

Privacy + Security
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DATA MAPPING WORKSHOP

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WORKSHOP

Plan of Attack

Part ONE

A. Data Ecosystem

- Pick large key processes
- Work through each
- Harmonize them into one overarching visual

B. Assets and Processes

- Document Assets and Processes
- Designate Custodians
- Plan Survey distribution and Interview process

Part TWO

C. Surveys

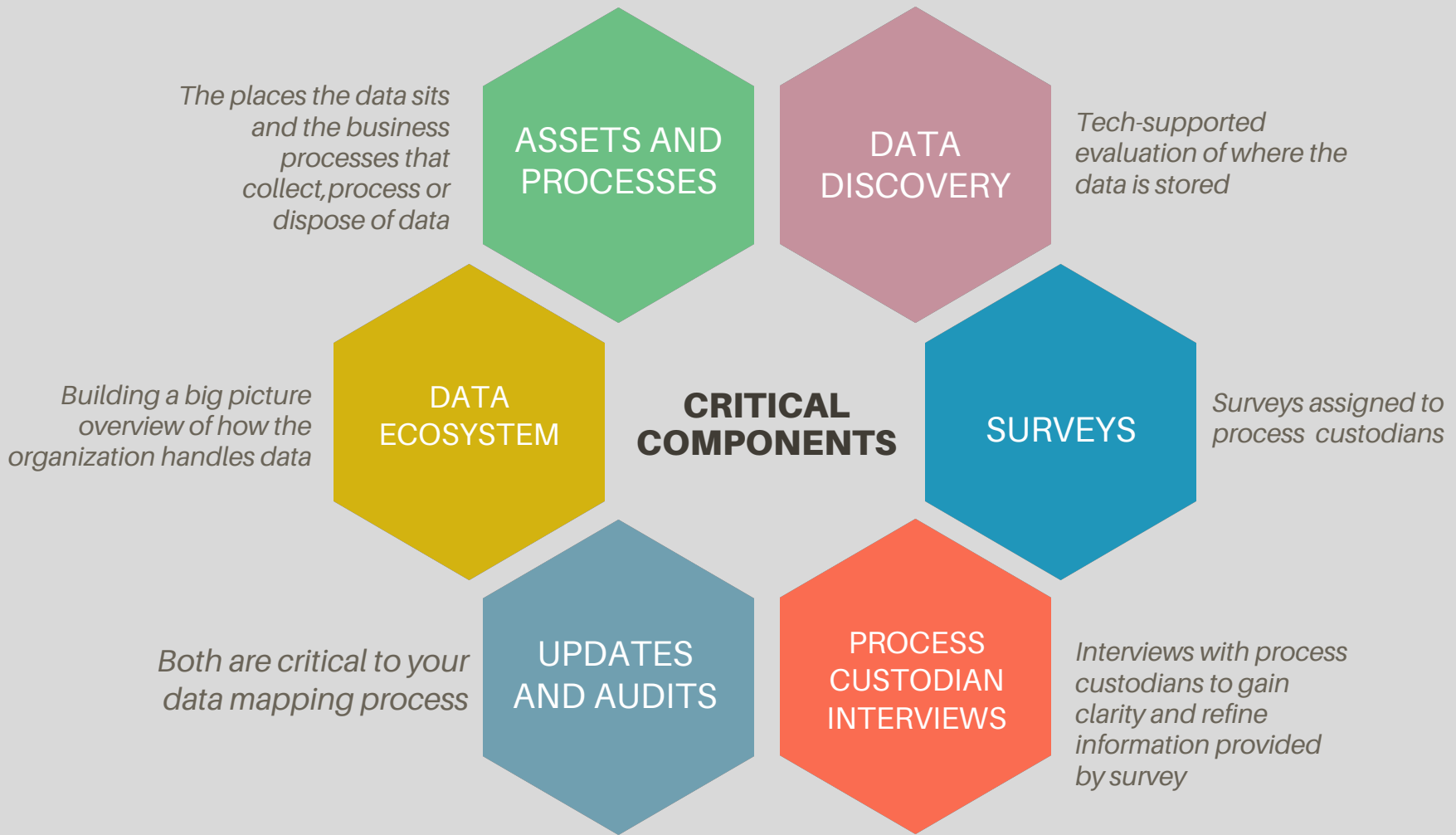
- Build the survey they can complete
- Test in one group or region
- Mind the gaps

