MDM GDPR Consent Mastering

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Housekeeping Tips











- Todays Webinar is scheduled to last 1 hour including Q&A
- ➤ All dial-in participants will be muted to enable the speakers to present without interruption
- Questions can be submitted to "All Panelists" via the Q&A option and we will respond at the end of the presentation
- The webinar is being recorded and will be available to view on our INFASupport YouTube channel and Success Portal.

 The link will be emailed as well.
- Please take time to complete the post-webinar survey and provide your feedback and suggestions for upcoming topics.



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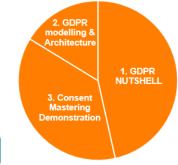


Disclaimer

- Compliance with the GDPR will be based on the specific facts of an organization's business, operations and use of data.
- This presentation provides a set of discussion points that may be useful in the development of an organization's GDPR compliance efforts, and is not intended to be legal advice, guidance or recommendations.
- An organization should consult with its own legal counsel about what obligations they
 may or may not need to meet



Agenda



GDPR Nutshell-Why When Where What?

Business Implications (Data Protection EU/Non EU)

Unleashing power of MDM with governance

Consent Data Services and Architecture

Live-Consent Mastering demo-Informatica Solution Covering All



GDPR nutshell





GDPR is about harmonization of protection of personal data in regard to its processing ways and also increase powers of subjects/ authorities to take action against non compliant business



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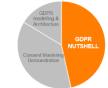
- All 28 FU member countries.
- EU business, organizations, authorities, nonprofit organizations
- Business outside EU processing personal data about EU citizens



Protection of personal data through individual consents via organizational, administrative or technical means and provide evidence of that protection



The Big Picture Key changes of the GDPR



❖Tough penalties:

Fines of up to 4% or $\varepsilon 20M\,$ of annual global turnover

€′000

€′000,000

Previously fines were limited in size and impact. GDPR fines will apply to both controllers and processors.

❖Right to be Forgotten





Data Subjects have the right to be forgotten and erased from records, cease further dissemination of the data, and potentially have third parties halt processing of the data

Affirmative & Retractable Consent





Consent for processing personal data must be clear, context based and must seek an affirmative response. It must be as easy to withdraw consent as it is to give it.

❖ Breach Notification within 72 Hours



Previously fines were limited in size and impact. GDPR fines will apply to both controllers and processors.

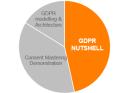
❖ Borderless Scope





Regulation also applies to non EU companies that process personal data of individuals in the EU $\,$

GDPR



GDPR

Definition

Do you know what data you hold, who has access to it, and for what purpose?

Discovery

Do you know where all your in-scope data is?

Execute: Manage, Protect & Monitor

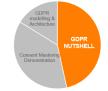
Do you know how you will protect your data and apply appropriate controls?

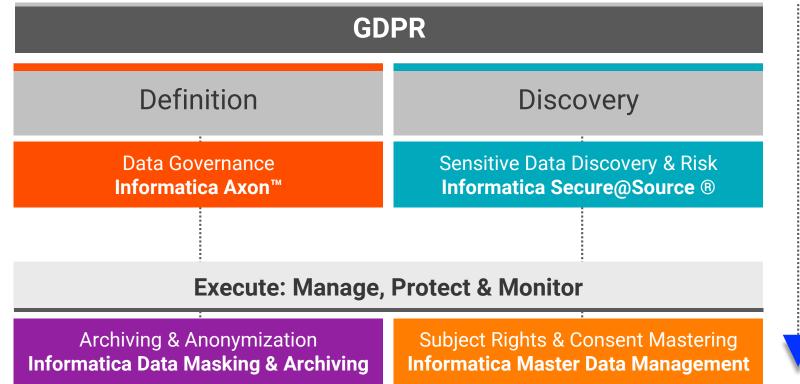
Do you know how you will manage consents and enacting rights?





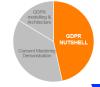
Informatica Data Governance & Compliance Solution for GDPR







GDPR Perspective-Why MDM needs DG?



MDM		
Discovery & Profiling		
Cleansing & Duplication		
Master/Ref Data Maintenance		
Measurement & Monitoring		
Data Publish/Sharing		
BPM/Workflow (ActiveVOS)®		



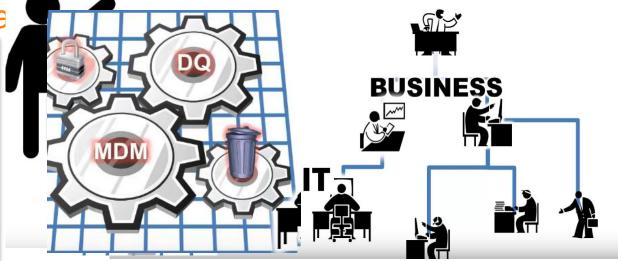




Enforcing Governa



Subject Rights and Consent Compliance



- Do you know whether you have consent to hold and use this data?
- Do you know how you will protect your data and apply appropriate controls?

Enforcing GDPR process & Consent Mastering via C360 10.4

- IT should not own DG program
- Business should be Key drivers of DG program while IT as participating member laying down MDM/DQ Frameworks.

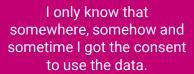
IT Business Collaboration via MDM BPM Workflows(ActiveVos)



Business implications(GDPR - a big shift in management of Consent)

In past:

Opt-in, Opt-out flag

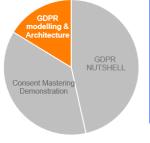


Consent is not just an Opt-in/Opt-out flag... I need to provide:

- WHY: The purpose for which the consent was collected.
- ❖ WHEN: The time I need the data stored for that purpose. Typical default is 6 months.
- WHAT: What data needs to be collected for that purpose.

Now

- Consent proofs accountability
- Privacy by default
- Controllers
- Purposes
- Policies
- Retention periods
- Share with 3rd party
- Audit
- History
- Cross border policies
- Portability to other parties
- Portability from other parties
- Withdrawal, rectification, objection and access rights
- Right to be forgotten
- Anonymization
- "In behalf of" data
- Unstructured data (i.e. images)
- Single view of person





3 BUCKET TYPES OF IDENTIFIERS FOR PERSONAL DATA

IDENTIFIER

Art. 4

Online IDENTIFIER

Rec. 30

Special Category IDENTIFIER

Art. 9

(Personal Data about the Data Subject)

Name

Address

Email Address

Passport Number

Financial & Bank

Info

Date of Birth

Healthcare Data

Biometric Data

Employee ID

Phone Number

("...online identifiers [Personal Data] provided by their [Data Subject's] devices, applications, tools and protocols...")

