A practical approach to GDPR

What has been done in practice for GDPR compliance in a complex startup incubator-like environment with many teams, many products and heavy usage of cloud services.

This is the footer text left from template for criticizing the presentation for inaccuracy.

telenor group

GDPR does not prohibit personal data processing. It just sets rules to protect people from *unwanted* personal data use.

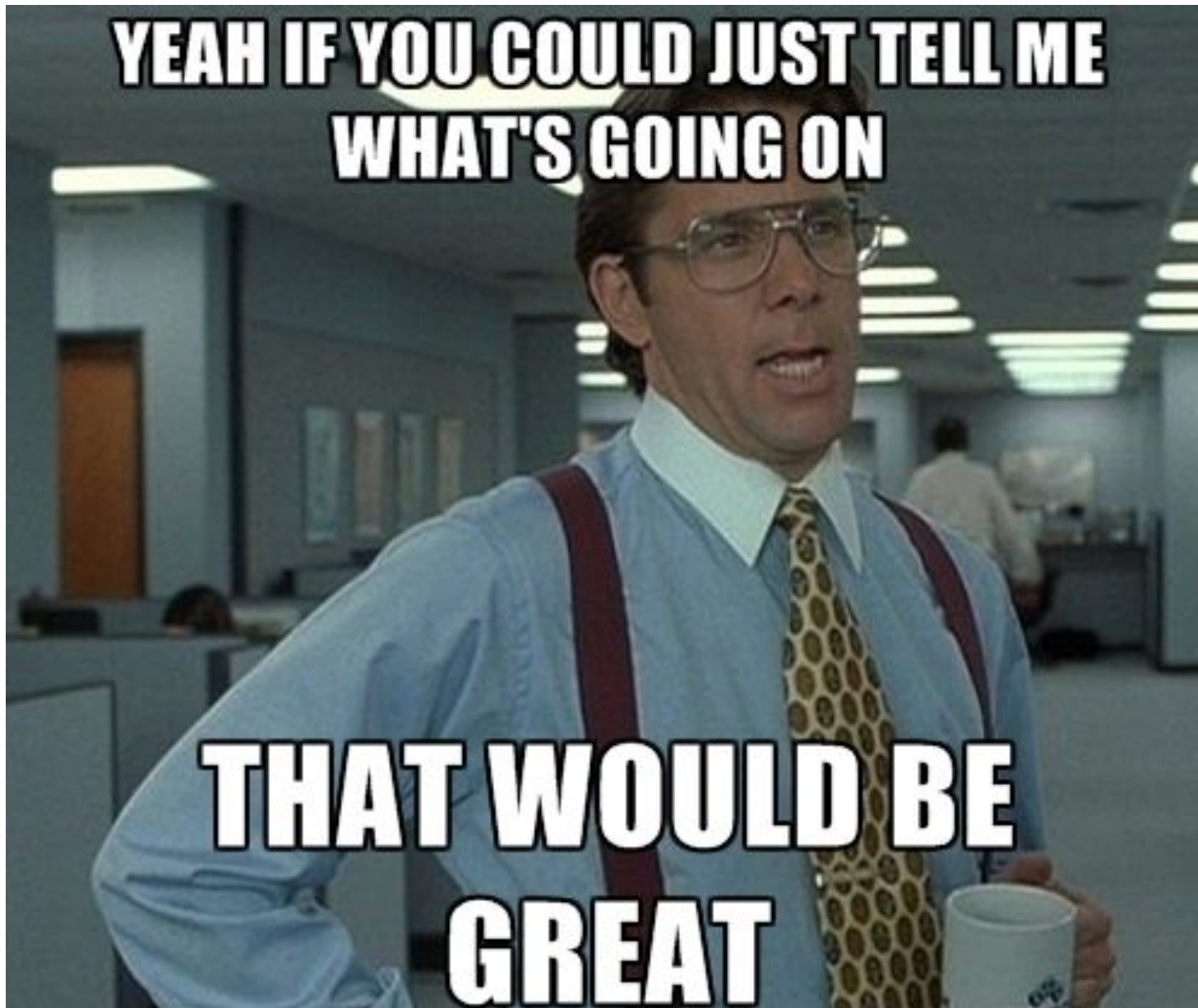https://supporters.eff.org/shop/illegal-spying-eagle-sticker

