

# Manage Personal and confidential data in M365

+



▶▶▶ Sébastien Paulet, Microsoft MVP, Aerow CTO  
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# Disclaimer

- Check all information related to regulation with your local legal council
- Microsoft license information are my understanding and may evolve.  
**Always** check with your Microsoft licensing contact.



# Data breach cost

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Source IBM and Ponemon Institute's annual "[Cost of a Data Breach](#)" report

“Companies that had security automation technologies deployed experienced around half the cost of a breach”

Figure 2:

## Global average total cost of a data breach

Measured in US\$ millions



# Between the hammer and the anvil

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## Increasing security attacks

Ransomware attacks in India increased 200% quarter-on-quarter in April-June with 4 lakh new cases detected during the period

### SBI Leaks the Account Details of Users as it Leaves Server Unprotected



SBI leaks the account details of several users as it leaves server

## Increasing data regulation (ex : GDPR)

British Airways –\$242 million

Over 330 fines for GDPR between January and August 2020

The total amount of fines issued in 2020 exceeds \$181 million

### BA faces £183m fine over passenger data breach

ICO says personal data of 500,000 customers was stolen from website and mobile app



▲ A British Airways data breach in 2018 compromised customers' credit card information. Photograph: Frank Augstein/AP

British Airways is to be fined more than £183m by the Information Commissioner's Office after **hackers stole the personal data of half a million** of the airline's customers.



An aerial photograph of a city model made of wooden blocks. A semi-transparent red oval is superimposed over the center of the image. Inside this oval, the text "SENSITIVE AND PERSONAL DATA" is written in white, bold, sans-serif capital letters. The city model includes various buildings of different heights, green spaces with small trees, and a few white structures that look like towers or lighthouses. Some of these white structures have small white labels with numbers like 1, 2, 3, 4, and 19. The overall scene is a detailed miniature representation of an urban environment.

**SENSITIVE AND PERSONAL DATA**



# Sensitive data breach cost

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## **2018; 2019 – PDPB** Personal Data Protection Bill

Applies to all Indian citizen / companies

Gov can access data

Fine: Failing to notify breach : Rs 5 crore / 2% global turnover

Unlawful data transfers : Rs 15 crore / 4% global turnover  
+ criminal penalties



## **2018 – GDPR** General Data Protection Regulation

Applies to all european citizen personal data

Restriction on data location

Fine: 20M€/4% consolidated worldwide revenue



## **2020 - CCPA** California Consumer Privacy Act

Personnal data of californian residents

750\$ / californian resident impacted + 7,5K\$/violation

# Personnal data

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*“means data about or relating to a natural person who is directly or indirectly identifiable, having regard to any characteristic, trait, attribute or any other feature of the identity of such natural person, whether online or offline, or any combination of such features with any other information, and shall include any inference drawn from such data for the purpose of profiling [...]” - [PDPB](#)*

## **Samples (according GDPR) :**

Name

ID / UID

Email

Location

Banking/financial data

IP address

Political, religious, caste, ethnical data, sexual orientation

Physical, medical, genetical data

A photograph of two men in construction attire shaking hands. The man on the left is seen from the side, wearing a white hard hat, safety glasses, and a high-visibility yellow vest over a light blue shirt. The man on the right is facing him, wearing a blue hard hat, safety glasses, and a high-visibility yellow vest over a blue patterned shirt. They are standing in front of a blurred background of a construction site with scaffolding and windows. A semi-transparent magenta banner is overlaid across the middle of the image, containing the text 'CLOUD - MICROSOFT AS DATA SUBCONTRACTOR' in white, bold, uppercase letters.

## CLOUD - MICROSOFT AS DATA SUBCONTRACTOR



# Responsibility

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Responsibility	On-Prem	IaaS	PaaS	SaaS
Data classification & accountability	Cloud Customer	Cloud Customer	Cloud Customer	Cloud Customer
Client & end-point protection	Cloud Customer	Cloud Customer	Cloud Customer	Cloud Customer
Identity & access management	Cloud Customer	Cloud Customer	Cloud Customer	Cloud Customer
Application level controls	Cloud Customer	Cloud Customer	Cloud Customer	Cloud Customer
Network controls	Cloud Customer	Cloud Customer	Cloud Customer	Cloud Customer
Host infrastructure	Cloud Customer	Cloud Customer	Cloud Customer	Cloud Customer
Physical security	Cloud Customer	Cloud Customer	Cloud Customer	Cloud Customer
	Cloud Customer	Cloud Customer	Cloud Customer	Cloud Customer

Figure 1: Shared responsibilities for different cloud service models



# Content sources in O365

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Teams



Planner



Yammer



OneDrive



Office 365 Groups



SHAREPOINT



EXCHANGE





OBLIGATION

The image features a hand holding a document titled 'OBLIGATION'. The document has several horizontal lines representing text. In the background, there is a stylized illustration of a classical building with columns and a pediment. A semi-transparent purple banner is overlaid across the middle of the image, containing the text 'COMPANIES OBLIGATIONS'.

## COMPANIES OBLIGATIONS



# Obligations (according to PDPB)

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- a) Prohibition of processing of personal data.
- b) Limitation on purpose of processing of personal data.
- c) Limitation on collection of personal data.
- d) Requirement of notice for collection or processing of personal data.
- e) Quality of personal data processed.
- f) Restriction on retention of personal data.
- g) Accountability of data fiduciary.
- h) Consent necessary for processing of personal data





**REQUIREMENT OF NOTICE FOR COLLECTION OR PROCESSING  
OF PERSONAL DATA.  
CONSENT NECESSARY FOR PROCESSING OF PERSONAL DATA**

# What are we talking about

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- (1) The personal data shall not be processed, except on the consent given by the data principal at the commencement of its processing.
- (2) The consent of the data principal shall not be valid, unless such consent is—
  - (a) free, having regard to whether it complies with the standard specified under section 14 of the Indian Contract Act, 1872;
  - (b) informed, having regard to whether the data principal has been provided with the information required under section 7;
  - (c) specific, having regard to whether the data principal can determine the scope of consent in respect of the purpose of processing;
  - (d) clear, having regard to whether it is indicated through an affirmative action that is meaningful in a given context; and
  - (e) capable of being withdrawn, having regard to whether the ease of such withdrawal is comparable to the ease with which consent may be given



# Disclaimer on first login

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Access Panel Applications X

Secure | https://account.activedirectory.windowsazure.com/TermsOfUse#

Microsoft

Contoso LLC terms of use

In order to access Contoso LLC resources you must accept the terms of use.

Contoso Official Terms of Use >

Choosing Accept means that you agree to all of the above terms of use.

Decline

Accept

Privacy & cookies

Terms of use

Help

Feedback

©2018 Microsoft

Microsoft

Britta  
CONTOSO

Profile

Britta Simon

Email: bsimon@contoso.onmicrosoft.com  
Alternate email: bsimon@contoso.com

Manage account  
[Review terms of use](#)  
[Sign out everywhere](#)

Documenter la conformité

Pour prouver votre conformité au règlement, vous devez constituer et regrouper la documentation nécessaire. Les actions et documents réalisés à chaque étape doivent être réexaminés et actualisés régulièrement pour assurer une protection des données en continu.

[> En savoir plus](#)

2 sur 2

12/03/2018 à 07:14

Veuillez cliquer sur Accepter pour confirmer que vous avez lu et compris les conditions d'utilisation.

Refuser

Accepter

Azure AD P1 required

@SP\_twit

#M365Gurgaon

# Disclaimer on first login (how to)

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Azure Active Directory admin center

Dashboard

All services

FAVORITES

Azure Active Directory

Users

Enterprise applications

Azure AD Conditional Access

Dashboard > Conditional Access

Conditional Access | Terms of use

Azure Active Directory

+ New terms

Edit terms

Delete terms

View all

Search for a terms of use

Name

No terms of use to display

Manage

Named locations

Custom controls (Preview)

Terms of use

VPN connectivity

Classic policies

Troubleshooting + Support

New support request

New terms of use

Terms of use

Create and upload documents

Name \*

Contoso Official Terms of Use

Display name \*

Contoso Official Terms of Use

Terms of use document

"SPT Conseil-Audit..."

Select default language

+ Add language

Require users to expand the terms of use

On

Off

Require users to consent on every device

On

Off

Expire consents

On

Off

Duration before re-acceptance required (days)

Example: '90'

Conditional access

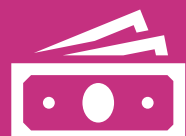
Enforce with conditional access policy templates \*

Custom policy

i

Select the users, groups, and apps that this Terms of Use will be applied to.

Create



Azure AD P1 required



A green highlighter pen is shown in the upper right corner, highlighting the word 'Confidential' in a large, bold, grey font. The background is a light grey with faint, repeating text that reads 'Confidentiality is a duty of confidence. Confidentiality is a duty of confidence. Confidentiality is a duty of confidence.'

**QUALITY OF PERSONAL DATA PROCESSED.**

# What are we talking about

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- (1) The data fiduciary shall take necessary steps to ensure that the personal data processed is complete, accurate, not misleading and updated, having regard to the purpose for which it is processed.
- (2) While taking any steps under sub-section (1), the data fiduciary shall have regard to whether the personal data—
  - (a) is likely to be used to make a decision about the data principal;
  - (b) is likely to be disclosed to other individuals or entities including other data fiduciaries or processors; or
  - (c) is kept in a form that distinguishes personal data based on facts from personal data based on opinions or personal assessments.
- (3) Where personal data is disclosed to any other individual or entity, including other data fiduciary or processor, and the data fiduciary finds that such data does not comply with the requirement of sub-section (1), the data fiduciary shall take reasonable steps to notify such individual or entity of this fact.

