

RSA®Conference2018

San Francisco | April 16 – 20 | Moscone Center

SESSION ID: GRC-R12

GDPR COMPLIANCE—YOU FORGOT YOUR DIGITAL ENVIRONMENT



#RSAC

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70% **\$1-2M** **52%**

GDPR should not be taken lightly



SCOPE



CONSENT



**EXTRA-
TERRITORIAL**



LIABILITY



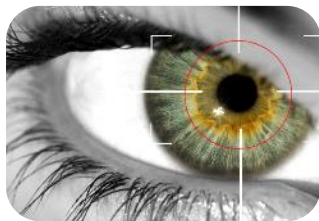
**BREACH
NOTIFICATION**



Your digital environment counts, too



**DATA
COLLECTION
&
CONSENT**



**PROFILING
&
ONLINE
TRACKING**



**VENDOR
MANAGEMENT**



**BREACH
REPORTING**



**PRIVACY
POLICY**



THE MEDIA TRUST

crowell  **moring**

POLL – Let's get out our mobile phones



- Session ID: GRC-R12
- Do you know who's in charge of your organization's website?
 - A – Yes
 - B – No
 - C – Not sure

<https://rsa1-live.eventbase.com/polls?event=rsa2018&polls=3805>



Who's really in charge?



MARKETING

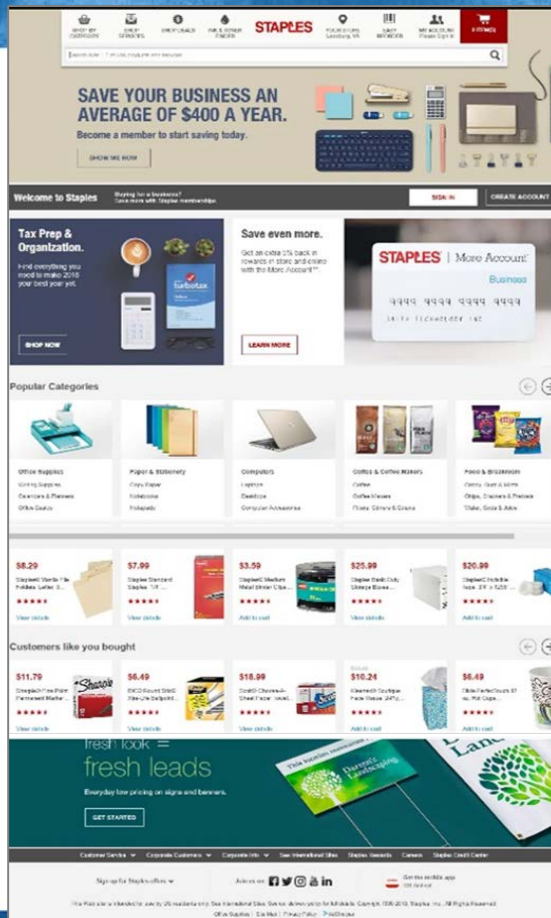
SECURITY

**WEBSITE
OPERATIONS**

**SALES/
REVENUE**

LEGAL

RISK



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Clearly, You're not ready!



MARKETING

59% haven't received
any GDPR-related
training

Institute of Direct & Digital Marketing

57% admitted they
were "under-trained"

