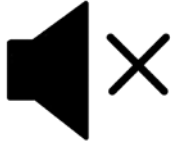


May 21, 2020

Operationalize Data Privacy – ‘Right to Know’ Request handling use case with Axon, DPM, IICS

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Housekeeping Tips



- Today's Webinar is scheduled for **1 hour**
- The session will include a webcast and then your questions will be answered live at the end of the presentation
- 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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Agenda

1

Data Privacy Use Case
Decomposition / Prioritization

2

Data Privacy Foundation and
Personas

3

A 'Day in the life' of Data and
Compliance Analysts

4

Axon, DPM and IICS Architecture
Operating Model

5

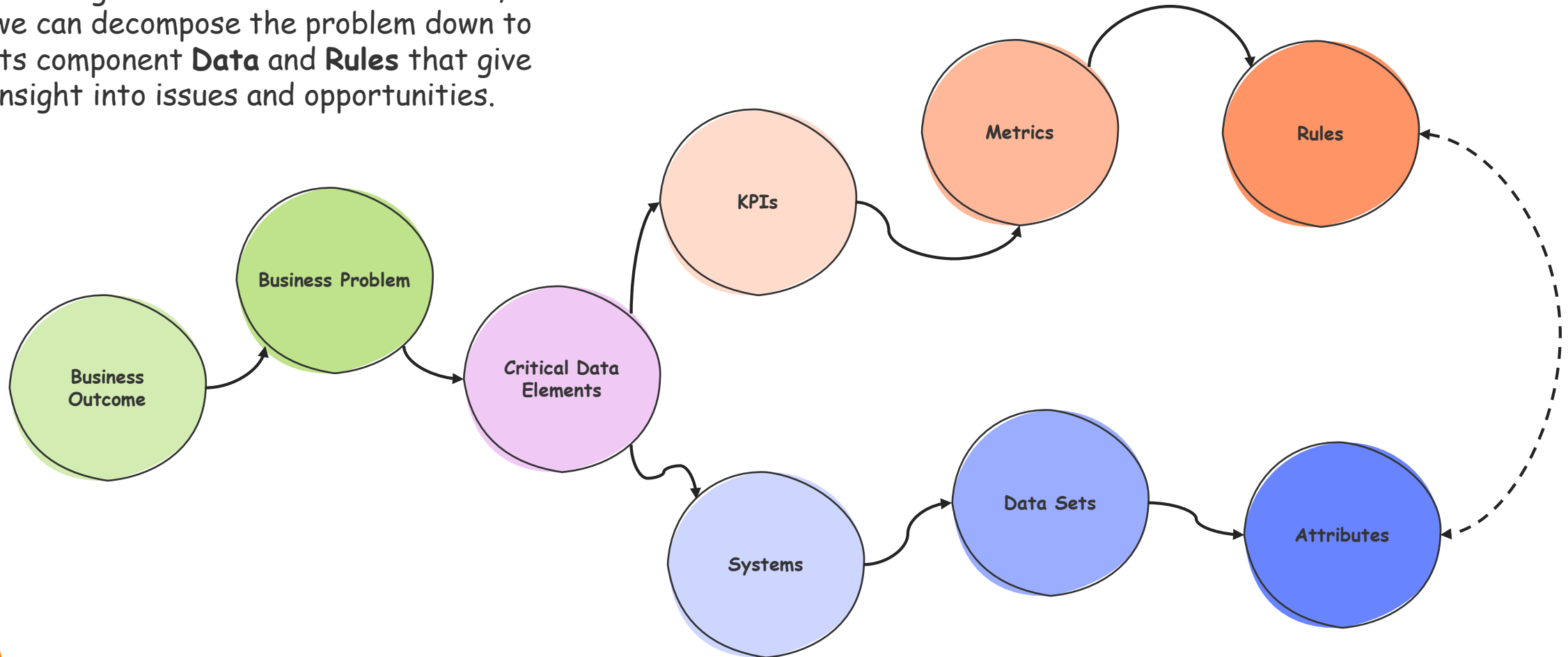
'Day in the life of' execution
flows

6

Demo

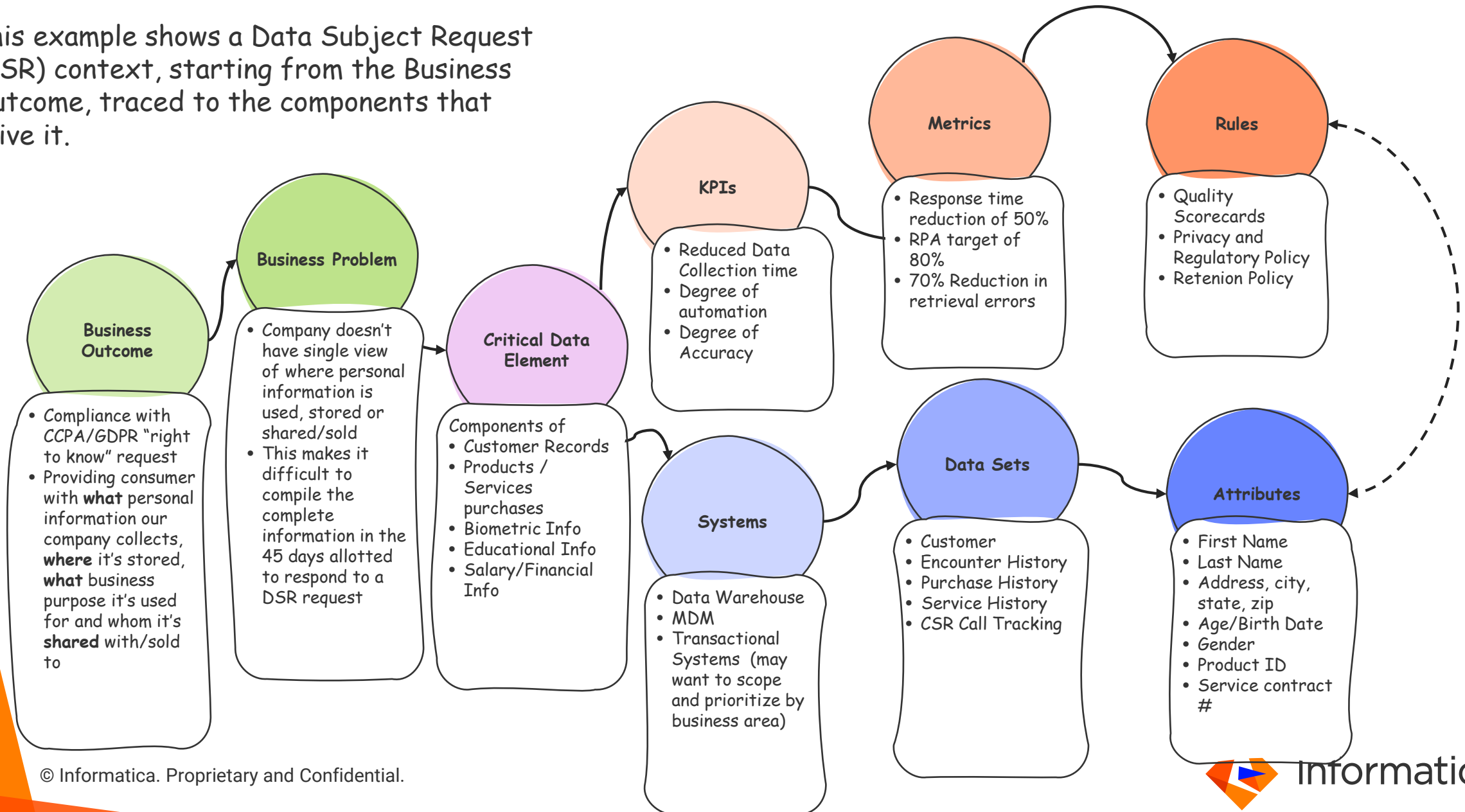
Data Governance: Business Problem Decomposition

Starting with the **Business Outcome**, we can decompose the problem down to its component **Data** and **Rules** that give insight into issues and opportunities.



Decomposing a Data Privacy Use Case

This example shows a Data Subject Request (DSR) context, starting from the Business Outcome, traced to the components that drive it.



Data Privacy Governance Foundation with Informatica



Axon

1

Define and manage governance policies

Collaborate on privacy policies/rules

Define how our organization processes personal data



DPM

2

Discover, classify and understand personal and sensitive data

Visibility across all data platforms and types

Locate and map personal data



Customer 360

3

Map identities

Index identities for identity intelligence and data subject access rights



DPM



Relate 360/AISights

Link people to their personal data

4

Analyze data risk, establish protection plans

Continuous risk analysis of sensitive data, simulation of remediation

Understand personal data risk and protection



DPM

5

Protect data, manage subject rights and consents

Automated orchestration and protection, fulfill subject rights requests, centralize, manage consents

Protect data, respond to rights requests



Data Masking



Test Data Management



Customer 360



DPM



Process Orchestration

6

Measure, communicate, audit readiness

Key risk indicators, visualizations, reports

Track compliance progress and communicate readiness to multiple stakeholders



DPM



Axon

Data Privacy Teams/Personas

3rd Party Partner

Team that sells/distributes consumer data to 3rd-party partners

Legal

Legal counsel for legal interpretation and setting requirements

Consumer Data Stewardship

Manage downstream systems and SaaS or Cloud based systems/applications containing Consumer data

Data Movement

Team that moves data in batches or files

API Development

Team that develops API's to enable web site to get information from other systems

