

Automated Privacy Compliance Auditing as a Service (DRAFT)



Benjamin J. Anderson

University of Wisconsin - Stevens Point

Stevens Point, Wisconsin

A Thesis Submitted in Fulfillment of the Requirements for the Degree Of

MASTER OF SCIENCE

in Data Science

December 2020

For my wife and son.

Contents

1	Executive Summary	1
2	General Company Description	2
2.1	Unique Value Proposition	2
2.2	Mission Statement	2
2.3	Vision Statement	2
2.4	Values Statement	2
2.5	Company Goals and Objectives	2
2.6	Business Philosophy	2
2.7	Industry Overview	3
2.8	Market Segment Overview	3
2.9	Legal Form of Ownership	4
2.10	Guiding Principles	4
	References	5

1 Executive Summary

Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua. Ut enim ad minim veniam, quis nostrud exercitation ullamco laboris nisi ut aliquip ex ea commodo consequat. Duis aute irure dolor in reprehenderit in voluptate velit esse cillum dolore eu fugiat nulla pariatur. Excepteur sint occaecat cupidatat non proident, sunt in culpa qui officia deserunt mollit anim id est laborum (Anderson, 1983).

2 General Company Description

Cereus is a software-as-a-service company offering privacy compliance auditing tools and solutions for businesses that collect customer information through their websites.

2.1 Unique Value Proposition

Consent involves more than just cookies on your website. It involves all information you share with your vendors and partners including network traffic. Cereus actively scans, monitors, and analyzes your website to identify compliance infringements in accordance with your business rules.

2.2 Mission Statement

To remove privacy barriers between companies and their partners, and enable them to communicate in an efficient, compliant way.

2.3 Vision Statement

Proactively detect all privacy compliance infringements defined by our clients before they reach their customers.

2.4 Values Statement

- Reliability
- Transparency
- Growth

2.5 Company Goals and Objectives

The primary goal of Cereus is to establish itself as a thriving company that leads the privacy industry by providing automated, insightful, audits to ensure that companies and their partners are sharing customer information in accordance to their business rules.

2.6 Business Philosophy

Some companies spend millions to establish a privacy program. Everyone else gets Cereus.

2.7 Industry Overview

The privacy technology industry is a rapidly growing field. In 2020, it is the fastest growing technology sector that includes the fastest growing company in the U.S (Hughes, 2020). As more consumers become impacted by massive data breaches in which sensitive, personally identifying information (PII), is exposed; consumer awareness and the call for data processing regulations are expected to be on the rise.

There are already governmental regulations impacting businesses in the U.S. The Health Insurance Portability and Accountability Act (HIPAA) highly regulates patient information and how it is stored. The California Privacy Protection Act (CCPA) regulates the selling of user data collected by a business for consumers in the state of California. The Children’s Online Privacy Protection Act (COPPA) imposes requirements on website operators on collecting information from children under the age of 13 years old. Lastly, the General Data Protection Regulation (GDPR) gives European Union citizens the right to manage their information any business has collected on them and requires explicit consent before information is collected.

With all these regulations, foreign and domestic, companies that collect information from their customers are relying on the assistance of privacy technologies to operate within the bounds of new regulations and meet consumer privacy expectations (Meehan, 2019). This has attracted massive funding, and, in July of 2019, OneTrust raised \$200 million in a Series A investment, TrustArc raised \$70 million Series D, Privitar raised \$40 million series B, and BigID raised \$30 million Series B (Wood, 2019).

In four years since its founding, as of August, 2020, OneTrust is valued at \$2.7 billion (Hughes, 2020).

2.8 Market Segment Overview

Any business that operates a website and collects data and analytics on their customers is subject to the regulations in which the customer originates. This also applies to the jurisdiction in which the business operates. Cereus can provide auditing for companies with a single website, to large enterprises with hundreds. It may prove difficult for small businesses with a single website to justify the expense of privacy audits when they are not often the subject of privacy lawsuits (LaNou, 2020). Cereus’s primary focus will be medium to large organizations maintaining multiple websites.

2.9 Legal Form of Ownership

Cereus will be organized as a small business corporation (S corporation). As an S corporation, Cereus will be allowed to collect funding and pass off any business profits and expenses to its shareholders without the additional taxes applied to C corporations.

2.10 Guiding Principles

The "Living Principles for Design" framework (Hamlett, 2020) was applied to outline how Cereus can maintain a sustainable design while achieving the company's objectives along the following dimensions:

2.10.1 Environment

The direct environmental impact of Cereus is expected to be minimal. Cereus will provide software-as-a-service (SAAS) and will rely on cloud services to manage its operations. Cloud services, such as Amazon Web Services (AWS), are composed of large computer networks in which infrastructure is shared with other AWS customers (Amazon, 2020). Cereus's physical hardware is limited to the machines required to manage services running on the cloud platforms.

With Cereus's services operating in the cloud, a central office space for employees is not required and will further reduce the company's environmental impact.

2.10.2 People

The societal impact of Cereus and its services are restricted to the transparency of the companies that use it. Cereus offers detailed reports from its audits that can provide insights into how customer information is shared between a website and its partners. If companies choose to share these reports, their customers will better understand how their information is used in exchange for the services the company provides. This has the potential to improve the relationship between a company and their customers – possibly making them more apt to sharing personally identifying information.

2.10.3 Economy

Cereus's operations are expected to reduce the amount of time required to conduct a compliance audit against websites. These actions will minimize the manual auditing cost and likelihood of Cereus's customers being subject to privacy lawsuits. Cereus's customers can

then focus and dedicate more resources towards achieving their goals and growing their business. The overall economic impact of Cereus is limited to the the actions of its customers and is expected to be minimal.

2.10.4 Culture

Cereus has the potential to influence organizations to be more transparent about the sharing of information on their customers with their partners. Traditionally, data processing and sharing are often confidential and kept internal; but with privacy becoming a concern for consumer – transparency will soon be an expectation (Meehan, 2019).

References

- Amazon. (2020). *What is aws*. Retrieved 2020-09-23, from <https://aws.amazon.com/what-is-aws/>
- Anderson, J. R. (1983). *The architecture of cognition*. Mahwah, New Jersey: Lawrence Erlbaum Associates.
- Hamlett, P. (2020). *Your roadmap for sustainable design*. Retrieved 2020-09-23, from <https://www.aiga.org/roadmap/>
- Hughes, J. T. (2020, 08 12). *Reflecting on the growth of the privacy industry*. Retrieved 2020-09-23, from <https://iapp.org/news/a/reflecting-on-the-growth-of-the-privacy-industry/>
- LaNou, C. (2020, 09 22). Personal interview.
- Meehan, M. (2019, 11 26). *Data privacy will be the most important issue in the next decade*. Retrieved 2020-09-23, from <https://www.forbes.com/sites/marymeehan/2019/11/26/data-privacy-will-be-the-most-important-issue-in-the-next-decade/>
- Wood, N. (2019, 05 11). *New privacy tech industry attracts massive funding*. Retrieved 2020-09-23, from <https://fpf.org/2019/07/11/new-privacy-tech-industry-attracts-massive-funding/>