

iapp

You Are Here: First Steps in Data Mapping

Thursday, 23 May

10:00-11:00 PST

13:00-14:00 EST

19:00-20:00 CET



Meet Your Hosts



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- What Is Data Mapping and Why Do It?
- Who Is Doing Data Mapping and Why
- What Info Should a Data Map Convey?
- How to and How Not to Map Your Data
- What Can I Do Today?
- How Osano Does It



Poll

How would you characterize your organization's current data mapping practices?

Not sure/we aren't familiar with data mapping.

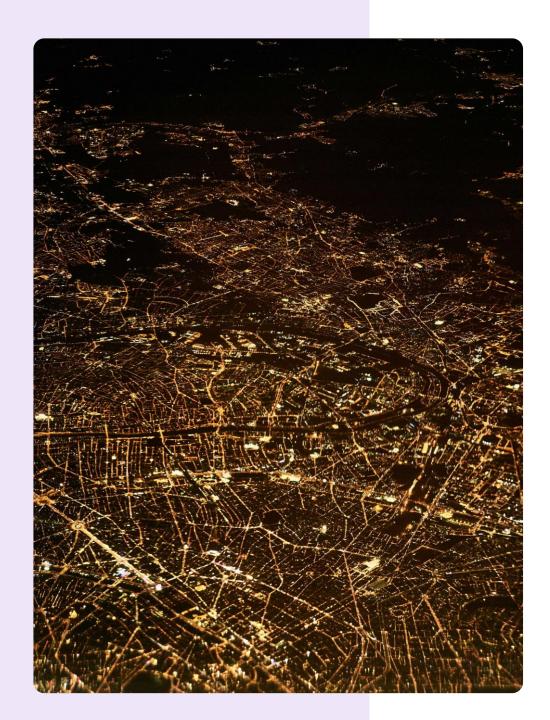
None—we have never mapped our data.

We primarily rely on spreadsheets to map our data.

We have a data mapping solution, but are still struggling.

We have a data mapping solution that works well. We're here to learn and improve our practices.





Defining Data Mapping

What Is Data Mapping?

Data mapping—any activity aimed at producing a complete picture of all the personal information (PI) an organization is responsible for.

Examples:



Asking people questions about the PI processed in the systems they manage.



Integrating a data map to another system to retrieve information about the PI processed in that system.



Rationalizing information from multiple sources to build an accurate, aggregate picture of the data that is collected and processed by your company.



Data Mapping Artifacts

What Do I Get?



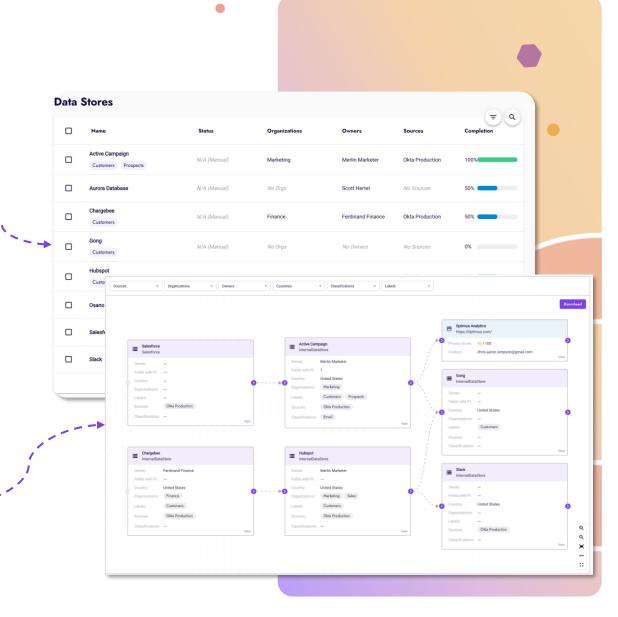
Data Inventory

- A complete list of all PI an organization is responsible for along with all additional information needed to manage that PI.
- Informs data map.



Data Map

- A visual representation of information within the data inventory that makes it easier for organizations to manage PI.
- Enables visualization and management of data inventory.





Why Do It?

Purpose(s) of Data Mapping

- 1. Enable true compliance
 - Process subject rights requests
 - Generate required assessments
 - Prioritize sensitive personal information
- 2. Identify privacy risks and opportunities
- 3. Reduce risks, operationalize opportunities

Additional Benefits

- Risk mitigation
- Compliance—regulators believe that "done" is better than "perfect."
- Efficiency gains in your privacy program
- Stronger data governance
- Potential to identify unnecessarily redundant systems or duplicated data flows
- More effective vendor management



IAPP-KPMG Privacy Risk Study 2023



Business Profiles

Who We See Implementing Data Mapping

Many of the businesses that approach Osano for data mapping fit these criteria.

Went the Spreadsheet Route

These teams that had already wanted to

These teams that had already wanted to map their data—but found spreadsheets too tedious, challenging to maintain, and inaccurate.

