

The GDPR Readiness of European Organisations and the role of identity technology

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Privacy Commissioners (ICDPPC)

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- GDPR = consumer in control of their own data
- GDPR programs have been focusing on internal processes and controls
- Is the customer now in control?

The proof the pudding is in the eating

- Researched a full year
- How ready are organisations from a consumer's perspective
- Sample: 89 of Europe's largest organisations

Scored on how compliant their consumer journeys are



7 countries - 6 verticals - 89 organisations



Insurance



Utilities



Retail/E-tail &
consumer goods



Media &
Publishing



Travel &
Services



Non-profit

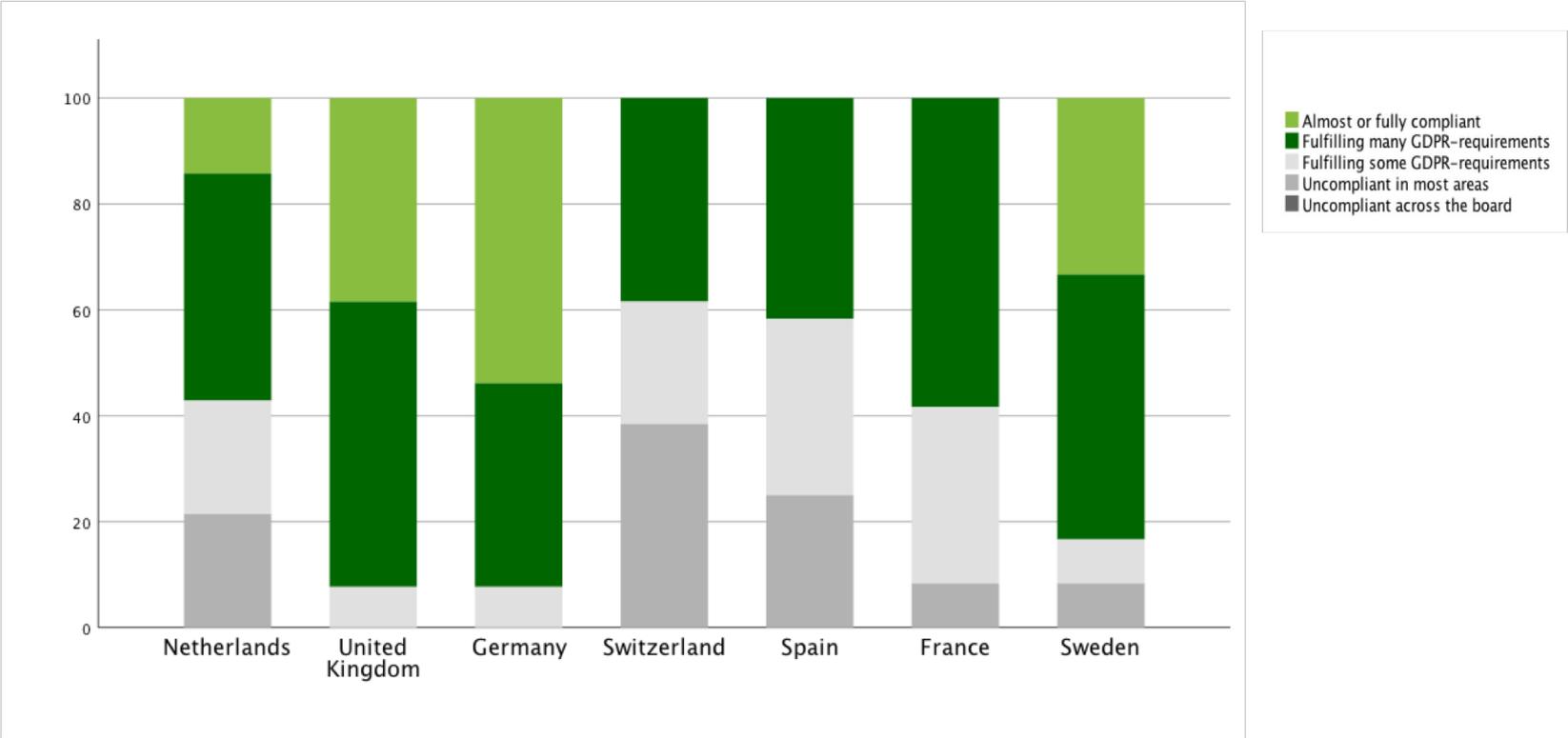
8 GDPR criteria

1. Consent
2. Ability to withdraw
3. Right of access
4. Right of rectification
5. Right to erasure
6. Data retention period
7. Privacy by default
8. 'Special categories of data' -> not always applicable