Direct Marketing Association

PRIVACY

46% have been
preparing for > 1 year

Forrester, December 2017

46% require vendor
compliance with privacy
policies

PwC, January 2018

IT/SECURITY

70% don't think they're
compliant

Forrester, January 2018

77% know company is
not prepared

Erwin, November 2017



Digital is the new Wild, Wild West



50-75% executing code is not
KNOWN or **SEEN**
by the website operator





WHEN RISK IS REALITY

6 examples of real-world websites

It's uglier than this



URL	#	Start	End	Mtd	HTTP	Type	Content Len		
▼ http://www.darkreading.com/	1	0.000	0.344	Get	200		0		1
▼ http://fonts.googleapis.com/css?family=Roboto+Slab:700	2	0.323	0.354	Get	200		0		
http://fonts.gstatic.com/s/robotoslab/v7/BngRUXZYTXPlvBgJJSb6u92w7CGwR0.woff2	171	16.619	16.835	Get	200		17,532		
http://twimg.com/nojitter/css/darkreading.css	3	0.324	0.348	Get	200		3,545		1
▼ http://www.darkreading.com/styles/pano-framework.css?v1.26	4	0.324	0.340	Get	200		0		
https://img.deusm.com/darkreading/background-pattern.png	128	10.492	10.533	Get	200		493		
https://img.deusm.com/darkreading/nav-background.png	165	16.575	16.695	Get	200		2,808		
https://img.deusm.com/darkreading/DR-Ribbon.png	173	17.615	17.640	Get	200		1,100		
http://www.darkreading.com/styles/styles.css?v7	5	0.325	0.342	Get	200		0		
http://i.ubm-us.net/oas/nativead/css/dr_nativead.css?v3	6	0.328	0.353	Get	200		0		1
http://i.ubm-us.net/oas/nativead/js/nativead.js	7	0.328	0.358	Get	200		0		1
http://i.ubm-us.net/oas/nativead/js/dr_nativead.js?v3	8	0.333	0.403	Get	200		0		1
http://staticxx.facebook.com/connect/xd_arbiter/FdM11_dpErI.js?version=42#channel=f27e17ab9e32a76&origin=http%3A%2F%2Fwww.darkreading.com	140	13.122	13.212	Get	200		14,254		
https://securepubads.g.doubleclick.net/pcs/view?xai=AKAOjsvyk8meSKZ-JVTJHEDeHOUcXN46xvaRC-Rby4GKK8TVxbnA-yfTrTGGpTd-I4UA3-o4k	142	13.676	13.777	Get	200		0		
https://tpc.googlesyndication.com/pagead/js/r20180327/r20110914/activeview/osd_listener.js	143	13.685	13.763	Get	200		26,689		
https://tpc.googlesyndication.com/pagead/imgad?id=CICAgKDr3YOdEhABGAeyCFEIHObNeccc	144	13.732	13.794	Get	200		10,818		
https://securepubads.g.doubleclick.net/pcs/view?xai=AKAOjsGm4fLuLa_2Qb2d_E4e6Gcd_5UUIx78qkTFIj-k5wNJaSaxI6ZQ8h73fkPL8Hd52ycjo	145	14.409	14.494	Get	200		0		
▼ https://adfarm.mediaplex.com/ad/3/28404-235571-21530-34?mpv=251470744&mpvc=https://adclick.g.doubleclick.net/pcs/click%253F%253DAKA	146	14.416	15.651	Get	302		0		1
https://iad.login.dotomi.com/commonid/match?url=https%3A%2F%2Fadfarm.mediaplex.com%2Fad%2Fjs%2F28404-235571-21530-34%3Fmpu	155	15.720	16.141	Get	302		0		1
https://adfarm.mediaplex.com/ad/3/28404-235571-21530-34?mpu_token=AAALReJ9mzWaCgAFCY46AAAAAA&mpv=251470744&mpvc=https://adclick.g.doubleclick.net/pcs/click%253F%253DAKA	160	16.222	16.230	Get	200		977		1
https://tpc.googlesyndication.com/pagead/js/r20180327/r20110914/activeview/osd_listener.js	147	14.418	14.472	Get	200		26,689		
▼ https://image6.pubmatics.com/AdServer/UCookieSetPug?oid=1&rd=https%3A%2F%2Frudy.adsnative.com%2Fcm.gif%3Fdspsid%3D823634934%26b	148	14.691	14.699	Get	302		118		1
▼ https://rudy.adsnative.com/cm.gif?dspsid=823634934&buid=436D4BC7-DAF6-4D7E-BC56-9A8FE05ABBB2	151	14.906	15.122	Get	302		0		1
https://p.adsymptotic.com/d/px?_pid=13539&_psign=8184c8609e3bb71e3b572a60fadd8128&_redirect=https%3A%2F%2Frudy.adsnative.com	152	15.183	15.337	Get	302		0		1
https://p.adsymptotic.com/d/px?_pid=13539&_psign=8184c8609e3bb71e3b572a60fadd8128&_redirect=https%3A%2F%2Frudy.adsnative.com	153	15.361	15.563	Get	302		0		1
https://rudy.adsnative.com/cm.gif?dspsid=1162890136&buid=155a4364cf66d44e42fa3b22937495c3	154	15.594	15.680	Get	302		0		1
https://p.adsymptotic.com/d/px?_pid=13539&_psign=8184c8609e3bb71e3b572a60fadd8128&_redirect=https%3A%2F%2Frudy.adsnative.com	156	15.730	15.734	Get	302		0		1
https://rudy.adsnative.com/cm.gif?dspsid=741299734&buid=155a4364cf66d44e42fa3b22937495c3	157	15.790	15.800	Get	302		0		1
https://track.com/pixel/cookiesync?source=47497f3d-4592-43eb-bba4-51bda47ff6e8&secure=1	158	15.834	15.994	Get	302		213		1

