

# Enterprise Data Lake

Assessment Name	Enterprise Data Lake
Assessment Description	The Enterprise Data Lake is a 'system of insight' created and owned by the IBM Chief Data Office under IBM's Transformation and Operations organization. It is an ecosystem where individuals can locate and access data and build visualizations and new analytical models that can be deployed to improve business performance. Data Lake considers the ecosystem of processes and teams that interact with these technical components to ensure that the data in the data lake is available findable useful and properly protected. In addition the data lake provides the flexibility to discover and access both structured and unstructured data breaks down silos and makes data more accessible through new tools. It provides a place to accumulate data develop analytics and understand the operations of multiple parts of the organization. It is both a factory for new insights and a collaboration space to investigate explore and develop analysis.
Countries	-
Division	-
Assessment Labels	-

Created By	Stephen A. Cureton
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Assessment Age	31 days

Assessment Lead	Stephen A. Cureton
Approvers	Charles Hill - Pending
Respondents	Stephen A. Cureton
	Stephen A. Cureton
	Stephen A. Cureton
	Stephen A. Cureton
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<b>Assessment Status</b>	12 - <i>Completed</i>
	0 - <i>In Progress</i>
	0 - <i>Not Started</i>
<b>Issues by Risk</b>	1 - <i>Unspecified</i>
	0 - <i>Critical</i>
	0 - <i>High</i>
	0 - <i>Med</i>
	0 - <i>Med-Low</i>
	0 - <i>Low</i>
<b>Tasks</b>	1 - Done
	5 - Pending

# Assessment

## PI Processing - Section 1

1

Does your initiative involve the processing of Personal Information ([http://w3-03.ibm.com/ibm/privacy/practices\\_guidance.html](http://w3-03.ibm.com/ibm/privacy/practices_guidance.html)) (PI)?

<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	-
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 8:59 AM</b></p> <p>The CEDP Enterprise Data Lake processes PI data from originating data sources for Analytics purposes. PI data will not be modified in any way.</p>
<b>Attachments</b>	<i>No attachments</i>

## Discovery Questions - Section 2

1

In which countries are the individuals whose PI you are processing located? Select all applicable countries on the left side and using the right facing arrow, move the countries to the right side.

<b>Status</b>	No Issues
<b>Response</b>	<p>TongaLiberiaSurinameEgyptNorwayBrunei DarussalamCote d'IvoirePapua New GuineaTogoMacauIndonesiaColombiaIsle of ManSaint Vincent and the GrenadinesNetherlandsSwazilandSpainMaliQatarIcelandCroatiaParaguayChadMalawiOmanJerseyMaldivesKiribatiGuinea-BissauDenmarkAngolaSloveniaVenezuelaCzech RepublicPalauMyanmarVanuatuLiechtensteinSingaporeBelarusSwedenHaitiMozambiqueBotswanaRomaniaGuatemalaGermanyCanadaAfghanistanThailandCentral African RepublicCambodiaMarshall IslandsGuyanaNicaraguaBarbadosNigerNauruMontenegroBosnia and HerzegovinaLao People's Democratic RepublicCongo, The Democratic Republic of theKenyaSeychellesSan MarinoPeruDominican RepublicBhutanSaint</p>