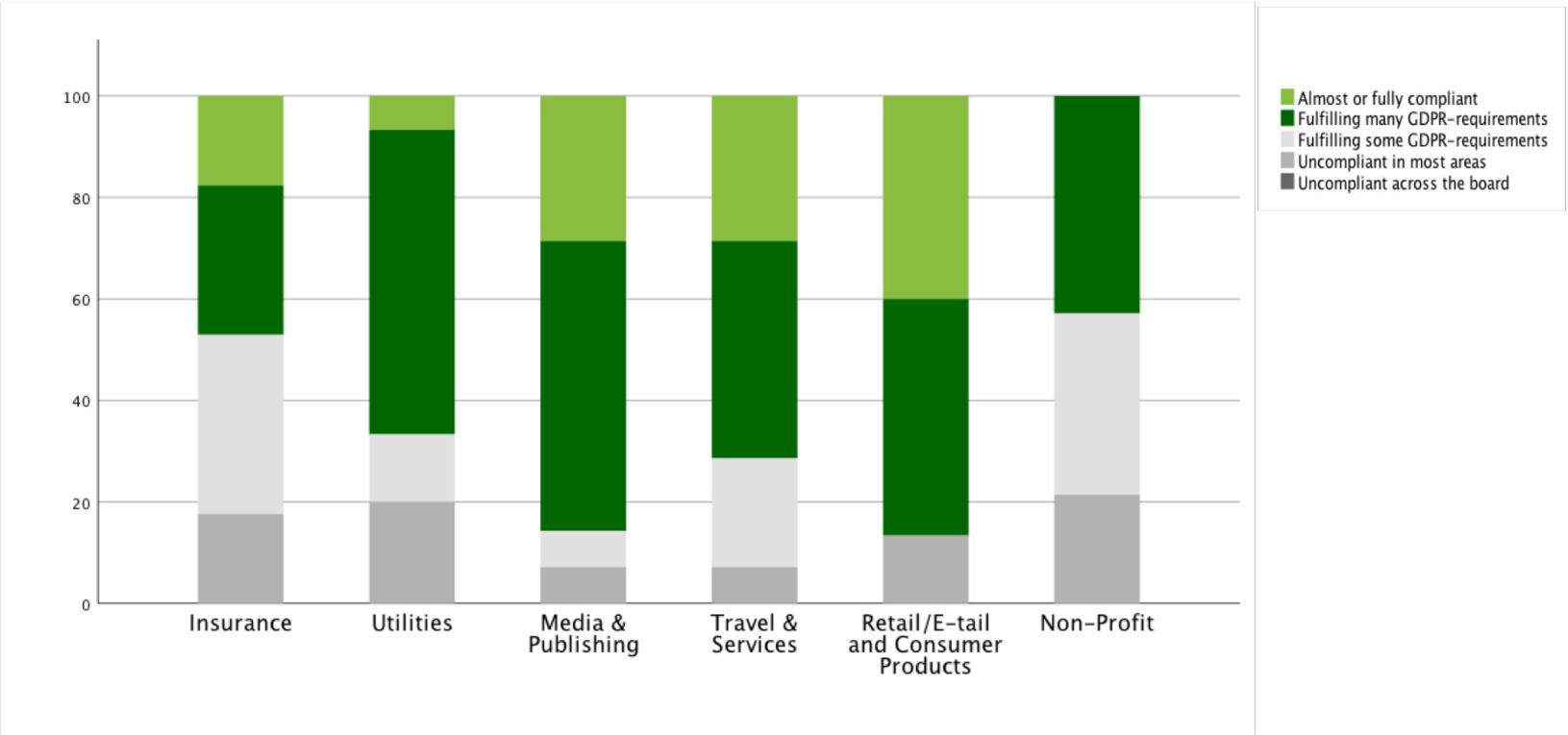
5 measurements

1. November 2017
2. January 2018
3. March 2018
4. May 2018
5. July 2018
6. October 2018
(forthcoming – includes US)

Overall GDPR-score per country



Overall GDPR-score per industry



34% of organisations
uncompliant in most areas
only fulfilling 'some' GDPR requirements

Basic GDPR requirements are in place:
Ability to withdraw (92%),
Right of access (96%),
Right of rectification (95%).

Key findings: 'Checklist' implementations Consumers not in control

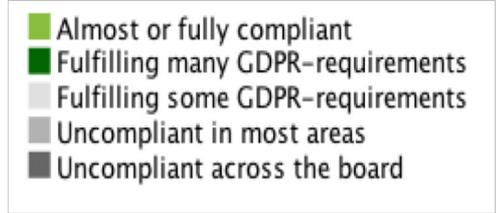
UK & Germany
