



The privacy gym: Get your data in shape!

Wednesday, 21 May

08:00–09:00 PST

11:00–12:00 EST

17:00–18:00 CET



Panelists



Rebecca Perry, CIPP/US/G

Managing Director,
Strategy & Operations,
Data Privacy, Security & Governance
Solutions

Exterro



Matthew L. Miller, Esq.

SVP, Global Advisory Services
Leader

HaystackID



K Royal, PhD, JD
FIP, CIPP/E /US, CIPM, CDPSE

Global Chief Privacy Officer and
Deputy General Counsel

Crawford & Company

+

Co-Host

Serious Privacy Podcast



exterro®

Safeguarding Your
Digital World



Effectively Prepare & Respond when Data Risks Become Reality



Agenda

1. Why Your Data Needs a Workout: The Legal Case for Minimization
2. From Hoarder to Minimalist: Data Fitness Transformations
3. Leverage Technologies: Automate the Reps, Maximize the Gains
4. Cool Down & Q&A



Why Your Data Needs a Workout: The Legal Case for Minimization



Records, Information and Data are Everywhere!

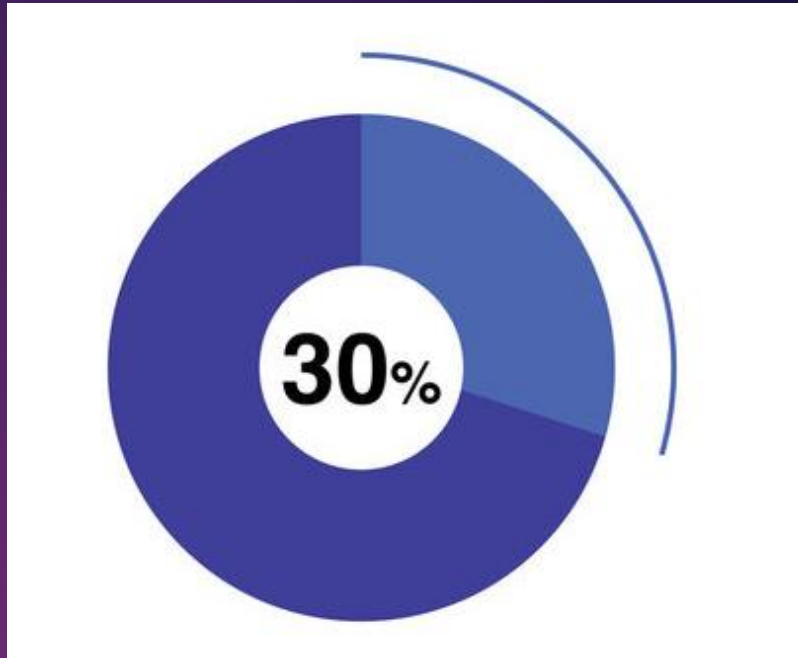


Desired IG & RIM Program Enhancement Outcomes



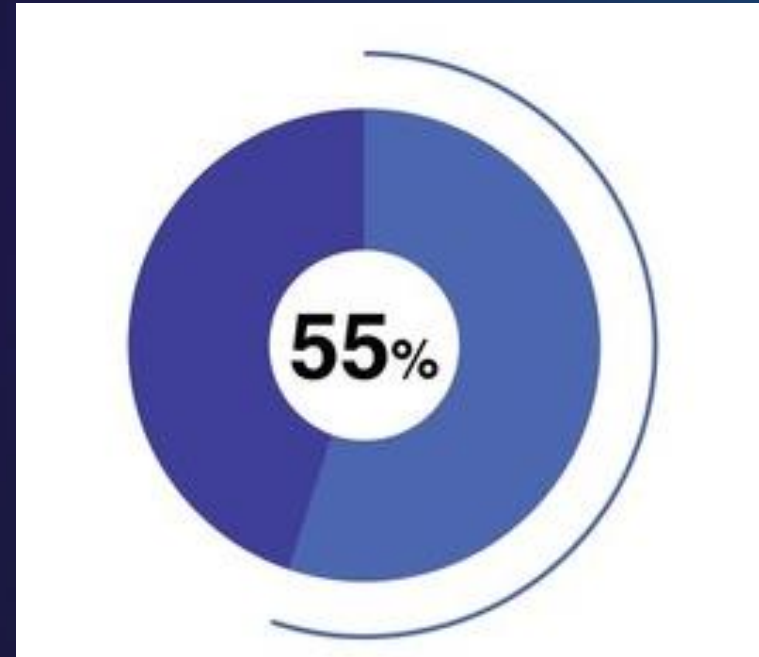
85% of Enterprise Data is ROT or Dark Data

ROT DATA



Redundant Obsolete Trivial Data

DARK DATA



Unknown or Untapped



Trimming the Fat:

The Sedona Conference Framework for Disposition

The **Sedona Conference, Commentary on Defensible Disposition (2019)** provides a framework for managing information no longer subject to legal or regulatory retention.