Website Maintenance

Team that needs to update web site with request link and policy statements

Web Link Requests

Team that would receive over the UI/internet

1-800 # phone requests

Team that would receive over the phone

Information/Cybersecurity

Compliance activities and associated technologies

Enterprise Architecture

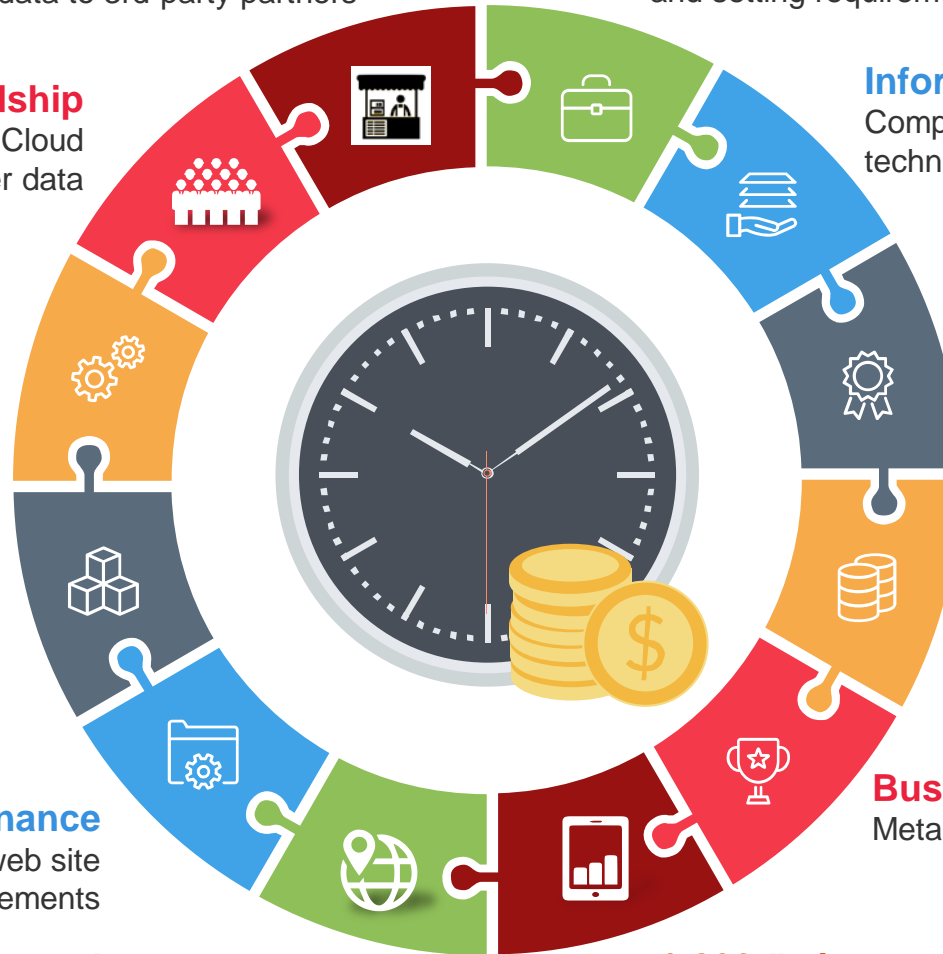
New Solution, best tools selection and technical assessment

Business SME

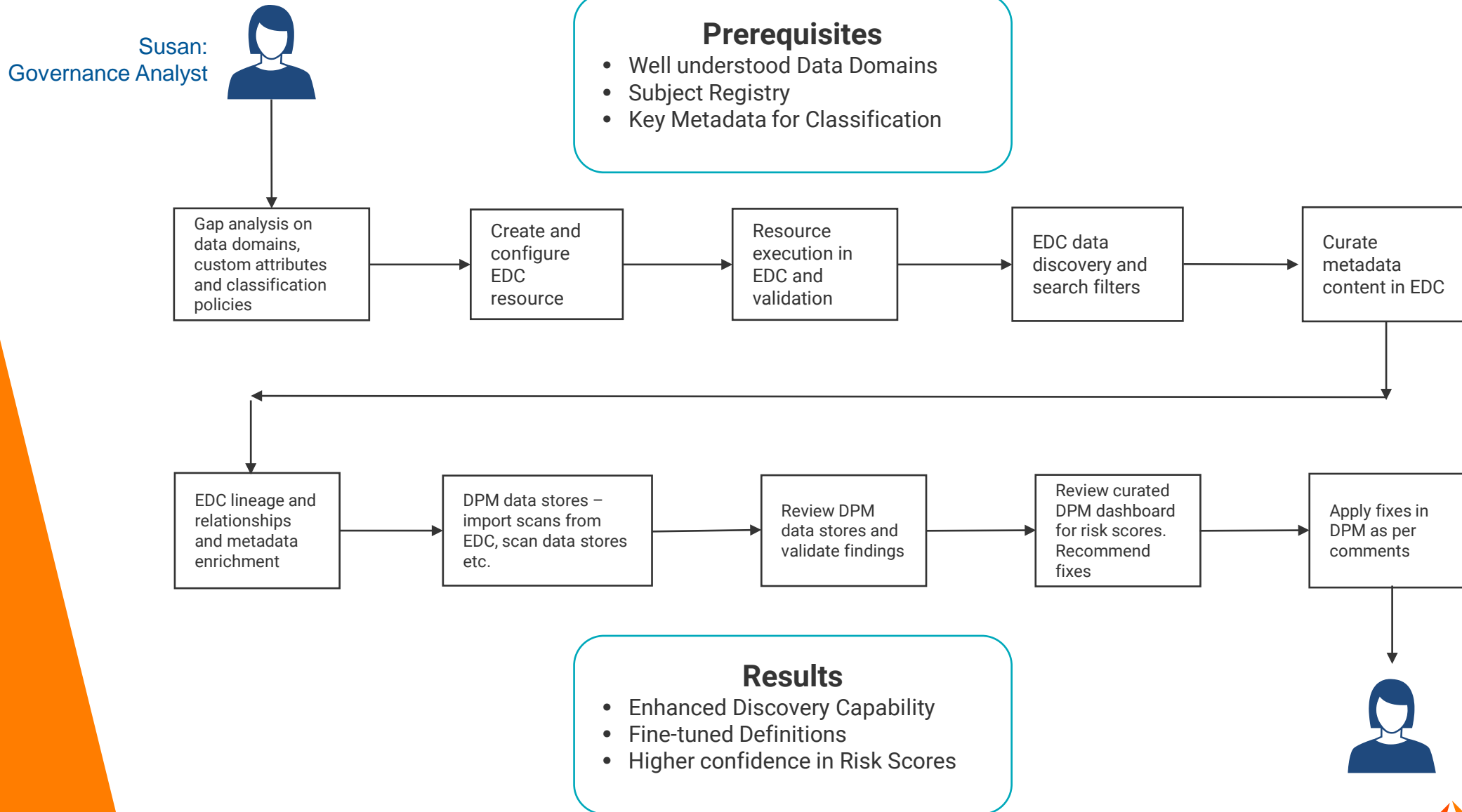
Management of the data assets for a system