Best performing countries

Retail/E-tail & Media/Publishing
Best performing industries

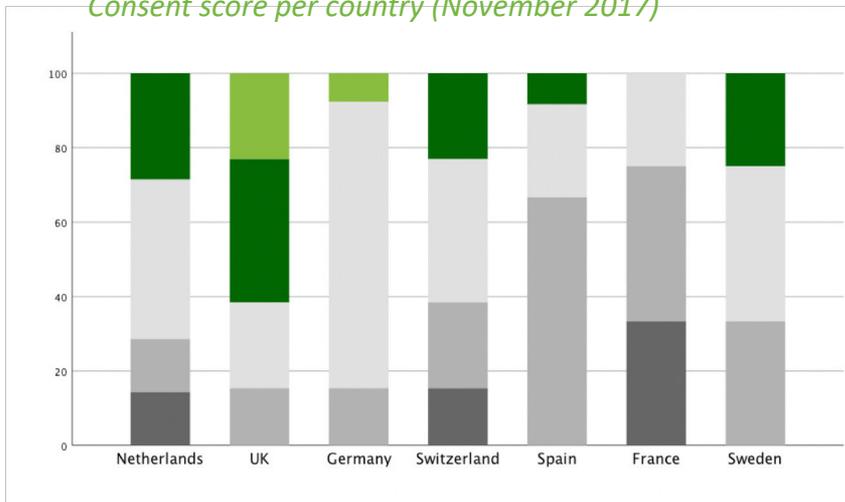
Core GDPR requirements are not in place:
Data retention period (43%),
Privacy by default (59%),
Consent (12%).

'Consent'

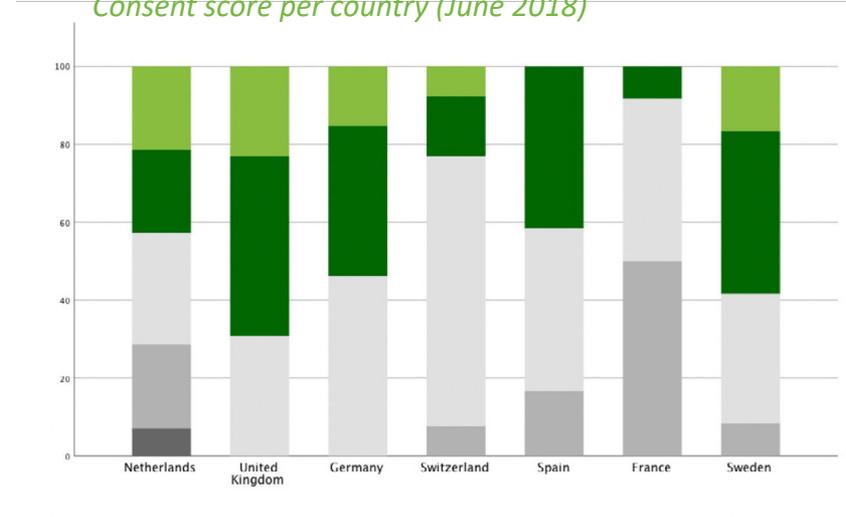
- Is consent being asked for in a straightforward manner?
- Are the purpose(s) of use mentioned at all?
- Does the organisation clarify for what purpose(s) the personal data will be used? Is it crystal clear?
- Are the purpose(s) of use specified per attribute?
- Little progress