MEDIA: Wall Street Journal

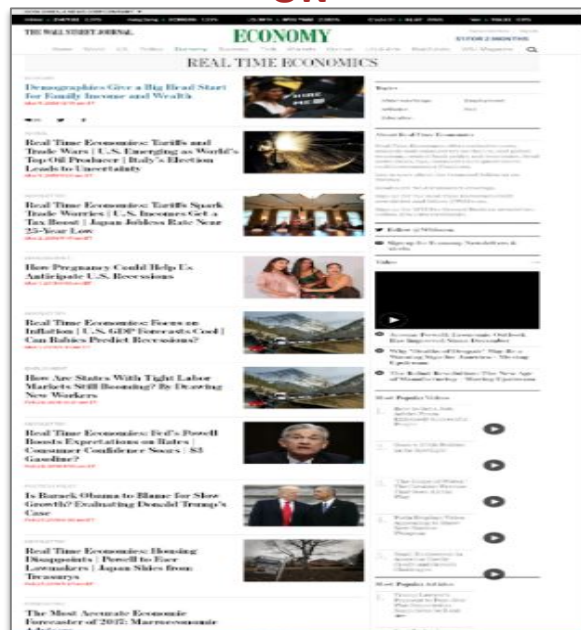


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UK

ANALYSIS

USA



AD/MARTECH CODE

68% vs. 73%

COOKIES

212 vs. 177

USER IDENTIFIER

66% vs. 67%

IDENTIFIER >1 YEAR

40 vs. 36

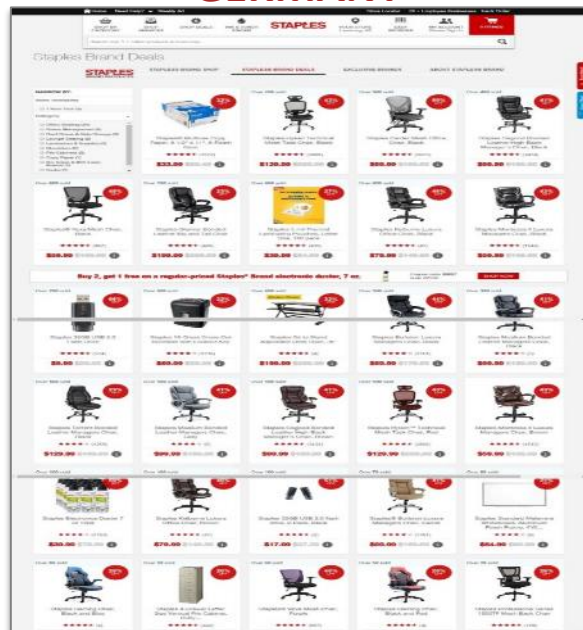


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RETAIL: Staples



GERMANY



ANALYSIS

AD/MARTECH CODE

73% vs. 74%

COOKIES

204 vs. 230

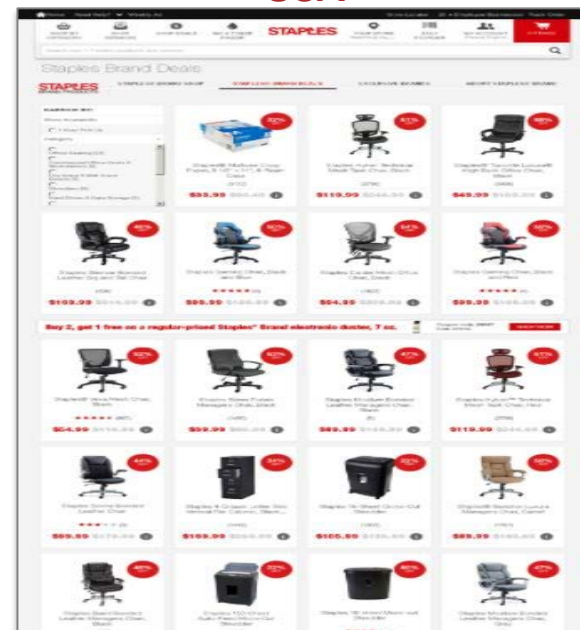
USER IDENTIFIER

68% vs. 70%

IDENTIFIER >1 YEAR

33 vs. 34

USA



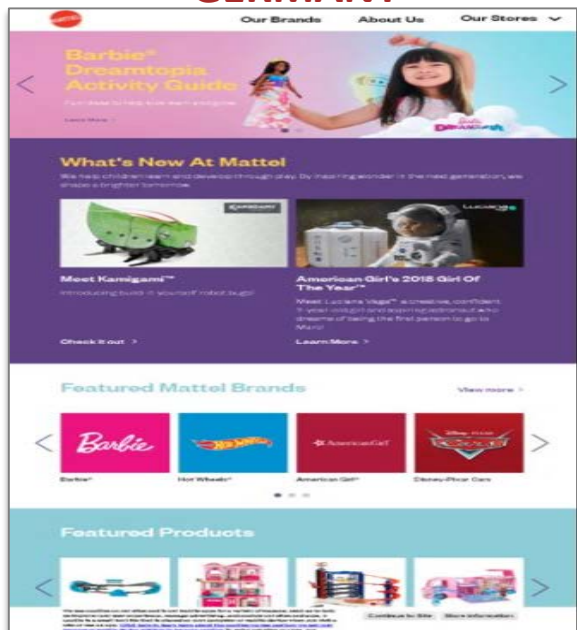
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BRAND: Mattel