Business Process Modeling

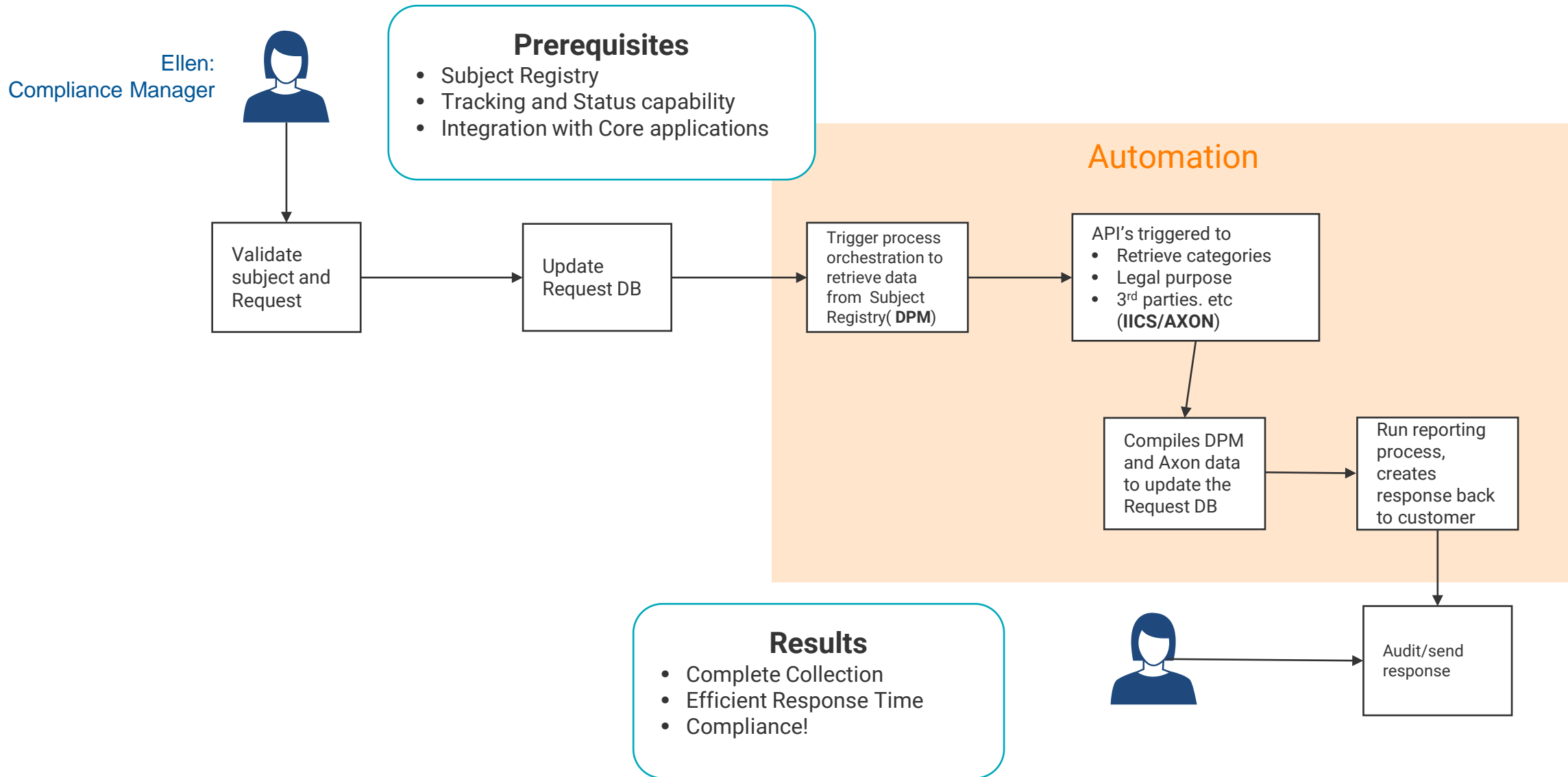
Meta-model for governance and security



'Day in the life of' – Sensitive Data Discovery and Tagging



'Day in the life of' – Preparing a Data Subject Access Request (DSAR) Response



Full Compliance has Broad Reach

Authenticating Requestors

Data Discovery and Mapping Identities

Right to be Forgotten

Risk Analysis

CONSENT MANAGEMENT

Out of Scope Data Movement Detection

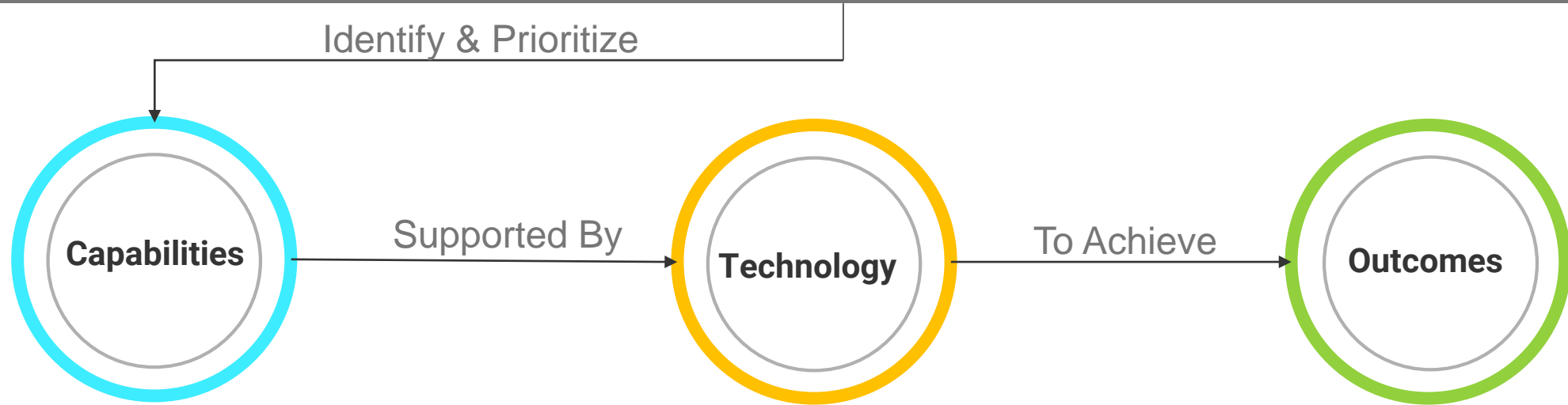
Protection / Encryption

Reporting and Analytics

AUDIT PREPARATION & RESPONSE

Privacy Operating Model

Strategic Roadmap Process



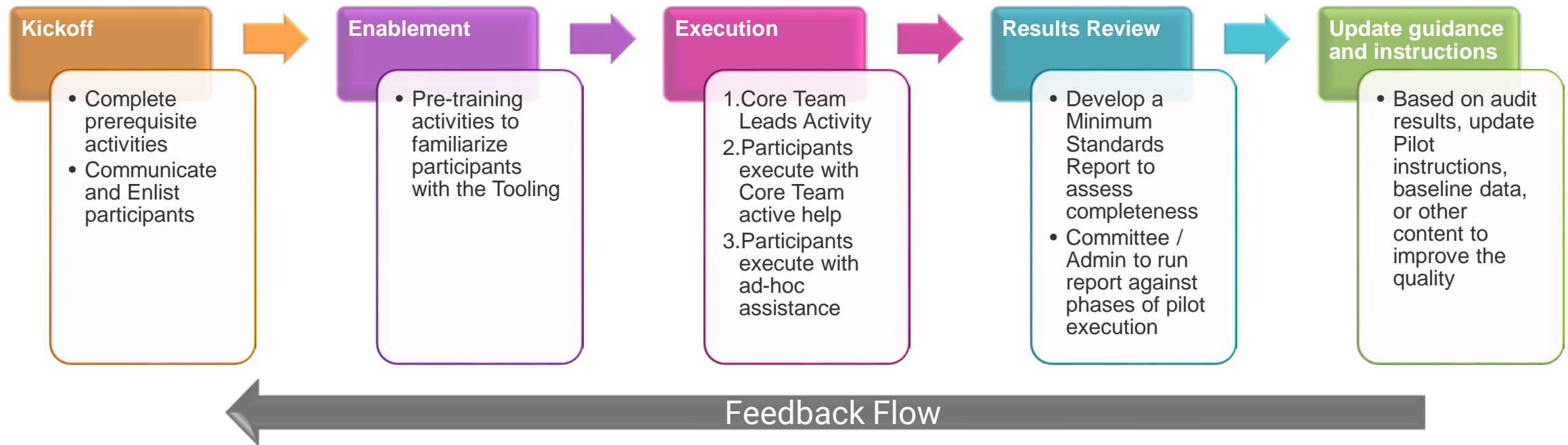
- Business Processes that Create/Use Personal Information
- Systems that support those Processes
- Regulation based policies and data categorization
- Fulfill DSAR's
- Privacy breach thresholds and workflows for breach response
- Data Subject deletion requests

EDC – Enterprise Data Catalog
Axon – Regulation, Policy, Workflows...
DPM – Data Security and Subject registry
EDP – Reporting and Audits
IICS - Data orchestration across multiple applications
TDM – Data masking/obfuscation in lower environments
DDM/PDM – Data masking in flight and at rest

- ✓ Discover and classify all regulation impacted data
- ✓ Map, inventory and index all data by individual
- ✓ Operationalize data flows and monitoring
- ✓ Integrate workflows for orchestration
- ✓ Enable automation of subject request processing and compliance audit requests

Data Privacy Implementation Best Practices

The following flow is essential to managing the inclusion of feedback into the pilot flow, for later adopters and the development of reusable processes.

