

**EDM**works  
joined-up thinking



**SAVE TIME, MONEY AND REPUTATION  
WITH JOINED-UP, EFFICIENT  
DATA GOVERNANCE FOR GDPR**

**FAST AND EFFECTIVE  
DATA GOVERNANCE IMPLEMENTATION FOR THE  
GENERAL DATA PROTECTION REGULATION**

# EXECUTIVE SUMMARY

The General Data Protection Regulation (GDPR) will fundamentally transform the way your organisation processes and governs personal data. New rights for consumers and employees are enforceable by new powers granted to regulators.

From May 2018, vastly increased volumes of requests for information, corrections, transfers and deletions can be expected. Data breach notifications are mandatory.

Streamlining of business processes is essential to cope with demands of the new regime. Management accountability for data must be clear.

Effective data governance is even more critical to ensure the underlying data assets are **KNOWN, UNDERSTOOD and TRUSTED**.

Without trusted data, process efficiency and human effort are wasted; reputations will be tarnished.

The data governance framework must contain a methodology for robust governance together with pre-defined templates and data models. It must be supported by an enterprise wide data governance platform.

## AN IDEAL SOLUTION MUST CONTAIN:

- Key support for operational processes
- Decision support for management
- Comprehensive, meaningful data models and dictionary for personal data
- End-to-end data flows, controls, transformations and accountability maps
- Catalogue of trusted data sets
- Facilities to empower staff to identify, record and follow through to resolution of issues
- Communications and training programme to embed data governance within the culture

EDMworks GDPR Data Governance Methodology, training programmes and Collibra based Templates provide an effective and comprehensive approach to Data Governance implementation to support GDPR and your wider goals.

Integrated with the Collibra Data Governance Center, our approach provides enterprise wide data governance capabilities to satisfy GDPR and beyond.

# TRUSTED DATA SECURES YOUR FUTURE

# GDPR IMPACT

**100 PAGES OF LEGAL CLAUSES AND NUMEROUS REFERENCES TO OTHER EU AND NATIONAL LAWS**

**GDPR WILL TRANSFORM THE WAY ORGANISATIONS MANAGE PERSONAL DATA**

## WHAT IS NEW?

### CONSUMER RIGHTS

- Cost of Data Subject Access requests abolished.
- Withdraw their consent for usage
- Access, copy or move data to others
- Delete, correct or 'forget' data
- Object to automated processing

### REGULATORY POWERS

- Access premises, systems and records
- Investigate data flows, lineage, controls and accountabilities including those for 3<sup>rd</sup> party vendors
- Ban data processing activities
- Sanctions of up to EUR20M or 4% of global turnover PER BREACH

### HEADLINES

- Complete overhaul of 30 year old legal structure
- Data Protection is a Board Level agenda item with new accountabilities for management
- Costs for Data Access requests abolished leading to potential vast increases in requests
- New rights granted to consumers
- New powers granted to regulators
- Impacts organisations processing data or monitoring EU citizens and residents

### YOUR OBLIGATIONS

- Implement "Privacy by Design and Default"
- Ensure effective data governance of all processing of personal data and maintain security for the data
- Notify regulators and consumers of data breaches
- Get appropriate consent for personal data collection and provide notification of processing activities
- Get parent's consent for data about children under 16
- Appoint a Data Protection Officer where relevant and enhance senior management accountabilities
- Take responsibility for third-party vendors
- Conduct Data Protection Impact Assessments
- Institute safeguards for cross-border data transfers
- Consult with regulators about certain activities
- Demonstrate compliance on demand
- Manage 'consent' and 'purpose' on systems

**OPERATIONAL PROCESSES AND MANAGEMENT DECISIONS NEED GOOD DATA  
DATA GOVERNANCE IS ESSENTIAL TO GDPR**

EXISTING DATA GOVERNANCE IS

# SLOW AND COSTLY

**CENTRALISED  
GOVERNANCE HAS  
BEEN TOO SLOW TO  
YIELD VALUE**

GDPR requires new and enhanced business processes, 'fit for purpose data' and an effective data governance process to drive and control the necessary changes across the organisation. The GDPR programme needs to engage many stakeholders; Legal & Privacy, Audit, Compliance, IT, Data Management, Operations, HR, Customer service etc.