Consent score per country (November 2017)



Consent score per country (June 2018)



Why are we where we are?

Cicumvent:

- Do we really care about privacy?
- As little effort as possible
- Trying to get away with legitimate interest

... or technology?

1. Scattered landscape

- Consumer facing: Portals and Apps
- Backend: Application landscape

2. Different personas

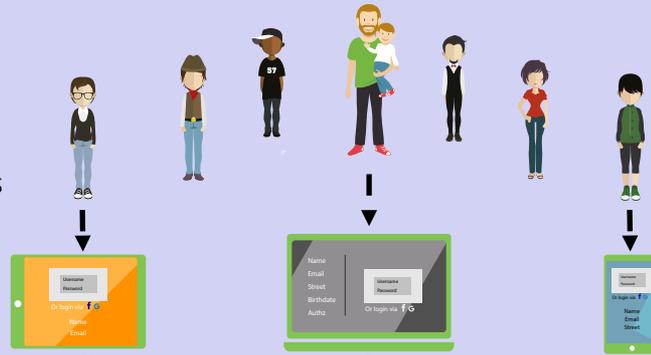
- Digital: frictionless customer journeys
- DPO: compliancy controls and reporting
- CFO: reputation and financial risks
- CIO: reduced costs

3. Multi-layered datamodel

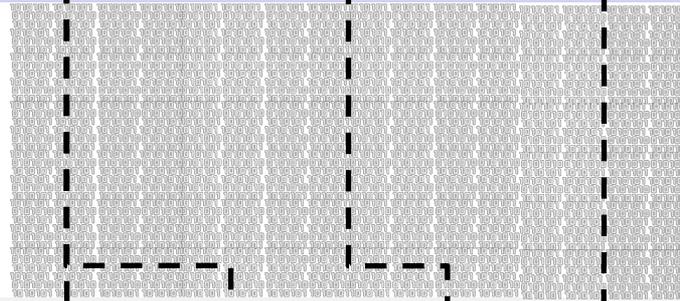
- Meta-data per Attribute value: retention, consents, Level of Assurance
- Proper UI/UX
- Integrating in processes and landscape
- Reporting

Scattered landscape

Consumers are offered different apps & portals for different services



Consumers are not offered the option to view, edit or delete their data



Consumer data is stored into a wide variety of systems and applications



Data reports and analytics need to be manually extracted per system



Chief Digital Officer



- Frictionless customer journeys
- Boost conversion, reduce drop-offs
- Actionable data to optimise cross- and upselling
- Building foundations for innovation (e.g. IoT)

Chief Information Officer



- IT agility & being quick to react
- Ability to scale rapidly
- High and guaranteed service levels
- Bringing innovation capacity into the organisation



Chief Risk Officer / DPO / CISO



- Become & stay compliant
- GDPR, US Consumer Privacy, PIPEDA, PSD2
- Assuring data residency
- Audit efficiency

Chief Financial Officer



- Reputation
- Do more with less
- Pay-as-you-go vs large upfront investments
- Reduce financial and operational risk

Meta-data for consent data and Know-Your-Customer

GOLDEN RECORD

META
NIST 8112

- Last Update: 22-mar-2018
- Mandatory field: Yes
- Provider name: Facebook
- Consent given: Yes
- Consent reason given: To send you our...
- Consent data: 22-mar-2018
- Verifier: not verified
- Classification: confidential
- Date deletion date: 12 month after last login
- Expiration date: 22-mar-2019
- Parental control: yes
- Parents allowed for consent: UID;UID