Based on a true story

1

Understanding personal data processing

YEAH IF YOU COULD JUST TELL ME WHAT'S GOING ON

THAT WOULD BE GREAT
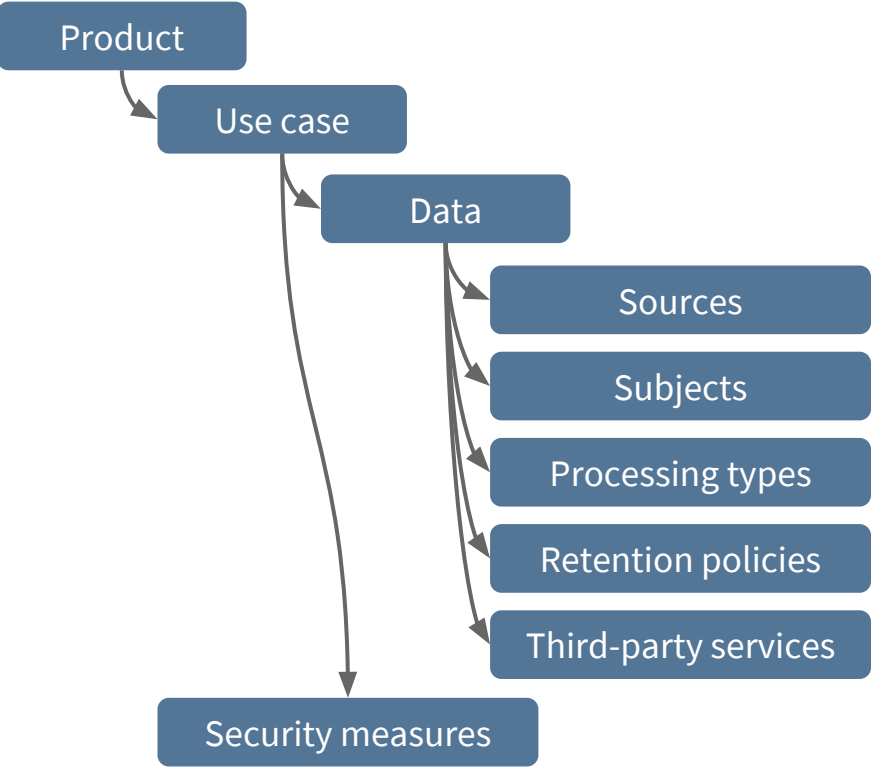
http://www.quickmeme.com/meme/3tmits

- Where are we processing personal data?

- For what purposes?

- How?

- Whose data is it?

- Where is it coming from?

- Do we have all data processing agreements in place?

- How long should we store data?

- Do we have security measures in place?

Spreadsheets to the rescue! … or not?
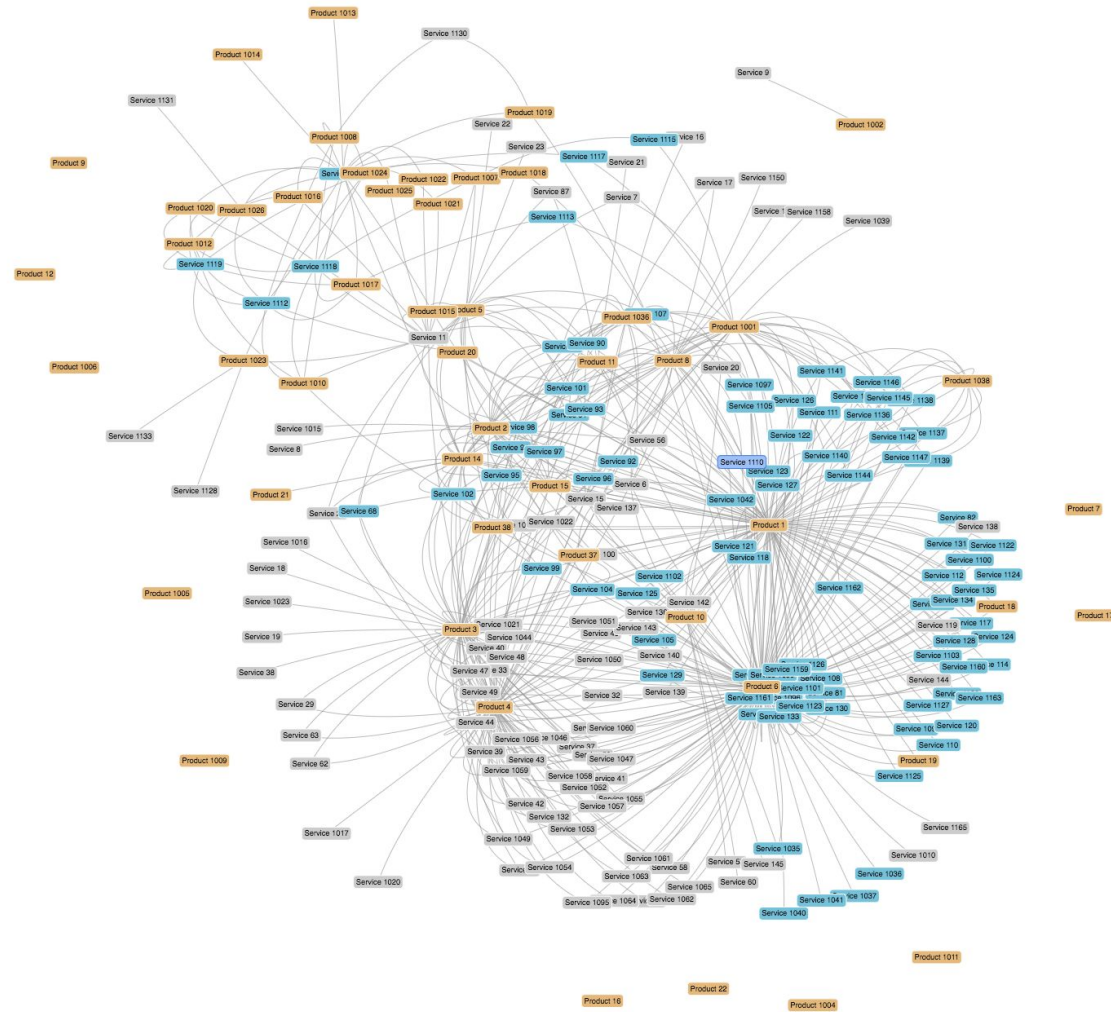
Data we needed had several layers:

```
Product
   └─> Use case
            └─> Data
                    ├─> Sources
                    ├─> Subjects
                    ├─> Processing types
                    ├─> Retention policies
                    └─> Third-party services
            └─> Security measures
```