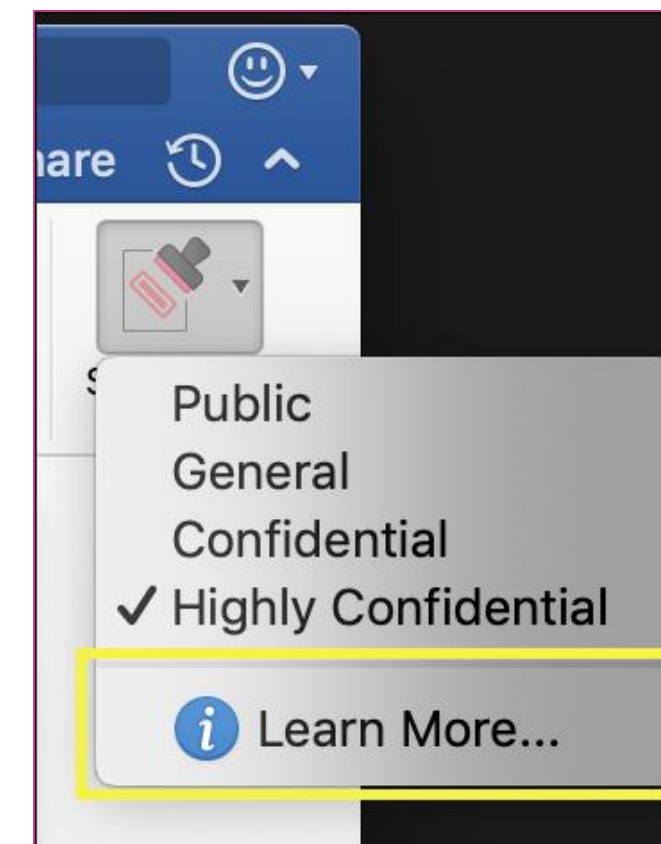
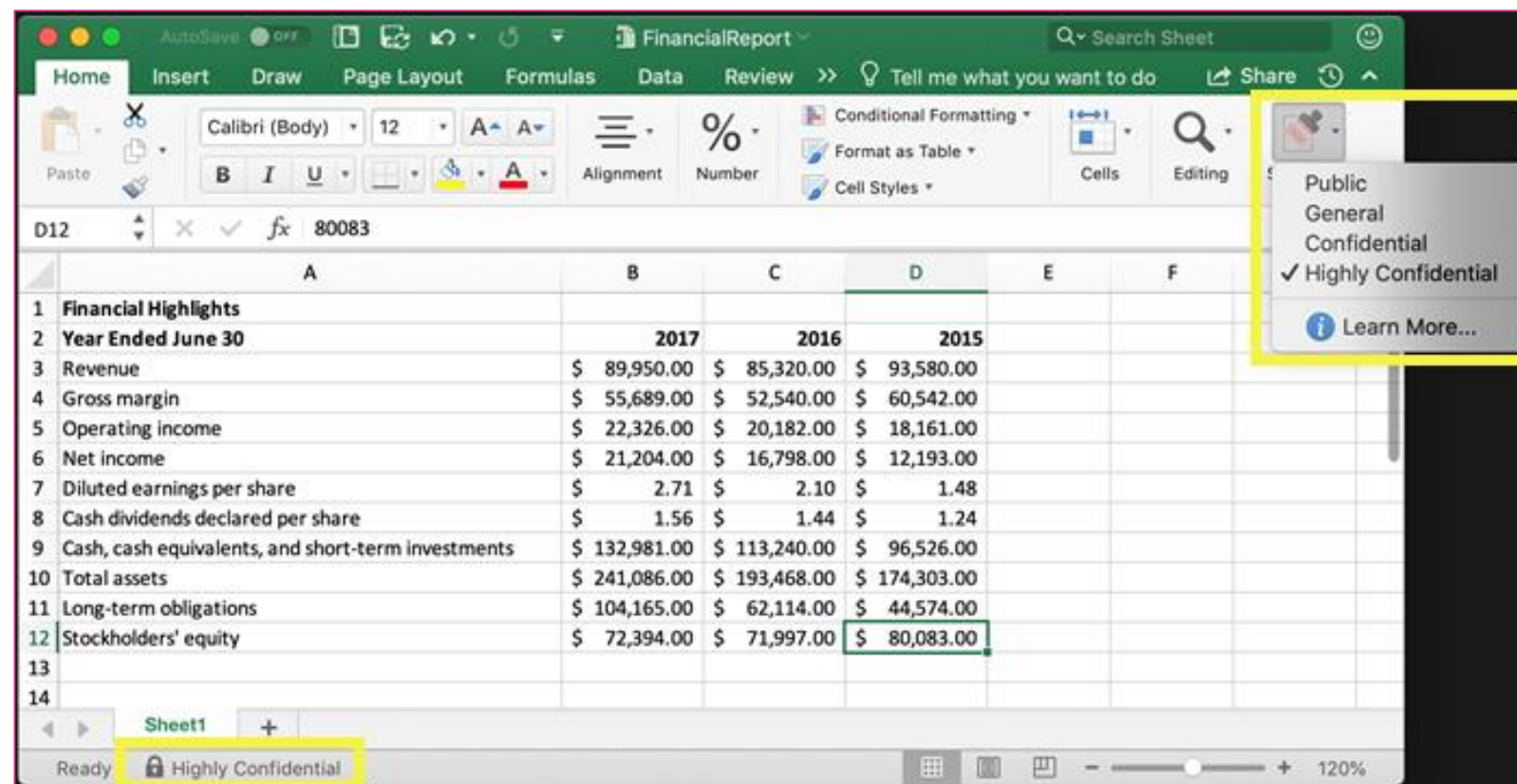
# Sensitivity Labels

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Define global sensitivity levels at tenant scale

End user can manually tag content as sensitive

Available in Outlook, SharePoint, Teams, OWA and M365 Apps for Business



Information Protection  
O365 (O365 E3) required



# Sensitivity Labels - Actions

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## Encrypt files

-> no way to read it for unallowed / non authenticated users

## Restricted permissions

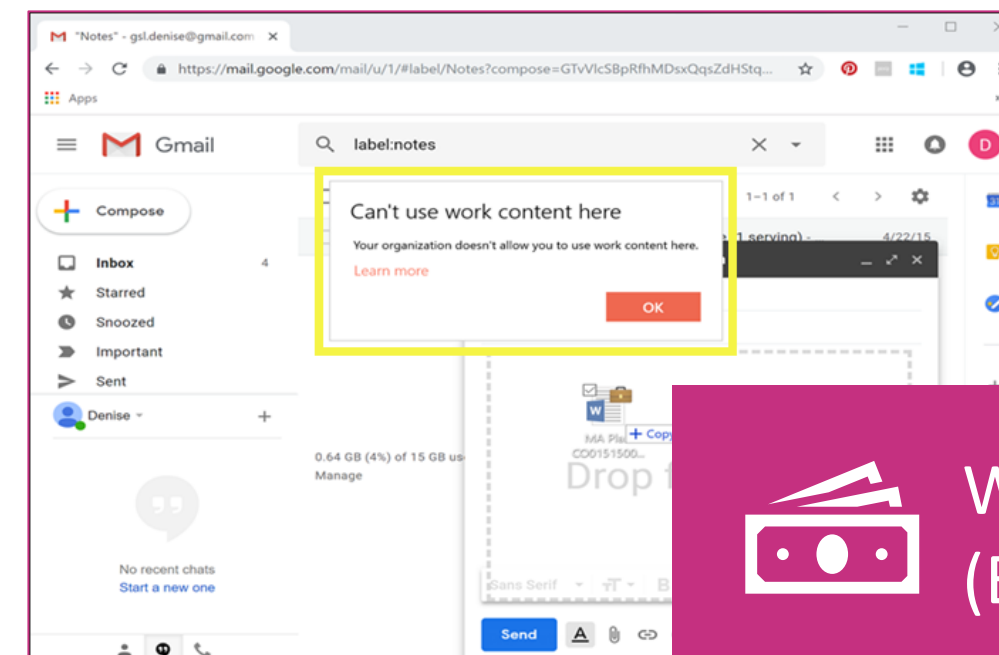
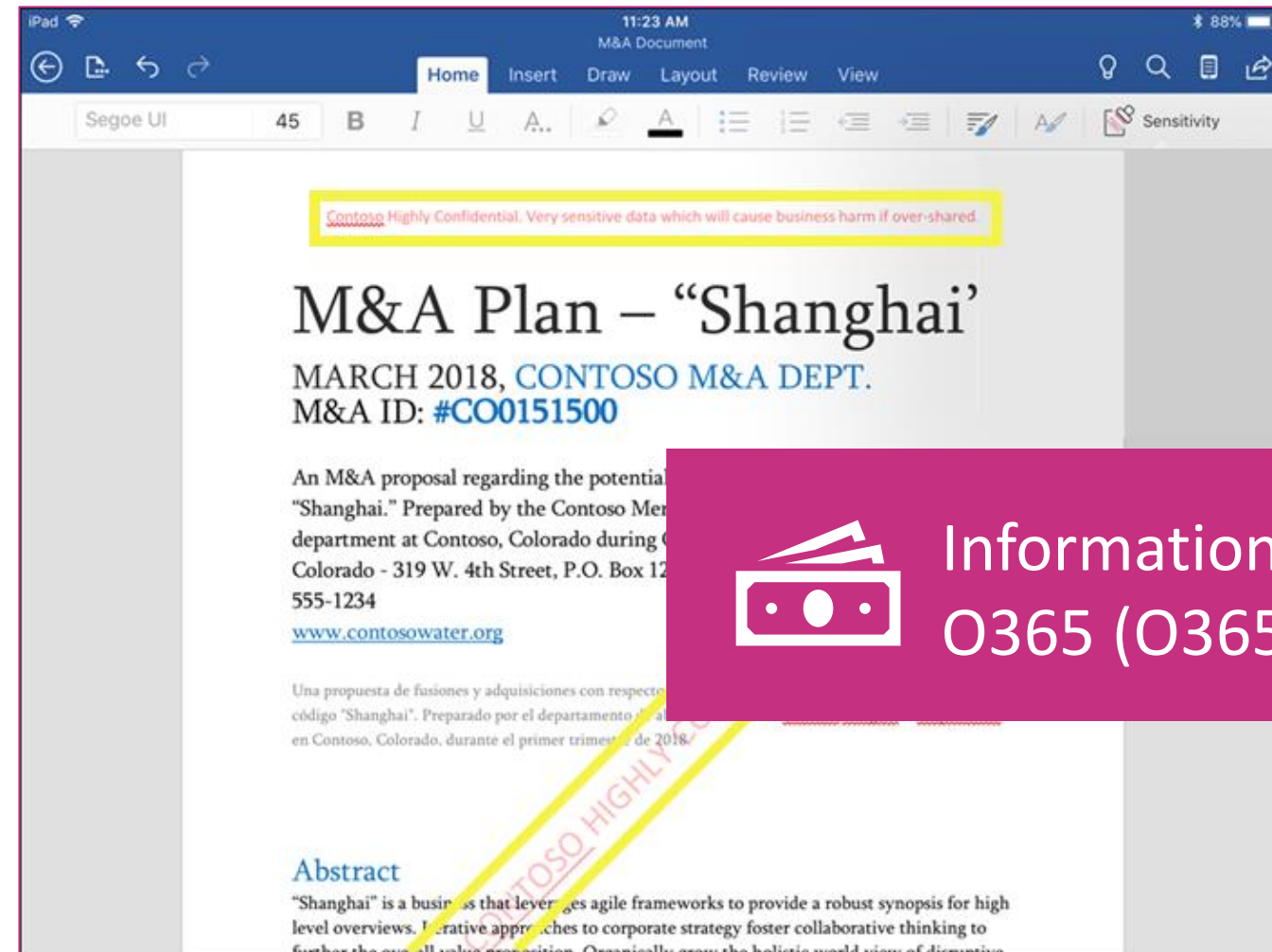
-> can block copy/paste, print, screenshot, email forward, and so on

