Analysis of the Cambridge Analytica Data Privacy Scandal

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1 Case Overview

- The Cambridge Analytica / Facebook data privacy incident is one of the most widely discussed cases of data misuse in modern history.
- The incident occurred in 2018 in both the UK and US after Cambridge Analytica gained access to millions of Facebook users' data without proper consent.
- A psychology app called "This Is Your Digital Life," developed by researcher Aleksandr Kogan, collected not only user data but also their Facebook friends' data even those who never agreed to share it.
- Over 50 million Facebook profiles were harvested and used to create psychographic profiles for targeted political advertising in the 2016 U.S. elections and the Brexit campaign.
- Following public exposure, Facebook faced investigations from regulators in the US, UK, and EU. The company restricted app data access, enforced stricter political ad policies, and suffered lasting reputational damage.
- The case sparked global debate on the influence of social media platforms on democracy and public opinion.

2 Analysis of Failures

This section analyzes the case from three required perspectives: Data Governance, Data Stewardship & Quality, and Privacy & Legal Compliance (GDPR / PDPL).

2.1 Data Governance Failures

- Lack of accountability and data ownership.
- Insufficient third-party access control and absence of continuous monitoring.
- No effective audit trail or proactive oversight; governance was reactive, not preventive.
- Policies existed but enforcement was weak.
- No formal Data Governance Board or risk registry for high-risk data use (e.g., political influence).

2.2 Data Stewardship & Quality Failures

- No designated Data Steward to monitor third-party usage.
- No Data Lineage tracking once information left Facebook systems.

- Weak consent management – friends' data collected without permission.
- Purpose drift – data initially collected for research reused for political targeting.
- Lack of Data Catalog or Metadata Management for tracking what data was shared, by whom, and for what purpose.

2.3 Privacy and Legal Failures (GDPR / PDPL)

- Transparency was missing.
- Consent principles violated.
- Purpose Limitation ignored.
- Accountability and audit absence.
- Cross-border data use violated PDPL transfer principles.
- No Data Protection Impact Assessment DPIA conducted for high-risk processing.
- Ethical Impact: users were profiled psychologically without consent, leading to behavioral manipulation and potential interference with democratic integrity.

3 Recommendations

- Define clear data governance roles and ownership responsibilities.
- Apply Privacy by Design and Default to all systems.
- Strengthen consent management and lawful basis validation.
- Enforce Purpose Limitation and Data Minimization principles.
- Maintain detailed audit trails and monitor third-party usage.
- Conduct periodic Privacy Impact Assessments (PIA / DPIA).
- Train employees and promote a privacy-oriented corporate culture.
- Long-term: Establish a Privacy Office led by a Data Protection Officer (DPO) with the authority to halt projects that pose high privacy risks.

References

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