IP addresses, static

and dynamic

MAC addresses

Cookies

International Mobile Equipment IDs

(IMEI)

International Mobile

Subscriber Identity

(IMSI)

Advertising IDs

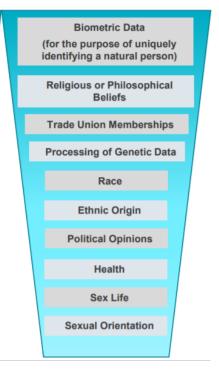
GPS or other

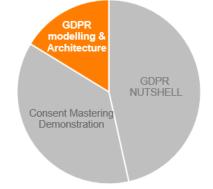
location data

Log files

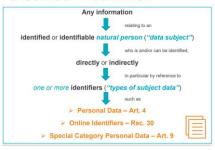
Browser fingerprints

(Special Categories of Personal Data about the Data Subject)





PERSONAL DATA DEFINITION





Expanded GDPR Rights achieved with MDM

- Right to be informed
- Right to erasure(RTF)
- Right to data portability
- Right to restriction
- Right to rectification
- Right of access
 - Including additional processing details

- Right to object
- Right to prevent automated processing, including profiling

ODPR modelling & Architecture GOPR NUTS-ELL Consent Mastering Demonstration

Other MDM functionalities required/wanted for GDPR:

Metadata?

Security?

Role & processing-purpose specific layouts

Special care (with aditional metadata) when:

Subject is a child: a proof with the consent of the parents should be provided.

Shared cross borders outside the EU: we need an special consent of the subject, we need to inform the destination country, we've to respect the laws.

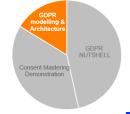
Shared with 3rd party providers: we've to inform to the subject what is the 3rd party and specify how he can apply his rights to that party.

Audit?

Complete Consent lineage, log the personal data usage.



Introduction: GDPR non-MDM functionalities

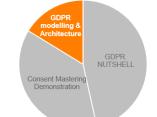


Other functionalities required for GDPR that we don't pretend to cover with MDM:

- Data breaches: in case a data gap occurs, the affected subjects has the right to be informed. It's
 more a Forensic task.
- Policy definition: a clear definition of the GDPR data governance policies, actors and taxonomies should be done. AXON more suitable for that.
- Consent evidence: we must store the proof of the consent. For example, if the customer filled a
 form with his personal data and consents, we've to keep a copy of the form, or if the customer gave
 us his data through the call center, we should to record it. Typically a content manager tool can be
 used for this. The URL with the proof can be stored with the MDM's consent.
- Data anonymization: when the erasure right is applied by a subject, we can delete the data or anonymize it. To anonymize, we can use a simple rule (i.e replace the last 4 digits of the phone by XXXX), or use data masking tools.
- Archiving: if we don't have the consent or the consent have been expired, we can still store it for historical purposes. Data Archiving tool can be used.



DPO Intro-GDPR Consents as a Competitive Advantage





Business



Consents Mastered

Data as a Risk

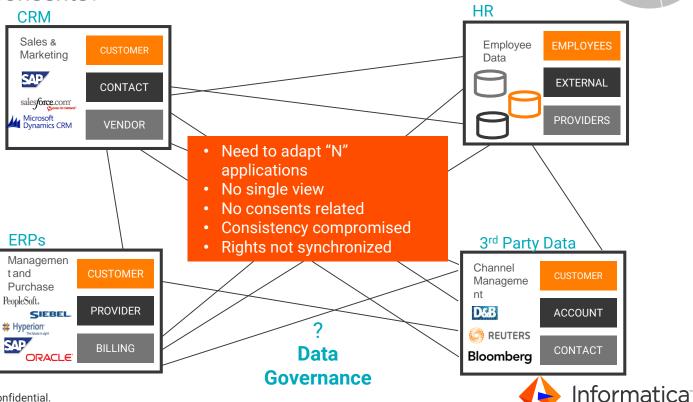
Data as an Asset



Information Challenge

Where to manage consents?

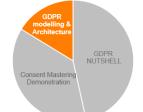
Using an existing application (i.e. CRM) to try to centralize consents is not a good idea:
Consents should exist for ALL senstive information and for ALL processes