D. Custodian Interviews

- New questions
- Clarifications
- New assets/processes

E. Updates and Audits

- Vendor Management
- Custodian Updates
- Audit mechanisms and scheduling



Data Mapping Basics

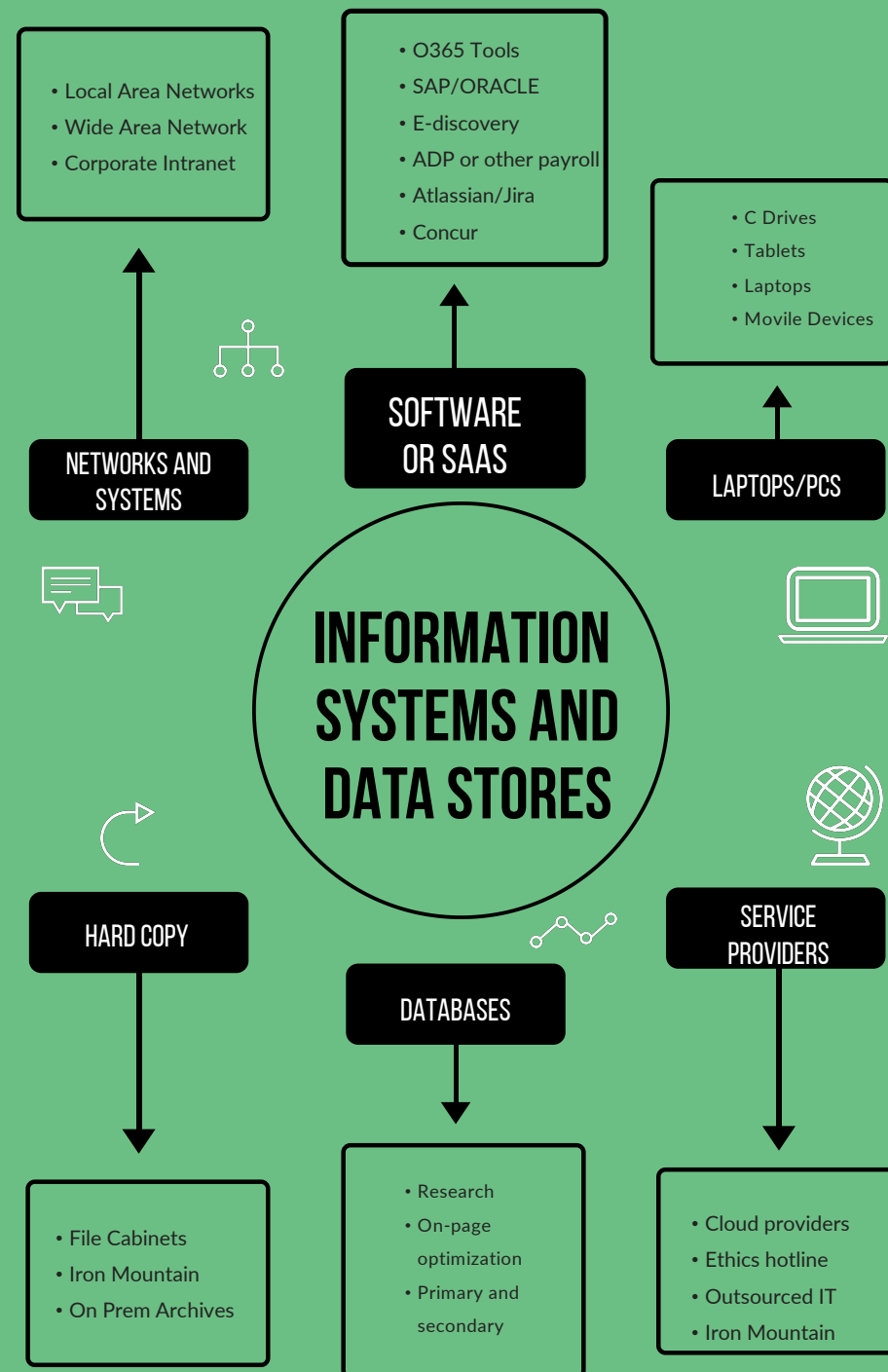
Discerning and documenting what data is collected, how it's used, where it's stored, and how it moves - both within the organization and beyond.

PROCESSES

When evaluating and brainstorming to list all processes: Break them down into those that concern the data of employees and those that handle data of other individuals. Follow the path of the data.