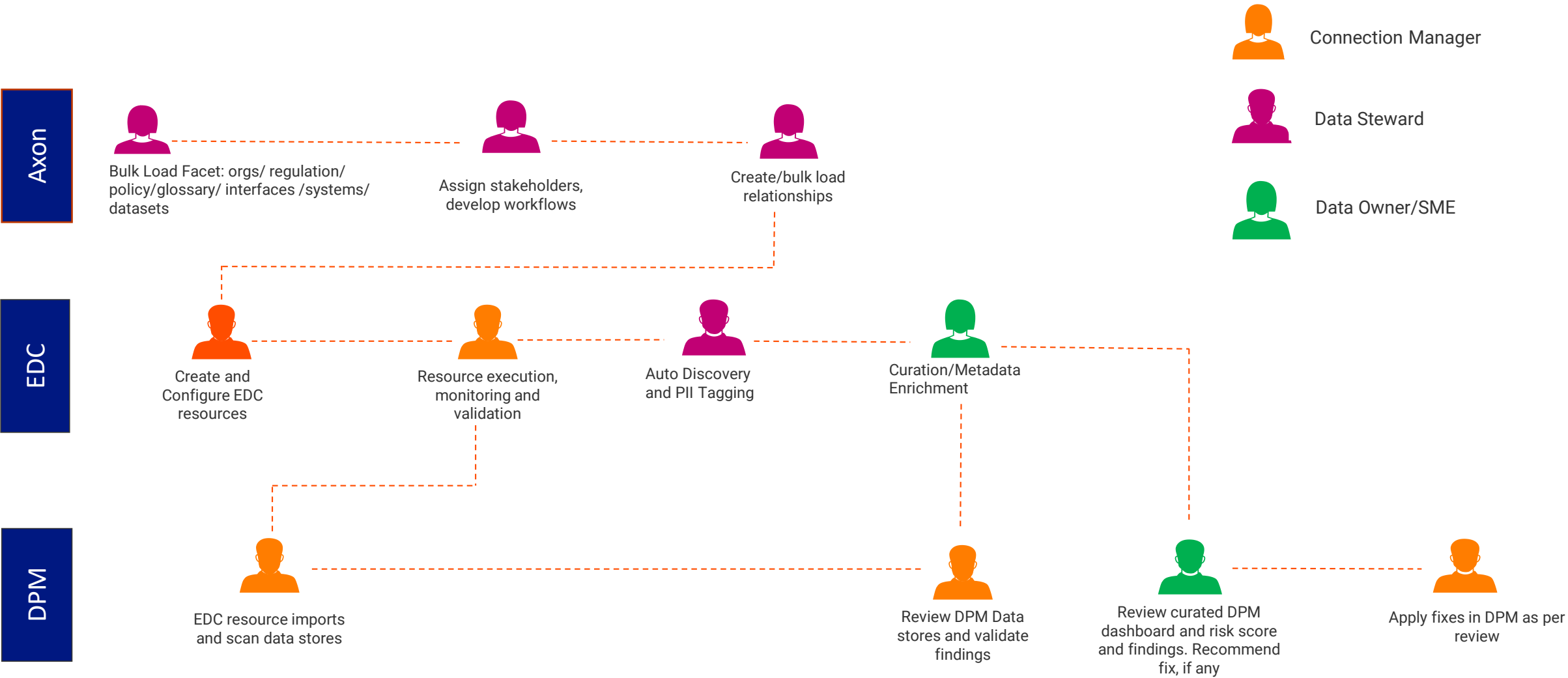


Context

- ❑ Key concepts for a successful Data Privacy program:
 - ✓ Establishing processes to reach consensus on policies, legal definitions, sensitive elements etc.
 - ✓ Once a consensus is reached, prepare and assign responsibilities and accountabilities for ensuring appropriate security measures are put in place for privacy requests

- ❑ The following execution flows will help in understanding:
 - ✓ A common approach for building the necessary assets for a data privacy program and collect information that will be used to service a data subject access request
 - ✓ Data elements contributing to privacy regulations and how a legal team can request a DSAR using the Informatica products