GDPR modelling 8 Architecture

> GDPR NUTSHELL

Subject Rights and Consent: built upon MDM

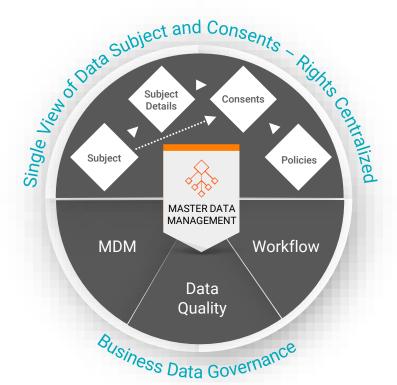


CRM



ERPs





HR

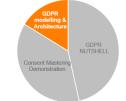


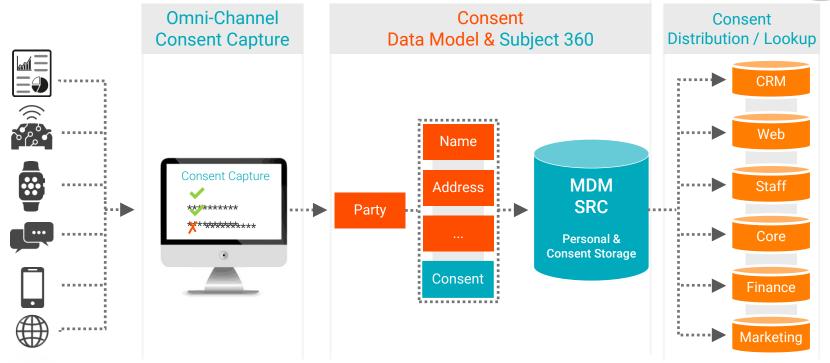
3rd Party Data





Example: Consent Data Services

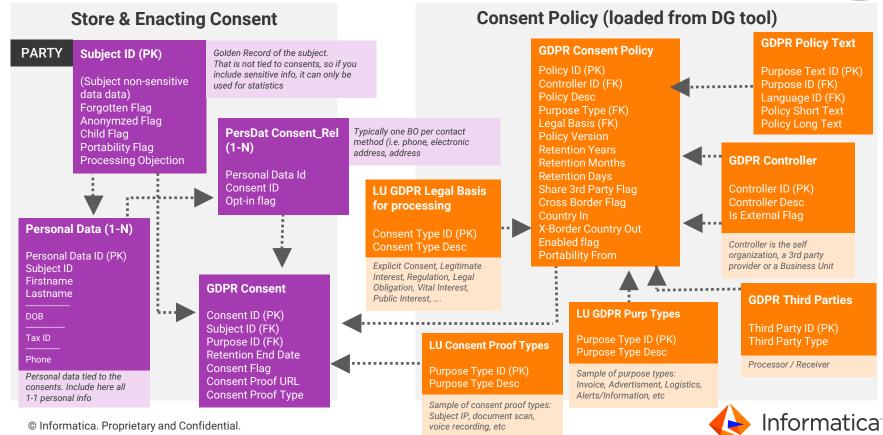




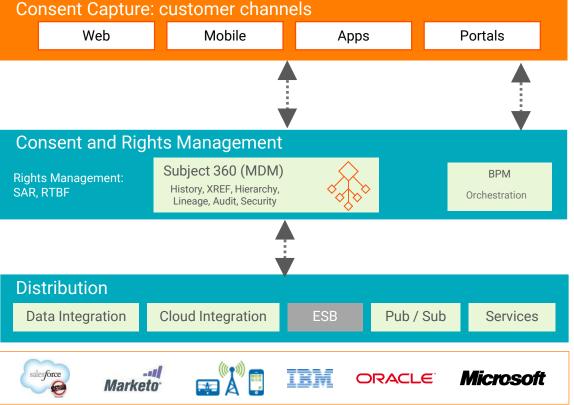


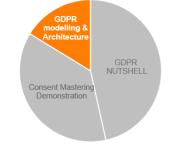
Simplified MDM Consent and Rights Data Model





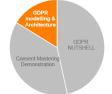
Subject Rights and Consent Architecture







Industry Accelerator: Prebuilt templates to fasten up implementation



Prebuilt Data Models

i i obdiit Bata iii odolo			
Industry	Domain(s)		
Horizontal	Party Model, Reference Data, Supplier Data		
Life Sciences	Investigators, Sites, Studies, Drugs, Compounds, Medical Devices, Provider, Affiliations, Medicinal Products		
Healthcare	Provider , Member, Payer, Plan, Groups, Contracts		
Telecommunications	Customer, Households, Contracts, Products, Services, Locations		
Travel and Hospitality	Customer, Loyalty, Location, Products & Services, Preferences		
Education	Constituent, Courses, Publications		
Media and Entertainment	Customer, Location, Product, Content Catalog		
Insurance	Customer, Broker, Agents, Beneficiaries, Policy, Insurables, Products, Services, Death Master		
Banking and Capital Markets	Customer, LEI, Counterparty, Financial Account, Securities, Asset Classes		
Retail	Customer, Loyalty, Product, Location, Employee GDSN – Food & Beverage		
Oil & Gas	Well Heads, Assets, Location, Contracts, Supplier		
Manufacturing and High Technology	Customer, Product, Supplier, Contracts		
Public Sector	Person of Interest, Citizen, Supplier,		

Industry Accelerators

Customer Data Management for Insurance	Provider Data Management for Life Sciences
Customer Data Management for Retail	Clinical Trials Data Management for Life Sciences
Securities Data Management	Medical Device Data Management
for Banking & Capital Markets	for UDI Compliance
Counterparty & LEI Data Management for Banking & Capital Markets	Reference Data Management
Provider Data Management	Well Head Master*
for Healthcare	for Oil & Gas
Payer Data Management	Medicinal Products Data Management*
for Healthcare	For IDMP Compliance

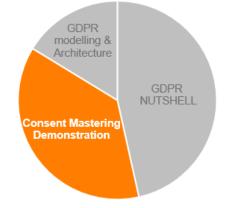
GDPR - SUBJECT RIGHTS AND CONSENT ACCELERATOR

- Single view of the subject
- Store consents and sensitive data
- Provide purpose-based perspectives to the consuming applications
- Enacting rights: Access, rectify, objection, portability, right to be forgotten



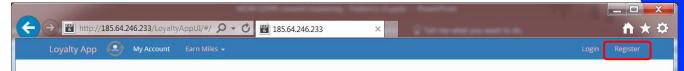






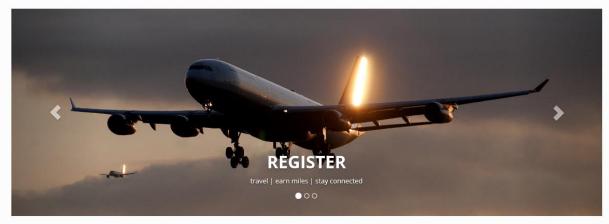
Entering Data & Consent from Apps Mock Applications





Hello. I'm Jim Tailor, and I want to join to the Wembley's Airlines frequent flyer program, so I'll click on the "register" button







EARN MILES

Find great ways to earn miles for tons of great rewards.

View details »



USE YOUR MILES

Choose from over 800 rewards in activities, merchandise and travel.

View details »



STAY CONNECTED

Connect with Aeroplan and other members to get the most out of the program.

View details »

♣ Informatica GSS Russia

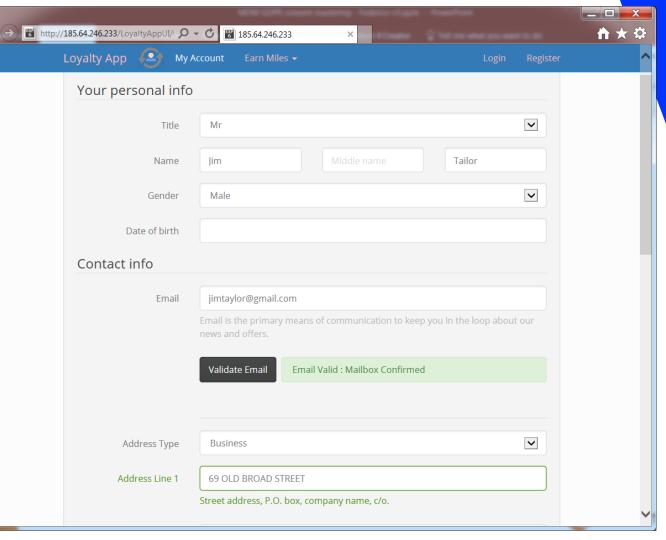
The webpage ask for my personal data, so I'm typing it.