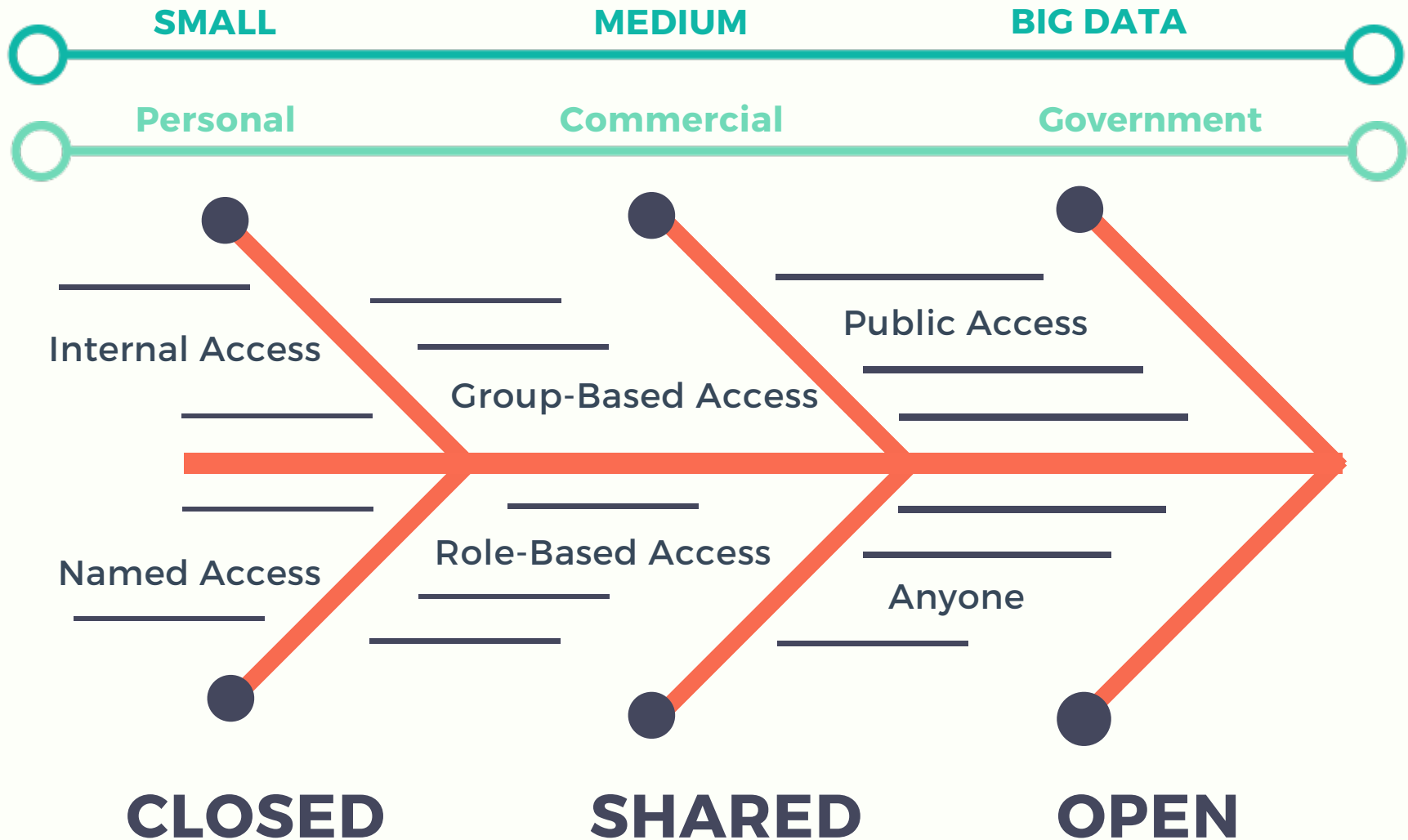


ASSETS



DATA SPECTRUM

Consider the big picture of how data is shared across the ecosystem by keeping the data spectrum in mind.



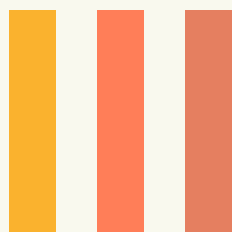


DATA ECOSYSTEM

SET DOWN THE PLAYERS IN DETAIL

CATEGORIES OF ACTORS AND FLOWS

DATA STEWARDS	Responsible for collecting, managing and ensuring access to a dataset; may include provision of infrastructure, data governance, etc
INDIVIDUALS/ORGANIZATIONS	Individuals or organisations the data is about or who are impacted by its use
CONTRIBUTORS	Individuals or organisations who contribute to or help curate a dataset; They may do so knowingly, using tools and frameworks provided by a data steward, or unknowingly through their use of a service
INTERMEDIARIES	Provide value-added services that wrap, host or enrich a dataset
AGGREGATORS	Type of intermediary. Packages together datasets from many sources
CREATORS/REUSERS	Use data to create information, in the form of products and services, analyses and insights, or stories and visualisations
REGULATORS	Create the policies and legislative frameworks within which others operate
POLICYMAKERS	Create principles and measures to generate outcomes
VENDORS/ SERVICE PROVIDERS	Provide services or serve as business partners requiring access to or transfer of data