https://www.fiverr.com/imabus/be-your-complete-excel-superhero

The scale of the problem

The Data Mapping Tool

2

Consents and objections management
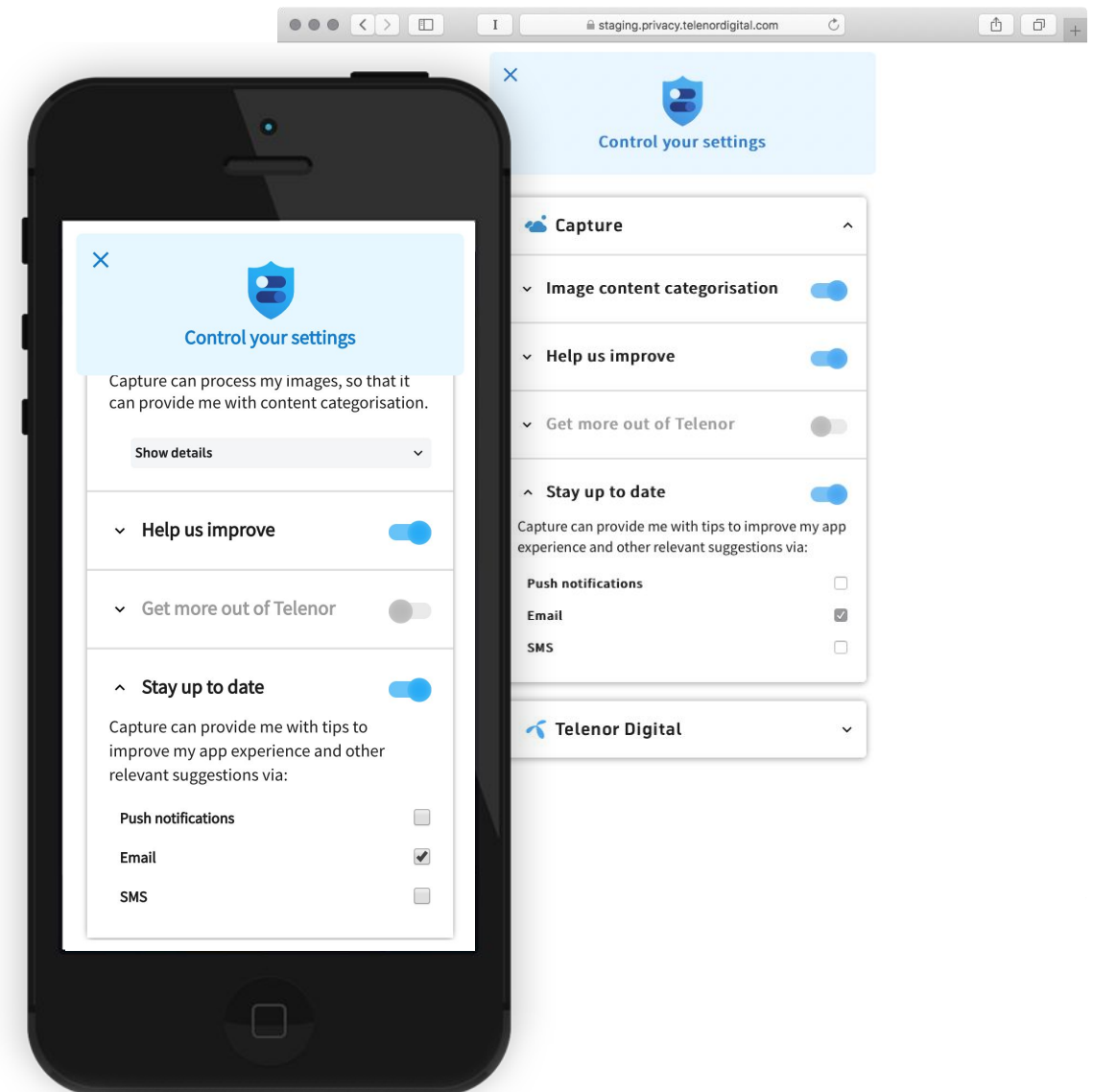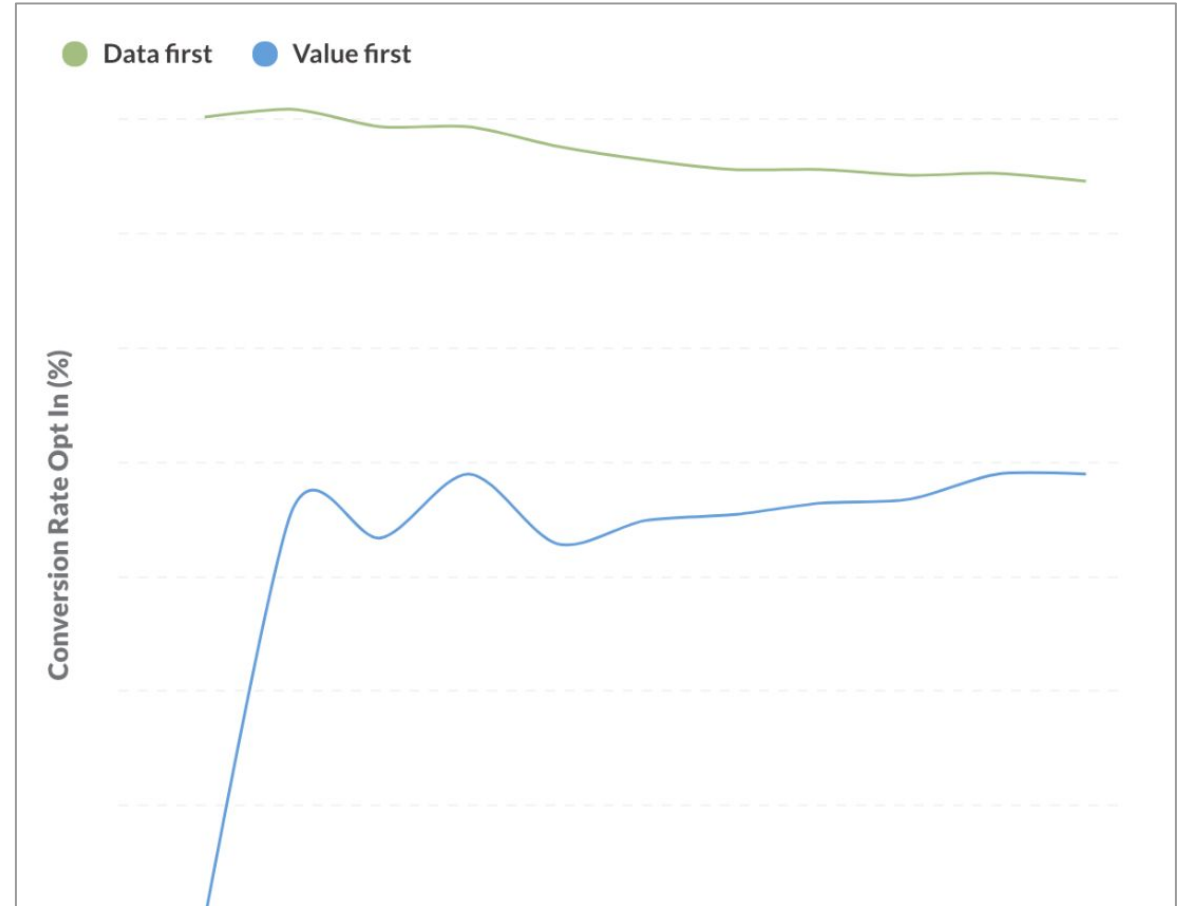
Permissions Management UI

