WISDOM OF CROWDS

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ARCHITECTING THE GDPR-READY ENTERPRISE

THE EUROPEAN ADDENDUM

NOVEMBER 2017 - BRUSSELS

CHECKLISTS, MIND MAP & POLL RESULTS

CYBER MANAGEMENT ALLIANCE

Innovative Business Growth Platforms

WISDOM OF CROWDS

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INTRODUCTION

On 13th November 2017, Cyber Management Alliance assembled together practitioners, and thought leaders in cyber security and data privacy from across Europe at their European inaugural Wisdom of Crowds event at the Pullman Hotel Brussels in Belgium.

Wisdom of Crowds is all about providing guidance and sharing knowledge derived from the collective experience of practitioners – 'the wisdom of many surpasses the knowledge of a single few'.

The event, led by Amar Singh, CEO and founder of Cyber Management Alliance, globally recognised cybersecurity thought leader and sought-after keynote speaker, focused on the forthcoming European GDPR, explored how to enable organisations to become GDPR-ready and comply with the new regulations.

From mind maps that covered the key steps, people and technology needed for a GDPR-ready enterprise, the over 70 experienced practitioners created a series of checklists to ask third parties, guiding controllers and processors in how to manage records.

Some of what the Checklists cover include:

Record Keeping Requirements – including corporate mission and vision, data register, records of external audit findings, risk management methodology, DPIA output, privacy notice, training records and data exposed to third parties.

GDPR Readiness – including training and awareness cover, DSAR readiness, DPO, CISO role and formal risk management.

Cyber Incident Planning & Response Maturity – including BCP readiness, cyber response training, SOC site visit and maturity assessment.

Insurance – liability, direct and indirect cover.

Staff – hiring practices, training metrics, subcontractor hiring policies and management approach.

Technical Competencies – including data encryption practices, data destruction/deletion, access management, data portability and exit strategy, certifications and references.

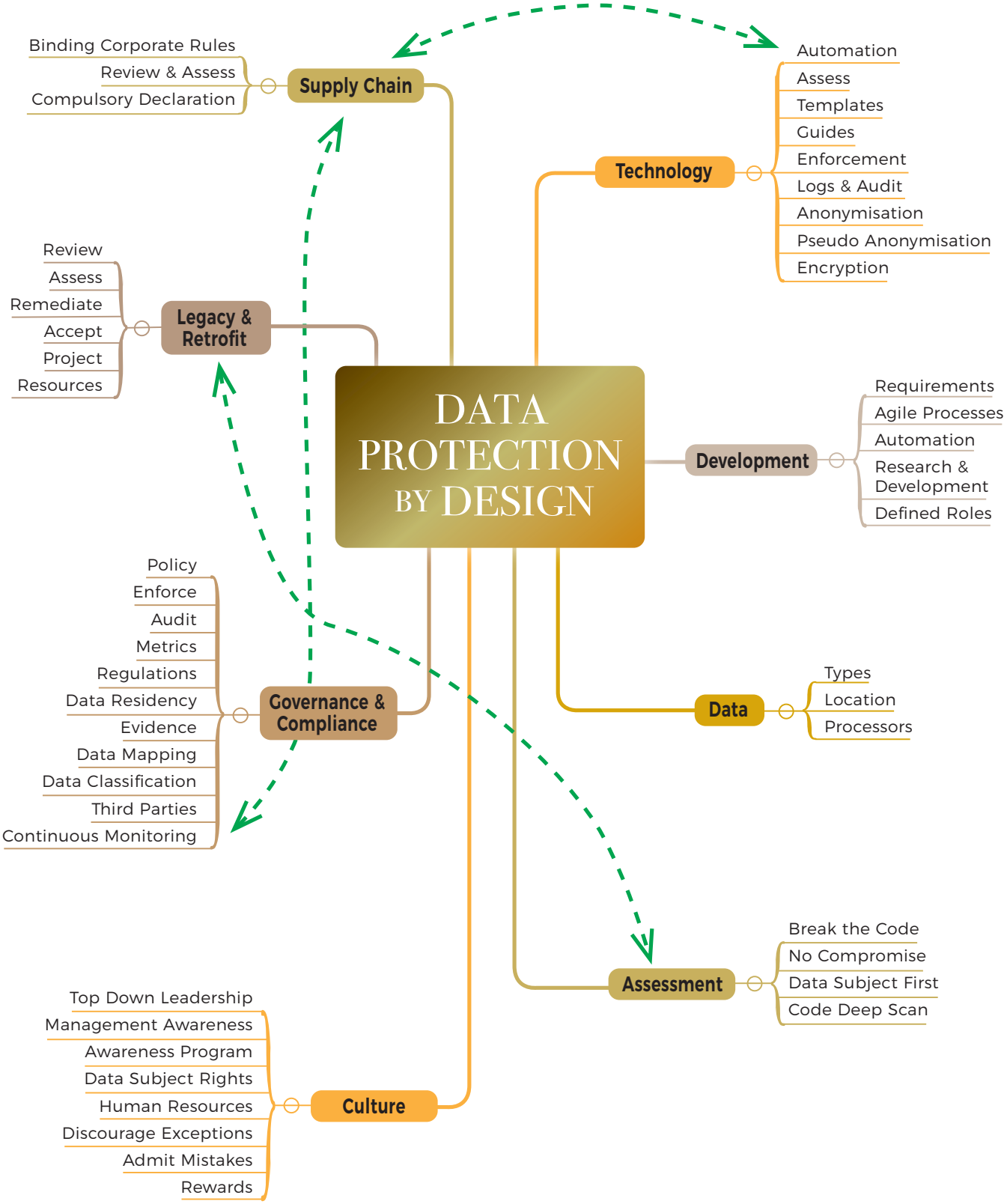
You can follow our unique Wisdom of Crowds 'Data Protection by Design mind map, created by attendees at the Pullman Hotel Brussels event in November. This comprehensive flow chart follows the routes for Supply Chain, Legacy and Retrofit, Technology, Governance and Compliance, Culture, Assessment, Development and Data.

