ▶ Transparency with your EU data subjects
  - ▶ Hard for some, regardless of customer view
- ▶ Risk-based, so work out the risks
  - ▶ But not just from your perspective
- ▶ Breach and subject access requests will need tight processes
- ▶ Focus on areas where customers interact with your organisation

# The Positives

- ▶ Handing back ownership – Privacy is a human right
- ▶ Discrimination will be more transparent
- ▶ You should now know your data – data centric approach
  - ▶ Not just your personal data
  - ▶ Data quality is a good thing
  - ▶ Where it is, who is using it – data minimisation
  - ▶ Maybe you have even consolidated it? Great – customer 360
- ▶ Different relationship needed – use this opportunity
- ▶ DPA in Ireland is very welcoming
  - ▶ Engage
  - ▶ Head of EDPB saying carrot not stick
- ▶ **Better Security is Good** – save on bitcoin ransoms...



▶ THANK YOU