## Watermarking

-> beware limitations

## Disable USB key copy / attached file in non O365 services

-> WIP (Windows Information Protection) and Intune required

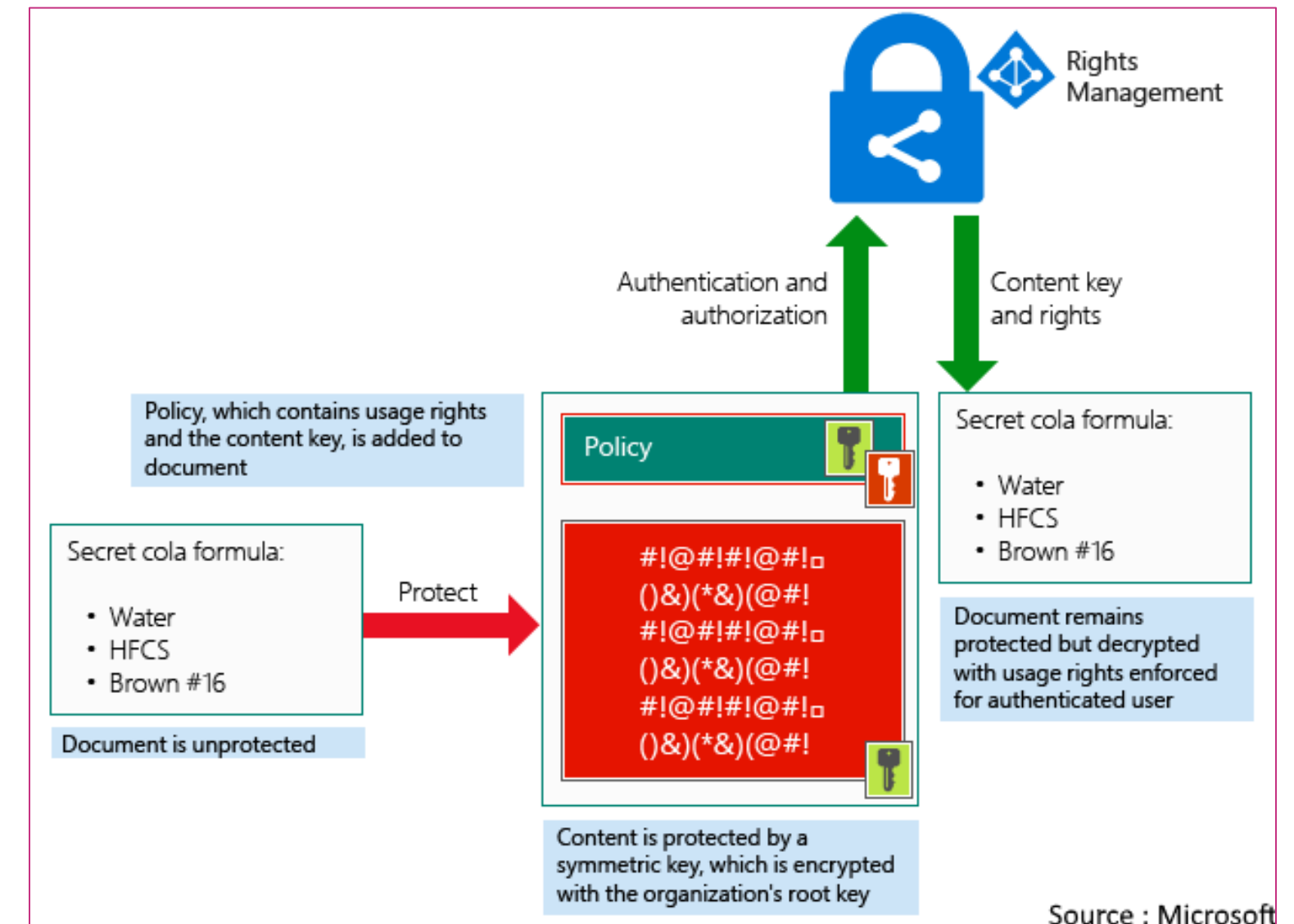


# Based on RMS - Right Management System

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Permissions are bound to the file

- Public/private key system  
Files encrypted by RSA 2048 bits, and signed with SHA-256
- Read <https://docs.microsoft.com/en-us/information-protection/understand-explore/how-does-it-work>



# Sensitivity Labels - How to create

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As tenant global admin, go to « Compliance » section (<https://compliance.microsoft.com/>) > « Display all »

In compliance center, go to « Solutions » > « Information Protection »

In labels page, go to « Labels » > « Create a label »

The screenshot displays the Microsoft 365 Information Protection interface. On the left, a navigation pane lists various compliance and security features, with 'Information protection' highlighted. The main area shows the 'Information protection' section, specifically the 'Labels' tab. A yellow banner indicates that the organization has not turned on the ability to process content in Office online files. Below this, there are buttons for '+ Create a label', 'Publish labels', and 'Refresh'. A table with columns 'Name' and 'Order' is partially visible. The bottom part of the image shows the 'Modifier l'étiquette de sensibilité' (Modify sensitivity label) form. This form has a sidebar with steps: 'Nom et description', 'Chiffrement' (selected), 'Marquage de contenu', 'Paramètres des sites et des gr...', 'Étiquetage automatique pour...', and 'Passer en revue vos paramètres'. The 'Chiffrement' section includes a dropdown for 'Appliquer', a warning about Office file encryption, and options to 'Attribuer des autorisations maintenant ou laisser les utilisateurs décider?', 'Expiration de l'accès de l'utilisateur au contenu', 'Autoriser l'accès hors connexion', and 'Attribuer des autorisations à des utilisateurs et des groupes spécifiques'. A table lists users and groups with their authorization levels. At the bottom, there are buttons for 'Précédent', 'Suivant', and 'Annuler'.

Communication compliance

Data loss prevention

Data subject requests

eDiscovery

Information governance

**Information protection**

Insider risk management

Records management

Settings

More resources

Customize navigation

Show more

### Information protection

**Labels** Label policies Auto-labeling

Sensitivity labels are used to classify email messages, documents, sites, and mobile content or site is protected based on the settings you choose. For example, you can control user access to specific sites. [Learn more about sensitivity labels](#)

① Your organization has not turned on the ability to process content in Office online files that have been encrypted. You can turn on here, but note that additional configuration is required for Multi-Geo environments. [Learn more](#)

+ Create a label Publish labels Refresh

Name	Order
------	-------

### Modifier l'étiquette de sensibilité

- Nom et description
- Chiffrement**
- Marquage de contenu
- Paramètres des sites et des gr...
- Étiquetage automatique pour ...
- Passer en revue vos paramètres

#### Chiffrement

Contrôlez les personnes autorisées à accéder aux fichiers et courriers auxquels cette étiquette est appliquée. [En savoir plus sur les paramètres de chiffrement](#)

#### Chiffrement

Appliquer

① L'activation du chiffrement affecte les fichiers Office (Word, PowerPoint, Excel) auxquels cette étiquette est appliquée. Étant donné que les fichiers seront chiffrés pour des raisons de sécurité, les performances risquent d'être faibles lors de l'ouverture ou de l'enregistrement des fichiers, et certaines fonctionnalités SharePoint et OneDrive seront limitées ou non disponibles. [En savoir plus](#)

**Attribuer des autorisations maintenant ou laisser les utilisateurs décider ?**

Attribuer des autorisations maintenant

Les paramètres de chiffrement que vous choisissez seront appliqués automatiquement lorsque l'étiquette est appliquée au courrier et aux fichiers Office.

**Expiration de l'accès de l'utilisateur au contenu**

Jamais

**Autoriser l'accès hors connexion**

Toujours

**Attribuer des autorisations à des utilisateurs et des groupes spécifiques \***

[Attribuer des autorisations](#)

Utilisateurs et groupes	Autoris...
AuthenticatedUsers	Co-Aut...

☐ Utiliser le chiffrement à double clé (preview)