	<p>LuciaYemenZambiaSamoaltalyCyprusKyrgyzstanPortugalZimbabwelraqMoroccoMoldovaUkraineNew ZealandAlbaniaUnited KingdomLibyaGeorgiaTunisiaLesothoBurundiLebanonRwandaBahrainGabonSaudi ArabiaHong KongSouth AfricaArmeniaSri LankaBrazilMexicoMacedoniaMadagascarAzerbaijanUnited Arab EmiratesKuwaitTurkmenistanEquatorial GuineaDominicaTanzaniaKazakhstanUruguayBermudaSolomon IslandsGambiaKorea, Republic ofFinlandTrinidad and TobagoSomaliaAntigua and BarbudaRussiaNamibiaTuvaluJamaicaErtitreaBurkina FasoJordanHondurasIndiaPakistanCosta RicaGhanaTimor-LesteMicronesia, Federated States ofEthiopiaChinaBeninChileSierra LeoneBangladeshPanamaLuxembourgMaltaAustriaPhilippinesBahamasJapanLithuaniaAndorraNigeria BoliviaSlovakiaMonacoTurkeyEstoniaPolandAustraliaLatviaArubaFranceMauritaniaAlgeriaTajikistanMalaysiaCuraçaoSaint Kitts and NevisBelizeGrenadaNepalArgentinaMongoliaCameroonSwitzerlandBulgariaSao Tome and PrincipeFijilrelandEcuadorUnited StatesIsraelCayman IslandsHungarySenegalDjiboutiBelgiumSerbiaGreeceUzbekistanEl SalvadorVietnamGuernseyTaiwanComorosUgandaGuineaCape VerdeMauritius</p>
<b>Recommendation</b>	-
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 9:01 AM</b></p> <p>The Enterprise Data Lake will process PI data for global customers.</p>
<b>Attachments</b>	<i>No attachments</i>

2

Does your initiative process PI for derive insights/analytics purposes?	
<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	-
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 9:02 AM</b></p> <p>The primary purpose for the PI data being captured by the Enterprise Data Lake is for insights/analytics purposes.</p>
<b>Attachments</b>	<i>No attachments</i>

3

Does your initiative use PI to conduct surveys?	
<b>Status</b>	No Issues
<b>Response</b>	No
<b>Recommendation</b>	-
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

4

Does your initiative use PI for corporate communications to employees?	
<b>Status</b>	No Issues
<b>Response</b>	No
<b>Recommendation</b>	-
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

### Derived Insights/Analytics, Surveys, & Corporate Communications - Section 3

1

Is the information derived used to create new PI about individuals?	
<b>Status</b>	No Issues
<b>Response</b>	No
<b>Recommendation</b>	This initiative uses derived information to create new PI about individuals. A review by the Corporate Privacy Office is required.

<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

## 1.2

Is business insight the only information derived from the initiative being assessed?	
<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	-
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

### 1.2.1

Can the data derived from the analytics be used to re-identify the individual?	
<b>Status</b>	With Issues
<b>Response</b>	Yes
<b>Recommendation</b>	Data derived from analytics is being used to re-identify individuals. A review by the Corporate Privacy Office is required.
<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/17/17 2:16 PM</b> The EDL does not de-identify PI data during ingestion process, therefore the individual PI data will not be re-identified.
<b>Attachments</b>	<i>No attachments</i>

### 1.2.1.

Describe the process. Also identify what new PI your initiative generates.	

<b>Status</b>	-
<b>Response</b>	-
<b>Recommendation</b>	-
<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/17/17 2:17 PM</b> The EDL does not de-identify PI data during ingestion process, therefore the individual PI data will not be re-identified.
<b>Attachments</b>	<i>No attachments</i>

4

Is PI processed for other purposes?	
<b>Status</b>	No Issues
<b>Response</b>	No
<b>Recommendation</b>	-
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

Data Card - Section 4

Additional Information - Section 5

Notice &amp; Transparency - Section 6

1

Do you provide notice to individuals when collecting, using or sharing PI?	
<b>Status</b>	No Issues

<b>Response</b>	Not required, collection purposes are obvious
<b>Recommendation</b>	Provide a notice that explains the purpose(s) for which PI will be used and with whom it will be shared.
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 9:32 AM</b></p> <p>The Enterprise Data Lake does not collect any PI data directly from individuals. All PI data is collected through other IBM originating data sources. The Enterprise Data Lake does not share PI data obtained through other IBM processes, or assets.</p>
<b>Attachments</b>	<i>No attachments</i>

