VERITAS The truth in information.

GDPR Strategy Guide.

Developing Visual Article 30 Records.

THE WORLD OF DATA PRIVACY IS CHANGING

On May 25, 2018, the European Union's General Data Protection Regulation (GDPR) will become law, and with it, introduce a dramatic change in how organizations protect the personal data of EU residents—whether they are employees, customers, or suppliers. The new law has far-reaching consequences that ensure individuals have better knowledge of and control over how their personal data is used. Overall, these new standards will deliver improved accountability and transparency in relation to how personal data is governed.

The GDPR is made up of 99 wide-ranging articles covering all aspects of personal data compliance. One of the most important mandates—and a key first step in adhering to the regulation—is creating an Article 30 Record.

Article 30 requires that organizations keep an ongoing record of sensitive and non-sensitive data flows. The creation and maintenance of an Article 30 Record enables organizations to demonstrate compliance in accordance with the GDPR principle of accountability. Additionally, the law dictates that Article 30 Records be made available to the European data protection authorities should they wish to audit and investigate compliance-related issues.

An Article 30 Record covers the following information:

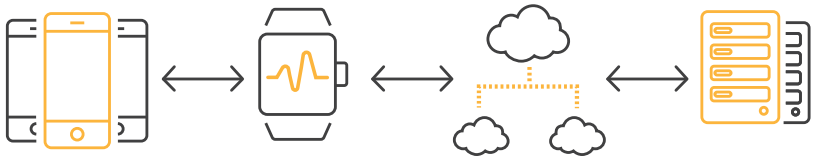
- Name and contact details of the data controller
- Purpose for processing the personal data
- Categories of different data subjects
- Elements of personal data the organization is processing
- Contacts who have received the personal data
- Countries where the organization has sent the data
- Retention period for the personal data or an idea of how the organization will calculate it
- Technical and organizational security methods the organization will use to protect the personal data

GDPR clearly defines the above information that is required to create a satisfactory Article 30 Record. That said, progressive organizations typically capture even more details about personal data processing for effective governance or audit use.

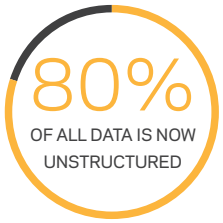
On the surface, data mapping and the development of Article 30 Records should be a straightforward process; however, the data environment in which most organizations now operate is far more complex and difficult to navigate than in the past.

THE STATE OF DATA FRAGMENTATION

The creation of data maps is not a new concept. For years, EU law has required organizations in most EU member states to map their data flows and deliver a report to the various data protection authorities. Many organizations have realized value from using these maps for both regulatory compliance and risk management initiatives. These maps assist with the strategic deployment of security protocols and the identification of data for access requests. Keeping tabs on data can also offer other positive business benefits, such as cost savings from data center consolidation and identification of redundant information the organization can delete.



Traditionally, the approach to creating data maps would involve an assessment of business processes and structured databases. A select group of users and the IT team would be asked to complete questionnaires that provide insight into typical business workflows. Historically, the IT department was often perceived to be solely responsible for data governance, even though it usually did not have the full picture of what data existed and whether it was sensitive or nor. Data quality governance schemes often ignored unstructured data held outside structured databases altogether because this data was frequently thought of as a by-product of non-mission-critical activities and therefore of little value. But times certainly have changed—dramatically.



In the age of digital transformation, organizations are desperate to extract insights and value from all the data and information they collect and store. Unstructured content sources like email, chat, and text messages have exploded. In fact, almost 80 percent of all data is now unstructured, and the volume of this data is doubling every two years, creating an increasingly complex environment from which organizations need to collect and create a data map.

The picture is further complicated when taking into account that employees can send data everywhere and easily by email. Insight into data ownership is further blurred by employee attrition or rapid-cycle projects. In today's environment, no single person has a perfect view of information and the humble questionnaire alone suffers from a notable deficiency: respondents can only reply regarding the data they know about, and they have blind spots, with unstructured data often being the chief one.

2X VOLUME DOUBLES
EVERY 2 YEARS

A NEW APPROACH IS REQUIRED

To ensure organizations create accurate and up-to-date Article 30 Records, collaboration is the keystone for eradicating blind spots. Collecting the workflow information required to inform meaningful and complete data maps must be a cross-organizational effort involving the Data Protection Office (DPO), legal/compliance teams, the lines of business, and IT. This extended group needs to analyze and document every workflow that involves the use of personal data to create the required records and apply the appropriate controls. Remember: IT does not own the data, the business does, but ownership must be combined with a renewed sense of responsibility to govern it appropriately, making a collaborative approach a necessity.