Précédent Suivant Annuler



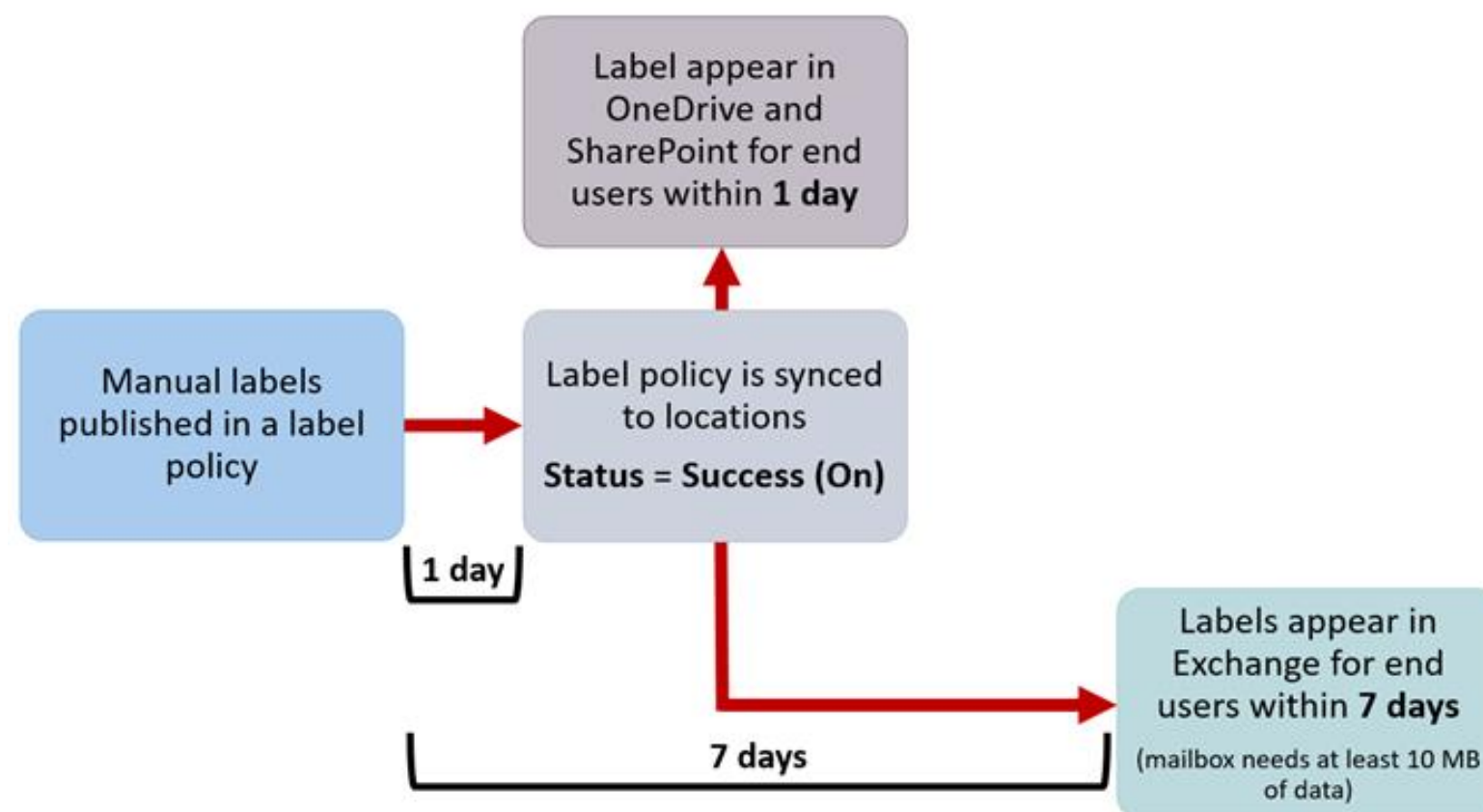
# Sensitivity Labels - How to publish

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As tenant global admin, go to « Compliance » section (<https://compliance.microsoft.com/>) > « Display all »

In compliance center, go to « Solutions » > « Information Protection »

In labels page, go to « Labels Policies» > « Publish label »



**Protection des informations**

Étiquettes **Stratégies des étiquettes** Étiquetage automatique

Créez des stratégies d'étiquette de confidentialité pour publier une ou plusieurs étiquettes publiées, les utilisateurs peuvent les appliquer pour protéger leur contenu.

**Publier des étiquettes** Actualiser

Nom	Créé par
TEST 20200603 Authenticated users	Sébastien
TEST 20200603 Restricted label	Sébastien

Stratégie d'étiquette de confidentialité > Créer une stratégie

- Sélectionnez les étiquettes à p...
- Publier pour des utilisateurs e...
- Paramètres de stratégie
- Nom et description
- Passer en revue vos paramè...

**Examiner et finaliser**

Voici un résumé des valeurs que vous avez entrées.

**Nom**  
TEST 20200603 Authenticated users

**Description**  
TEST 20200603 Authenticated users  
[Modifier](#)

**Publier ces étiquettes**  
TEST 20200603 Authenticated users  
[Modifier](#)

**Publier pour des utilisateurs et groupes**  
All  
[Modifier](#)

**Paramètres de stratégie**  
[Modifier](#)

# Sensitivity Labels - Automatically apply

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1- Can be done while end user types (set up at label creation)

2- Or when uploading content (based on keyword or RegEx):

As tenant global admin, go to « Compliance » section (<https://compliance.microsoft.com/>) > « Display all »

In compliance center, go to « Solutions » > « Information Protection »

In labels page, go to « Automatically apply » > « Create application policy »

**Protection des informations**

Étiquettes   Stratégies des étiquettes   **Étiquetage automatique**

Créez des stratégies d'étiquetage automatique pour appliquer automatiquement des étiquettes de confidentialité aux courriers ou aux fichiers OneDrive ou SharePoint contenant des informations sensibles. Pour confirmer que les étiquettes seront appliquées aux bons éléments, vous devez d'abord exécuter la stratégie en mode de simulation afin de pouvoir examiner les éléments qui seront étiquetés lors de l'activation de la stratégie. Outre ces stratégies, vous pouvez également appliquer automatiquement des étiquettes aux applications clientes Office en modifiant les paramètres « Étiquetage automatique » d'une étiquette spécifique. [En savoir plus sur l'étiquetage automatique](#)

+ Créer une stratégie d'étiquetage automatique   Actualiser   2 éléments

Nom	Emplacements	Dernière mo...	État	Étiquette appliquée
Simulation (1)				
TEST PIC	SharePoint	8/18/2020	Simulation en...	Ma super étiquette
Publié (1)				
Custom policy test PIC 13082020	SharePoint	8/18/2020	Publié	Ma super étiquette

**Modifier la règle**

Nom \*  
CUSTOM ALL-SPO

Description  
Entrez une description pour cette règle

Conditions  
Nous appliquerons cette stratégie au contenu qui correspond à ces conditions.

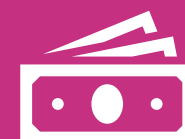
Le contenu inclut des types d'informations sensibles

Valeur par défaut   Tous ces éléments

Types d'infos confidentielles

Label	Précision	à	Nombre d'instances	à	N'im...
CUSTOM ALL	1	100	1	N'im...	

Ajouter



Rules based classification  
O365 (O365 E5) required

# Sensitivity Labels - Automatically apply

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Or based on Machine Learning (preview)  
Use existing trained criterias or create your own  
(50 to 500 contents to learn, up to 10,000 to test).

As tenant global admin, go to « Compliance » portal  
(<https://compliance.microsoft.com/> )  
> « Data classification »

The screenshot displays the Microsoft 365 Data Classification interface. On the left is a navigation pane with options like 'Accueil', 'Score de conformité', 'Classification des données', 'Connecteurs de données', 'Alertes', 'Rapports', 'Stratégies', 'Autorisations', 'Solutions', 'Catalogue', 'Audit', 'Recherche de contenu', and 'Conformité des communications'. The main area is titled 'Classification des données' and includes a sub-section 'Classifieurs pouvant être formés (préversion)'. Below this, there's a button 'Créer un classifieur pouvant être formé' and a table of existing classifiers.

Nom	Précision	État	Créé par	Dernière modification	Dev
Prêt à être utilisé (6)					
Offensive Language	-	Prêt à être utilisé	Microsoft	6/1/2019	
Resumes	-	Prêt à être utilisé	Microsoft	6/1/2019	
Source Code	-	Prêt à être utilisé	Microsoft	8/20/2019	
Targeted Harassment	-	Prêt à être utilisé	Microsoft	8/20/2019	
Profanity	-	Prêt à être utilisé	Microsoft	8/20/2019	

Below the table, there's a preview window titled 'Data classification (preview) > Trainable classifiers > Contoso - Contracts'. It shows a list of items with columns for Subject, Review, Prediction, and Author. A sample item is highlighted, showing a 'Contract notice - Open procedure' document. A yellow box at the bottom of the preview states: 'We predict this item is "Relevant". Do you agree?'.



ML based classification O365  
(M365 E5 Compliance) required



An illustration on a teal background. A hand in a grey suit sleeve holds a credit card. Below, a computer monitor displays the card's details. Above the monitor, a white cloud contains a padlock icon. A purple rectangular box is overlaid on the center of the image.

## ACCOUNTABILITY OF DATA FIDUCIARY.

CREDIT CARD

1234 5678 9876 5432

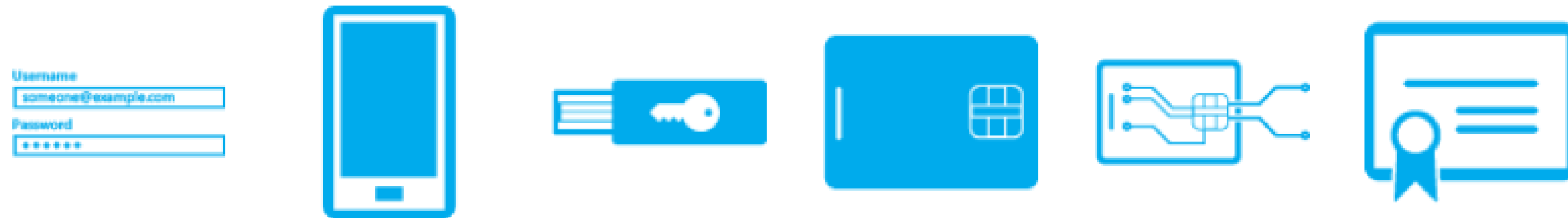
John R. Sample 12/99

# What are we talking about

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- (1) The data fiduciary shall be responsible for complying with the provisions of this Act in respect of any processing undertaken by it or on its behalf

If you don't have have EMS / AAD Premium, at least, enable MFA on admin and users accounts



- (1) Something you know (typically a password)
- (2) Something you have (a trusted device that is not easily duplicated, like a phone)
- (3) Something you are (biometrics)



# Audit logs

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Enable audit logs in Office 365 (in Compliance center) and Azure AD  
Audit logs are kept 90 days max (up to 365 days for “O365 E5” users)

As tenant global admin, go to « Compliance » portal (<https://compliance.microsoft.com/>) > « Display all »

In compliance center,  
go to « Solutions »  
> « Audit »

Accueil

Score de conformité

Classification des données

Connecteurs de données

Alertes

Rapports

Stratégies

Autorisations

Solutions

Catalogue

**Audit**

Recherche de contenu

Conformité des communications

Enquêtes sur les données

Protection contre la perte de don...

Demandes de la personne conce...

eDiscovery

Gouvernance des informations

Protection des informations

Gestion du risque interne

Gestion des enregistrements

## Audit

Vous avez besoin de savoir si un utilisateur a supprimé un document ou si un administrateur a réinitialisé le mot de passe d'un utilisateur ? Effectuez une recherche dans le journal d'audit Office 365 pour découvrir l'activité des utilisateurs et des administrateurs au sein de votre organisation, notamment celle relative aux courriels, aux documents, aux autorisations, aux services d'annuaire, etc. [En savoir plus sur la recherche dans le journal d'audit](#)

Créer la stratégie de rétention d'audit

### Rechercher

Activités  
Afficher les résultats pour toutes les activités

Utilisateurs  
Rechercher

Fichier, dossier ou site  
Ajoutez tout ou partie d'un nom de fichier, d'un nom de dossier ou d'une URL.