O2 Suffered a Breach

These companies experienced a security/privacy incident and where unsure of which data could have been compromised.

Undergoing Corporate Change

Some companies interested in data mapping are undergoing

M&A or onboarding new leadership and need to catalogue their data to facilitate the transition.

Manage a complex data landscape

These businesses simply recognize that their data landscape is too convoluted to understand without a robust solution.

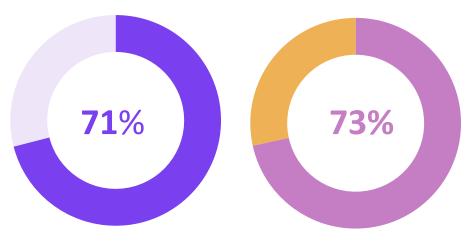
Pursuing New Opportunities

These organizations are seeking funding

These organizations are seeking funding or exploring new markets. First, they need to shore up their data privacy before they can pursue these opportunities.



Who Should Be Implementing Data Mapping



71 percent of businesses globally process the PI of EU citizens.*

73 percent of businesses globally process the PI of U.S. citizens.*

Efficient compliance with data privacy laws like the GDPR, CCPA, and others requires data mapping.

Challenges Associated With Building Your First Data Map

- X Lack of buy-in
- ★ Too busy attending to explicitly required compliance activities
- ★ Lack of awareness that data mapping for privacy compliance exists or that there are solutions for data mapping
- X Limited access to systems
- X Fear of the unknown/not knowing where to start
- ➤ Misconception that you have to have technical expertise to build a data map



What Info Should A Data Map Convey?

Categories of PI

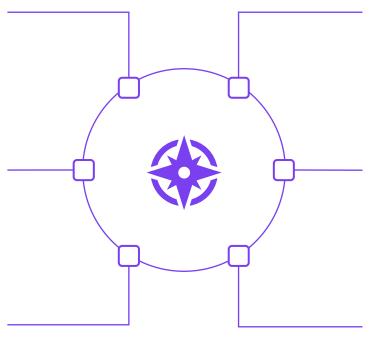
Inventory of personal information processed by the organization incl. categories showing sensitivity and volume as basis for privacy risk

Inherent Risk Description

Initial inherent risk register of threshold questions triggering privacy impact assessments

Data Flows & Third Parties

Data map showing exchanges, flows, and residency of personal information



Purpose & Use

Transparency regarding collection, purpose, and use of personal information established for confirming appropriate lawful processing

Ownership & Stewardship

Accountability for personal information handling and lifecycle management

IT Assets

Register of IT assets handling personal information and their safeguards



How Not to Map Your Data

Ad Hoc, Unprepared Data Mapping

Most organizations do not have a sustainable process for creating and maintaining a living data map. Why?



Excess Need for

Information

Eager to "finish" compliance, businesses treat all compliance tasks as one outcome, including:

- Complete automation of subject rights processing,
- Automated generation of ROPAs
- Identification and reduction of critical risks and costs
- Etc.



- Makes maintenance untenable
- Creates many, ultimately lowimpact tasks



 The people responsible for managing data don't want to respond to extensive questionnaires that include questions outside their domain of expertise.



You can run into this pitfall with any approach to data mapping.

Whether you use spreadsheets, a homegrown solution, or a dedicated data mapping solution, ad hoc/unprepared data mapping will still yield poor outcomes.



2024 | You Are Here: First Steps in Data Mapping The Automation Trap

Automation is Not the (Only) Answer

Faced with the challenges of creating and maintaining a living data map, many organizations turn to automation as a potential panacea. However...

- Automation requires maintenance.
- Automation is not prioritization.
- Sourcing needed information cannot (always) be automated.
 - e.g. Purpose for processing
- People know things systems don't.



How to Map Your Data

The Sourced Approach

You need a sustainable process for creating and maintaining a living data map.





1. Prepare

- Prioritize Desired Outcomes
- Determine Needed Information
- Determined Needed People







2. Identify sources of information for your data map that:

- Have all the information you need
- Can provide the information on a regular basis
- Represent sources of truth and/or responsibility for the information provided







3. Establish repeatable flows of information from these sources to your data map.



4. Rationalize these flows against one another to generate and maintain your living data map.



What Can I Do Today?



Get Started Today With Step One: Preparing

- Prioritize outcomes
 - e.g., aim for a data map that facilitates subject rights requests.
- Determine what information is needed
 - List of all systems that might process PI
 - List of all owners responsible for those systems
- Determine who is needed
 - List of individuals responsible for creating and maintaining the data map
 - List of individuals responsible for sourcing information to the data map
- Develop a sustainable process for creating and maintaining a living data map, working towards additional prioritized outcomes in a sequence.