- Privacy tour
- Permissions Management
  - Consents
  - Automatically accepted objections
- Data subject rights
  - Request forms
  - Exports storage
- Legal documents
  - Terms of use
  - Privacy Notice

Built-in A/B testing

Different channel types support

SMS

App

Web page

3
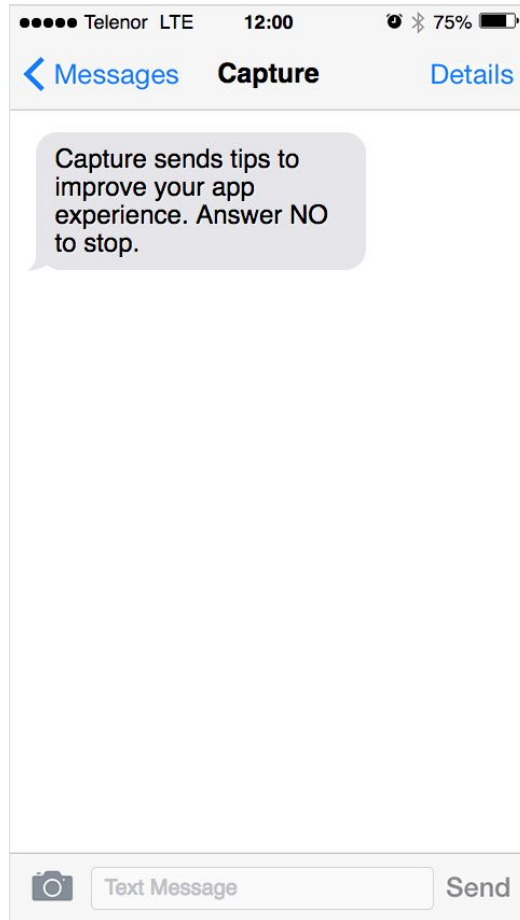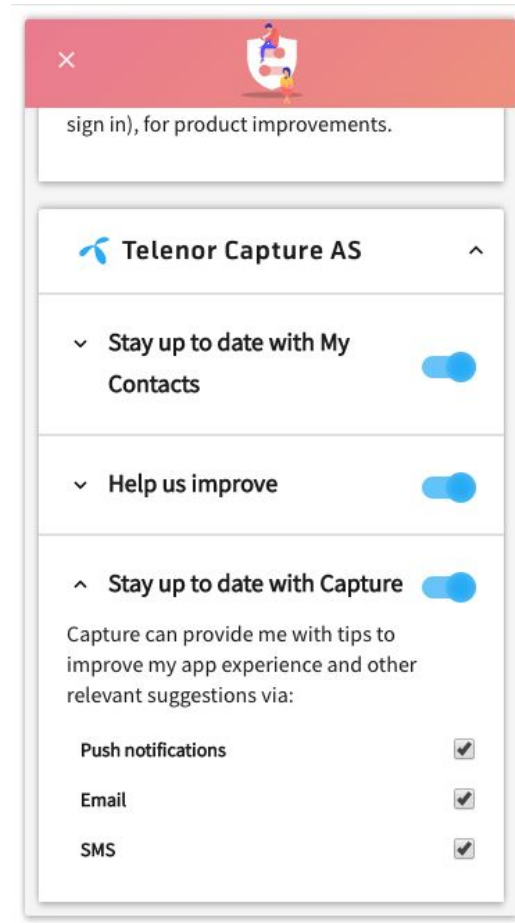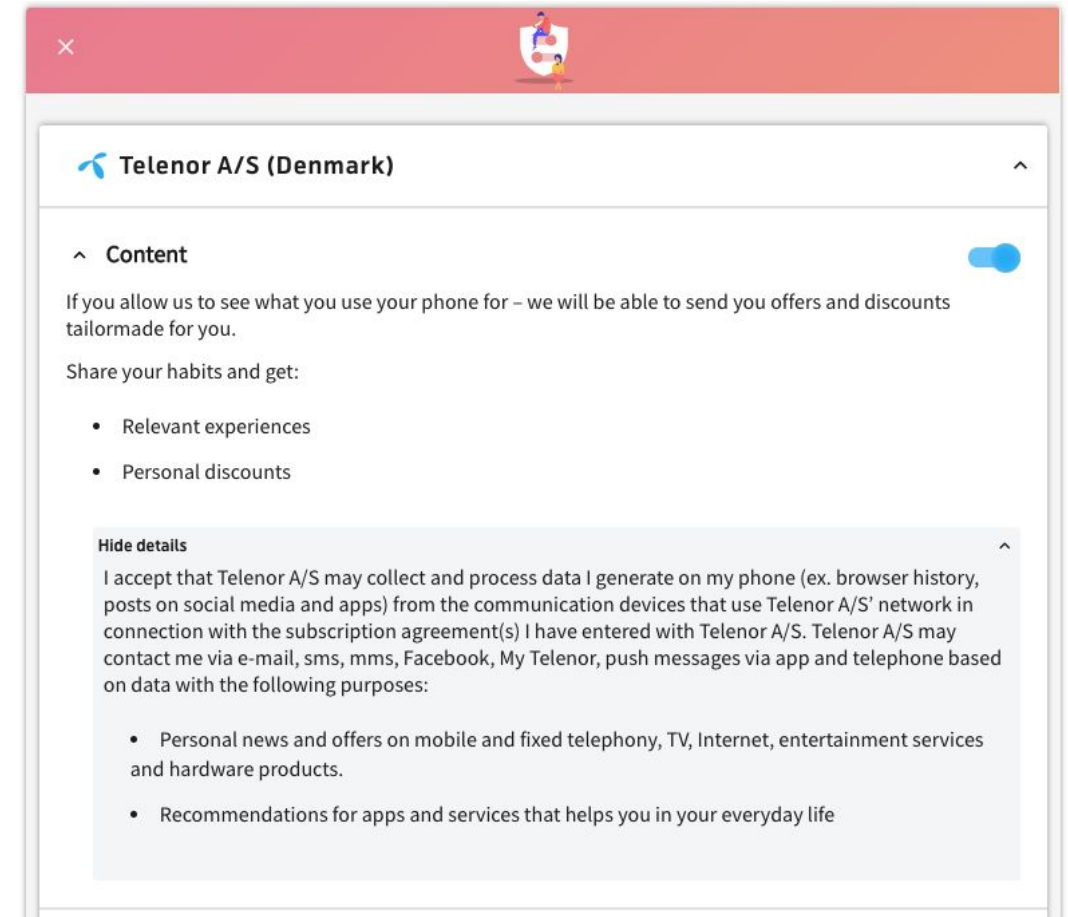
Under the cover