GERMANY



ANALYSIS

AD/MARTECH CODE

55% vs. 55%

COOKIES

58 vs. 71

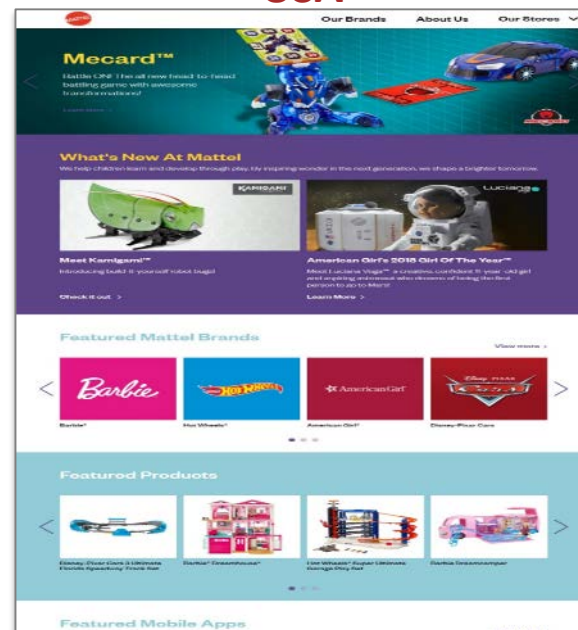
USER IDENTIFIER

57% vs. 59%

IDENTIFIER >1 YEAR

8 vs. 9

USA



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TRAVEL: Lufthansa



FRANCE



ANALYSIS

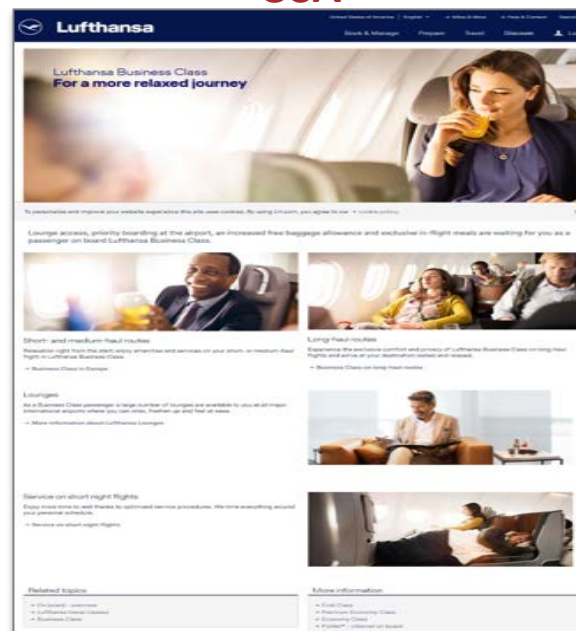
AD/MARTECH CODE
73% vs. 77%

COOKIES
140 vs. 90

USER IDENTIFIER
73% vs. 75%

IDENTIFIER >1 YEAR
38 vs. 35

USA

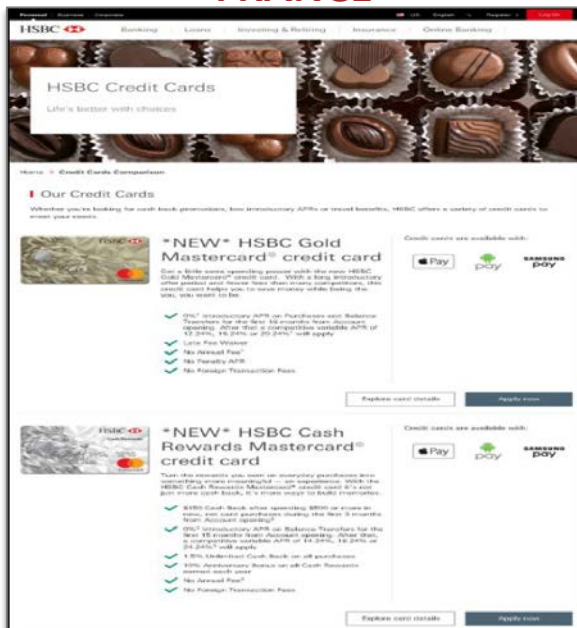


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BANKING: HSBC (credit card)