DATA ECOSYSTEM

DRAWING EACH PIECE OF THE ECOSYSTEM

FOLLOWING THE DATA

INITIAL QUESTIONS	<p>“What role does your organisation play?”</p> <p>“Who is directly involved in the delivery of the service?”</p> <p>“Do people in different roles interact differently with the service?”</p> <p>“What data do you use or publish?”</p>
THINK THROUGH THE OVERALL DATA PATH FOR EACH PART OF THE ECOSYSTEM	<p>“What data does each player use, who provides it, how is it accessed?”</p> <p>“What data does each player release, who uses it and for what?”</p> <p>“Is data shared reciprocally?”</p>
ADDITIONAL CONSIDERATIONS	<p>How is data released? (eg via downloads, APIs, portals...)</p> <p>Are there any data standards in place?</p> <p>Who is funding what?</p>

Breakdown of Activities

GROUP ASSIGNMENTS

**They
know
much
more than
where
you need
to go...**

For the Data Ecosystem Activity you have been assigned to one of these groups:

**DATA SHARING WITH
LOCAL AND FEDERAL
GOVERNMENTS**

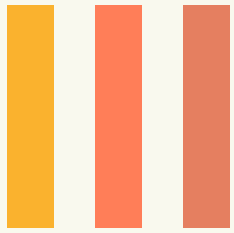
**CUSTOMER SUPPORT AND
OTHER PERSONAL DATA**

**APPLICABLE LAWS AND
REGULATORY AUTHORITIES**

HEALTH DATA

CHILDREN'S DATA

**LOCATION DATA
(GPS/PICK UP/DROP
OFF/ROUTE HISTORY)**



DATA ECOSYSTEM

DRAWING EACH PIECE OF THE ECOSYSTEM

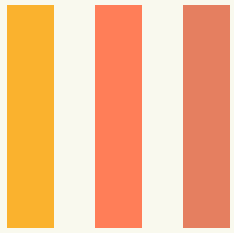
INITIAL QUESTIONS

“What role does your organisation play?”

“Who is directly involved in the delivery of the service?”

“Do people in different roles interact differently with the service?”

“What data do you use or publish?”



DATA ECOSYSTEM

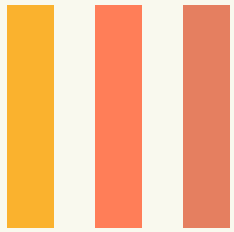
DRAWING EACH PIECE OF THE ECOSYSTEM

OVERALL PATH FOR EACH PIECE

“What data does each player use, who provides it, how is it accessed?”

“What data does each player release, who uses it and for what?”

“Is data shared reciprocally?”