Contributor Execution Flow



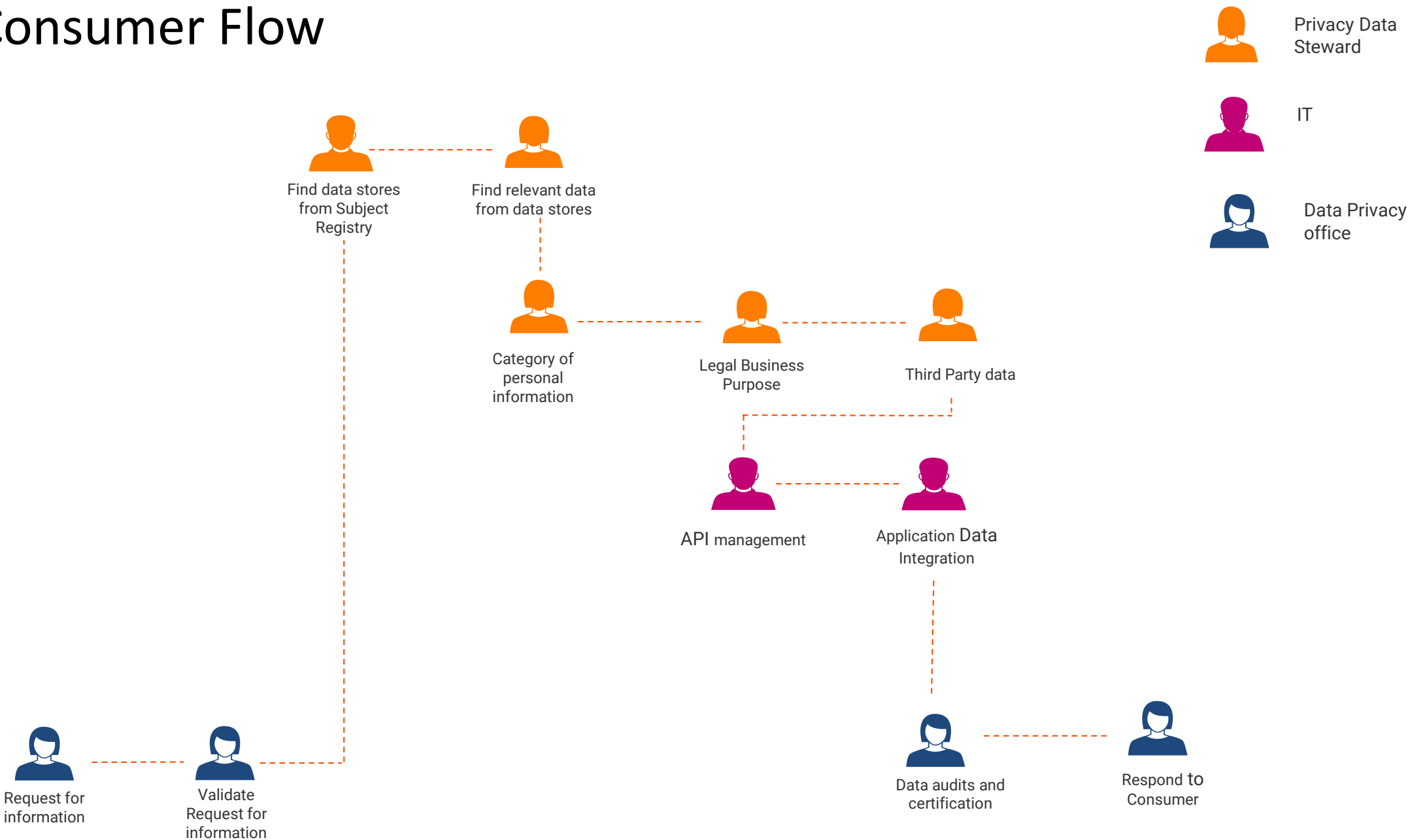
DSR - Consumer Flow

DPM

Axon

Orchestration

Data Privacy Office





Demo



Methodology and Tools

Data Privacy Roadmap (Sample)

Business Capability Roadmap

Good 1H 2020	Better 2H 2020	Best 2021/2022
Ability to handle requests to Search, Update, Erase, Copy, Restrict Processing on personal data and provide Acknowledgement & Results Applies to artifacts as well as data.		
Request intake via email	Service Now w/ request & activity tracking	Request email direct to Service Now
Look up data type & systems in AXON	Manually invoke requests to ICS/ICRT/DI processes to fulfill the request in some systems, manual process for systems without ICS/ICRT/DI connectors	Person MDM (expansion) Relate 360 ICS/ICRT/DI Workflow manages automated processes & required manual reviews
Handle request tracking via email to all BU's to process their portion of request.		API's - Single Record API's - Bulk Records / ETL's (Batch) Self Service web portal/mobile portal
Manual email response w/ results		
Ability to archive and purge personal data used in ALL BU's		
Develop manual purge process for Systems managed by BU and by IT Apps	Use Service Now to schedule & track manual purges	Migrate system management to IT Apps for central coordination of purge & archive via shared service using ICS/ICRT/DI + manual purge where there is no connector tracked via Service Now
Record of Data Processing Activity		
Each operational system has Last User Update and Timestamp on every record		
Purpose of processing is recorded in Axon		Purpose of processing documented in BPM tool

Guidance

- Show 2 year fast track – achieve success quickly
- Prioritize critical business capabilities with corresponding applications and high readiness
- High risk, high visibility systems first
- Long term items noted but not on immediate plan

Technology Roadmap

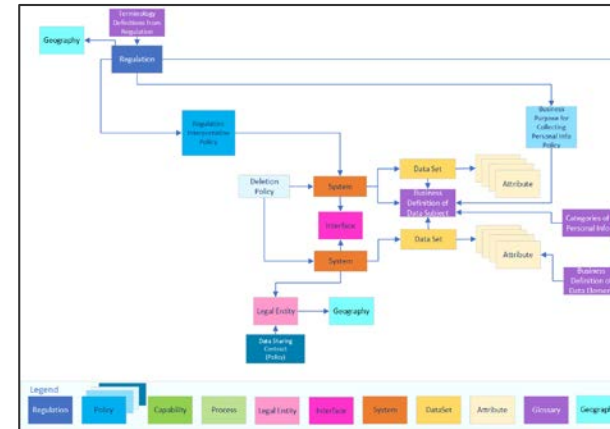
1H 2020					2H 2020					2021/2022	
Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19
"Right To" Request											
					Service Now (Expansion - Right To Requests)					Person MDM (expansion)	
					Axon - test - Initial Load					Relate 360	
					Axon - Stand up & Initial Load from					ICS/ICRT/DI Workflow manages automated processes & required manual reviews	
					Axon Sustain - periodic loads & Integration w/ S@S					S@S Subject scan for Relate 360	
					ICS/ICRT/DI - Requests (10 system limit)					Relate 360 API wrappers - Single Record	
					Stand up S@S & Scan 1 system					Relate 360 API wrappers - Bulk Records / ETL's (Batch)	
					S@S meta data scan & Axon integration					Right To - Self Service web portal/mobile app	
Ability to archive and purge personal data used in ALL BU's											
									Service Now (Expansion - Purges)		
										Migrate system management to IT Apps for central coordination of purge & archive via shared service using ICS/ICRT/DI + manual purge where there is no connector tracked via Service Now	
Ability to log a GDPR Compliance incident and track it through its resolution including notifications											
Right to Consent/Objection:											
										Consent and intent documentation from individual systems moved to MDM Consent Management	
										Consent change via self-service web portal/mobile app using APIs	
Data Available for Compliance Monitoring											
										Service Now - Automated notifications and tracking w/ dashboard of metrics and open	