FRANCE



ANALYSIS

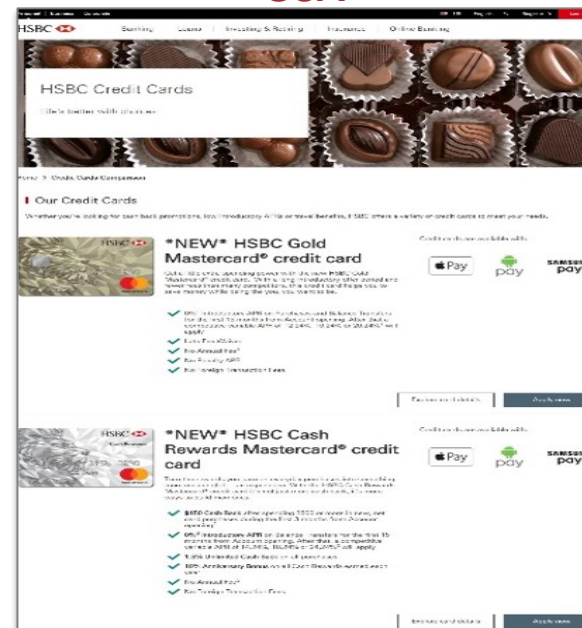
AD/MARTECH CODE
66% vs. 69%

COOKIES
28 vs. 27

USER IDENTIFIER
19% vs. 19%

IDENTIFIER >1 YEAR
7 vs. 7

USA



GOVERNMENT: U.S. Senate



UK



ANALYSIS

AD/MARTECH CODE

43% vs. 43%

COOKIES

1 vs. 1

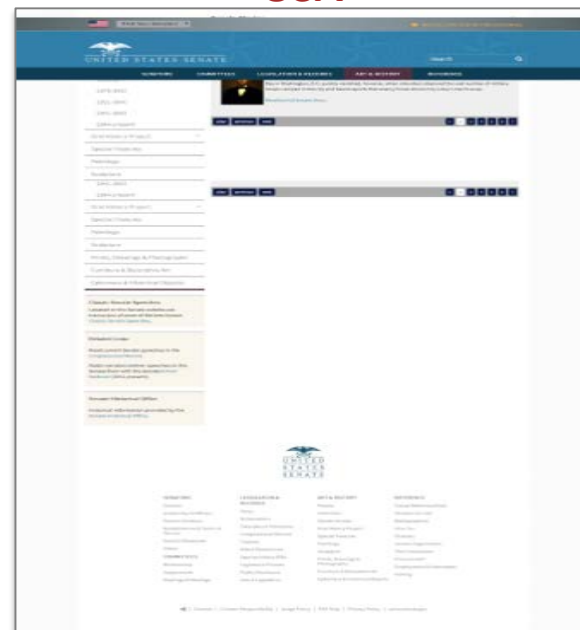
USER IDENTIFIER

100% vs. 100%

IDENTIFIER >1 YEAR

1 vs. 1

USA



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Security failures are GDPR risks, too



JUST IN: SEC CHARGES FORMER EQUIFAX EXECUTIVE WITH INSIDER TRADING AFTER DATA BREACH

UK government websites, ICO hijacked by cryptocurrency mining malware

US and Australian government domains were also affected by the bold cryptojacking scheme.



CATEGORIES

FEATURED

PODCASTS

VIDEOS

WORDPRESS USERS WARNED OF MALWARE MASQUERADING AS IONCUBE FILES



816 - November 12th, 2017

Cause for concern? Pro-ISIS hacking group targets 800 US school websites



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> SC US NEWS CYBERCRIME NETWORK SECURITY PRODUCT REVIEWS IN DEPTH EVENTS WHITEPAPERS

SC UK

THE CYBERSECURITY SOURCE

Under Armour: unauthorized third party accessed 150 million MyFitnessPal accounts

MOTHERBOARD

Over 400 of the World's Most Popular Websites Record Your Every Keystroke, Princeton Researchers Find

Krebs on Security

In-depth security news and investigation

02 **Panerabread.com Leaks Millions of Customer Records**
APR 18

You know the risks, right?



RISK

- Fines: €20,000 or 4% turnover
- Remediation costs
- Legal fees
- Lost Revenue
