

Lesson 16

Explaining Data Privacy and Protection Concepts

Topic 16A

Explain Privacy and Data Sensitivity Concepts

Syllabus Objectives Covered

- 2.1 Explain the importance of security concepts in an enterprise environment
- 5.3 Explain the importance of policies to organizational security
- 5.5 Explain privacy and sensitive data concepts in relation to security

Privacy and Sensitive Data Concepts

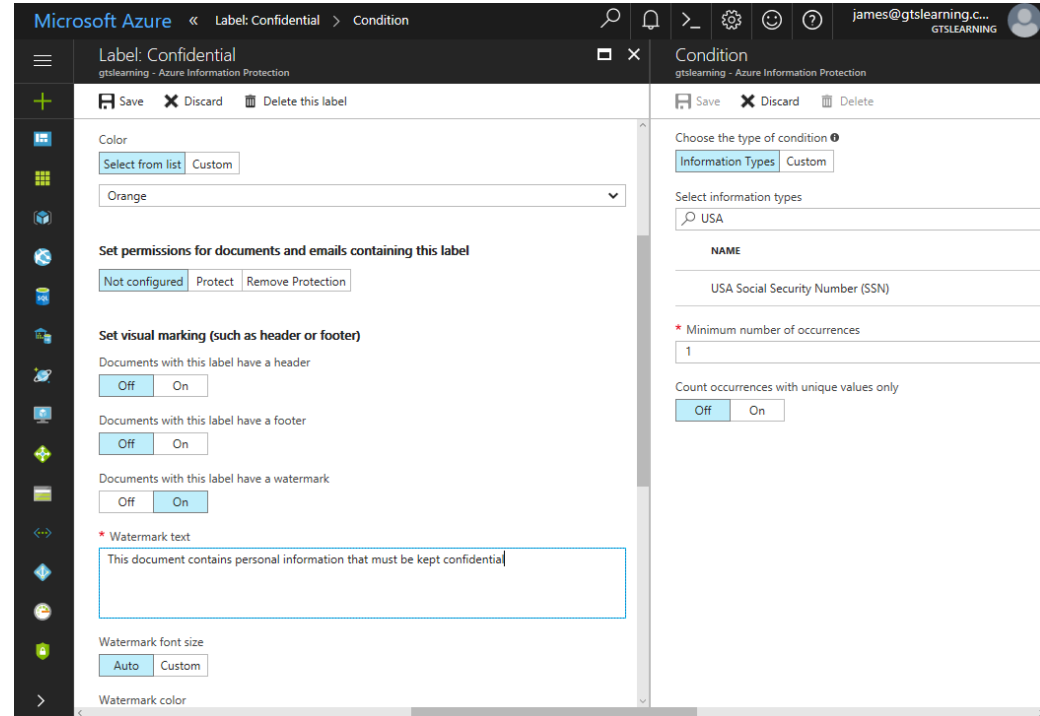
- Security
 - Confidentiality, integrity, and availability (CIA) attributes
- Privacy
 - Personal data about data subjects
 - Compliance with regulations
 - Rights of data subjects
- Information life cycle management
 - Creation/collection (classification)
 - Distribution/use
 - Retention
 - Disposal

Data Roles and Responsibilities

- Oversight and management of a range of information assets within the organization
- Data owner
 - Ultimate responsibility
- Data steward
 - Data quality and oversight
- Data custodian
 - Information systems management
- Data privacy officer (DPO)
 - Oversight of personally identifiable information (PII) assets
- Organizational roles in privacy legislation
 - Data controllers and data processors

Data Classifications

- Public (unclassified)
 - No confidentiality, but integrity and availability are important
- Confidential (secret)
 - Subject to administrative and/or technical access controls
- Critical (top-secret)
- Proprietary
 - Owned information of commercial value
- Private/personal data
 - Data that can identify an individual
- Sensitive
 - Special categories of personal data, such as beliefs, ethnic origin, or sexual orientation



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Data Types

- Personally identifiable information (PII)
 - Data that can be used to identify, contact, or locate an individual
- Customer data
 - Institutional information
 - Personal information about the customer's employees
- Health information
 - Medical and insurance records and test results
- Financial information
 - Data held about bank and investment accounts, plus information such as payroll and tax returns
- Government data
 - Legislative requirements