Note I'm using my nickname and personal email address... also the 69 Old Broad Street address

(continues next slide)



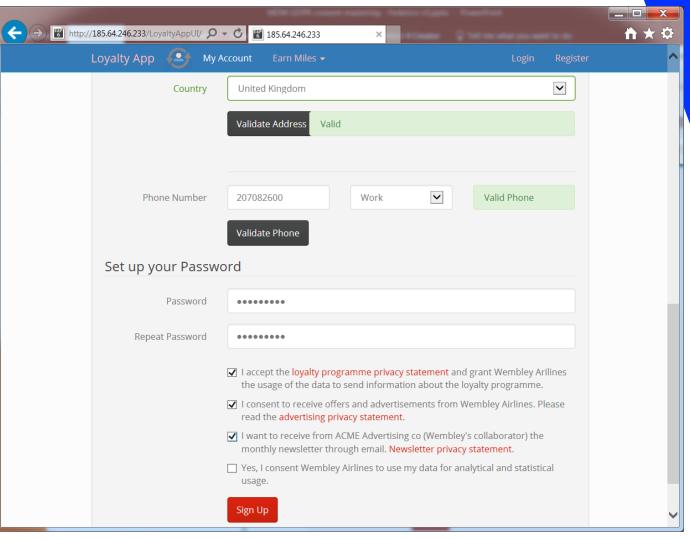
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At the bottom I got four different consent policies. I'll accept the first three: I allow Wembley to send me Information from the loyalty program, I accept to receive offers, and also the newsletter. But I don't want my data to be used for analytical usage

Note: policies and texts are fully configurable; those are just for demo purposes.

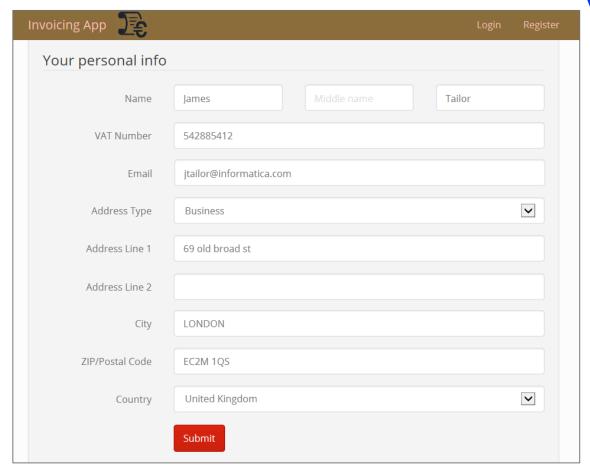




Now I want to get an invoice of a flight I did two months ago, so I call Wembley Airlines'
Customer Service.
In that case I give my given name, VAT
Number, the work email address and my
Company's address.
In that case, I don't need to give consent, as invoicing doesn't require an implicit consent.









Datasteward Viewing Data & Consent MDM Entity 360

I'm Wembley's
Datasteward... I'm
receiving a complaint
from James Tailor,
because he is receiving
offers into his phone,
and he doesn't want it.
Let's log into
Informatica Data
Director (MDM
Datastewardship
solution) to see what's
going on

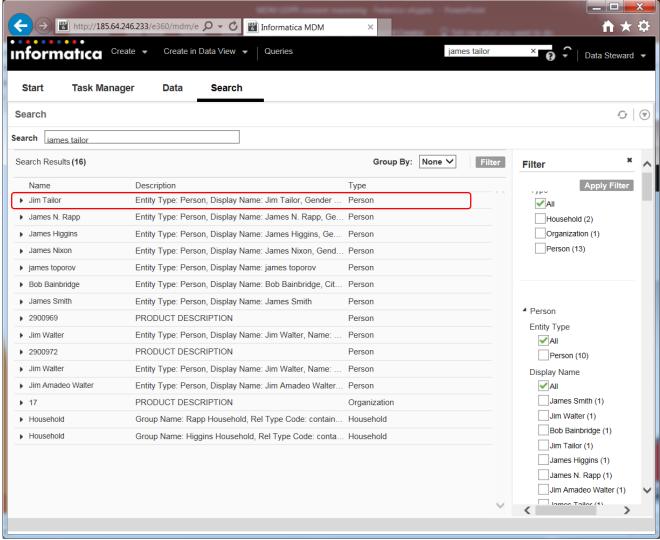


☆★☆ informatica Master Data Management datasteward Username: Password: Version 10.2.0 Copyright © 1993-2016 Informatica LLC. See patents at https://www.informatica.com/legal/patents.html. All Rights Reserved.

Using MDM
smartsearch
capabilities, I get easily
results based on any
data I got from James
Tailor to identify him
(name, phone, address,
etc.) in a google-like
search. Let's open it to
see his details



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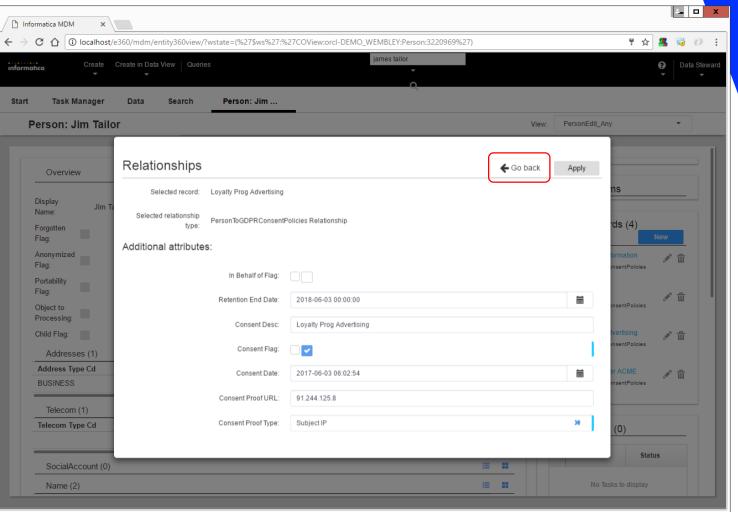
Nice! From here I've the complete 360° view of this customer... I can see he has 1 address, 1 phone number, 2 names, 2 email addresses...