Governance activities for GDPR need to be integrated or aligned with other governance activities underway within the organisation.

Many approaches have been attempted in order to implement a workable governance function.

Centralised governance functions found it hard to get traction as the business could or would not get engaged.

De-centralised governance functions made progress locally but failed to integrate in order to provide consistent end to end data flows, quality measures and controls. They produce insufficient value for the enterprise.

**DE-CENTRALISED  
GOVERNANCE HAS  
PROBLEMS BUILDING  
THE BIG PICTURE**

**GDPR NEEDS AN ENTERPRISE READY  
METHODOLOGY WITH A SCALABLE  
PLATFORM**

**ADDRESS INDIVIDUAL ISSUES WITH  
AN ENTERPRISE READY SOLUTION**

# A GAP IN YOUR PROCESS CAUSES BOTTLENECKS AND GENERATES WA\$TE

## The consequences of GDPR include:

- Enhanced existing processes that scale to the potential volumes of requests, corrections, transfers and deletions etc.
- New and amended processes and systems to support “privacy by design and default” as well as the maintenance of “consent” and “purpose”
- Creation of new processes for data breach identification, impact analysis and notification
- Adding quality controls and providing transparency over data ownership and accountability

Unless properly managed, gaps in the process chain will be filled by spreadsheets or manual intervention leading to increased risk, cost and effort.

These processes, and the ability to properly document them, are critically dependent upon accurate and complete catalogues of data sets, processes and accountability maps.



**Imagine** processing volumes of information requests or notifying consumers their data has been breached when you do not know:

- Which processes are relevant to the customer
- Which processes the breached system impacts

How do you address these real issues? More spreadsheets and manual workarounds ARE NOT the answer.

## DATA GOVERNANCE SUPPORTS KEY OPERATIONAL PROCESSES

# A GAP IN YOUR DATA WILL COST YOU TIME, MONEY AND REPUTATION

Data is the underlying asset that supports business processes, decision making, customer engagement, product innovation and legal compliance.

In practice, data systems are designed (and financed) to support individual functional needs. The result is often a set of divergent data sets of variable quality, transparency and ownership.

Investment decisions continue to be made on a functional basis because it is often too difficult to unravel and rationalise the data.

This leads to further divergence which leads to:

- Exposure to cyber-attack and data theft
- Increased costs and delays for product innovation
- Bad information causing bad decisions
- Poor customer engagement and service
- Regulatory fines
- High fixed costs
- Poorly executed, inflexible, outsourcing deals



Information request volumes and data breaches are almost certain to increase. Critical data will be needed to satisfy customer needs, avoid potential regulatory sanction while at the same time running efficient operational processes:

- What data do we hold on this customer and in which systems is it held?
- What data is contained in the breached system? Which processes and systems does it impact and who is responsible for the system?

Without this information, will our actions in processing the data be legal or illegal? Is the way we addressed the breach negligent because we did not understand our use of the data?

Gaps in data cost time, money and reputation!

**DATA LIES AT THE HEART OF YOUR ORGANISATION**

**DATA GOVERNANCE ENSURES TRUSTED DATA IS AVAILABLE**

**IT WILL SAVE YOU TIME, MONEY AND REPUTATION**

## WHAT AN

# IDEAL SOLUTION LOOKS LIKE

## YOUR PEOPLE



Your people, their culture, values and ethics are the most important ingredients to a successful outcome.

Your People make change happen. Their creativity, motivation, collaboration and persistence makes the difference.

‘Change’ is a common outcome to many governance activities so it is critical for an effective and ongoing communications and training strategy to support the programme.