DATA ECOSYSTEM

DRAWING EACH PIECE OF THE ECOSYSTEM

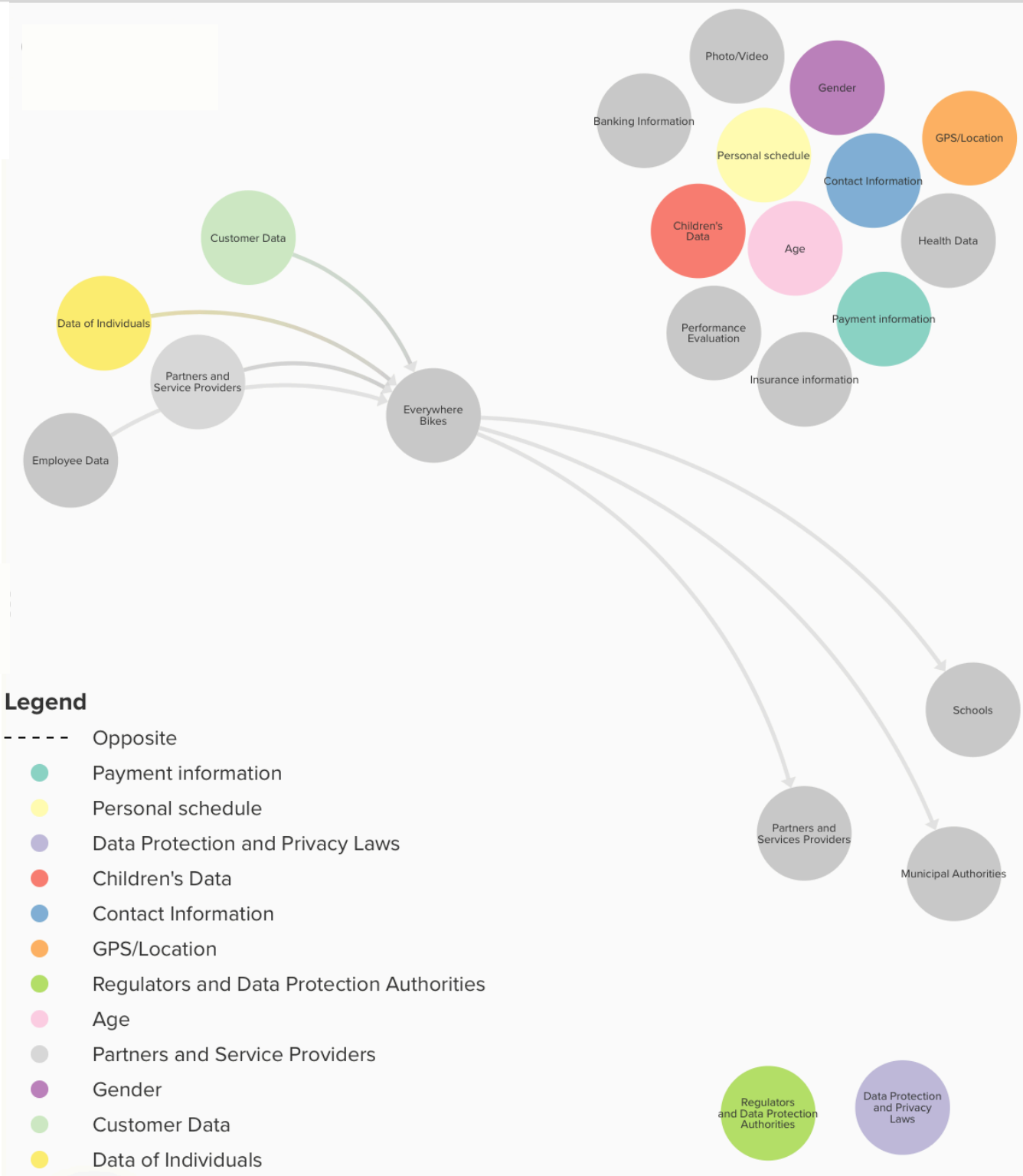
ADDITIONAL CONSIDERATIONS

How is data released? (eg via downloads, APIs, portals...)

Are there any data standards in place?

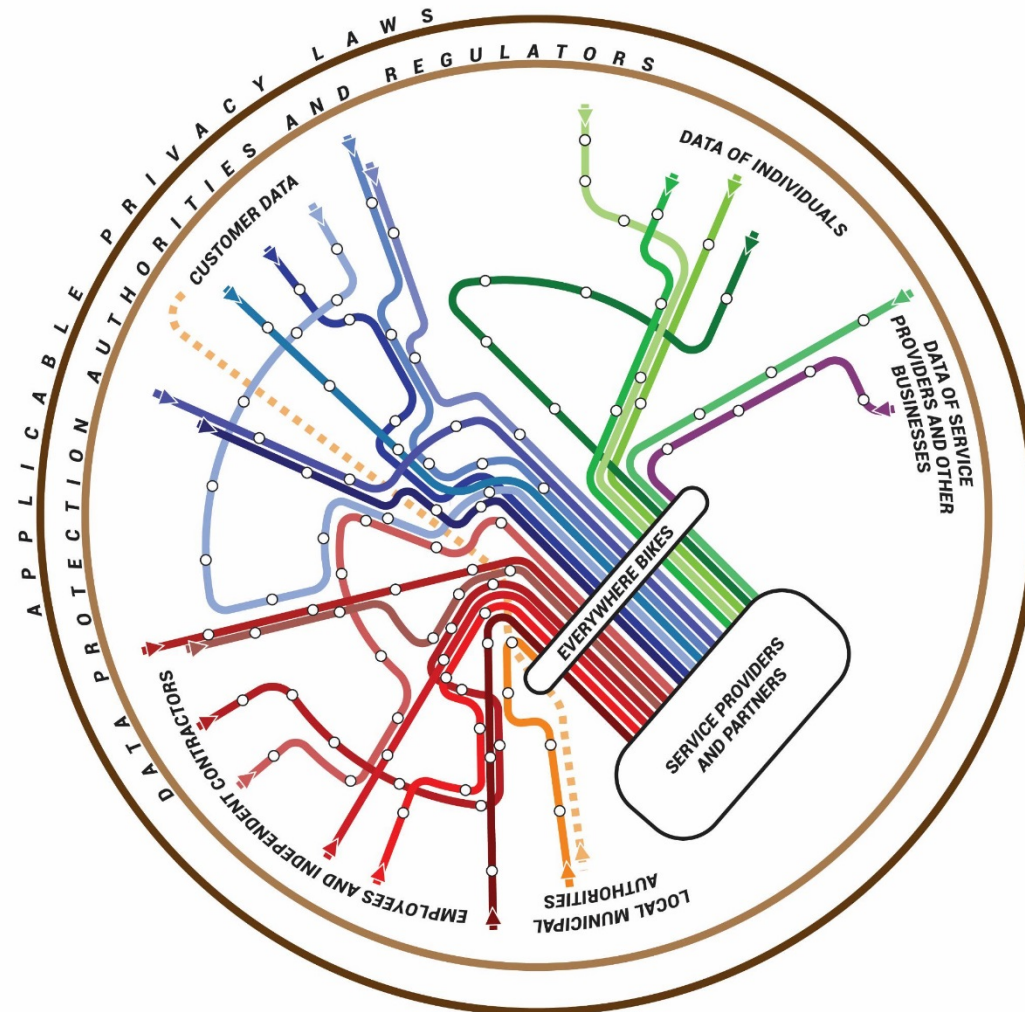
Who is funding what?