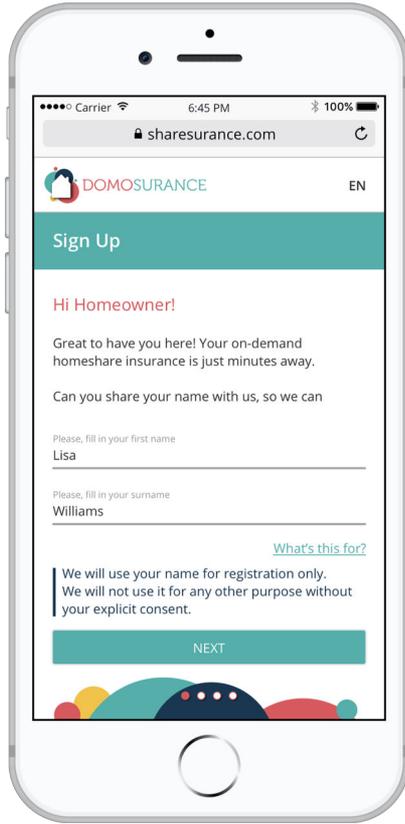
FIRST NAME LAST NAME DATE OF BIRTH PHONE NUMBER STREET NAME CITY SHOE SIZE AUTHZ GROUP MEMBER PREF. >

API Policy driven data management & Consent management

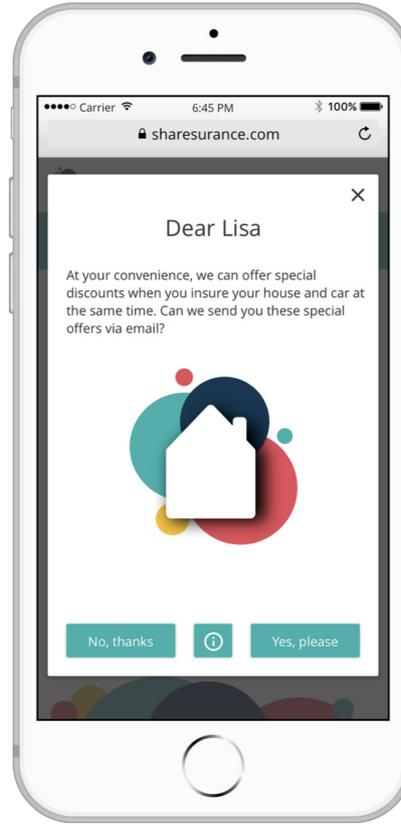
UI UX

Applications

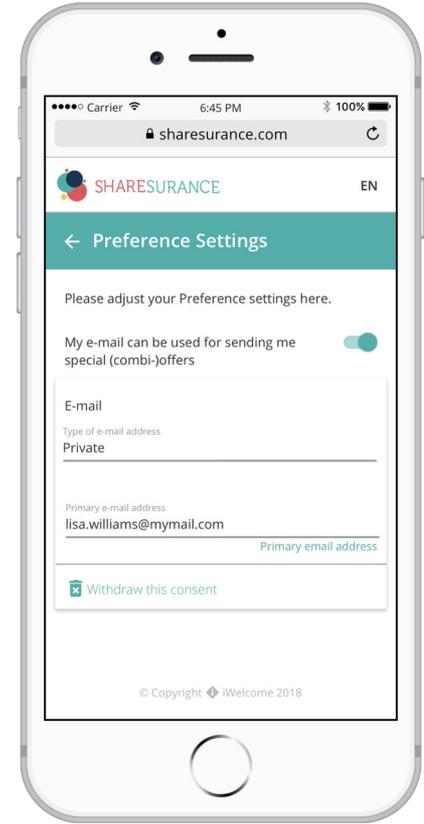
Consumer dialogue & Just In Time (JIT) consent