## POLICIES & METHODS

Collaboration is easier when people have understood common goals and agreed upon aligned approaches to addressing the required activities and tasks.

Different parts of the organisation may have different approaches based on legacy systems or approaches.

A methodology for governance activities capable of adapting to local variations where necessary is essential.

## ARTEFACTS AND CATALOGUES

The methodology must encapsulate key deliverables:

- Glossaries, dictionaries, definitions and links
- Data lineage, flows, accountability maps
- Data quality targets and measures
- Catalogued data sets of known quality
- Pre-defined templates for the above to support particular regulations or projects

## GOVERNANCE PLATFORM



An extensive, functionally rich and proven data governance platform with enterprise wide reach and adaptable for your own programmes, operational methods, collaborative culture and management decisions

Provision of complete support for the above methodologies and artefacts.

Provision of extensive, enterprise wide community development to build a collaborative enterprise that values data assets and is capable of exploiting them.

# WHAT THE **EDMworks SOLUTION** LOOKS LIKE

**WE PROVIDE ADVISORY AND IMPLEMENTATION SERVICES TO SUPPORT COLLIBRA DATA GOVERNANCE**

**WE PROVIDE PRE-CONFIGURED TEMPLATES TO FAST-TRACK YOUR COLLIBRA IMPLEMENTATION**

**WE PROVIDE TRAINING AND DEVELOPMENT SERVICES TO UPSKILL AND DEVELOP YOUR PEOPLE**

## YOUR PEOPLE



We have been the partner of choice for major firms to implement communications and training programmes to embed data governance into their culture.

We have a library of workshops, eLearning and certifications to support your needs at [edmworks.com](https://edmworks.com). And you can find additional data governance courses and certifications at [Collibra University](https://collibrauniversity.com).

For GDPR, we are an approved training provider for the International Association of Privacy Professionals ([www.iapp.org](https://www.iapp.org))

## POLICIES & METHODS

With over 25 years of data design, implementation and governance experience for some of the world's largest firms, we have extensive experience in the policies and methods needed.

Our EDMworks Data Governance Methodology and implementation guidelines have been evolved over several years of engagements with clients in Europe and North America.

## ARTEFACTS AND CATALOGUES

One challenge with governance is "Where to start?". At EDMworks we have developed a broad set of pre-defined artefacts to fast track governance initiation and development. These include:

- Data policies, strategies, principle and guidelines
- Data architecture, models, dictionaries and glossaries
- Data process flows, lineage, quality measures and RACI charts
- Job descriptions, skill sets, roles and responsibilities

## GOVERNANCE PLATFORM



The Collibra Data Governance Platform helps organizations prove that they are always doing the right thing with the data. The platform meets GDPR requirements for driving governance, compliance, and operational activities by orchestrating all activities and information surrounding the data, its meaning, and its use. The Collibra solution enables true data governance by providing the policies, controls, and workflows needed to document data and show its lineage and by enabling organisations to set and enforce appropriate policies and address the roles and responsibilities of everyone that touches the data.

## OUR APPROACH SAVES TIME, MONEY AND REPUTATION



# TEN KEY AREAS FOR A JOINED-UP PLAN FOR DATA GOVERNANCE

## GDPR EXTENDS ACROSS YOUR ENTIRE ORGANISATION AND 3<sup>RD</sup> PARTIES

### 1. DATA GOVERNANCE FRAMEWORK

Create and/or enhance a Data Governance (DG) Framework including:

- DG organisation structure including Data Protection Officer
- Capability for full data/systems inventory, flow, lineage, quality, accountabilities for all PII
- Catalogue for trusted PII data sets
- Collaborative workflow to support issue logging, escalation, impact assessment, prioritisation and resolution

### 2. CORE DATA GOVERNANCE ACTIVITIES

- Identify and inventory PII data at data set and attribute level in all systems including relevant sub-contractors/outsource providers
- Create/enhance PII data glossary/dictionary and cross references
- Assess risk to the data subject of data being breached/lost and use risk measures as a prioritisation for data flow/lineage analysis
- Identify and map the flow/lineage of PII data through the organisation (process and system) and identify input, transformation, storage, distribution and deletion. Map controls, quality measures and ownership (individual and legal entity) onto the flow. Include Data Sharing Agreements in the analysis.