Consider a Manual Exercise

- Conduct an application discovery survey.
 - IT asset/application
 - Categories of PI processed
 - Purpose & use of PI
 - Description of PI's and data store's inherent risk
 - Ownership and stewardship information
 - Data flows (internal and external)
- Distribute to functional leads, admins
- Collect responses & visualize
- Or skip the manual exercise and evaluate data privacy platform solutions capable of data mapping



The Osano Platform

How Osano Does It

1. Identify Data Stores

Automated discovery via:

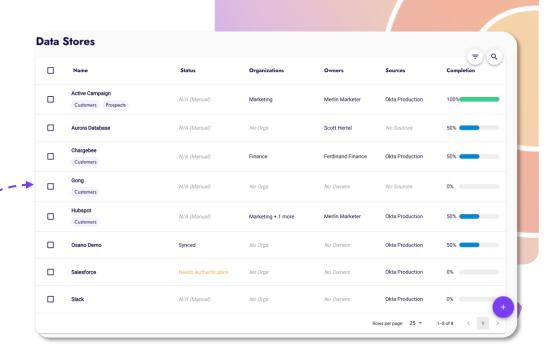
- SSO or CDP
- CSV upload of known data stores
- Assigned application discovery survey from Osano Assessments

2. Review Discovered Applications

Data inventory remains up to date via:

- Automated SSO/CDP discovery
- Regular application discovery surveys

Discovered apps can be ignored (e.g. for inactive systems), assigned to existing data stores, or assigned to a new data store.





The Osano Platform

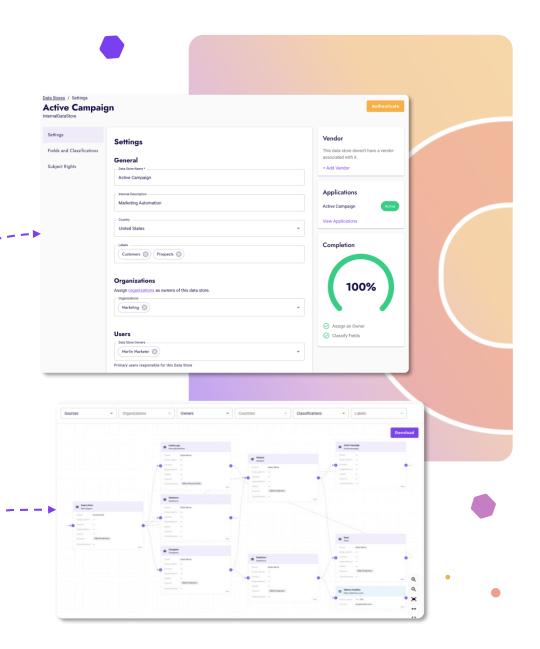
How Osano Does It

3. Add Metadata

- Integrated apps automatically populate metadata
- Data store owners are prompted to add info as needed.

4. Visualize and Add Data Flows/Vendor Relationships as Needed

- Your data map automatically populates discovered applications
- If data flows and vendor relationships haven't already been automatically generated, you can add flows here.





The Osano Platform

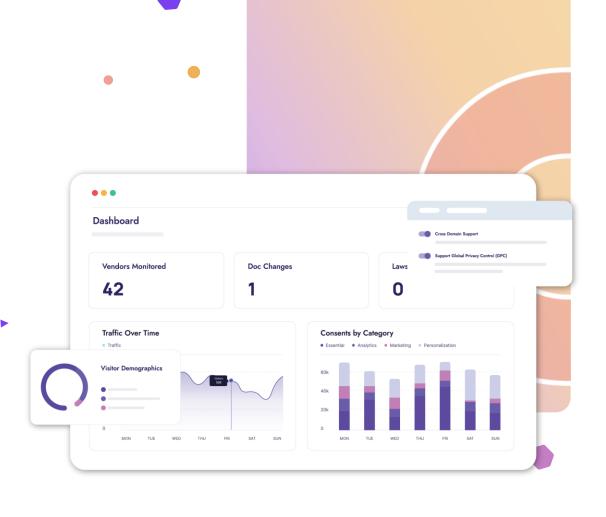
How Osano Does It

5. Use Your Data Map!

While you can use your data map for reference purposes, Osano also uses data map information to power other compliance activities, such as:

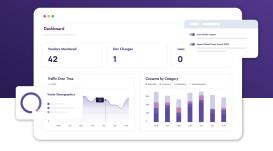
- Subject rights request fulfillment
- · Generating records of processing activity
- Vendor monitoring
- And more

Using Osano can also cut down on data map bloat—e.g. assessing for data minimization and retention, identifying redundant data stores/flows.





Stay In Touch and Learn More!



Schedule a Demo









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Q&A

Ask your most pressing data mapping questions.



Web Conference Participant Feedback Survey

Please take this quick (2 minute) survey to let us know how satisfied you were with this program and to provide us with suggestions for future improvement.

Click here: https://iapp.questionpro.com/t/AOhP6Z2f5d

Thank you in advance!

For more information: www.iapp.org



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