Principle 1

Absent a legal retention or preservation obligation, organizations may dispose of their information.

Principle 2

When designing and implementing an information disposition program, organizations should identify and manage the risks of over-retention.

Principle 3

Disposition should be based on Information Governance policies that reflect and harmonize with an organization's information, technological capabilities, and objectives.



Data Retention Obligations Under Privacy Regulations



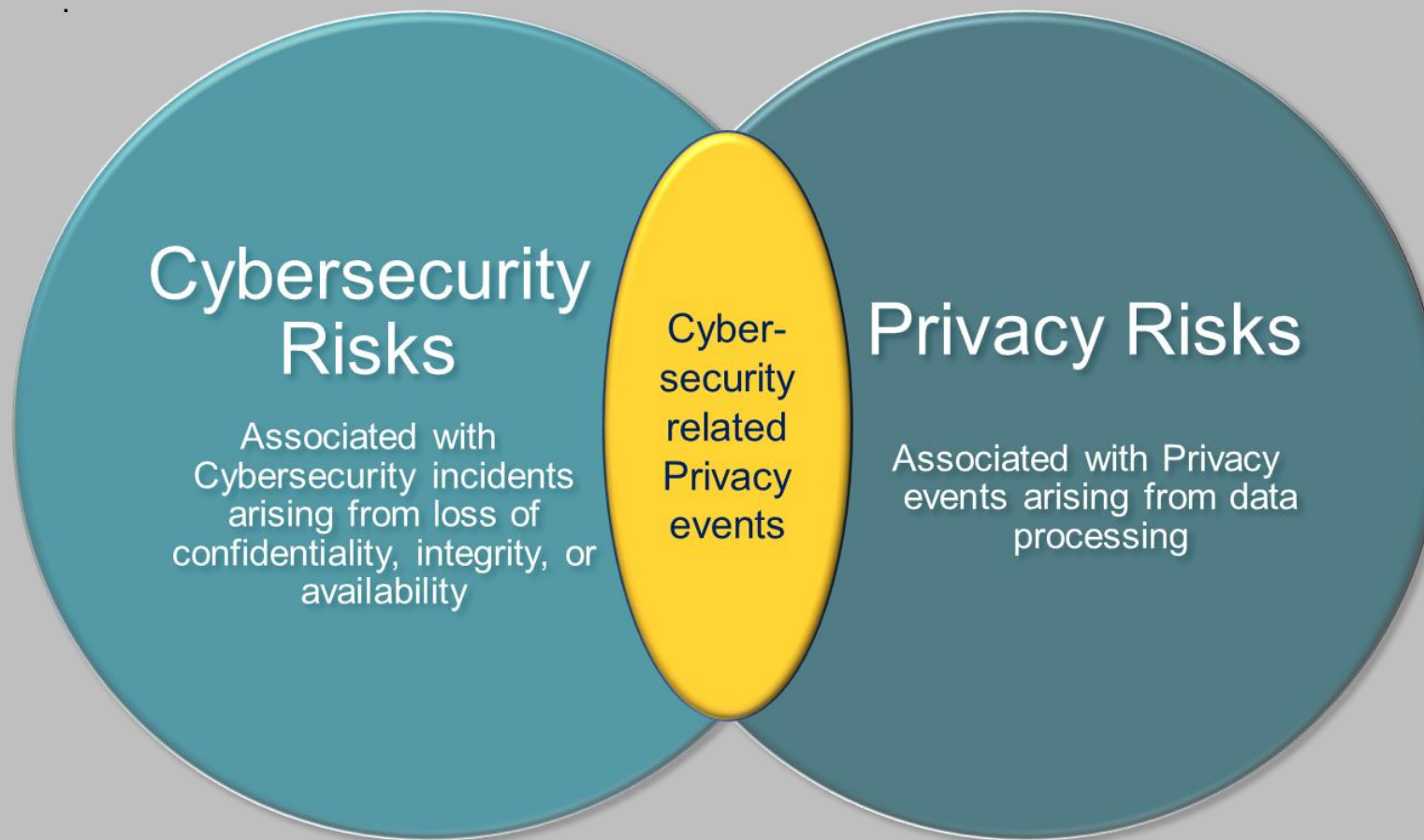
- Transparency / Notice
- Data Minimization
- Purpose Limitation
- Storage Limitation