2

Does your notice explain the purpose(s) for which PI is collected, used or shared and with whom in a clear manner?	
<b>Status</b>	No Issues
<b>Response</b>	N/A
<b>Recommendation</b>	Update your notice so that it clearly explains the purpose(s) for which PI will be used and with whom it will be shared in a clear manner.
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 9:33 AM</b></p> <p>The Enterprise Data Lake does not collect PI data directly from the individual. All PI data are obtained through other IBM originating data sources.</p>
<b>Attachments</b>	<i>No attachments</i>

3

Is the service being provided a XaaS service?	
<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	-
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 9:35 AM</b></p>



	The Enterprise Data Lake is a component of the CDO Cognitive Enterprise Data Platform (CEDP) which provides the following XaaS services: Cognition-as-a-Service (CaaS); Data-as-a-Service (DaaS); and Trust-as-a-Service (TaaS).
<b>Attachments</b>	<i>No attachments</i>

### 3.1

Provide a link to the Terms of Use/Service.

<b>Status</b>	-
<b>Response</b>	-
<b>Recommendation</b>	-
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 11:58 AM</b></p> <p>The Enterprise Data Lake is an internal use only application, and uses the acknowledgement of Section 4.3 "Acquiring and Using Information" in the IBM Business Conduct Guidelines as agreement that all users will adhere to the Terms of Use.</p>
<b>Attachments</b>	<i>No attachments</i>

## Limiting Collection & Access - Section 7

### 1

Is the PI processed by your initiative relevant, necessary and not excessive for the purpose(s) identified earlier?

<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	Limit the PI collected to that which is strictly required to fulfill the purpose(s) identified earlier.
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

## Consent - Section 8

1

Has consent (<http://w3.ibm.com/ibm/privacy/consent.html>) (implied or express depending on where individuals are located) been obtained from individuals in the countries listed here ([http://w3-03.ibm.com/ibm/privacy/dwnlds/Implied\\_Consent\\_for\\_PISPI.pdf](http://w3-03.ibm.com/ibm/privacy/dwnlds/Implied_Consent_for_PISPI.pdf)) for the processing of their PI/SPI for the purpose(s) described in this assessment?

<b>Status</b>	No Issues
<b>Response</b>	N/A
<b>Recommendation</b>	Obtain <u>consent</u> ( <a href="http://w3.ibm.com/ibm/privacy/consent.html">http://w3.ibm.com/ibm/privacy/consent.html</a> ) (implied or express depending on the country where individuals are located as per <u>this list</u> ( <a href="http://w3-03.ibm.com/ibm/privacy/dwnlds/Implied_Consent_for_PISPI.pdf">http://w3-03.ibm.com/ibm/privacy/dwnlds/Implied_Consent_for_PISPI.pdf</a> )) from individuals.
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 9:56 AM</b></p> <p>The Enterprise Data Lake does not process PI data directly from the individual. All PI data is collected by upstream originating data sources, and provided to the EDL via data feeds. Individual consent is obtained by the originating data source. Also employee consent is obtained through employment agreement and BCG acknowledgment.</p>
<b>Attachments</b>	<i>No attachments</i>

1.1

Explain why obtaining consent (implied or express) from individuals for the processing of their PI/SPI is not applicable to your initiative.

<b>Status</b>	-
<b>Response</b>	-
<b>Recommendation</b>	-
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 11:59 AM</b></p> <p>The Enterprise Data Lake does not process PI data directly from the individual. All PI data is collected by upstream originating data sources, and provided to the EDL via data feeds. Individual consent is obtained by the originating data source. Also employee consent is obtained through employment agreement and BCG acknowledgment.</p>

<b>Attachments</b>	<i>No attachments</i>
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2

Has express consent (<http://w3.ibm.com/ibm/privacy/consent.html>) been obtained from individuals in the countries listed here ([http://w3-03.ibm.com/ibm/privacy/dwnlds/Express\\_Consent\\_PISPI.pdf](http://w3-03.ibm.com/ibm/privacy/dwnlds/Express_Consent_PISPI.pdf)) for the processing of their PI/SPI for the purpose(s) described in this assessment?