Data Privacy – Reusable Axon implementation workbook

- Information Subjects mapped to Axon Facets
- Pre-populated templates where available

Information Type	Facet	pre-populated
Regulatory		
CCPA Regulation	Regulation	Yes
Terminology Definitions from CCPA Regulation	Glossary	Yes
Categories of Information defined in CCPA Regulation	Glossary	Yes
Regulator responsible for CCPA regulation	Regulator	no bulk upload needed - just add 1 Regulator for the State of California
Jurisdiction to which the regulation applies	Geography	no bulk upload needed - just add 1 Geography for California
Customer's Legal Business Reason for collecting personal	Policy	No - your legal team needs to define these
Legal department's interpretation of Regulation into Policies	Policy	No - your legal team needs to define these
Privacy Notice - definitions for each site/brand, point of collection, etc. including attributes identified for collection.	Glossary	No - your legal team needs to define these
Source of data collection (web app, mobile app, 3rd party)	Glossary	No - your legal team needs to define these
Business Functionality		
Project	Project	no bulk upload needed - just add 1 CCPA Project
High level business functions	Capability	Yes - (if Industry Model Framework is used)
Processes under each high level business function (can be high level)	Process	No - this is specific to each customer
Systems/Data		
High level systems hierarchy	System	Yes - (if Industry Model Framework is used)
Applications, Systems	System	No - this is specific to each customer (Typically this is scanned data from EDC but also can be bulk uploaded from refined CMDB export)
Data Tables, Spreadsheets, Reports - <i>Conceptual/Logical Business definitions</i> (ie: Customer w/ Alias: Owner, Client, etc.; Address, Contact Info, etc.)	Glossary	No - this is specific to each customer
Data Tables, Spreadsheets, Reports - <i>Physical definitions</i> (Typically this is scanned data from EDC) (ie: TBL_CUST, CustomerInfo, Cust_Addr, etc.)	Data Set	No - this is specific to each customer (Typically this is scanned data from EDC)
Information Subjects - High level (ie: Customer Profile, Order, Service Request, etc.)	Business Glossary	Yes - (if Industry Model Framework is used)
Fields, Attributes, Data Elements and Aliases - <i>Conceptual/Logical Business definitions</i> (ie: FirstName, LastName, E-Mail, Phone, Street, City, State)	Business Glossary	No - this is specific to each customer
Fields, Attributes, Data Elements - <i>Physical definitions</i> (ie: Street1, Str1, Address1, Address2, ZipCode, Zip+5, PostalCode)	Attributes	No - this is specific to each customer (Typically this is scanned data from EDC)
Integration Patterns, interfaces, etc that move data from one system to another system. Used to create lineage between systems for data flow visualization (ie: ETL Jobs, MFT Jobs, APIs, WebServices (SOAP/REST), MessageServices, Pub/Sub queues, CDC processes, stored procedures, etc.)	Interfaces	No - this is specific to each customer
Organizational/People		
Business Area, Departments, Teams, etc.	Org Unit	No - this is specific to each customer
SME's, Business Owners, Technical owners, Data Stewards	People	No - this is specific to each customer
Brand, 3rd Parties, Stakeholders, Service Providers	Legal Entity	No - this is specific to each customer

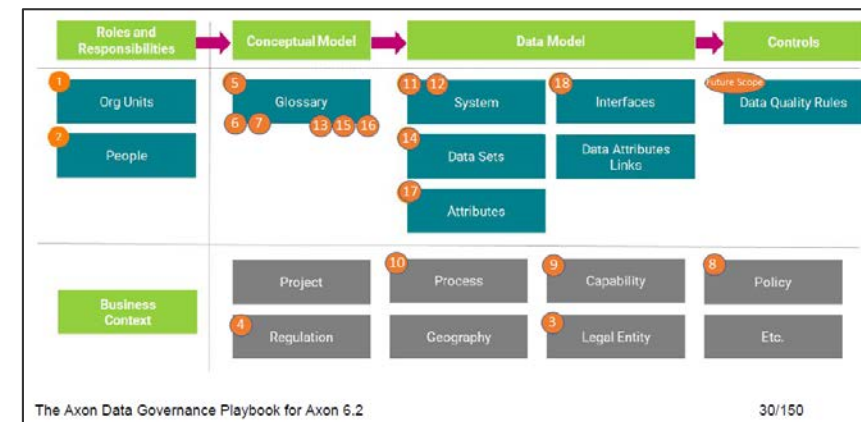
- Relationships between those Facets



- Required Fields
- Choice Lists Selections

Facet	Information Type	Required Fields	Choice Lists Selections
Organizational/People			
Org Unit	Business Area, Departments, Teams, Legal Entities	Org Unit Name, Description, Reference, Org Unit, Asset, Reference, Status	validate selection
People	SME's, Business Owners, Technical owners, Data Stewards	First Name, Last Name, Function, Description, Email, Password, Asset, Reference, Profile	validate selection
Legal Entity	Brand, 3rd Parties, Stakeholders, Service Providers	Short Name, Long Name, Description, Parent, Asset, Status, Asset Viewing, User Email, User First Name, User Last Name, User ID	validate selection
Regulatory			
Regulation	CCPA Regulation	Already provided by Informatica bulk upload for CCPA Regulation	
Glossary	Terminology Definitions from CCPA Regulation	Already provided by Informatica bulk upload for CCPA Regulation	

- Load Order based on your Use Case priorities



Q&A with the Panel

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