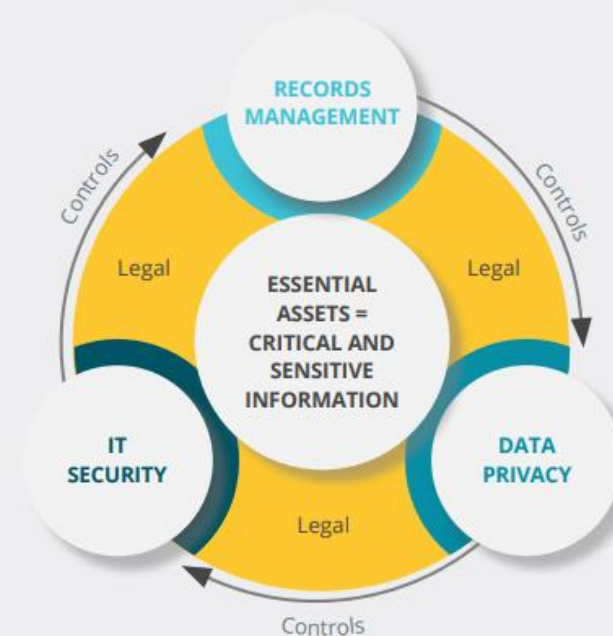
Privacy & Security Overlap

NIST Privacy Framework: A Tool For Improving Privacy Through Enterprise Risk Management,
Version 1.0 (January 16, 2020)

Figure 2: Cybersecurity and Privacy Risk Relationship



Linking Records Management with IT Security and Data Privacy with Legal Oversight



NIST.SP.800-53r5, Security and Privacy Controls
for Information Systems and Organizations
(September 2020)



Data Breaches & Massive Fines

BlackBaud

“Reckless Data Retention Practices”



FTC Fine
\$3M

- 2020 data breach impacting millions of people
- Failed to enforce their records retention schedule
- Exacerbated the number of individuals impacted.
- The average fine levied by the FTC for privacy and cybersecurity violations is \$45.7M

Disney

“Millions of Slack Messages Breached”



Internal
Slack Messages
44 Mil

- 18,800 spreadsheets
- 13,000 PDFs
- Highly sensitive personal data about employees
- Unreleased projects & sensitive documents
- Class action lawsuit



From Hoarder to Minimalist: Data Fitness Transformations



Slim Down Your Data: A Defensible Approach

Organizational Benefits of Disposition	Defensibility of Purpose & Process Benefits
<ul style="list-style-type: none">• Reduce enterprise and legal risks	<ul style="list-style-type: none">• Expand policy compliance
<ul style="list-style-type: none">• Decrease downstream eDiscovery costs	<ul style="list-style-type: none">• Meet regulatory obligations
<ul style="list-style-type: none">• Increase ability to satisfy legal holds	<ul style="list-style-type: none">• Enable production of the right data
<ul style="list-style-type: none">• Reduce attack surface and lower risk of exfiltration	<ul style="list-style-type: none">• Satisfy courts, regulators, and auditors
<ul style="list-style-type: none">• Trim 3rd party costs	
<ul style="list-style-type: none">• Improve system performance	
<ul style="list-style-type: none">• Reduce storage footprint	