<b>Status</b>	No Issues
<b>Response</b>	N/A
<b>Recommendation</b>	Obtain <u>express consent</u> ( <a href="http://w3.ibm.com/ibm/privacy/consent.html">http://w3.ibm.com/ibm/privacy/consent.html</a> ) from individuals for <u>these countries</u> ( <a href="http://w3-03.ibm.com/ibm/privacy/dwnlds/Express_Consent_PISPI.pdf">http://w3-03.ibm.com/ibm/privacy/dwnlds/Express_Consent_PISPI.pdf</a> )s for the processing of their PI/SPI.
<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/13/17 9:58 AM</b> The Enterprise Data Lake does not process PI data directly from the individual. All PI data is collected by upstream originating data sources, and provided to the EDL via data feeds. Individual consent is obtained by the originating data source. Also employee consent is obtained through employment agreement and BCG acknowledgment.
<b>Attachments</b>	<i>No attachments</i>

2.1

Explain why obtaining express consent from individuals for the processing of their PI/SPI is not applicable to your initiative.

<b>Status</b>	-
<b>Response</b>	-
<b>Recommendation</b>	-
<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/17/17 1:55 PM</b> The Enterprise Data Lake does not process PI data directly from the individual. All PI data is collected by upstream originating data sources, and provided to the EDL via data feeds. Individual consent is obtained by the originating data source. Also employee consent is obtained through employment agreement and BCG acknowledgment.

<b>Attachments</b>	<i>No attachments</i>
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5

Has express written consent (<http://w3.ibm.com/ibm/privacy/consent.html>) been obtained from individuals in the countries listed here ([http://w3-03.ibm.com/ibm/privacy/dwnlds/Express\\_Written\\_Consent\\_PISPI.pdf](http://w3-03.ibm.com/ibm/privacy/dwnlds/Express_Written_Consent_PISPI.pdf)) for the processing of their PI and/or SPI for the purpose(s) described in this assessment?

<b>Status</b>	No Issues
<b>Response</b>	N/A
<b>Recommendation</b>	Obtain <u>express written consent</u> ( <a href="http://w3.ibm.com/ibm/privacy/consent.html">http://w3.ibm.com/ibm/privacy/consent.html</a> ) from individuals for <u>these countries</u> ( <a href="http://w3-03.ibm.com/ibm/privacy/dwnlds/Express_Written_Consent_PISPI.pdf">http://w3-03.ibm.com/ibm/privacy/dwnlds/Express_Written_Consent_PISPI.pdf</a> ) for the processing of their PI/SPI.
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 9:58 AM</b></p> <p>The Enterprise Data Lake does not process PI data directly from the individual. All PI data is collected by upstream originating data sources, and provided to the EDL via data feeds. Individual consent is obtained by the originating data source. Also employee consent is obtained through employment agreement and BCG acknowledgment.</p>
<b>Attachments</b>	<i>No attachments</i>

5.1

Explain why obtaining express written consent from individuals for the processing of their PI and/or SPI is not applicable to your initiative.

<b>Status</b>	-
<b>Response</b>	-
<b>Recommendation</b>	-
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 12:00 PM</b></p>

	The Enterprise Data Lake does not process PI data directly from the individual. All PI data is collected by upstream originating data sources, and provided to the EDL via data feeds. Individual consent is obtained by the originating data source. Also employee consent is obtained through employment agreement and BCG acknowledgment.
<b>Attachments</b>	<i>No attachments</i>

## 8

In some cases, an individual can withdraw their consent. If withdrawing consent could have a significant impact on the individual and the consequences of doing so are not obvious, these must be communicated to the individual. Do you have a process in place to manage cases where consent is withdrawn and does it include an explanation to the individual of the consequences of doing so when such are not obvious?