A broad overview of the data ecosystem of
EverywhereBikes



EVERYWHERE BIKES

DATA ECOSYSTEM



DATA OF INDIVIDUALS

- GPS Data
- Children's Data
- Payment Information
- Contact Information
- Health Information

CUSTOMER DATA

- GPS Data
- Children's Data
- Payment Information
- Contact Information
- Health Information
- Gender
- Photo/Video

EMPLOYEES AND INDEPENDENT CONTRACTORS

- Business Contact Information
- Health/Disability Data
- Children's Data
- Personal Contact Information
- Photo/Gender/Race/Criminal Data
- Insurance Information
- Banking Information

DATA OF SERVICE PROVIDERS AND OTHER BUSINESSES

- Business Contact Information

LOCAL AND MUNICIPAL AUTHORITIES

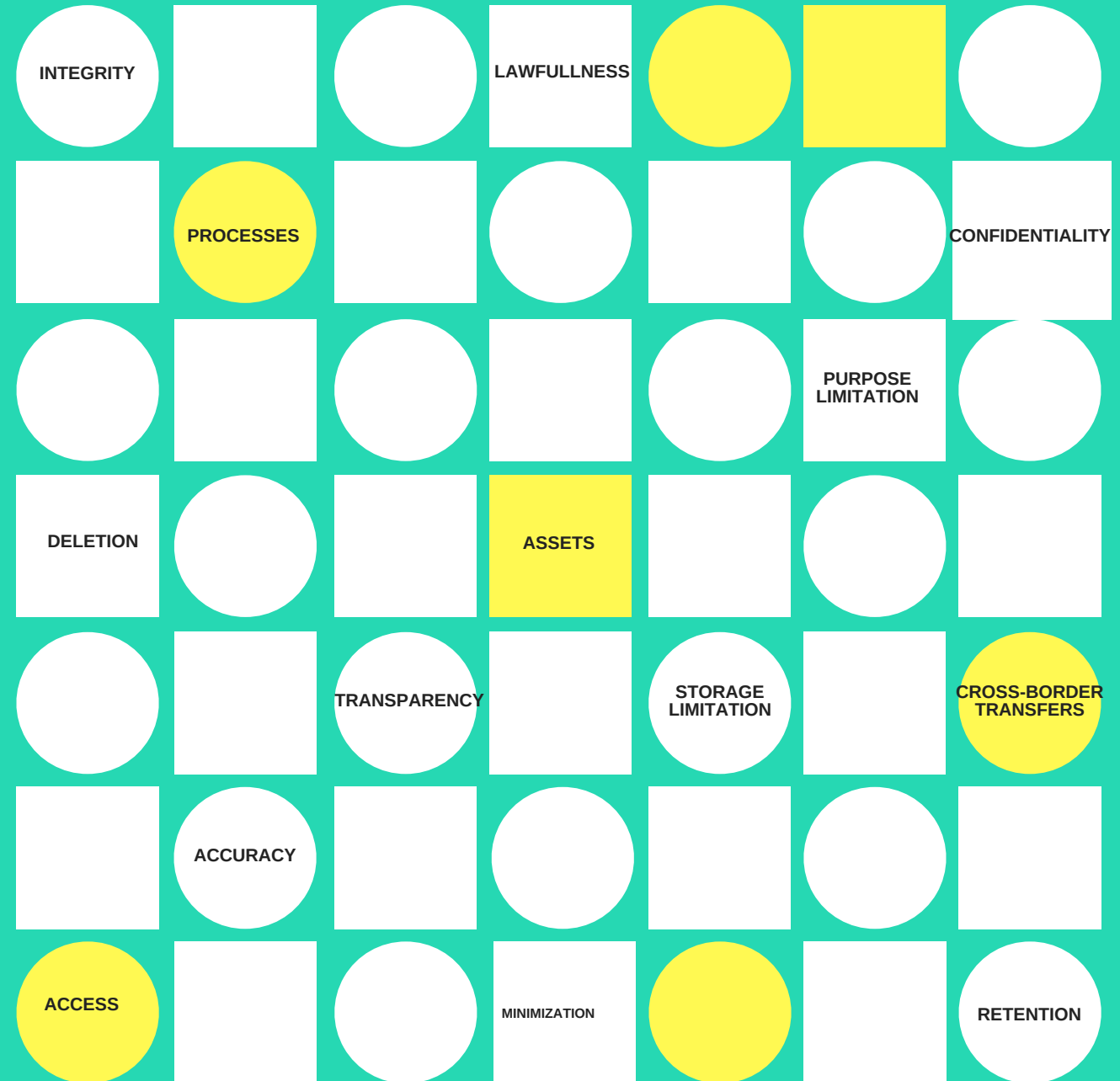
- Business Contact Information
- Pothole/Hazard reporting Data