Afficher toutes les activités

Date de début  
Sat Sep 05 2020

Heure de début  
00:00

Date de fin  
Sun Sep 13 2020

Heure de fin  
00:00

Rechercher

Effacer tout

↓ Exporter

150 éléments

Filtres appliqués:

Date	Adresse IP	Utilisateur	Activité	Élément	Détail
Sep 12, 2020 6:22 PM	78.237.114.63	sebastien.paulet@spt-conseil.fr	Fichier modifié	M365_Gurgaon-SPAULET-How to manage sensitive and ...	AuditSearchResultDetail_FileModified
Sep 12, 2020 6:22 PM	78.237.114.63	sebastien.paulet@spt-conseil.fr	FileModifiedExtended	https://sptconseil-my.sharepoint.com/personal/sebastien...	AuditSearchResultDetail_FileModifiedExtended
Sep 12, 2020 6:21 PM	78.237.114.63	sebastien.paulet@spt-conseil.fr	FileModifiedExtended	https://sptconseil-my.sharepoint.com/personal/sebastien...	AuditSearchResultDetail_FileModifiedExtended
Sep 12, 2020 6:20 PM	78.237.114.63	sebastien.paulet@spt-conseil.fr	FileModifiedExtended	https://sptconseil-my.sharepoint.com/personal/sebastien...	AuditSearchResultDetail_FileModifiedExtended
Sep 12, 2020 6:20 PM	78.237.114.63	sebastien.paulet@spt-conseil.fr	FileModifiedExtended	https://sptconseil-my.sharepoint.com/personal/sebastien...	AuditSearchResultDetail_FileModifiedExtended
Sep 12, 2020 6:20 PM	78.237.114.63	sebastien.paulet@spt-conseil.fr	Get-Label		AuditSearchResultDetail_Get_Label
Sep 12, 2020 6:19 PM		6b23f485-01ca-4aef-9a82-cbc20d7072f9	SearchAlertAggregate		AuditSearchResultDetail_SearchAlertAggregate
Sep 12, 2020 6:19 PM		sebastien.paulet@spt-conseil.fr	SearchDataInsightsSubscription		AuditSearchResultDetail_SearchDataInsightsSubscription
Sep 12, 2020 6:19 PM	78.237.114.63	sebastien.paulet@spt-conseil.fr	FileModifiedExtended	https://sptconseil-my.sharepoint.com/personal/sebastien...	AuditSearchResultDetail_FileModifiedExtended

# Enterprise Mobility + Security

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## Microsoft Enterprise Mobility + Security



### Control identity + access in the cloud

Centrally manage single sign-on across devices, your datacenter, and the cloud.



### Get identity-driven security

Comprehensive, intelligent protection against today's advanced attacks.



### Manage mobile devices + apps

Securely manage apps and data on iOS, Android, and Windows from one place.



### Protect your information

Intelligently safeguard your corporate data and enable secured collaboration.



### Virtualize your desktops

Efficiently deliver and manage Windows desktops and apps on all devices.

# Enterprise Mobility + Security

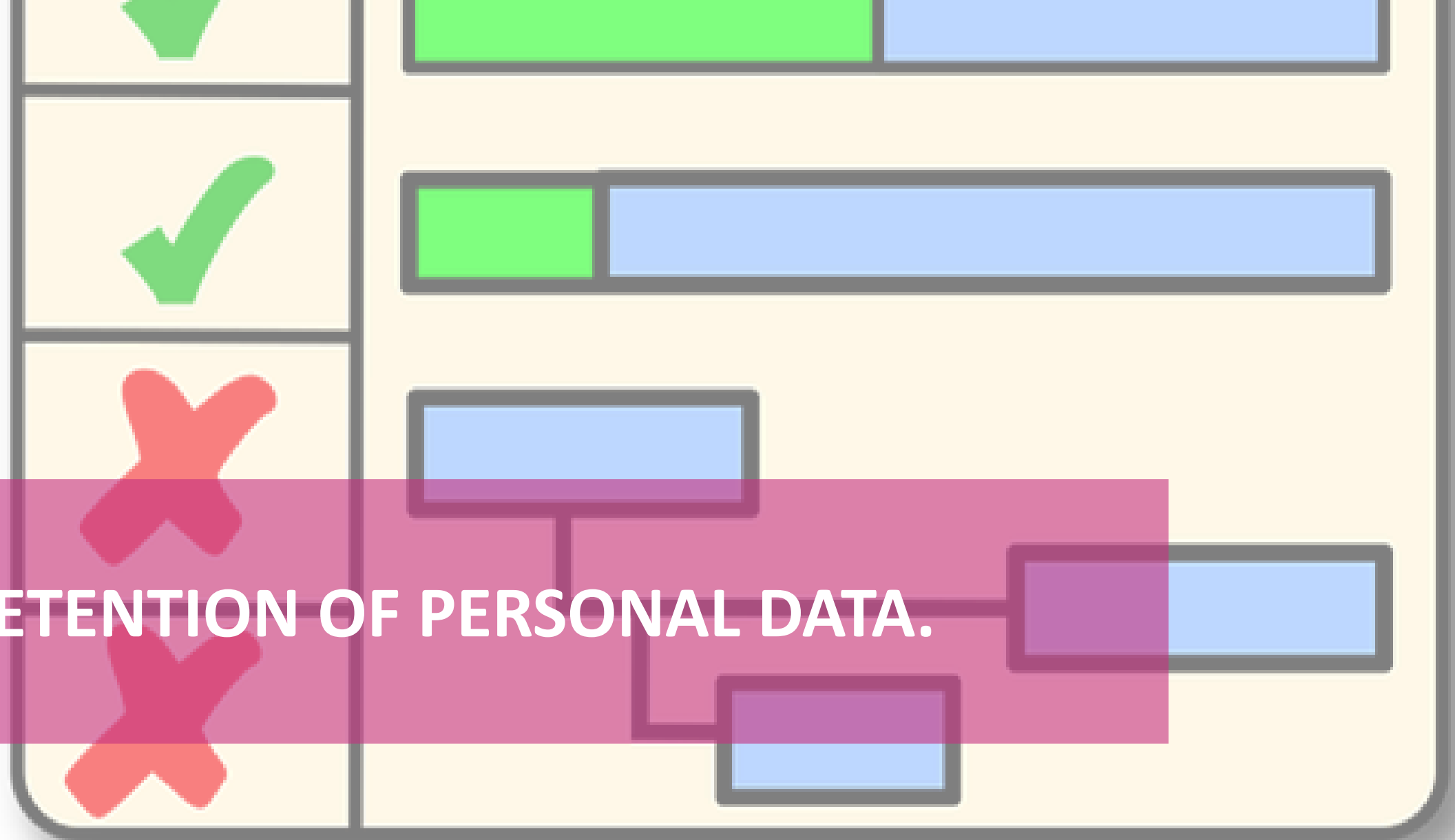
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- Azure Active Directory Premium
- Azure MFA
- Azure Advanced Protection
- Microsoft Cloud App Security
- Azure Information Protection Premium
- Azure Right Management Premium
- Intune





RESTRICTION ON RETENTION OF PERSONAL DATA.



# What are we talking about

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- (1) The data fiduciary shall not retain any personal data beyond the period necessary to satisfy the purpose for which it is processed and shall delete the personal data at the end of the processing.
- (2) Notwithstanding anything contained in sub-section (1), the personal data may be retained for a longer period if explicitly consented to by the data principal, or necessary to comply with any obligation under any law for the time being in force.
- (3) The data fiduciary shall undertake periodic review to determine whether it is necessary to retain the personal data in its possession.
- (4) Where it is not necessary for personal data to be retained by the data fiduciary under sub-section (1) or sub-section (2), then, such personal data shall be deleted in such manner as may be specified by regulations

# Retention labels

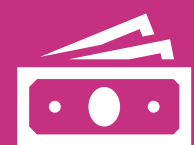
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End user can manually apply one retention label per file or email

A retention formula is attached to the retention label  
ex : Last modification + 7Y

Retention labels can also be set up by default per:

- Exchange folder
- SharePoint document library



Retention Policy (O365 E3) required

The screenshot shows the Outlook interface with an email from Patrick Guimonet in Teams. The email content is partially blocked. The retention label 'RGPD - Donnée personnelle client' is applied, with a retention period of 7 years. The label is highlighted in yellow.