<b>Status</b>	No Issues
<b>Response</b>	N/A
<b>Recommendation</b>	Update your process to allow you to manage cases where an individual withdraw consent. Your process must include a requirement to inform the individual of the consequences of doing so, when they're not obvious.
<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 10:08 AM</b></p> <p>Individual consent withdrawal is managed by the originating data source that feeds the PI data to the Enterprise Data Lake. If consent is withdrawn, individual data will not be received in data feeds to the Enterprise Data Lake.</p>
<b>Attachments</b>	<i>No attachments</i>

## 8.1

Explain why having a process in place to manage cases where consent is withdrawn and include an explanation to the individual of the consequences when such are not obvious is not applicable to your initiative.

<b>Status</b>	-
<b>Response</b>	-
<b>Recommendation</b>	-

<b>Comments</b>	<p><b>Stephen A. Cureton commented d on 1/13/17 11:59 AM</b></p> <p>Individual consent withdrawal is managed by the originating data source that feeds the PI data to the Enterprise Data Lake. If consent is withdrawn, individual data will not be received in data feeds to the Enterprise Data Lake.</p>
<b>Attachments</b>	<i>No attachments</i>

## Security & Limiting Access - Section 9

1 Is your initiative compliant with ITCS 104 (<https://w3-03.ibm.com/ibm/documents/corpdocweb.nsf/ContentDocsByTitle/Corporate+Instruction+CIO+104>), ITCS 300 (<http://w3-03.ibm.com/transform/sas/as-web.nsf/ContentDocsByTitle/Security+and+Use+Standards+for+IBM+Employees>), the Cloud Security Policy (<http://w3-03.ibm.com/transform/sas/as-web.nsf/ContentDocsByTitle/Cloud+Security+Policy>) and Cloud Security Implementation Standard (<http://w3-03.ibm.com/transform/sas/as-web.nsf/ContentDocsByTitle/Cloud+Security+Implementation+Standard>), as applicable?

<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	<p>Implement the necessary steps to become compliant with <u>ITCS 104</u> (<a href="https://w3-03.ibm.com/ibm/documents/corpdocweb.nsf/ContentDocsByTitle/Corporate+Instruction+CIO+104">https://w3-03.ibm.com/ibm/documents/corpdocweb.nsf/ContentDocsByTitle/Corporate+Instruction+CIO+104</a>), <u>ITCS 300</u> (<a href="http://w3-03.ibm.com/transform/sas/as-web.nsf/ContentDocsByTitle/Security+and+Use+Standards+for+IBM+Employees">http://w3-03.ibm.com/transform/sas/as-web.nsf/ContentDocsByTitle/Security+and+Use+Standards+for+IBM+Employees</a>), the <u>Cloud Security Policy</u> (<a href="http://w3-03.ibm.com/transform/sas/as-web.nsf/ContentDocsByTitle/Cloud+Security+Policy">http://w3-03.ibm.com/transform/sas/as-web.nsf/ContentDocsByTitle/Cloud+Security+Policy</a>) and <u>Cloud Security Implementation Standard</u> (<a href="http://w3-03.ibm.com/transform/sas/as-web.nsf/ContentDocsByTitle/Cloud+Security+Implementation+Standard">http://w3-03.ibm.com/transform/sas/as-web.nsf/ContentDocsByTitle/Cloud+Security+Implementation+Standard</a>), as applicable. In cases where compliance is unattainable, risk documentation must be completed and approved.</p>
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

2 Do you have a process in place to assign, approve, remove and regularly review access to PI processed by your initiative?

<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	Implement a process to assign, approve, remove and regularly review access to PI for your initiative.
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

3

Do you limit access to PI to those who have a 'need-to-know (<http://w3-03.ibm.com/ibm/privacy/faqs.html>)'?

<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	Ensure that your initiative has a process to limit access to PI to those who have a ' <u>need-to-know</u> ( <a href="http://w3-03.ibm.com/ibm/privacy/faqs.html">http://w3-03.ibm.com/ibm/privacy/faqs.html</a> )'.
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

## Accuracy - Section 10

1

Is your processing of PI impactful to individuals?