Throughout the European Wisdom of Crowds event, the audience participated in a series of polls around about 'Architecting a GDPR-Ready Enterprise'. The results of the polls provide an informative insight into the minds of GDPR and information security practitioners, and thought leaders.

CHECKLIST TO ASK YOUR THIRD PARTIES & RECORD KEEPING REQUIREMENTS (CONTROLLERS & PROCESSORS)

- **Record Keeping Requirements (Controller & Processor)**
  - Corporate mission & vision
  - Categories of data processed
  - Purpose of processing
  - Data register
  - Data breach register
  - Data sharing register
  - Records of external audit findings
  - Risk management methodology
  - Data processing activities
  - DPIA output
  - High priority incident logs
  - Privacy notice
  - Training records
  - Data exposed to third parties.
- **GDPR Readiness**
  - Overview of current state
  - Training & awareness cover
  - Other audits available for review (ISO 27001)
  - Privacy notice
  - Responsible person / DPO
  - DSAR readiness
  - CISO role
  - Formal risk management
- **Cyber Incident Planning & Response Maturity**
  - Share P1 incidents overview last three years
  - BCP readiness
  - Cyber response training for executives
  - Security Operations Centre (SOC) site visit
  - SOC maturity assessment
- **Insurance**
  - Liability
  - Direct & indirect cover
- **Staff**
  - Hiring practices
  - Training metrics
  - Subcontractor hiring policies
  - Subcontractor management approach
- **Technical Competencies**
  - Data encryption practices
  - Data destruction / deletion
  - Guarantee integrity of the data
  - Access management
    - Role-based access control
    - Audits of access
  - Data
    - Portability
    - Exit strategy
    - Isolation / segregation
    - Deletion
    - Backup
    - Retention
    - Access management
  - Certifications & references
    - Staff skills
    - Accreditations (ISO, SOC, etc)
    - Other government accreditation
    - Customer reference
- **Define roles and responsibilities**
- **Service Level Agreements (SLAs)**

Simplification | Obligation | Privacy | Culture



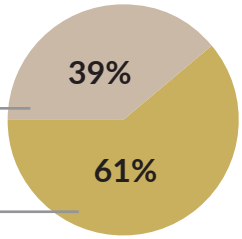
POLL RESULTS

GDPR to my organisation is:

Troublesome compliance requirement: **0%**

An obligation to protect personal information: **39%**

An opportunity to show our competitors, customers and business partners that we have appropriate data protection controls and processes: **61%**



Breach readiness in GDPR starts with:

Having a Cyber Incident Planning & Response strategy..... **25%**

Getting every employee trained on GDPR..... **10%**

Ensuring all senior execs and stakeholders understand the principles of GDPR and breach notification..... **69%**

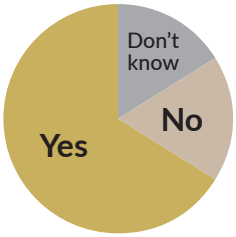
Understanding / mapping all data processing workflows..... **21%**

Do you believe there is a tangible shortage of DPOs?