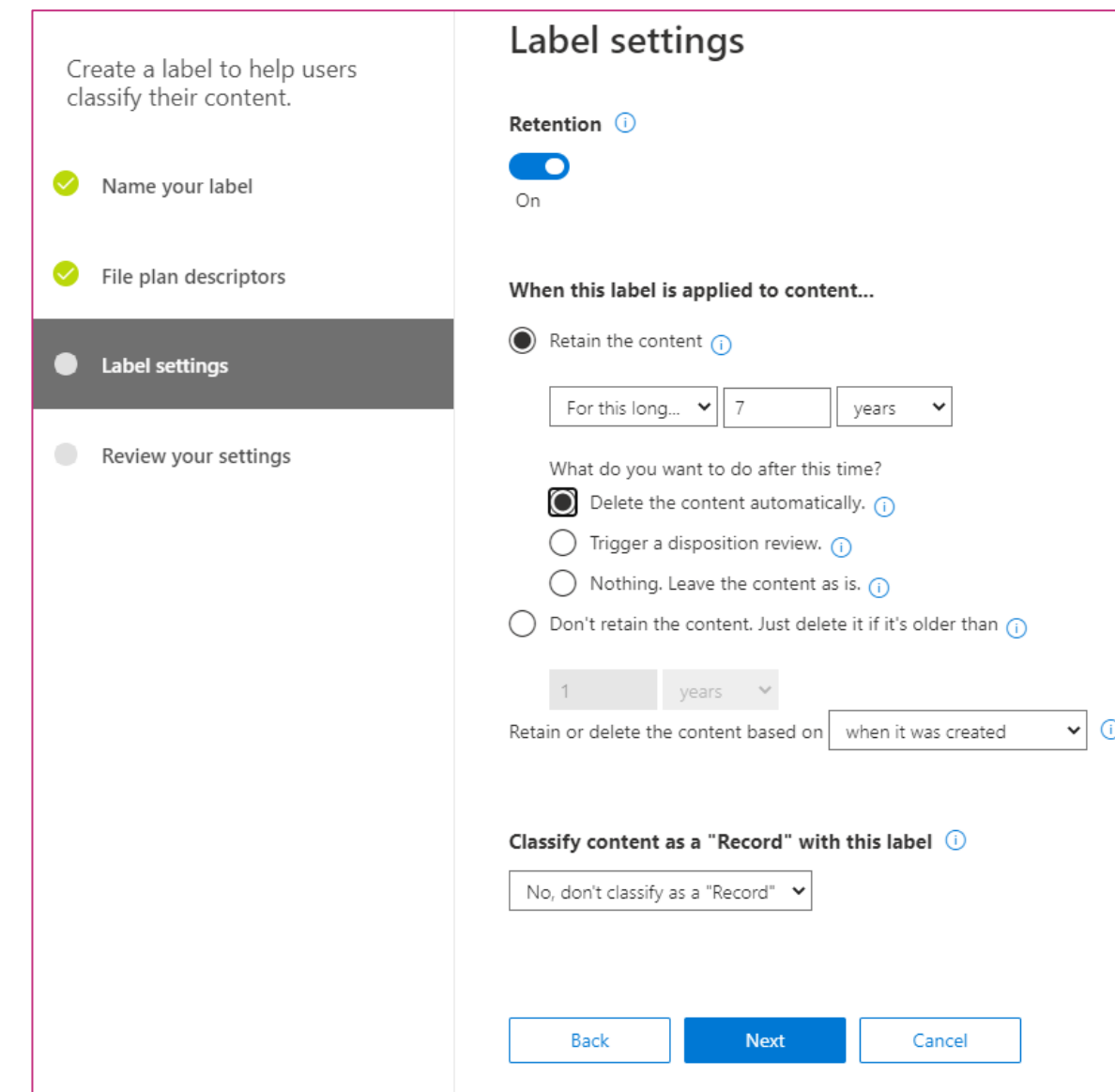
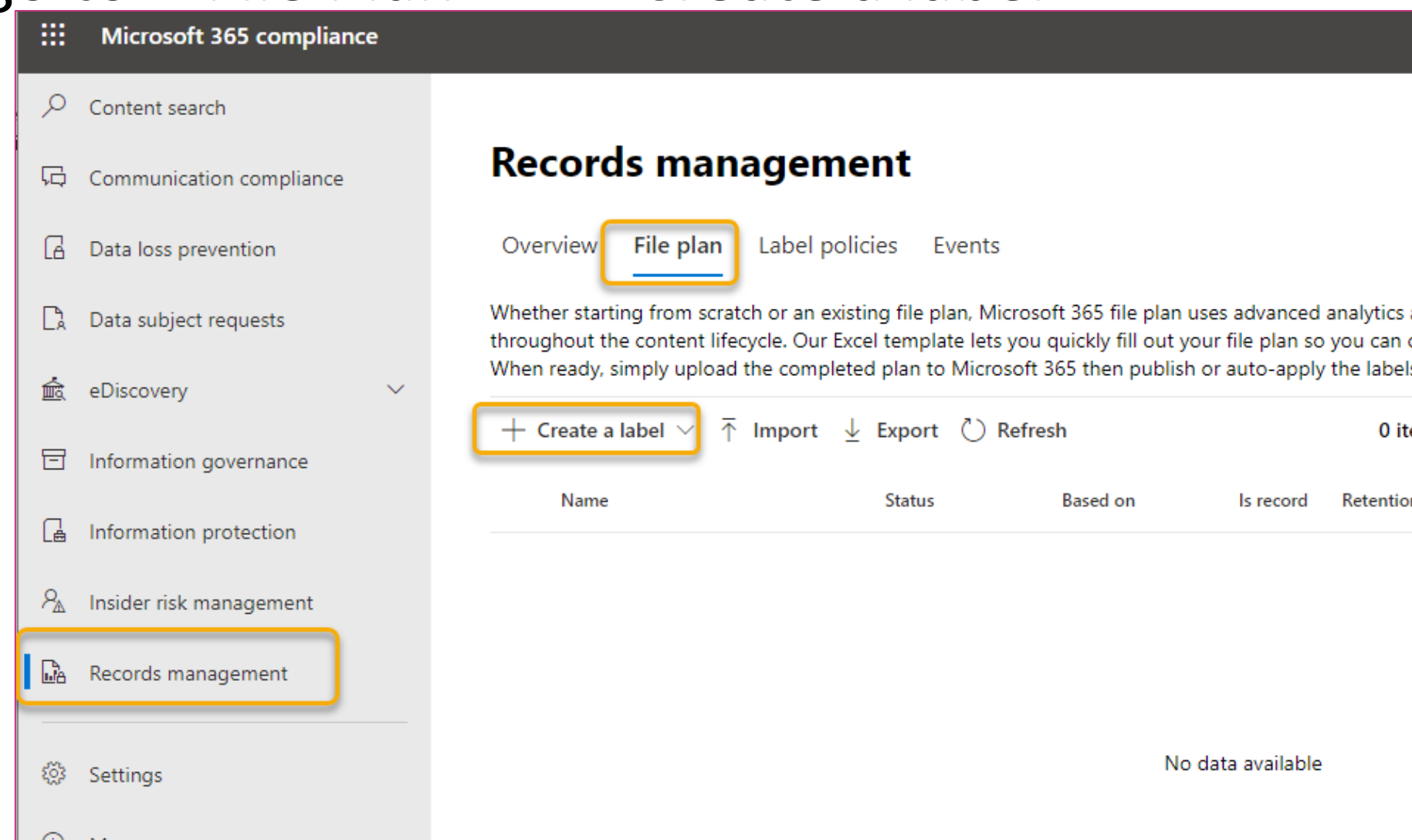
# Retention labels - How to create

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As tenant global admin, go « Compliance » portal

In compliance center, go to « Classification » > « Solutions » > Records Management

On RM page, go to « File Plan » > « Create a label »





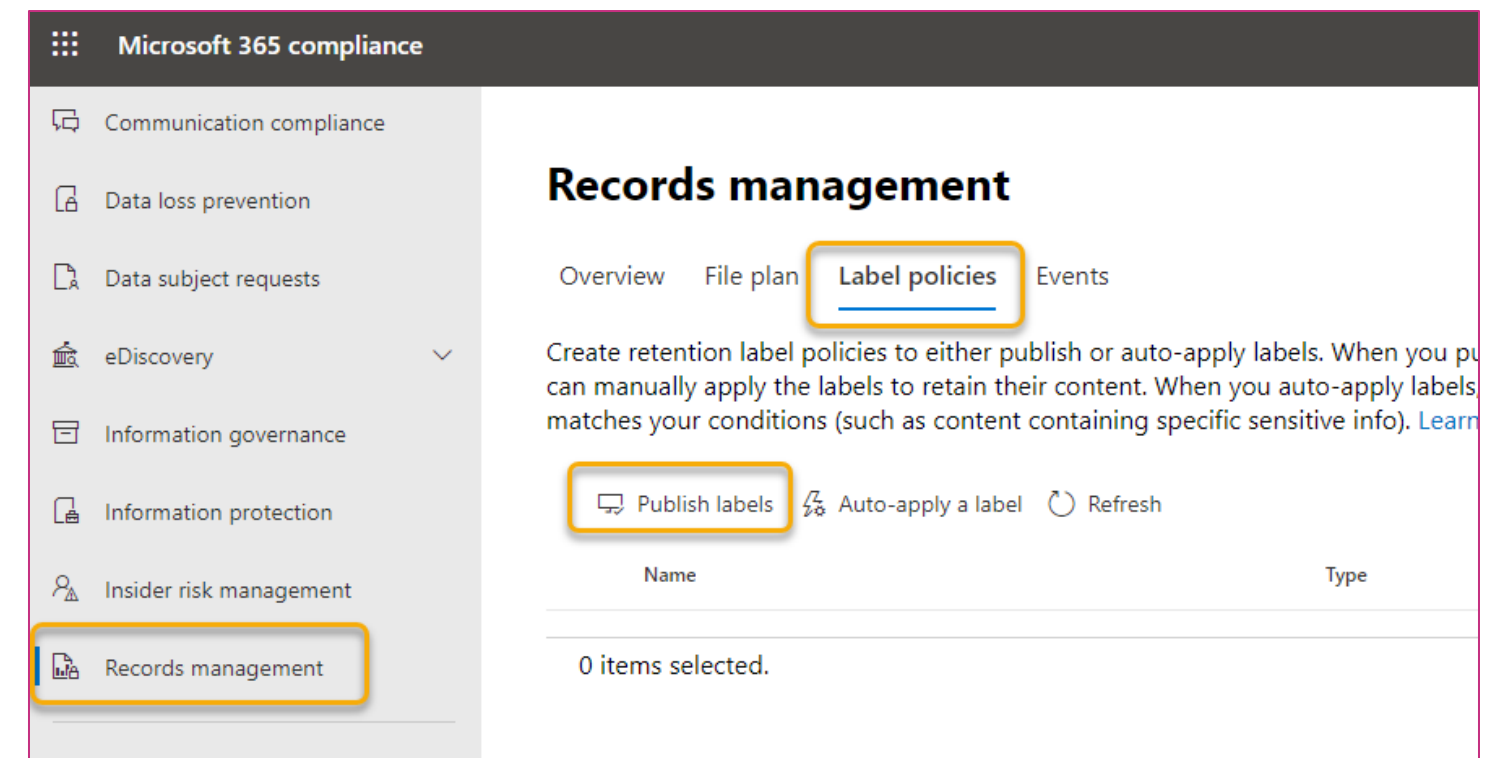
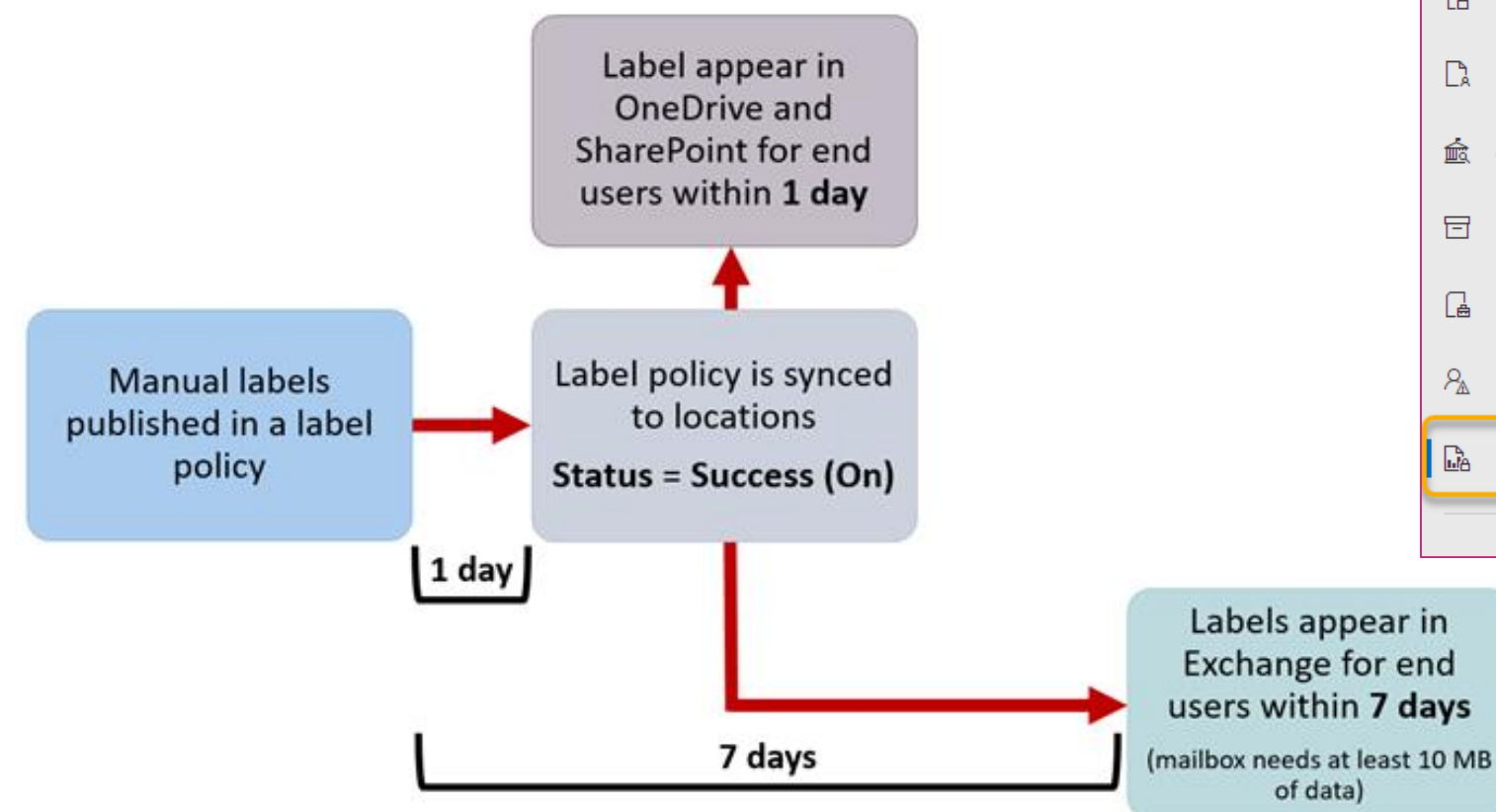
# Retention labels - How to publish