DATA MAPPING

GIVING
STRUCTURE TO
CHAOS

or

how an organization
learns to stop worrying
and embrace
information governance



Data Mapping Strategy

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graph LR; A[Data Mapping Strategy] --> B[Understand the Data Ecosystem]; B --> C[Assets and Processes]; B --> D[Data Discovery]; B --> E[Surveys]; B --> F[Custodian Interviews]; B --> G[Updates and Audits]; B --> H[Access Requests and Data Incidents];
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Understand the Data Ecosystem

Assets and Processes

Data Discovery

Surveys

Custodian Interviews

Updates and Audits

Access Requests and Data Incidents



DOCUMENTING ALL DATA FLOWS AND PROCESSES ACROSS THE ORGANIZATION

DATA DISCOVERY THROUGH FILE ANALYSIS

There are many stakeholders in any given organization who benefit from file analysis tools:

PRIVACY

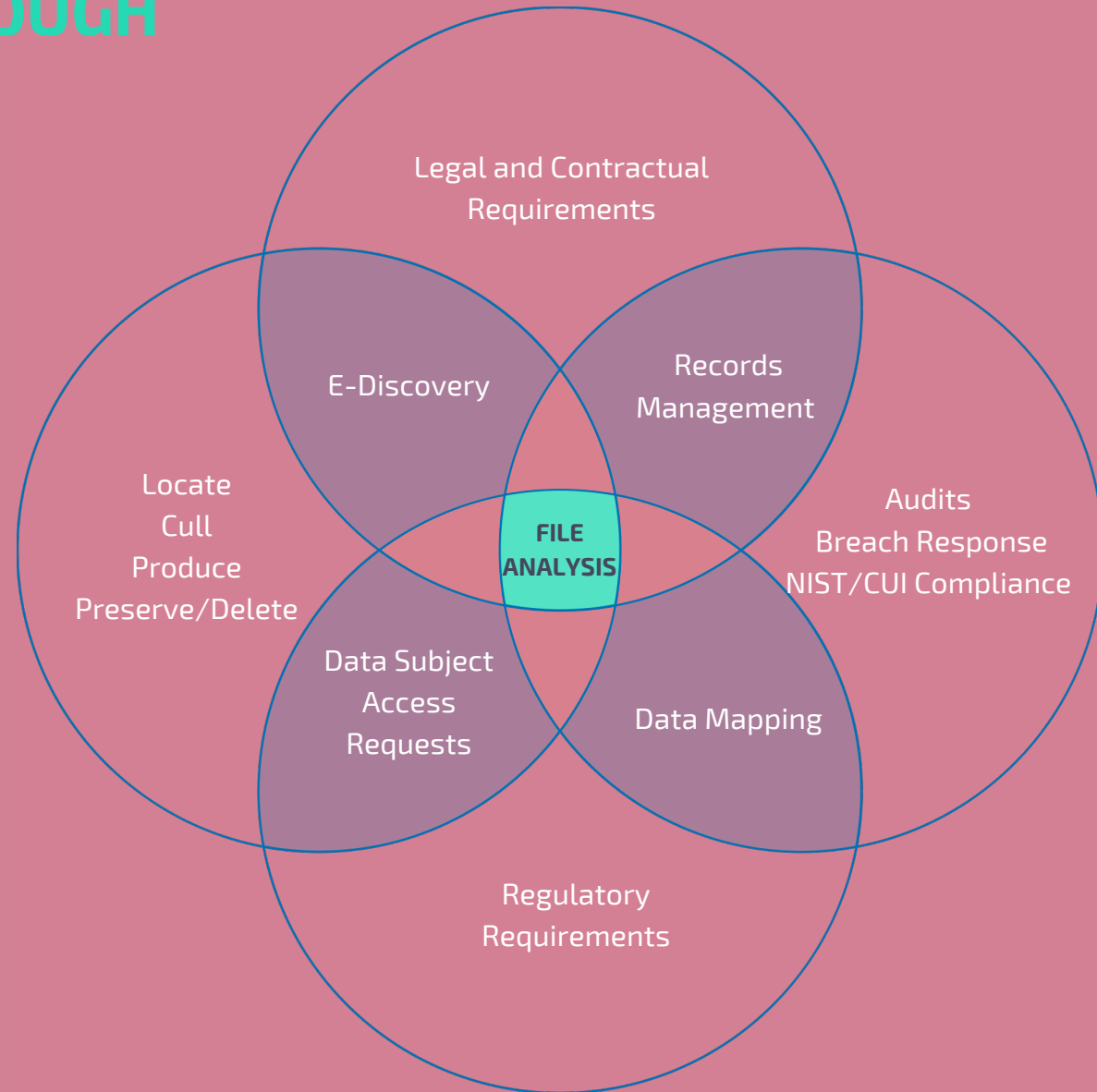
LEGAL

RECORDS MANAGEMENT

INFORMATION SECURITY

COMPLIANCE/RISK MANAGEMENT

AUDIT



RESPONSIVE, REPEATABLE, DEFENSIBLE

SURVEY COMPONENTS

Process Surveys and Assessments can capture a great deal of information, but they must be in tune with the awareness level of the organization in order to maximize their utility.

Business Purpose for Processing	DESCRIPTION OF PROCESS	PROCESS OWNER	IS PERSONAL DATA TRULY NECESSARY TO PROCESS?	DPIA COMPLETED?
Data Elements Collected	SPECIAL CATEGORIES	LIMITED TO WHAT IS NEEDED?	MATCHED TO DATA SUBJECT TYPE?	PHOTOGRAPHS RECORDINGS
Data Subjects	TYPE AND NUMBERS	CHILDREN?	LOCATION	LEGAL BASIS FOR PROCESSING
Data Lifecycle	WHAT IS THE SOURCE OF THE DATA?	WHERE IS IT STORED?	WHAT SYSTEMS OR GROUPS HAVE ACCESS TO IT?	WHEN IS IT DELETED OR REMOVED?
Location	COUNTRIES WHERE DATA IS COLLECTED FROM	COUNTRIES TRANSFERRED TO	DATA TRANSFER MECHANISM/ ADEQUACY	CONTROLLER OR PROCESSOR OR BOTH
Assets utilized	INTERNAL OR EXTERNAL?	DATA PROTECTION ADDENDUM?	AUTOMATIC UPDATES TO OTHER SYSTEMS?	WHERE DOES DATA ARCHIVE TO?