Privacy Notices and Data Retention

- Legislation and regulations
 - General Data Protection Regulation (GDPR)
 - Rights of data subjects
- Privacy notices
 - Purpose of collecting personal information
 - Consent to declared uses and storage
- Impact assessments
 - Assess and mitigate risks from collecting personal data
- Data retention
 - Keeping data securely to comply with policy/regulation/legislation
 - Audit requirements versus privacy requirements

Data Sovereignty and Geographical Considerations

- Data sovereignty
 - Jurisdiction that enforces personal data processing and storage regulations
- Geographical considerations
 - Select storage locations to mitigate sovereignty issues
 - Define access controls on the basis of client location

Privacy Breaches and Data Breaches

- Definition of a breach event
 - Data breach versus privacy breach
- Organizational consequences
 - Reputation damage
 - Identity theft
 - Fines
 - IP theft
- Notifications of breaches
- Escalation
- Public notification and disclosure

Data Sharing and Privacy Terms of Agreement

- Service level agreement (SLA)
 - Require access controls and risk assessment to protect data
- Interconnection security agreement (ISA)
 - Requirements to interconnect federal systems with third-party systems
- Non-disclosure agreement (NDA)
 - Legal basis for protecting information assets
- Data sharing and use agreement
 - Specify terms for the way a dataset can be analyzed
 - Proscribe use of reidentification techniques

Topic 16B

Explain Privacy and Data Protection Controls

Syllabus Objectives Covered

- 2.1 Explain the importance of security concepts in an enterprise environment
- 3.2 Given a scenario, implement host or application security solutions
- 5.5 Explain privacy and sensitive data concepts in relation to security

Data Protection

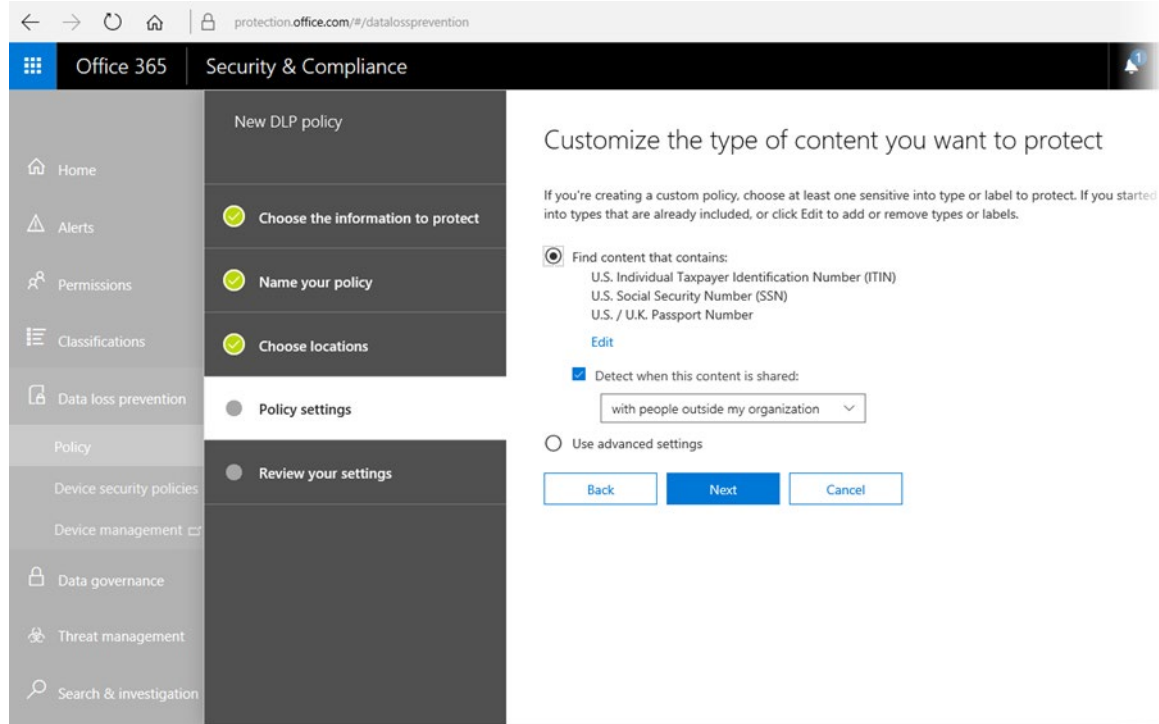
- Data at rest
 - In some sort of persistent storage media
 - Encrypt the data, using techniques such as whole disk encryption, database encryption, and file- or folder-level encryption
 - Apply permissions—Access Control Lists (ACLs)—to ensure only authorized users can read or modify the data
- Data in transit (or data in motion)
 - Transmitted over a network
 - Protected by transport encryption, such as TLS or IPsec
- Data in use
 - Present in volatile memory, such as system RAM or CPU registers and cache
 - Malicious intruder with rootkit access to the computer may be able to access it
 - Trusted execution environments/enclaves