With the average environment containing millions if not billions of files, built up over many years, knowing what personal data is contained in these repositories can never be answered by completing just a questionnaire. Organizations need tools to illuminate the dark data no one really knows about, so they can bring it into the data map and govern it appropriately.

Classification of all unstructured data "in the wild" and locating which data contains personally identifiable information (PII) are vital for organizations to establish policy-driven controls. It's even better when organizations implement automated scanning activities to help understand real-time shifts in data creation and file activity.

2.31 BILLION FILES
IN 1 PETABYTE OF DATA

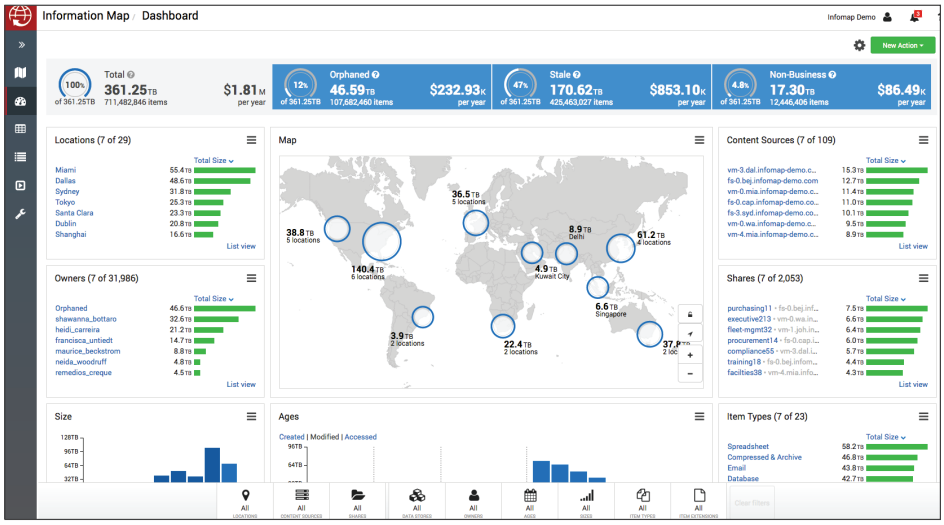
VERITAS 360 DATA MANAGEMENT FOR GDPR

Veritas' 360 Data Management for GDPR delivers an integrated solution framework to help organizations locate, search, minimize, protect, and monitor their personal data. By achieving global visibility of their data estate, organizations can expedite the work that underpins the creation of successful Article 30 Records.

Data identification is the first critical step in locating personal and sensitive data hidden within the unstructured environment. Veritas Information Map arms organizations with an intuitive visualization of their entire data estate to help them focus resources and attention.

Specifically, Information Map provides:

- File type, ownership, age, and location in as little as 24 hours
- Immediate insights into potential risk areas like PSTs or databases that could contain personal data
- A real-time picture of the environment and continuous monitoring



Organizations can then execute a more detailed analysis of their data estate through classification of data containing PII to better understand its context, profile, and activity level using Veritas Data Insight. This tool helps organizations:

- Gain visibility and develop policies around unstructured data
- Create a detailed audit trail of who accessed which data and when they made changes
- Identify data owners and understand their permissions to design an effective data protection process
- Locate areas of unauthorized use and exposure and report against what personal data is included

SUMMARY

Having accurate, collaboratively created records of data processing along with up-to-date visual maps of classified data can deliver exceptional value to an organization.

Visual Article 30 Records provide an in-depth view of what is going on in every IT system across the organization. These maps help organizations make informed decisions about the appropriate data controls to apply, which data they can delete knowing the full impact of that action, and which data they need to move to a compliant archive with active policy and retention management. Having these records also makes it easier to identify any and all personal data potentially impacted by a data breach within the GDPR's 72-hour notification timeline.

Veritas has developed a holistic, integrated approach to managing unstructured data in accordance with the GDPR and other privacy regulations. Combined with a range of professional services, these solutions can help advance your journey toward regulatory compliance.

ABOUT VERITAS TECHNOLOGIES LLC

Veritas Technologies empowers businesses of all sizes to discover the truth in information—their most important digital asset. Using the Veritas platform, customers can accelerate their digital transformation and solve pressing IT and business challenges including multi-cloud data management, data protection, storage optimization, compliance readiness and workload portability—with no cloud vendor lock-in. Eighty-six percent of Fortune 500 companies rely on Veritas today to reveal data insights that drive competitive advantage. Learn more at **www.veritas.com** or follow us on Twitter at **@veritastechllc**.

Veritas Technologies LLC
500 East Middlefield Road
Mountain View, CA 94043 USA
+1 (650) 527 8000
+1 (866) 837 4827
veritas.com

For specific country offices and contact numbers, please visit our website.
veritas.com/about/contact

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