Get Buy-In by Identifying Strategic Benefits



Reduce Risk of
Litigation and
Fines



Reduce Expected
Cost of a Data
Breach



Reduce Storage
Costs



Reduced E-Discovery
Costs and Cyber
Insurance Premiums



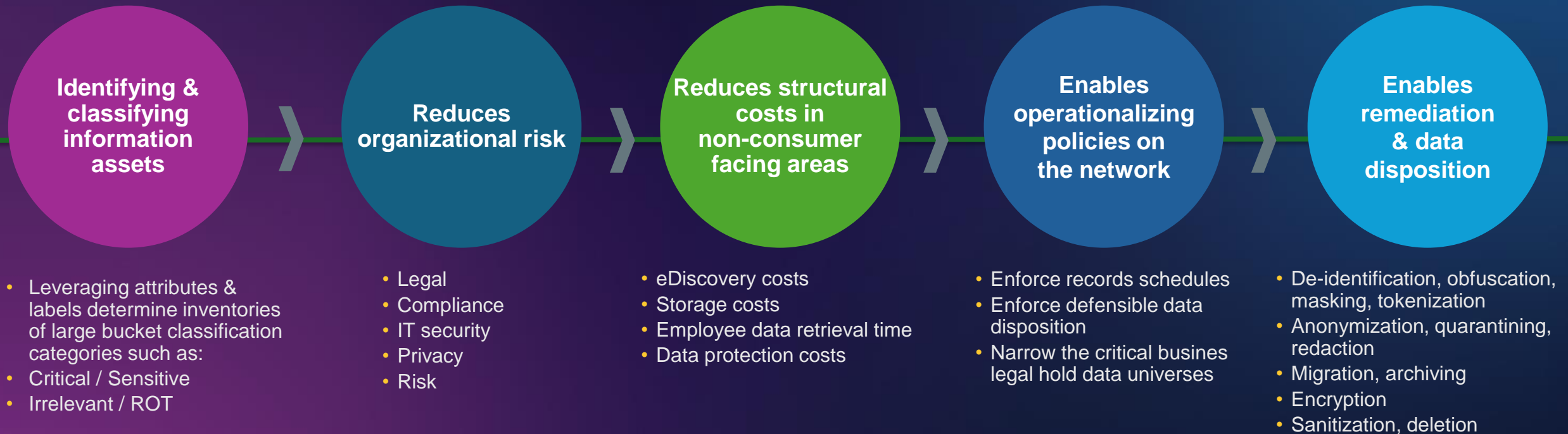
Your Data Fitness Plan: 4 Moves to Strengthen Compliance



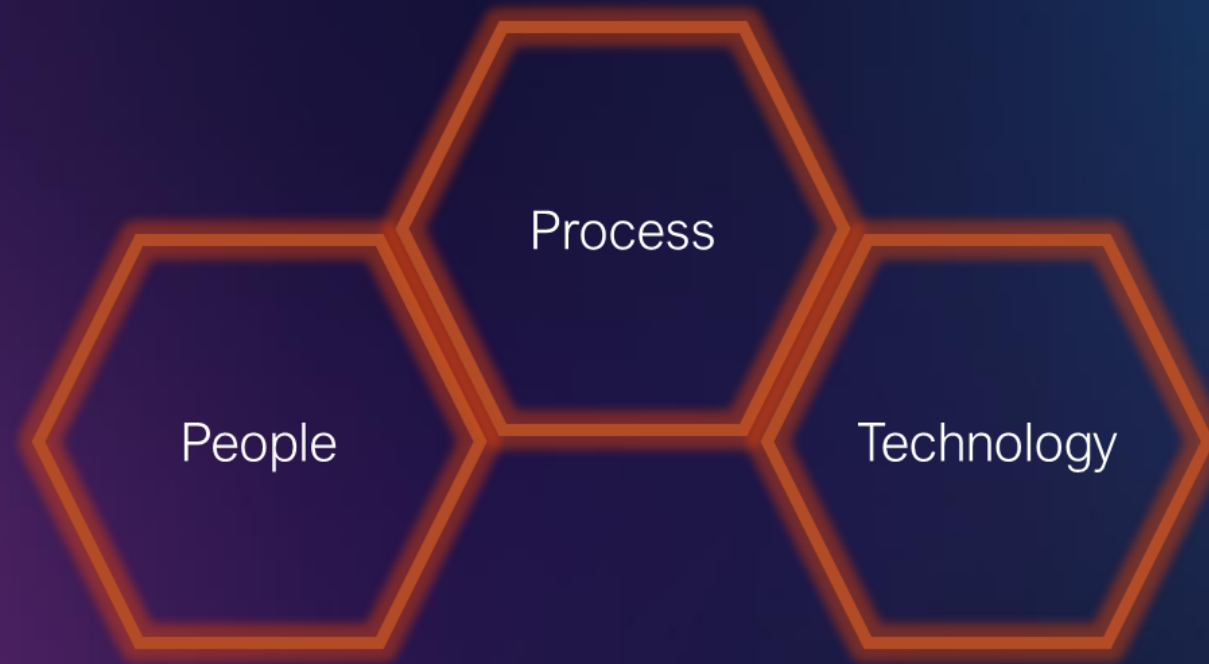
Roadmap for Implementing Data Disposition