_ D X I can see this person exists jim tailor Create Create in Data View | Queries both in the CRM and in the Billing systems Task Manager Search Person: Jim... Person: Jim Tailor View: Edit Any Display Name: Jim Tailor Name Prefix Cd: Gender Cd MALE Source Systems First Name: James Birthdate: Forgotten Flag: Anonymized Flag: Middle Name: Customer Tier Cd: Portability Flag: Last Name: Activity Status Cd: 3200962 Object to Rowid Object: Processing: 2/Jun/2017 11:26:37 Child Flag: Addresses (1) Address Type Cd Address Line1 Address Line2 City Name State Province Postal Cd Country (Related Records (4) BUSINESS 69 OLD BROAD ST... LONDON CITY OF LONDON EC2M 1QS GBR Loyalty Prog Information PersonToGDPRConsentPolicies Relationship Telecom (1) Telecom Type Cd Phone Number Validation Status **Eff Start Date** Eff End Date anonymizedFlag PersonToGDPRConsentPolicies Relationship 207 082 8600 Valid Phone Loyalty Prog Advertising PersonToGDPRConsentPolicies Relationship SocialAccount (0) Email Newsletter ACME Name (2) PersonToGDPRConsentPolicies Relationship Name Type Cd anonymizedFlag Jim Tailor James Tailor I can see he has accepted 4 VATNumber (0) consent policies . . URL (2) No Tasks to display Electronic Address... Electronic Address anonymizedFlag **FMAII** jimtaylor@gmail.com **EMAIL** jtailor@informatica.com

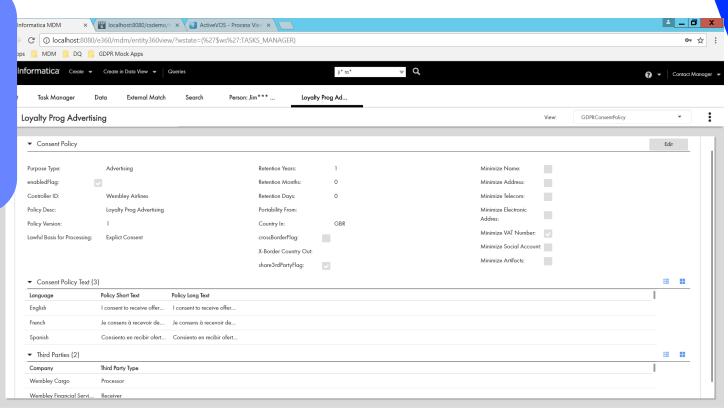
I'm clicking on the loyalty program advertising policy to see that I got the consent to use his data till 1/6/2018 for advertising. I even have a proof of the consent (the IP address he used to register into the loyalty program)



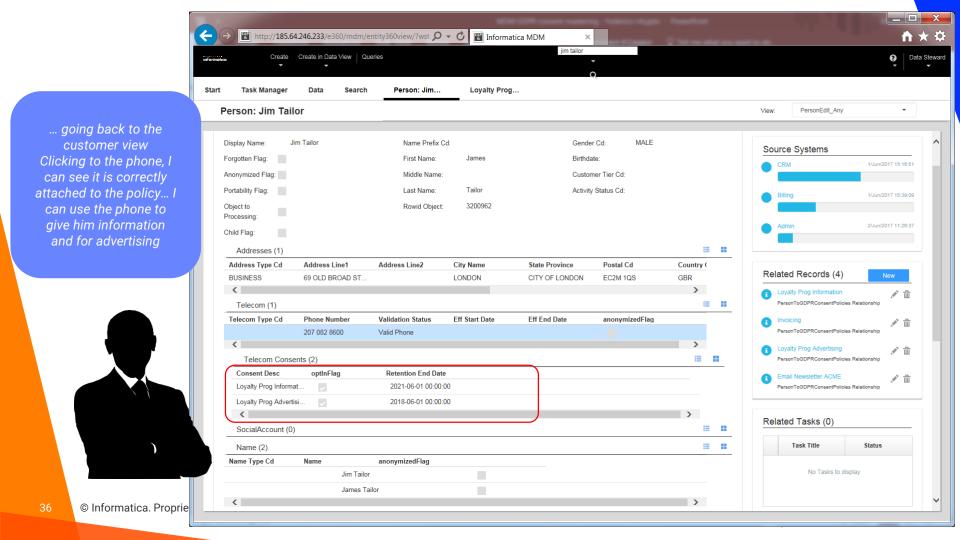


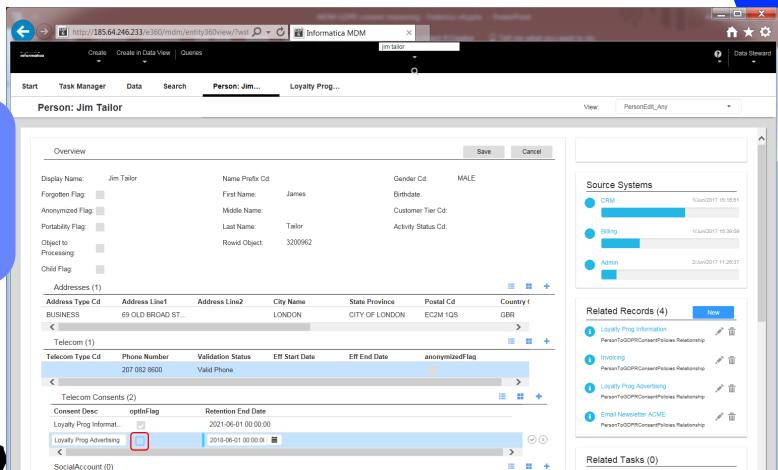
In any moment I can see details of this consent policy: version, retention periods, data scope, lawful basis for processing, legal text, to what third parties can be shared, etc
Those policies are created and maintained by the legal department, directly here, or can loaded from any policy management tool











H H +

Task Title

Status

I'll edit the record and opt-out the phone for advertising, so he will not receive more calls for this purpose.