- Brand damage
- Compliance monitoring

REALITY

Belgium: E250,000/day, Facebook to tracking via 3rd party websites (Feb 2018)

Italy: E11M across 5 firms for unlawful processing of personal data (Mar 2017)

UK: Doubling of enforcement actions in 2016. (June 2017)

EU: Roche AVOIDED penalty by taking violation notification seriously (Dec 2017)



Steps to Digital Compliance, **1 month**



1. **ASSIGN** a digital asset owner
2. **IDENTIFY ALL** executing code
3. **ANALYZE** role in rendering UX



Steps to Digital Compliance, **3 months**



1. **ASSIGN** a digital asset owner

2. **IDENTIFY ALL** executing code

3. **ANALYZE** role in rendering UX

4. **ESTABLISH** legal basis for data collection

5. **UPDATE** privacy policy

6. **CREATE** a digital asset policy

7. **COMMUNICATE** policy to vendors

8. **ENFORCE** vendor compliance



Steps to Digital Compliance, 9 months



1. **ASSIGN** a digital asset owner
2. **IDENTIFY ALL** executing code
3. **ANALYZE** role in rendering UX
4. **ESTABLISH** legal basis for data collection
5. **UPDATE** privacy policy
6. **CREATE** a digital asset policy
7. **COMMUNICATE** policy to vendors
8. **ENFORCE** vendor compliance
9. **AUDIT:** Prove you've taken control
10. **ENABLE** data requests by visitors



Your next step: Transparency



KNOW YOUR DIGITAL ASSETS

- Establish governance:
GDPR prep? Data risk framework? Vendor Risk Management?
- Connect & Communicate
- Demonstrate compliance

WHERE ARE YOU?

70%

\$1-2M

52%





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