Privacy, Trust, and the General Data Protection Regulation (GDPR)

JP Clementi, Microsoft: Azure Global Privacy

"Businesses and users are going to embrace technology only if they can trust it."

Satya Nadella
Chief Executive Officer
Microsoft Corporation

- We take a principled approach with strong commitments to privacy, security, compliance and transparency.
- Moving to the cloud makes it easier for you to become compliant with privacy regulations by managing and protecting personal data in a centralized location.
- Microsoft is the industry leader in privacy and security with extensive expertise complying with complex regulations.
Overview

Privacy - Microsoft understands that when you, our customer, use our business cloud services, you are entrusting us with your most valuable asset—your data. You trust that its privacy will be protected and that it will be used only in a way that is consistent with your expectations.

General Data Protection Regulation (GDPR) - imposes new rules on organizations in the European Union (EU) and those that offer goods and services to people in the EU, or that collect and analyze data tied to EU residents, no matter where those organizations are located.

- **Enhanced** personal privacy rights
- **Increased** duty for protecting data
- **Mandatory** breach reporting
- **Significant** penalties for noncompliance

General Data Protection Regulation (GDPR)

<table>
<thead>
<tr>
<th>Art. 15</th>
<th>Right of access by the data subject</th>
</tr>
</thead>
<tbody>
<tr>
<td>Art. 16</td>
<td>Right of rectification</td>
</tr>
<tr>
<td>Art. 17</td>
<td>Right to erasure (right to be forgotten)</td>
</tr>
<tr>
<td>Art. 18</td>
<td>Right to restriction of processing</td>
</tr>
<tr>
<td>Art. 20</td>
<td>Right to data portability</td>
</tr>
<tr>
<td>Art. 25</td>
<td>Data protection by design and by default</td>
</tr>
<tr>
<td>Art. 30</td>
<td>Records of processing activities</td>
</tr>
<tr>
<td>Art. 32</td>
<td>Security of processing</td>
</tr>
<tr>
<td>Art. 33</td>
<td>Notification of a personal data breach to the supervisory authority</td>
</tr>
<tr>
<td>Art. 35</td>
<td>Data protection impact assessment</td>
</tr>
<tr>
<td>Art. 46</td>
<td>Transfers subject to appropriate safeguards</td>
</tr>
<tr>
<td>Art. 84</td>
<td>Penalties</td>
</tr>
</tbody>
</table>

People  Process  Technology
What key changes result from the GDPR?

<table>
<thead>
<tr>
<th>Data Subject Rights</th>
<th>Controls and notifications</th>
<th>Transparent policies</th>
<th>IT and training</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individuals have the right to:</td>
<td>Organizations are required to:</td>
<td>Organizations are required to:</td>
<td>Organizations are required to:</td>
</tr>
<tr>
<td>• Access their personal data</td>
<td>• Protect personal data by implementing appropriate security</td>
<td>• Provide clear notice of data collection</td>
<td>• Train privacy personnel and employees</td>
</tr>
<tr>
<td>• Correct errors in their personal data</td>
<td>• Notify authorities of personal data breaches</td>
<td>• Outline processing purposes and use cases</td>
<td>• Audit and update data policies</td>
</tr>
<tr>
<td>• Erase their personal data</td>
<td>• Obtain appropriate consent for processing data</td>
<td>• Define data retention and deletion policies</td>
<td>• Employ a Data Protection Officer (if required)</td>
</tr>
<tr>
<td>• Object to processing of their personal data</td>
<td>• Keep records detailing data processing</td>
<td></td>
<td>• Create and manage compliant vendor contracts</td>
</tr>
<tr>
<td>• Export personal data</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Microsoft Confidential – for internal only use by partners.

GDPR is......

Privacy by Design

Security by Design
What does this mean for my data?