### 3. CULTURE AND VALUES

- Ensure GDPR core principle are communicated to all staff
- Update code of conduct and all communications/training material
- Enable collaborative workflow capability for all staff to report and escalate privacy related issues via DG framework

### 4. MANAGEMENT ACCOUNTABILITIES

- Review Data Protection Officer and Management accountabilities.
- Create DG dashboards and scorecards. Use these to identify unassigned PII, control gaps, metadata coverage etc. and to generate and monitor activities to resolve issues
- Integrate workflow into the DG framework for management

### 5. OPERATIONS

- Breach management: Ensure DG PII inventory is sufficient to support operational activity by containing PII data per system together with assessments of risk for exposed data subjects
- Information request processing: Ensure DG PII inventory contains cross references/aliases to all systems in order to be capable of responding to increased scale of information requests.

## 6. RISK MANAGEMENT

- Create Privacy Risk Assessment Process/template and conduct risk review of systems on a prioritised basis
- Use DG platform to identify and review all PII data sets and assess risk of individual set breach
- Assess risk of multiple systems breaches by joining related data sets
- Create plan for risk mitigation (anonymization, encryption etc.)

## 7. MANAGING CONSENT AND LEGAL PURPOSE

- Review PII inventory and identify/flag all systems having legitimate purpose for processing based on commercial contracts and revised GDPR compliant privacy notices
- Review PII inventory and identify/flag all systems requiring consent or explicit consent
- Use DG dashboard to identify, monitor and resolve systems with PII where neither consent or legitimate purpose exists

## 8. PRIVACY BY DESIGN AND DEFAULT

- In addition to 'purpose and consent' as above, identify all systems with PII and flag whether the data is anonymised, pseudonomised, encrypted or has some other protection
- Ensure workflow for new systems or processes is amended to incorporate privacy by design

## 9. IMPLEMENTING CONSUMER RIGHTS

- Use DG dashboard and scorecard analysis to establish that PII data is tracked through the organisation and that the capabilities to capture, process, transform, store, distribute and delete PII exist
- Use DG dashboard to ensure that all processes using automated PII profiling and decision making are identified
- Ensure data subjects ages are captured and parental rights enabled

## 10. COMPLIANCE (INCLUDING FINES MITIGATION )

- Use DG framework to provide evidence that the organisation has taken all reasonable steps to conform to GDPR principles
- Ensure all PII data is covered including data sharing agreements with 3<sup>rd</sup> parties
- Ensure Privacy by design implemented and evidenced

**JOINED-UP, EFFICIENT DATA GOVERNANCE ENSURES COMPLIANCE AND SAVES TIME, MONEY AND REPUTATION**

# CONCLUSIONS

GDPR is a major overhaul of privacy legislation to create a legal and ethical framework for the 21<sup>st</sup> century data driven world. Organisations must protect individuals' data and respect their rights.

EDMworks programmes with the Collibra Data Governance Center platform provide the right combination to empower your people to deliver governance fit for your organisation.

**TRUSTED DATA SECURES YOUR FUTURE**

# ABOUT US

## EDMworks

EDMworks was founded by experienced Data Strategists, Architects and Governance specialists with deep experience of leading transformational change across large, complex global organisations. At the core of their ethos is a passionate desire to empower people and enable organisations to improve engagement with.

To book a personal discussion:

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collibra™

Collibra makes it easy for data citizens to find, understand, and trust the organizational data they need to make business decisions every day. Unlike traditional data governance solutions, Collibra is a cross-organizational platform that breaks down the traditional data silos, freeing the data so all users have access. Learn more at [www.collibra.com](http://www.collibra.com).