applying decisions to the data processing

Data processing

Single checks

"can I trace this user session for product improvement?"

— make a REST API call before tracing

Bulk latency insensitive checks

"which users in the audience agreed to marketing?"

— get a decision dump, merge with the audience, filter out those who didn't agree

Data processing

Latency sensitive or extremely bulky checks

"Can I personalise this banner?", "Who can I provide personalised offers?"

— a local cache updated real-time from a changes queue

| Permission Management | → | Changes queue
Kafka | → | Cache updater
Kafka consumer | → | Local cache
Relational DB | → | Data processor
E.g. marketing engine |

4

ID Mapping

Problem statement

- Permissions Management UI uses Telenor's global customer identifier — CONNECT ID
- Some data processing systems use different customer identifiers
  and have no clue about related CONNECT ID
- Some of them even use subscription identifiers
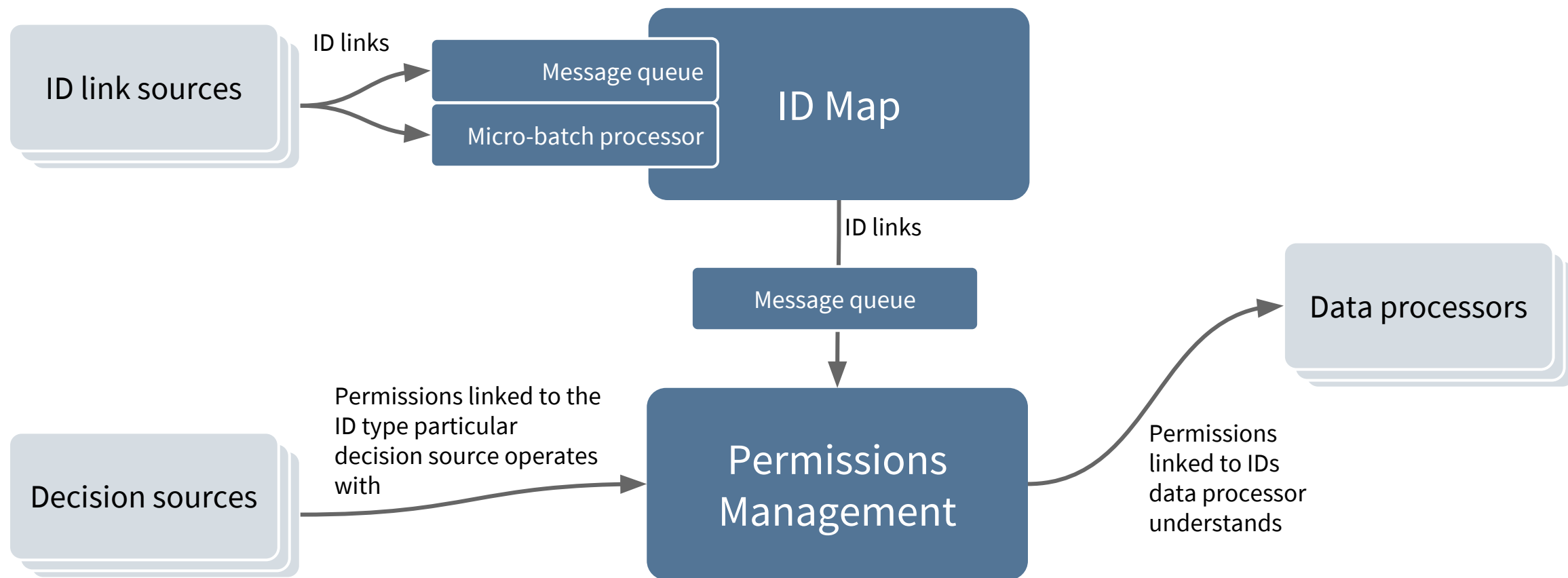- Programmatic marketing platforms use… cookies!

https://www.target.com/p/sesame-street-feed-me-cookie-monster/-/A-53331819

https://www.wattpad.com/599678228-a-book-of-relatable-things-and-other-funny-stuff-3

The solution: a bit of master data management

ID link sources
— ID links →

Message queue

Micro-batch processor

ID Map

— ID links →

Message queue

Decision sources

Permissions linked to the ID type particular decision source operates with →

Permissions Management

Permissions linked to IDs data processor understands →

Data processors

5

Data subject right requests automation

Don't just give a button, explain first

Make a request

Step 1

Telenor Capture | **Telenor Digital**

Access information   —

Here you can request a dataset of your personal information that Telenor Digital have processed.

If you are interested in information related to your phone network such as call logs, bill payments etc, please contact your local Telenor customer service.

Next

Object to data processing   +

Correct your data   +

Export Request

Step 2

Telenor Digital

Before submitting a request, it is important that you read the information below.

You should have in mind that your personal data is personal to you, and so should store the archive securely on download.

What can I expect?   —

The dataset may not be in a very readable format. Here are examples of what you might receive:

From CONNECT ID:

• Profile information such as name, email, phone number

• Locale activation code and it's timeout

Export Request

Step 2

✓ What can I expect?   +

How we do it   —

It can take up to 30 days to resolve your request and provide you with the dataset.

• Customer Care will receive your request after you submit it. They will get in contact with you if they need extra details.

• The correspondence between you and Customer Care will be in English.

• As soon as the dataset is ready, Customer Care will send you an email with a link for downloading.

• You can also find the dataset under the **see your downloads** page.

Submit request

Step 3

Telenor Digital

You are about to request insight into what personal data we process. You may expect up to 30 days for the request to be completed.