RIM Enhancement Program: Controls for Better Data Risk Management



Harmonize Overlapping Obligations



Automated
Data Map



Data Retention
& Disposition



RoPA
Manager



Privacy Rights
/ DSAR



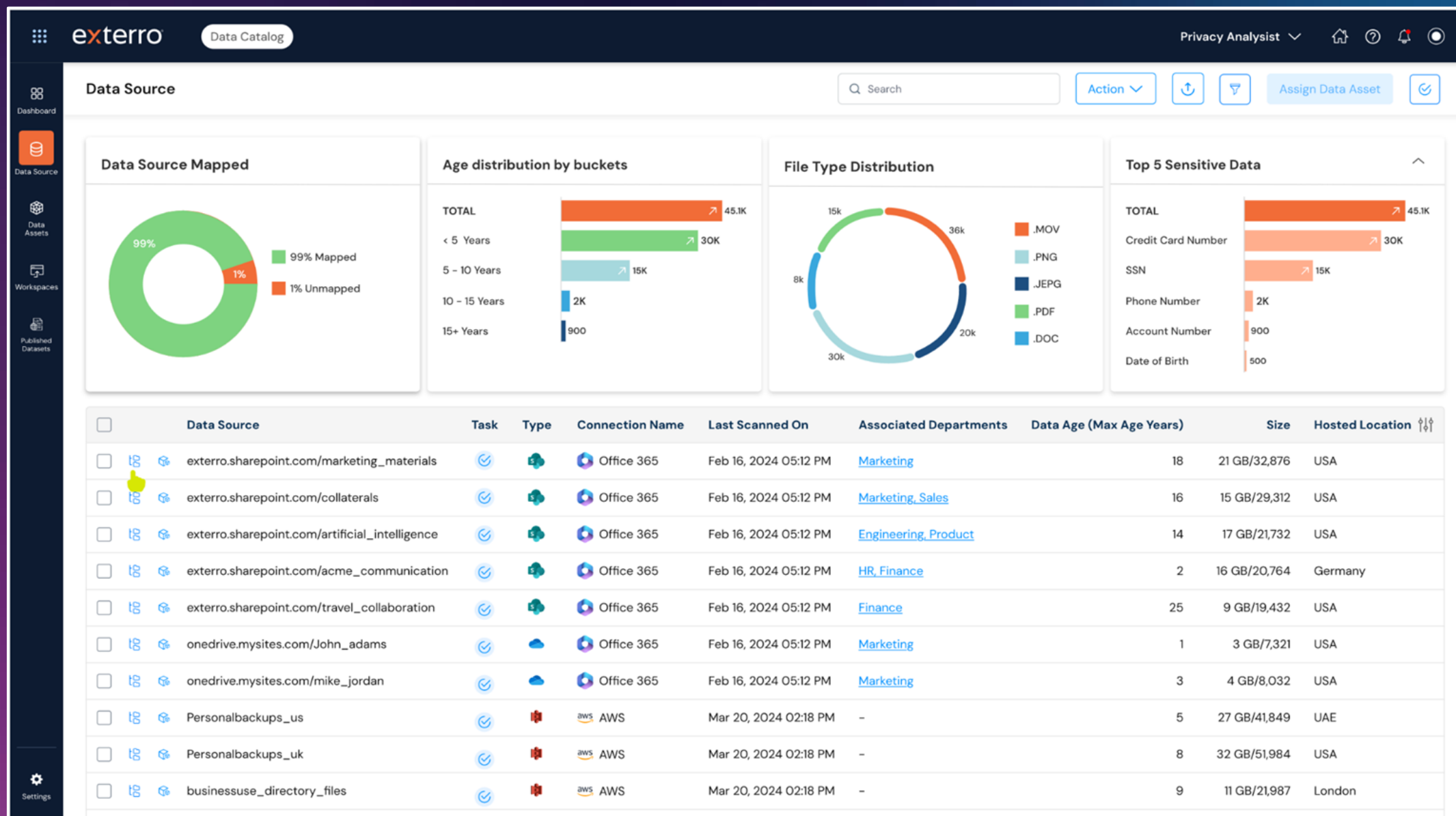
Legal
Holds



Data Privacy
Assessments



Data Examination: Understand & Classify Data



Your Data Fitness Plan!



Cool Down and Q&A



Thank You!



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Keep Training: Free Tools to Help You Stay in Shape

- Data Retention Handbook
- Infographic: The Sleeping Giant of Privacy & Security: Data Deletion
- Privacy Program Assessment Checklist

& more



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