Points and types of access	INTERNAL OR EXTERNAL?	LEGAL BASIS/ JUSTIFICATION	ACCESSIBLE BY OTHER REGIONS?	ACCESSIBLE BY OTHER SYSTEMS/SOFTWARE?

Data Elements

EVERYWHERE BIKES

	CUSTOMERS	EMPLOYEES AND INDEPENDENT CONTRACTORS	INDIVIDUALS (TO INCLUDE FORMER CUSTOMERS)	SERVICE PROVIDERS/ BUSINESSES	SCHOOLS/ MUNICIPALITIES
BUSINESS CONTACT INFORMATION	X	X	X	X	X
IP ADDRESS DEVICE ID	X		X		
HEALTH /DISABILITY DATA	X	X	X		
CHILDREN'S DATA	X	X	X		
PERSONAL CONTACT INFORMATION	X	X	X		
LOCATION DATA	X				
VIDEO/PHOTO	X	X	X		
INSURANCE INFORMATION	X	X	X		
PAYMENT/CC INFORMATION	X		X		
SCHEDULE INFORMATION	X		X		
BANKING INFORMATION		X			

ADDRESS INFORMATION GAPS AND PRIVACY-RELATED CONCERNS RAISED BY A PROCESS SURVEY

Custodian Interviews

CLARIFICATIONS, ISSUE SPOTTING AND NEW INFORMATION

01

Inquire as to gaps or questions raised. Answer any questions custodian may have.

02

Revisit assets and any external or vendor access described to evaluate purpose and appropriate contractual mechanisms in place.

03

Discuss options with Custodian where excess data may be collected or used or unnecessary/ duplicative points of access or storage seem to exist.

04

Ask the Process Custodian for their thoughts around how best to improve organizational awareness and protection of personal data.

05

Evaluate and incorporate new information and adjust survey, Data Mapping strategy or Data Ecosystem as needed

Date Mapping Updates and Audits

KEYS TO KEEPING DATA MAPPING UP-TO-DATE AND ACCURATE



Consider ways to trigger new process assessments or updates. (Approved DPIAs/ new vendor contracts, acquisitions, partnerships.)



Schedule periodic audits and spot checks



If you have file analysis software- schedule deployment on key systems over the course of the year.



Vendor changes and vendor management are essential to keeping a data map up-to-date



Expand the awareness within the organization of the need to map new processes, transfers and uses of data

THANK YOU!

KEEP IN TOUCH

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