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As tenant global admin, go « Compliance » portal

In compliance center, go to « Classification » > « Solutions » > Records Management

On RM page, go to « Label policies» > « Publish label »



# 0

## 1

### 2

#### 3

##### 4

###### 5

###### 6

###### 7

###### 8

###### 9

**REQUIREMENT OF NOTICE FOR COLLECTION OR PROCESSING  
OF PERSONAL DATA**



# What are we talking about

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- (1) Every data fiduciary shall give to the data principal a notice, at the time of collection of the personal data, or if the data is not collected from the data principal, as soon as reasonably practicable, containing the following information, namely:—
  - (a) the purposes for which the personal data is to be processed;
  - (b) the nature and categories of personal data being collected;
  - (c) the identity and contact details of the data fiduciary and the contact details of the data protection officer, if applicable;
  - (d) the right of the data principal to withdraw his consent, and the procedure for such withdrawal, if the personal data is intended to be processed on the basis of consent;
  - [...]

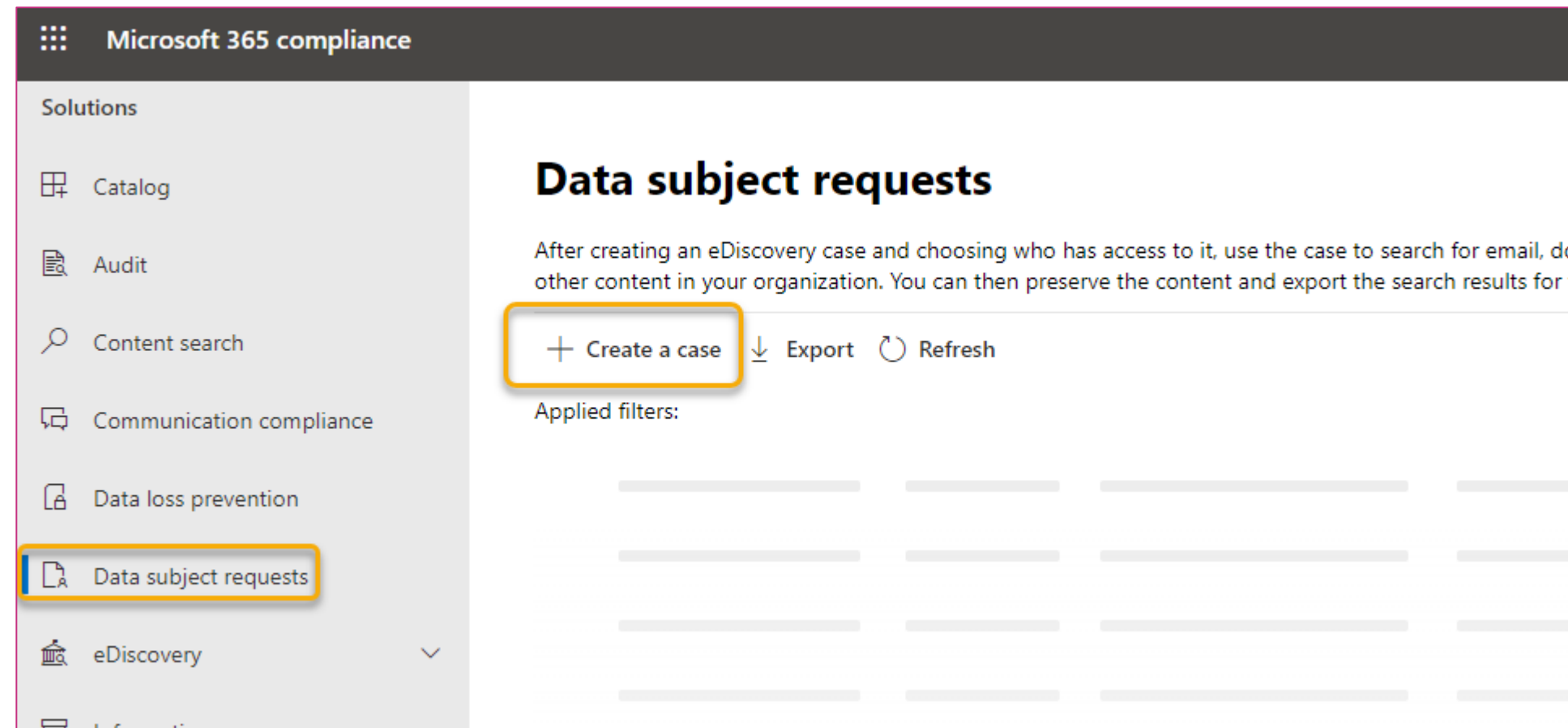
# DSR - Data Subject Request

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Search across all  
Mailboxes  
SharePoint  
Teams  
OneDrive

Based on  
Content  
Metadata  
Labels

Export results as a .zip





A photograph of President George W. Bush seated at a desk, signing a document. He is surrounded by several men in suits, some of whom are looking at the document. The scene is set in a formal room with large windows and curtains. A semi-transparent magenta banner is overlaid across the middle of the image.

## DATA LOCATION

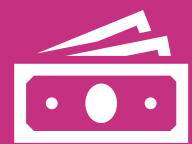
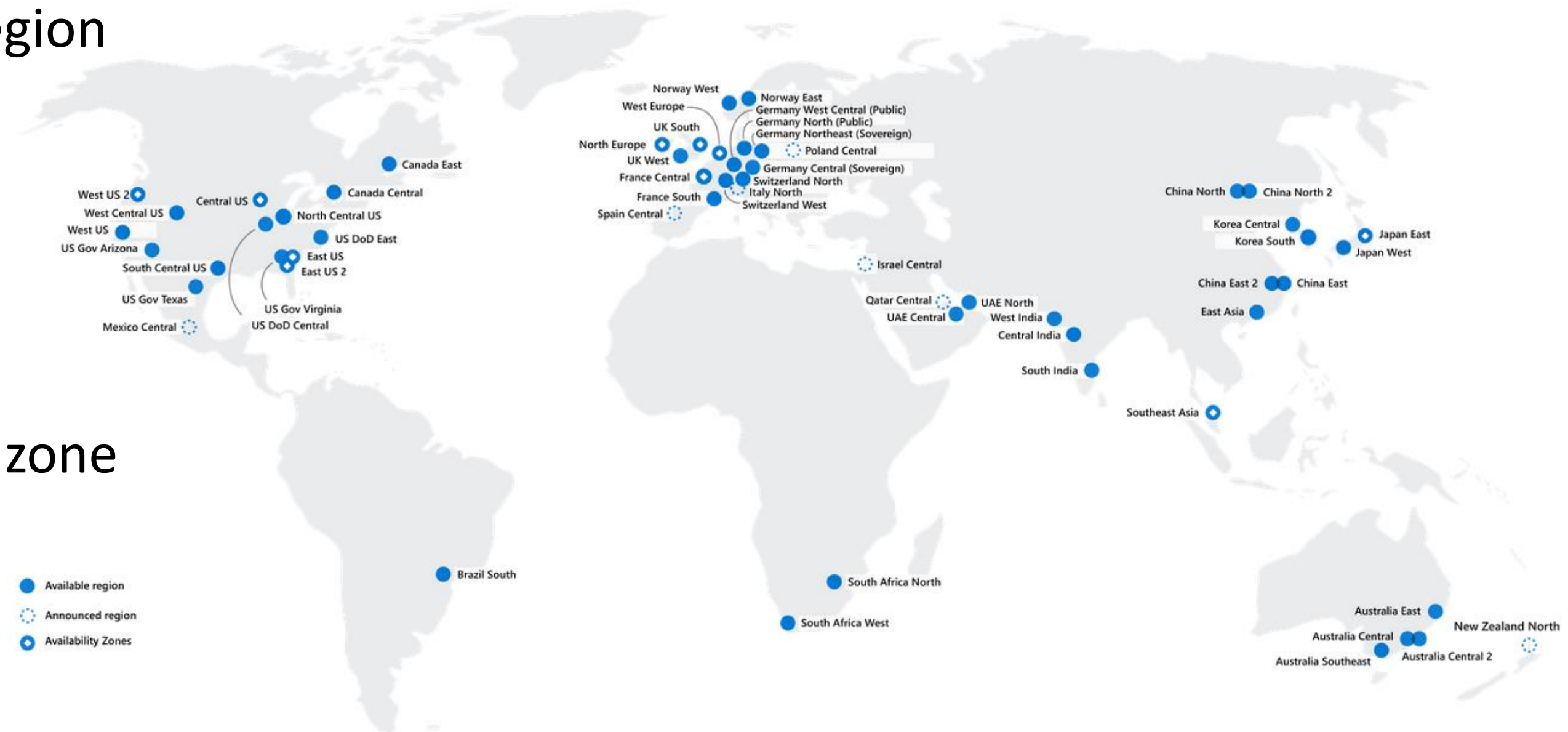
# Location

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By default, all in a single region

ANNOUNCED : Yammer  
and search indexes  
also geo located.