Name (2)

Name

anonymizedFlag

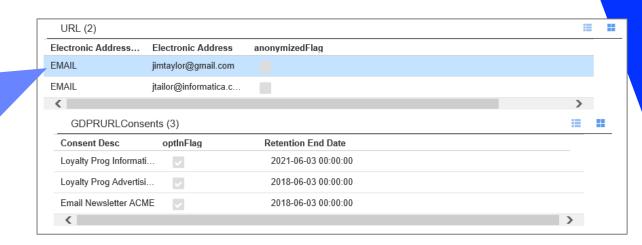
I can review other data associated with James Tailor... for example I can see the address is common for the loyalty program and invoicing



_ D X http://localhost/e360/mdm/entity360view/?wstate=('\$ws':'COView:orcl-DEMO_WEMBLEY:Pei 🔎 🔻 🖒 Informatica MDM ☆☆戀 Informatica Create - Create in Data View - james tailor Queries Data Steward ▼ Start Task Manager Data Person: Jam... Loyalty Prog... Search Person: James Tailor PersonEdit Any Source Systems Overview Edit CRM 3/Jun/2017 04:43:13 Name Prefix MALE Display Name: James Tailor Gender Cd: Cd: Forgotten Flag: Birthdate: 1980-08-11 00:00:00 3/Jun/2017 09:19:21 First Name: Anonymized Customer Tier Middle Name: Cd: 3/Jun/2017 05:14:45 Tailor Activity Status Portability Flag: Last Name: Cd: Rowid Object: 3220967 Object to Processina: Related Records (4) Child Flag: Addresses (1) Loyalty Prog Information Address Type Cd Address Line1 Address Line2 City Name State Province Postal C PersonToGDPRConsentPolicies LONDON BUSINESS 69 OLD BROAD ST. CITY OF LONDON EC2M 10 Relationship < > . . PersonToGDPRConsentPolicies Address Consents (3) Relationship Consent Desc optlnFlag Retention End Date Loyalty Prog Informati. Loyalty Prog Advertising 2021-06-03 00:00:00 PersonToGDPRConsentPolicies Loyalty Prog Advertisi.. 2018-06-03 00:00:00 Relationship Invoicing 2022-06-03 00:00:00 **♪** 🖶 < PersonToGDPRConsentPolicies Relationship Telecom (1) Telecom Type Cd Phone Number Validation Status Eff Start Date Eff End Date anonym 207082600 Valid Phone Related Tasks (0) Task Title Status SocialAccount (0) Name (2) No Tasks to display Nama Tima Cal

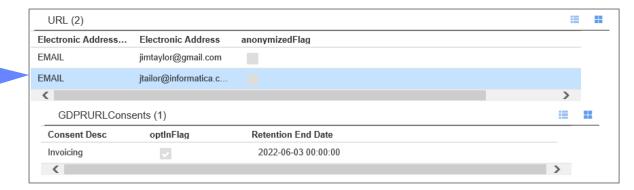
For the electronic address, I got 2 different emails

This email can be used for advertising, information and newsletters (through ACME's Company)





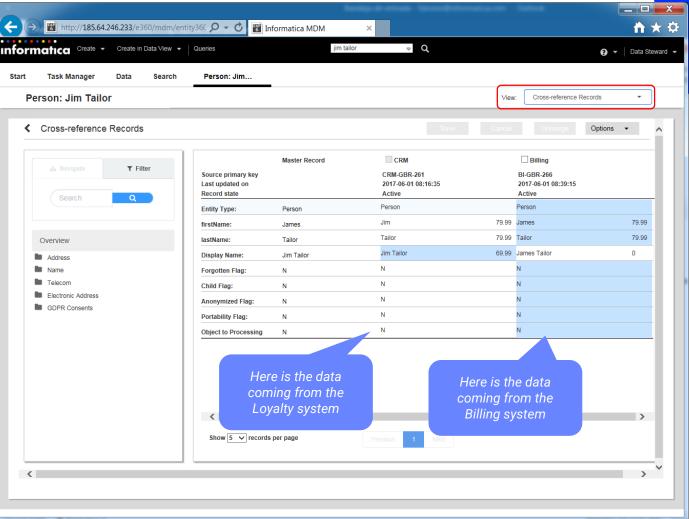
This other email can be only used for Invoicing purposes





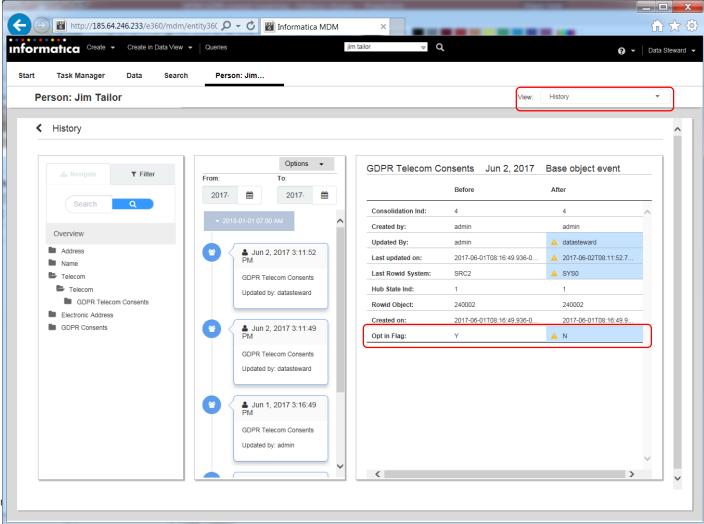
As DataSteward, I can see all the traceability of the data, knowing where it came from, just selecting the Crossreference View





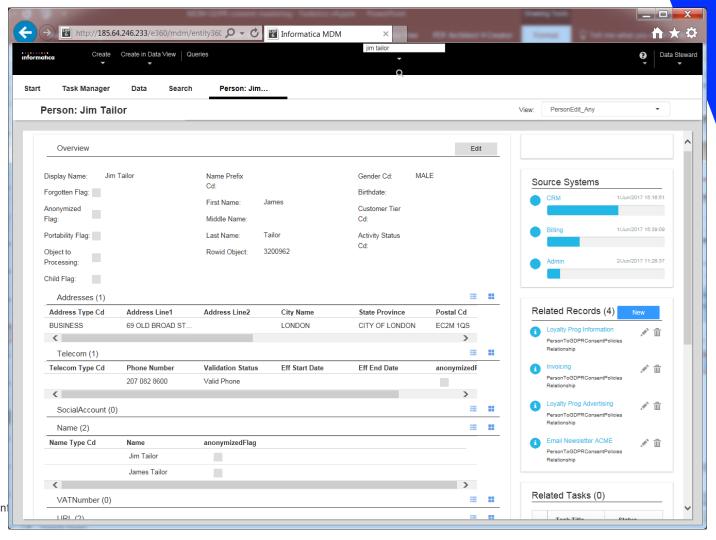
On the History view I can see all changes happened on the data... for example, here I can see the opt-out I just did... I can see the date of the update, what was the previous value, user that made the update, etc.