- Stricter control on where personal data is stored and how it is used
- Better data governance tools for better transparency, recordkeeping and reporting
- Protecting customer privacy with GDPR
- Improved data policies to provide control to data subjects and ensure lawful processing

Our commitment to you

- To simplify your path to compliance, we are GDPR compliance ready across our cloud services beginning on May 25, 2018.
- We will share our experience in complying with complex regulations such as the GDPR.
- Together with our partners, we are prepared to help you meet your policy, people, process, and technology goals on your journey to GDPR.
GDPR Overview

Customer Inputs...
- Your data sources
- Your business reasons for data capture
- Your personal data definitions
- Your policies

Risk & Compliance Management for Data Privacy Engagement
- Data Inventory, Data Policies, and Data Map
- Data Protection Management
- Consent Management
- Data Subject Request Management
- Breach Notification
- Data privacy risk management reporting & portal

Customer Manages...
- Responding to data subject requests and consent changes
- Reporting to authorities
- Breach response
- Ongoing compliance programs

---

Enabling Data Subject Requests through the Azure Privacy Portal
Get started with User Privacy
User Privacy enables Active Directory tenant administrators to export user-specific data and delete accounts. Learn more

Request to export user data
Submit and manage user requests to export stored data. Learn more

Delete user in Active Directory
Delete users from the Azure environment by deleting the user in Active Directory. Learn more

Manage User Privacy

Microsoft Azure
Policy - User privacy

Data request type
Data Subject Rights (DSR) Request

Requests summary
Pending Complete Total
20 0 20

Data Name User Name Status Type Date Requested Date Completed User
sathyraj@microsoft.com sathyraj@microsoft.com Pending Export 3/14/2019 8:47 PM https://login.microsoft.com
Jim Soon Lim jlim@microsoft.com Pending Export 3/14/2019 2:15 PM https://login.microsoft.com
ramya ramyam@microsoft.com Pending Export 3/14/2019 2:16 PM https://login.microsoft.com
Lisa lima@travaris.example.com Pending Export 2/22/2018 10:09 AM
ramya ramyam@microsoft.com Pending Export 2/22/2018 1:01 AM
Lisa lima@travaris.example.com Pending Export 2/22/2018 11:16 AM
ramya ramyam@microsoft.com Pending Export 2/22/2018 11:20 AM
Jim Soon Lim jlim@microsoft.com Pending Export 2/22/2018 11:39 AM
ramya ramyam@microsoft.com Pending Export 2/25/2018 2:14 PM https://login.microsoft.com
ramya ramyam@microsoft.com Pending Export 2/25/2018 3:53 AM https://login.microsoft.com

© Microsoft Corporation. All rights reserved. MICROSOFT MAKES NO WARRANTIES, EXPRESS IMPLIED OR STATUTORY, AS TO THE INFORMATION IN THIS PRESENTATION.
Trusted Platform

Built-in compliance and security to manage and control access to personal data

- Transparency & Privacy
- Data Residency
- Operational Security
- Breach Notification
**Transparency - Compliance Manager**

- View your compliance posture against evolving regulations in real-time.
- Take recommended actions to improve your data protection capabilities.
- Conduct pre-audits to prepare for external audits.

Compliance Manager is a dashboard that provides a summary of your data protection and compliance stature and recommendations to improve data protection and compliance. This is a recommendation, it is up to you to evaluate its effectiveness in your regulatory environment prior to implementation. Recommendations from Compliance Manager should not be interpreted as a guarantee of compliance.

---

**Azure covers 79 compliance offerings**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Government</td>
<td>FedRAMP High</td>
<td>FedRAMP Moderate</td>
<td>EAR</td>
<td>DoD DISA SRG Level 5</td>
<td>DoD DISA SRG Level 4</td>
<td>DoD DISA SRG Level 2</td>
<td>DFARS</td>
<td>DoD 10 CFR Part 810</td>
<td>NIST SP 800-171</td>
<td>NIST CSF</td>
<td>Section 508 VPATs</td>
<td>FIPS 140-2</td>
<td>ITAR</td>
<td>CJIS</td>
</tr>
<tr>
<td>Industry</td>
<td>PCI DSS Level 1</td>
<td>GLBA</td>
<td>FFIEC</td>
<td>Shared Assessments</td>
<td>FSC (JP)</td>
<td>APRA (AU)</td>
<td>GDFI</td>
<td>CSA STAR Self-Assessment</td>
<td></td>
<td>EU ENISA IAF</td>
<td>EU Model Clauses</td>
<td>EU – US Privacy Shield</td>
<td>GDPR</td>
<td>Germany C5</td>
</tr>
</tbody>
</table>
Resources

- Azure sales guide, playbook, and customizable presentation for GDPR
  https://aka.ms/GDPR-Partners

- GDPR on the Microsoft Trust Center
  https://microsoft.com/gdpr

- Compliance Manager
  https://aka.ms/compliancemanager

- Azure Blueprints
  https://aka.ms/Azure-Blueprints

Thank you!