Yes: **67 %**

No: **18%**

Don't know: **16%**



Is your organisation "ready" for the GDPR?

Yes, bring it on **22%**

Somewhat prepared **53%**

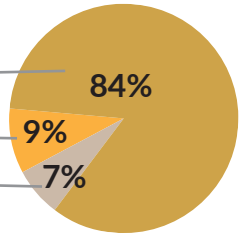
Early stages of research (means no)..... **24%**

Governments must take the lead on GDPR and increase transparency around how and what they do with citizens' data.

Absolutely, agree: **84%**

No, disagree: **9%**

Indifferent, don't care: **7%**



Technology must be used to enforce GDPR principles.:

Yes **62%**

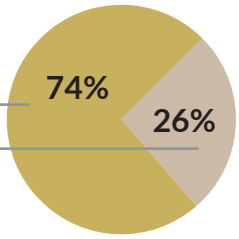
Not Really **38%**

POLL RESULTS

Cookies (most) are a threat to online privacy.

Agree: **74%**

Disagree: **26%**



Governments have done a good job to make businesses aware of the upcoming GPDR regulations.

Yes **11%**

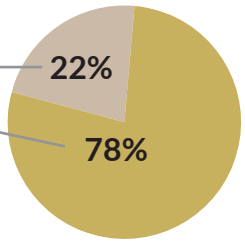
No **74%**

Don't know **15%**

On the topic of Legitimate Interests:

I understand every aspect of this.: **22%**

Need more clarification from regulators: **78%**



Post GDPR - DSAR may be used as a means to launch a DOS attack on a business (think thousands of DSAR per day/week or month):

Yes, worried and prepared..... **12%**

Yes, worried, BUT not prepared..... **64%**

No, not a concern **24%**

In your opinion, in an organisation, which department is most likely to cause a data breach?:

Human Resources (HR): **18%**

Marketing: **61%**

Accounting: **0%**

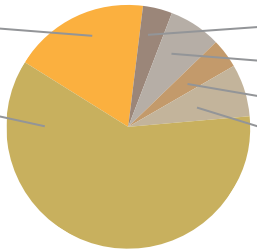
Other: **0%**

4%: Procurement

7%: IT

4%: Legal

7%: Sales



POLL RESULTS

Third parties are a significant risk for potential data breaches (causing a data breach).

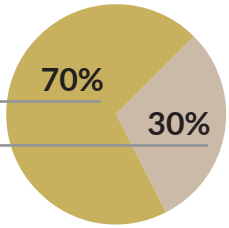
Agree **82%**

Disagree **18%**

In time, consumers/data subjects will judge companies based on their GDPR practices (as in how companies respect and protect personal privacy of customers and employees).

Yes, absolutely: **70%**

Nope, it's a far-fetched idea.: **30%**



Top three challenges in the post GDPR life (say, May 2019 onwards)**:**

Finding and retaining skilled staff. **26%**

Data Management (consent etc)..... **65%**

Managing the underlying security vulnerabilities..... **38%**

Managing and monitoring third party risk and compliance (to GDPR).... **85%**

Being able to swiftly detect and respond to a data breach.. ..... **68%**

In your opinion, what are the TOP three threats that could cause a Data Breach in 2018?:

Ransomware created from recent NSA theft of advanced technologies... **9%**

Mismanagement of privileges and rights within an organisation..... **70%**

Nation state attacks having impacts on organisations (non-Petya).. ..... **9%**

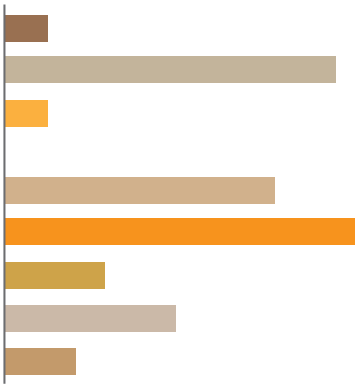
Bad cyber hygiene practices in the cloud and non-cloud data centres – such as misconfiguration, poor vulnerability management..... **57%**

Insufficient training and awareness of employees... ..... **74%**

Poor or non-existent encryption technology.... ..... **21%**

Poorly written and communicated policies..... **36%**

A compliance (tick box) approach to GDPR.... ..... **15%**



POLL RESULTS

One word to describe your experience today at Wisdom of Crowds:

The next Wisdom of Crowds in Brussels must cover:

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