Data Exfiltration

- Data exfiltration methods
 - Removable media
 - Transferring over the network
 - Communicating data over the phone or by video
 - Taking a picture or video of text data
- Ordinary countermeasures
 - Ensure that all sensitive data is encrypted at rest
 - Create and maintain offsite backups of data
 - Ensure that systems storing or transmitting sensitive data are implementing access controls
 - Restrict the types of network channels that attackers can use
 - Train users about document confidentiality and the use of encryption to store and transmit data securely

Data Loss Prevention

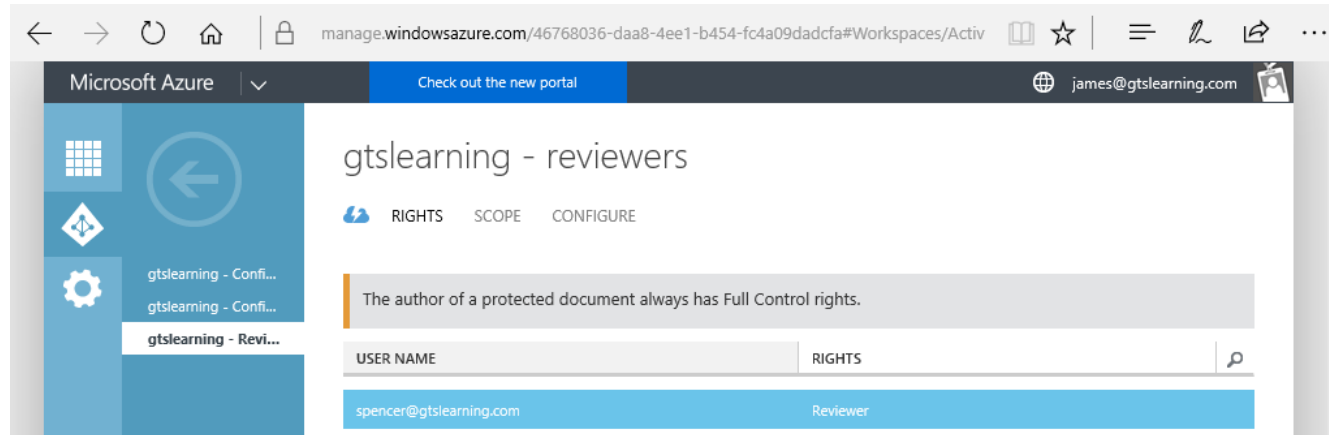
- DLP products scan files for matched strings and prevent unauthorized copying or transfer
 - Policy server
 - Endpoint agents
 - Network agents
- Cloud-based DLP
- Remediation
 - Alert only
 - Block
 - Quarantine
 - Tombstone



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Rights Management Services

- Assign file permissions for different document roles
- Restrict printing and forwarding of documents
- Restrict printing and forwarding of email messages



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Privacy Enhancing Technologies

- Data minimization
 - Only collect sufficient data to perform the specific purpose that consent was obtained for
- Deidentification
 - Removing personal information from shared data sets
- Anonymization
 - Irreversible deidentification techniques
- Pseudo-anonymization
 - Reidentification is possible using a separate data source
- Reidentification attacks
 - K-anonymous information

Database Deidentification Methods

- Data masking
 - Whole or partial redaction of strings
 - Format-preserving masks
 - Irreversible
- Tokenization
 - Replacing field value with a random token
 - Token stored in a separate data source (vault)
 - Reversible with access to the vault
- Aggregation/banding
- Hashing and salting
 - Indexing method
 - Discarding original data for identifier

Lesson 16