Consumer data capturing



JIT Consent capturing

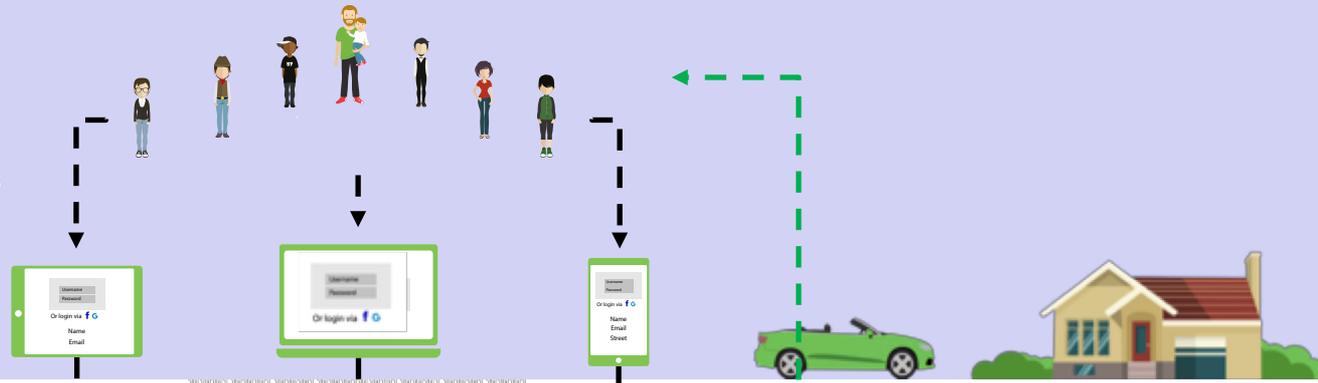


Self-service overview

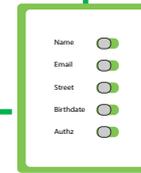
Fail early / learn fast via A/B-testing

Integrated landscape

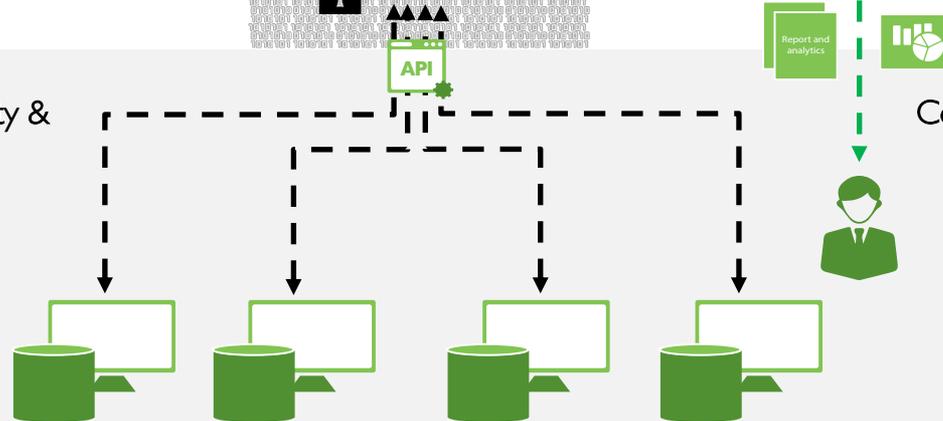
Consumers are offered one frictionless multichannel experience



Consumers can manage their personal information, consents and purposes



Applications are relieved from Identity & Consent Mgt complexity



Consumer analytics and reports
CDO/CSO/DPOs

Conclusions

- We do not see a true focus on the consumer:
GDPR is more like a 'checklist', the consumer is not in control;
- Consumer-centric requirements like consent and privacy-by-default are not in place;
- A missed opportunity to build trusted relationships;
- We do need a framework of best practices and technology to enable companies and change their approach;
- Larger organisations will need to pave the way for smaller ones.



What's next?

- Initiative to build frameworks:
Kantara Initiative workgroup for Consent Management Solutions;
- The future is to those building trusted relationships with customers;
- Consent Management will become pivotal
Explore integrated technology and UI/UX instead of island-optimisations;
- Opportunity for frontrunners to outsmart the competition by
investing in empowering customers with full control over their personal data;
- ... October comparing with USA (highlighting California).



Thank you for your attention!

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