✓ Access information   +
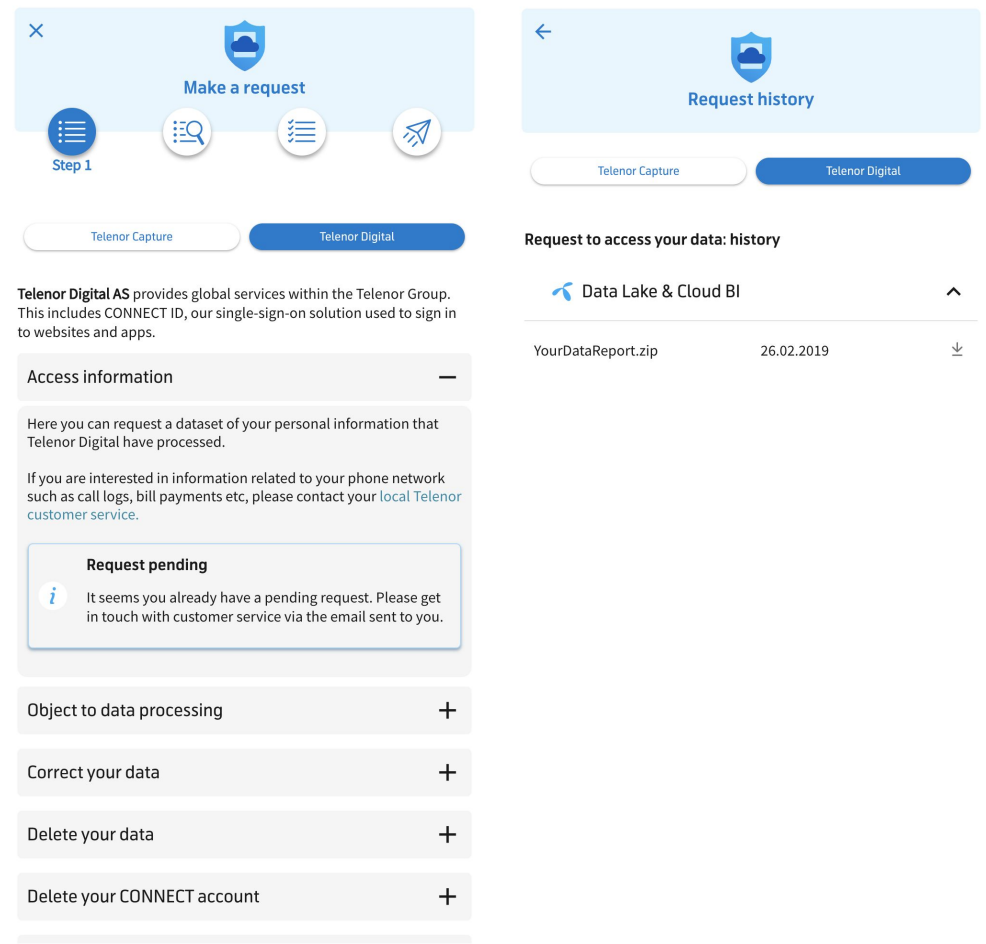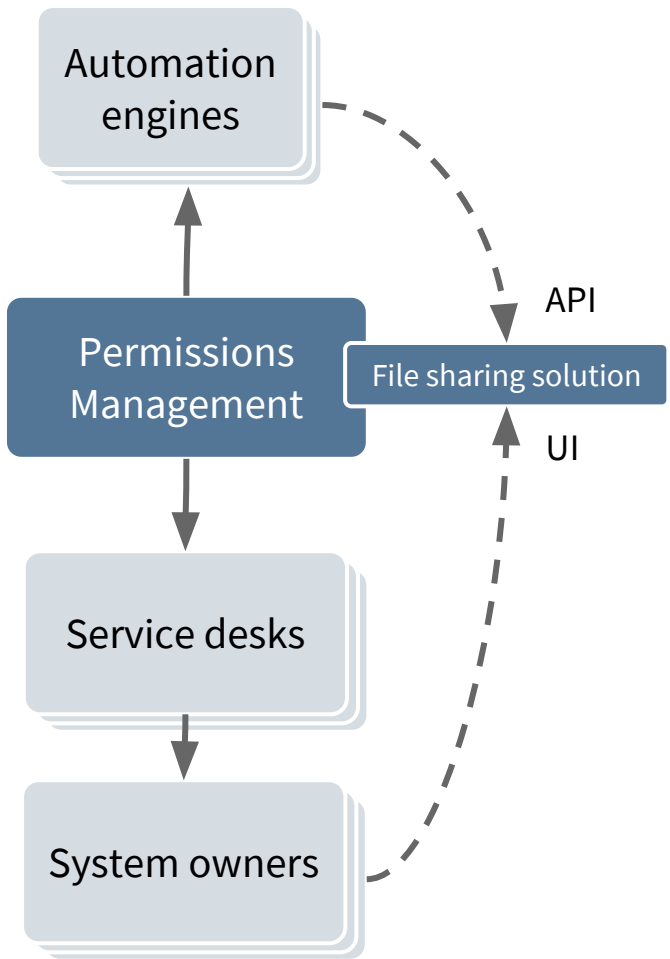
✓ What can I expect?   +

✓ How we do it   +

Submit
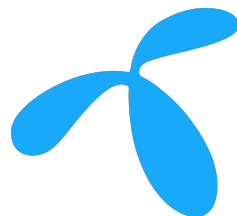
20

Data subject rights fulfillment

On the scene

Behind the scene

Thanks!

Questions?

Andrey Mostovykh
Senior Data Architect
Data Management & Insights
Telenor Digital

telenor group