Ok, problem solved! This customer will no longer receive advertising calls. This interface give me all the info I need. Also here I can directly enact the rights of my customer: cancel, rectify, portability, object to processing, object on any action, right to be forgotten (we will see this later), etc.





Right to be Forgotten & Portability workflows

ActiveVOS (MDM BPM Option)

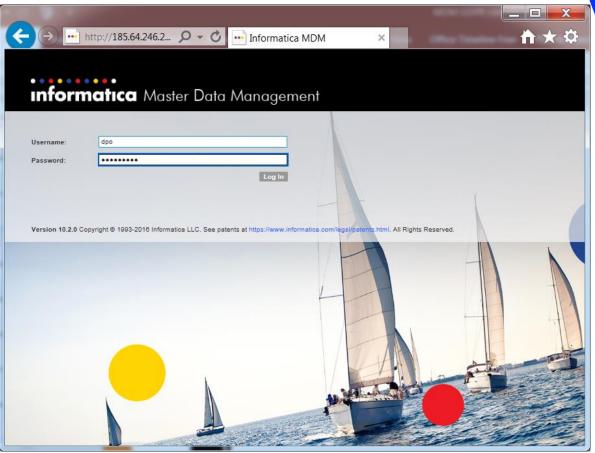


I'm the Wembley's DPO, and we got a certified letter from James Tailor requesting his right to be forgotten.

OMG! That means I've to search in our 50 different apps where we have personal information to see if James Tailor Exists??

No! fortunately we got Informatica MDM, and we have all our subjects centralized there

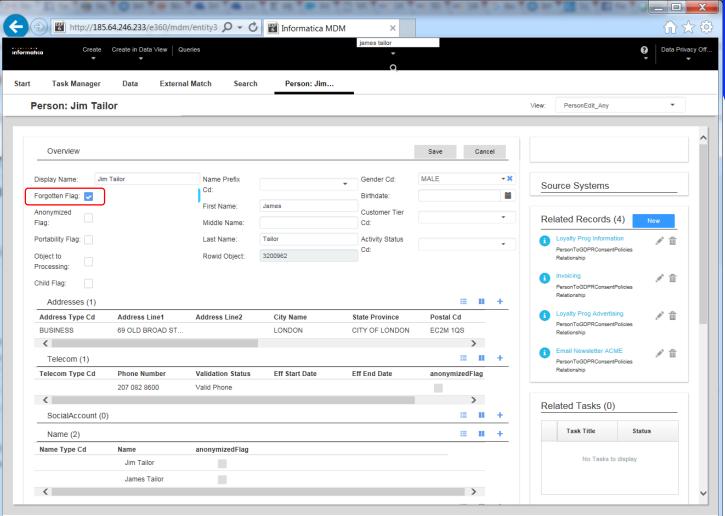






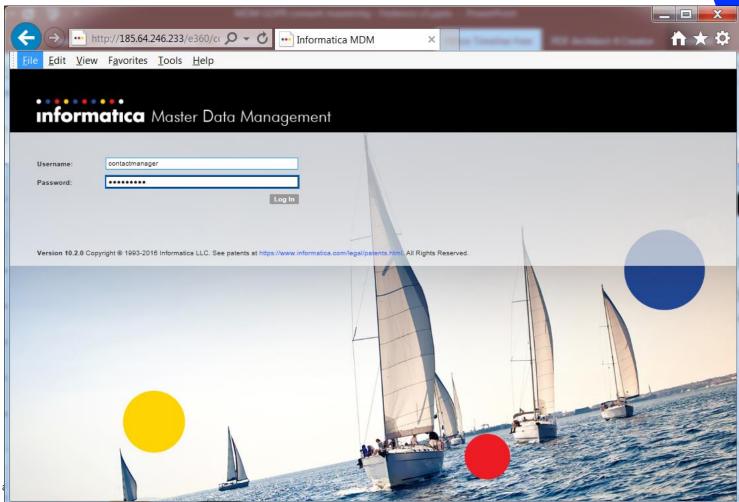
All I've to do is to search the person from here, edit, and check the "Forgotten Flag" checkbox. When I save, that will trigger a workflow, as the RTBF requires extra verifications





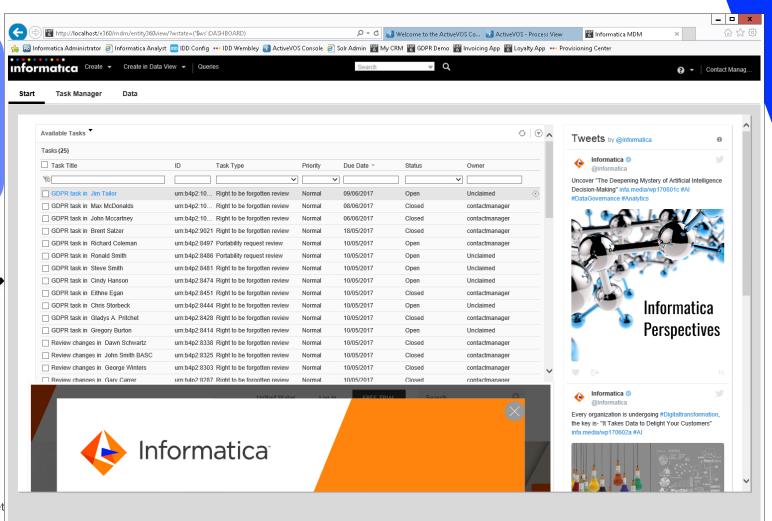
I'm the Contact
Manager and I got an
email with the RTBF
request automatically
generated by the
MDM system.
Clicking on a link, it
will open my
dashboard





Here is my list of tasks... I've several RTBF and Right of Portability to approve... I'll open the task related to Jim Tailor