ANNOUNCED : Availability zone  
in Central India in 2021



Multi geo capability  
(500 users min. 2\$/users/month)





# Where is my data?

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Tenant administration > Settings > Organization profile

## Data location

Office 365 has been built from the ground-up to provide enterprise-grade security, privacy and compliance capabilities. As part of our transparency principles we publish the location of your core customer data at rest here.

Service Name	Region
 Exchange	France
 SharePoint	France
 Skype for Business	Europe
 Microsoft Teams	Europe

Visit the [Office 365 Trust Center](#) to learn more about this topic.

```
PS> Connect-MsolService
```

```
PS> (Get-MsolCompanyInformation).AuthorizedServiceInstances
```



# Where is my data?

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<https://docs.microsoft.com/en-us/microsoft-365/enterprise/o365-data-locations?view=o365-worldwide#india>

India	
▼ Click to expand	
Service	Location
Exchange Online	India
OneDrive for Business	India
SharePoint Online	India
Skype for Business	India
Microsoft Teams	India
Office Online & Mobile	India
EOP	India
Intune	Global Geography 2 – Asia Pacific
MyAnalytics	India
Planner	Global Geography 2 – Asia Pacific
Sway	United States
Yammer	United States
OneNote Services	India
Stream	India
Whiteboard	United States
Forms	United States
Workplace Analytics	United States

```
Microsoft Azure Active Directory Module for Windows PowerShell
PS C:\WINDOWS\System32> Connect-MsolService
PS C:\WINDOWS\System32> (Get-MsolCompanyInformation).AuthorizedServiceInstances
WindowsDefenderATP/NA001
Windows/SDF
SCO/PROD_AMSUC0501_02
MultiFactorService/NA001
AzureAdvancedThreatAnalytics/NA001
AADPremiumService/NA001
exchange/apcprd04-005-01
YammerEnterprise/NA003
WhiteboardServices/NA001
To-Do/NA001
TeamspaceAPI/NA001
Sway/NA001
SharePoint/SPOS1020
RMSOnline/AP
ProjectWorkManagement/PROD_AS_Org_Ring_202
ProcessSimple/NA001
PowerBI/AS001
PowerAppsService/NA001
OfficeForms/NA001
MicrosoftStream/NA001
MicrosoftOffice/NorthAmerica3
MicrosoftKaizala/NA001
MicrosoftCommunicationsOnline/APAC-0F-S2
ExchangeOnlineProtection/apac01-03
Deskless/NA001
Bing/NA001
Adallom/Prod05
SMIT/NA002
Metro/NA001
DirectoryToCosmos/WW002
BecWSClients/*
BDM/NA031
AadAllTenantsNotifications/ASHK02
PS C:\WINDOWS\System32>
```



# Norms compliance leader

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<https://www.microsoft.com/en-us/trust-center/compliance/>

Various norms including Indian ones

- RBI (Banking)
- IRDAI (Insurance)
- MeitY (gov guidelines)

External audits

Can get audit documents

Current compliance offerings			
Microsoft offers a comprehensive set of compliance offerings to help your organization comply with national, regional, and industry-specific requirements governing the collection and use of data.			
<b>Global</b> <ul style="list-style-type: none"><li>CIS Benchmark</li><li>CSA-STAR attestation</li><li>CSA-STAR certification</li><li>CSA-STAR self assessment</li><li>ISO 20000-1:2011</li><li>ISO 22301</li><li>ISO 27001</li></ul>	<b>Global</b> <ul style="list-style-type: none"><li>ISO 27017</li><li>ISO 27018</li><li>ISO 27701</li><li>ISO 9001</li><li>SOC</li><li>WCAG</li></ul>	<b>US Government</b> <ul style="list-style-type: none"><li>CJIS</li><li>CNSSI 1253</li><li>DFARS</li><li>DoD DISA L2, L4, L5</li><li>DoE 10 CFR Part 810</li><li>EAR (US Export Adm. Reg.)</li><li>FedRAMP</li></ul>	<b>US Government</b> <ul style="list-style-type: none"><li>FIPS 140-2</li><li>IRS 1075</li><li>ITAR</li><li>NIST 800-171</li><li>NIST CSF</li><li>Section 508 VPATS</li></ul>
<b>Industry</b> <ul style="list-style-type: none"><li>23 NYCRR Part 500</li><li>AFM + DNB (Netherlands)</li><li>APRA (Australia)</li><li>AMF and ACPR (France)</li><li>CDSA</li><li>CFTC 1.31 (US)</li><li>DPP (UK)</li><li>EBA (EU)</li><li>FACT (UK)</li><li>FCA (UK)</li></ul>	<b>Industry</b> <ul style="list-style-type: none"><li>FDA CFR Title 21 Part 11</li><li>FERPA</li><li>FFIEC (US)</li><li>FINMA (Switzerland)</li><li>FINRA 4511</li><li>FISC (Japan)</li><li>FSA (Denmark)</li><li>GLBA</li><li>GxP</li><li>HDS (France)</li></ul>	<b>Industry</b> <ul style="list-style-type: none"><li>HIPAA / HITECH</li><li>HITRUST</li><li>KNF (Poland)</li><li>MARS-E</li><li>MAS + ABS (Singapore)</li><li>MPAA</li><li>NBB + FSMA (Belgium)</li><li>NEN-7510 (Netherlands)</li><li>NERC</li><li>OSFI (Canada)</li></ul>	<b>Industry</b> <ul style="list-style-type: none"><li>PCI DSS</li><li>RBI + IRDAI (India)</li><li>SEC 17a-4</li><li>SEC Regulation SCI</li><li>Shared assessments</li><li>SOX</li><li>TISAX (Germany)</li><li>TruSight</li></ul>
<b>Regional</b> <ul style="list-style-type: none"><li>BIR 2012 (Netherlands)</li><li>C5 (Germany)</li><li>CCPA (US-California)</li><li>IRAP / CCSL (Australia)</li><li>CS Mark Gold (Japan)</li><li>Cyber Essentials Plus (UK)</li><li>Canadian Privacy Laws</li><li>DJCP (China)</li><li>EN 301 549 (EU)</li><li>ENS (Spain)</li></ul>	<b>Regional</b> <ul style="list-style-type: none"><li>ENISA IAF (EU)</li><li>EU Model Clauses</li><li>EU-US Privacy Shield</li><li>GB 18030 (China)</li><li>GDPR (EU)</li><li>G-Cloud (UK)</li><li>IDW PS 951 (Germany)</li><li>ISMS (Korea)</li><li>IT Grundschutz Workbook (Germany)</li><li>LOPD (Spain)</li></ul>	<b>Regional</b> <ul style="list-style-type: none"><li>MeitY (India)</li><li>MTCS (Singapore)</li><li>My Number (Japan)</li><li>NZ CC Framework (New Zealand)</li><li>PASf (UK)</li><li>PDPA (Argentina)</li><li>Personal Data Localization (Russia)</li><li>TRUCS (China)</li></ul>	

# Law enforcement requests

M365 Gurgaon | 2020

## 2019 (Jul-Dec) - India

### Requests

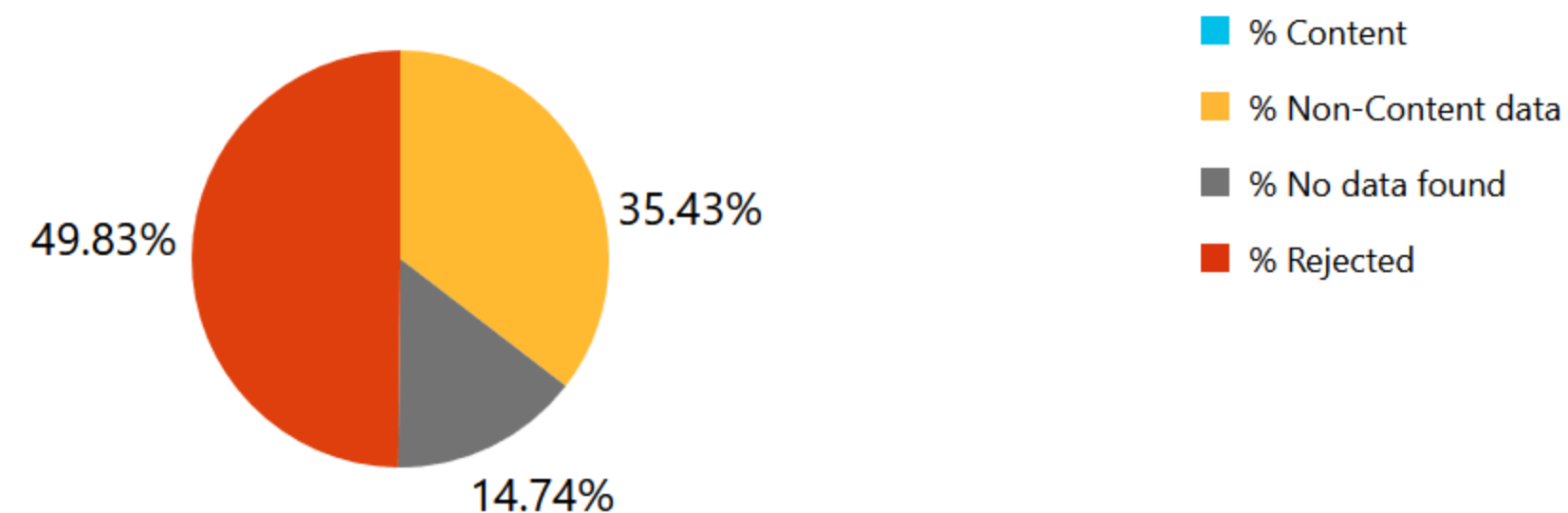
Total number of requests



Accounts/users specified in request



### Disclosures



# Questions?

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Microsoft 365 and Power  
Platform India User Group