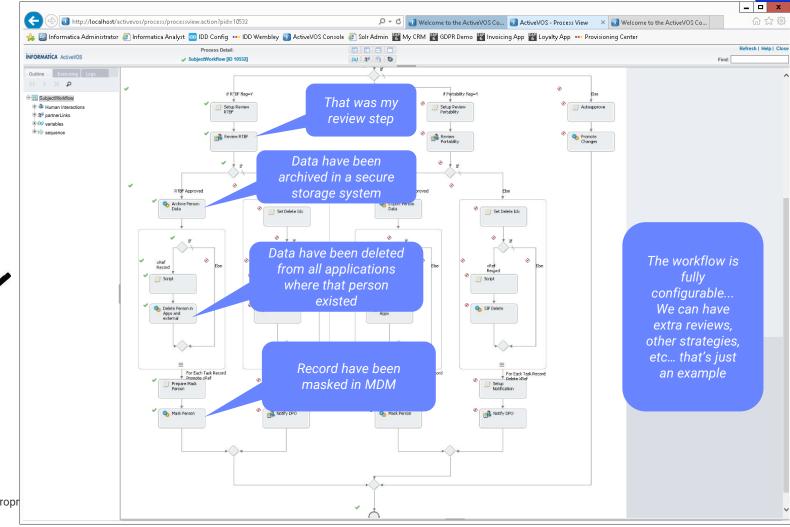
Ok, I've verified this customer has no debts and no active services. so I'll approve his RTBF request... otherwise I can cancel the request (I'd write a justification and the DPO would get a notification), or escalate the request to someone else



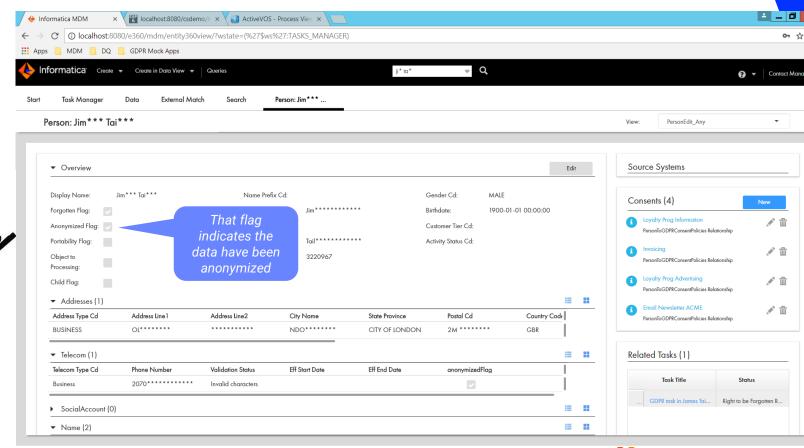
_ D X a Http://localhost/e360/mdm/entity360view/?wstate=('\$ws':TASKS_MANAGER) Welcome to the ActiveVOS Co... ActiveVOS - Process View Informatica MDM 🖕 🔯 Informatica Administrator 🤌 Informatica Analyst 💿 IDD Config 🚥 IDD Wembley 👔 ActiveVOS Console 🤌 Solr Admin 🖁 My CRM 👸 GDPR Demo 闠 Invoicing App 🎇 Loyalty App 🚥 Provisioning Center ¬
Q Informatica Create - Create in Data View - Queries Contact Manag Start Task Manager Data ☐ Task Title \wedge ID Task Type Priority Due Date " Status Owner ~ ~ ~ GDPR task in Jim Tailor 09/06/2017 Open Unclaimed urn:b4p2:10534 Right to be forgotten review Normal GDPR task in Max McDonalds urn:b4p2:10226 Right to be forgotten review Normal 08/06/2017 Closed contactmanager GDPR task in John Mccartney urn:b4p2:10009 Right to be forgotten review Normal 06/06/2017 Closed contactmanager GDPR task in Brent Salzer urn:b4p2:9021 Right to be forgotten review Normal 18/05/2017 Closed contactmanager GDPR task in Richard Coleman 10/05/2017 Open um:b4p2:8497 Portability request review Normal contactmanager GDPR task in Ronald Smith urn:b4p2:8486 Portability request review Normal 10/05/2017 Open Unclaimed GDPR task in Jim Tailor Task Details Options -Forget Person Cancel RTBF Disclaim Person Overview Social Network Account Entity Type: Person Display Name: James Tailor Object to Processing Flag: Middle Name: Address Process ID: Name Prefix Cd Birthdate: Forgotten Flag: Name Gender Cd: MALE First Name: Child Flag: James Customer Tier Cd: Artifact Image URL: Anonymized Flag: Generation Suffix Last Name: Tailor Portability Flag: Telecom Activity Status Cd: Org Social Network Account (0) . . Electronic Address Address (1) Primary Ind Cameo Category Longitude City Name Postal Cd Address Line1 Address Line2 GDPR Consents LONDON EC2M 1QS 69 OLD BROAD ST.. VAT Number < Name (2) © Informatica. Proprieta Eff End Date Eff Start Date Anonymized Flag lastName birthdate firstName Name Jim Tailor

That is the view of the workflow that have been executed.



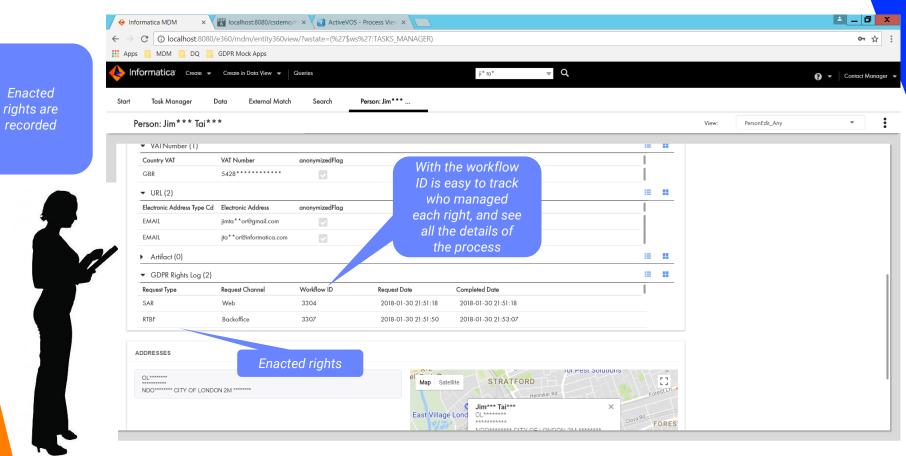


If someone
tries to open
James
Tailor's
record, he will
just get
masked
information



Informatica







With MDM Subject 360, all personal data and consents are safely secured, audited, historified and managed in a centralized and consistent way.

It can be used for all our subjects, not only customers and prospects, also employees, visitors, ...

The GDPR consent & rights compliance is managed from MDM, a minimal adaptation of the applications are required!







References

- MDM GDPR Consent Mastering -Federico Alonso <u>falonso@informatica.com</u>
- https://network.informatica.com/
- GDPR EU General Data Protection Regulation Anna Borg KnowlT
- Personal Data Definition-Protiviti
- Data Governance program-Intricity
- https://infawiki.informatica.com/