<b>Status</b>	No Issues
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<b>Response</b>	No
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<b>Recommendation</b>	-
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<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/17/17 2:41 PM</b> No impact to employee/individuals.
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<b>Attachments</b>	<i>No attachments</i>
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1.2

Explain why your processing of PI is not impactful to individuals.

<b>Status</b>	-
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<b>Response</b>	-
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<b>Recommendation</b>	-
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<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/13/17 12:06 PM</b> The PI data within the Enterprise Data Lake is used for business decisions, insights, and analytics, and is not altered in any way.
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<b>Attachments</b>	<i>No attachments</i>
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## Retention and Disposal - Section 11

1

Has a retention period been identified, documented and implemented for the PI in your initiative?

<b>Status</b>	No Issues
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<b>Response</b>	Yes
<b>Recommendation</b>	Identify, document and implement minimum and maximum retention requirements for the PI in your initiative. Indicate in the comments field how long the data is retained.
<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/13/17 10:14 AM</b> The retention period for PI, and non-PI data in the Enterprise Data Lake is adopted from the originating data source, and complies with IBM's Worldwide Records Management corporate instructions.
<b>Attachments</b>	<i>No attachments</i>

## 1.1

How long will PI be retained (including storage and archiving)?	
<b>Status</b>	-
<b>Response</b>	-
<b>Recommendation</b>	-
<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/13/17 12:10 PM</b> The retention period for PI, and non-PI data in the Enterprise Data Lake is adopted from the originating data source, and complies with IBM's Worldwide Records Management corporate instructions.
<b>Attachments</b>	<i>No attachments</i>

## 2

Do you have a process in place to securely dispose of PI handled by your initiative once it is no longer required?	
<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	Implement a process to securely dispose of PI processed through your initiative once it is no longer required.

<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/13/17 10:16 AM</b> The destruction/disposal process for PI, and non-PI data in the Enterprise Data Lake will be adopted from the originating data source, and will comply with IBM's Worldwide Records Management corporate instructions.
<b>Attachments</b>	<i>No attachments</i>

## Third Party Data Controllers and Data Processors - Section 12

1

Enter the name(s) of the Data Controller(s) involved in your initiative.	
<b>Status</b>	-
<b>Response</b>	-
<b>Recommendation</b>	-
<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/17/17 2:43 PM</b> Dun & Bradstreet  <b>Stephen A. Cureton commented d on 1/17/17 2:44 PM</b> TWC
<b>Attachments</b>	<i>No attachments</i>

2

When obtaining PI from a Third Party Data Controller, have you obtained confirmation that the data was acquired legally and that you have permission to use the data for your intended purposes?	
<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	Obtain contractual commitment from the Third Party Data Controller that it legally acquired the PI it is passing onto IBM and that IBM has the right to use it for IBM's intended purposes.

<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/17/17 2:45 PM</b> The EDL has an enterprise contract and agreement.
<b>Attachments</b>	<i>No attachments</i>

3

If PI received from a Third Party Data Controller is retained by IBM, is there a process in place for receiving amended PI from the Third Party Data Controller or individual?

<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	Update your process to allow amended PI from the Third Party Data Controller or individual to be received and processed.
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

## Cross Border PI Transfer - Section 13

2

You have indicated your business process/application is processing Taiwan BPI. Will you be transferring this data to China?

<b>Status</b>	No Issues
<b>Response</b>	No
<b>Recommendation</b>	-
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

3

You have indicated transferring PI from Argentina to an IBM entity located in another country. Review the applicable [Data Transfer Agreement \(http://w3-03.ibm.com/ibm/privacy/datatransfer/argentina.html\)](http://w3-03.ibm.com/ibm/privacy/datatransfer/argentina.html) and confirm that all IBM entities involved in the processing of Argentinian PI for your initiative will adhere to the requirements found within.

<b>Status</b>	No Issues
<b>Response</b>	I confirm
<b>Recommendation</b>	You have indicated transferring Argentinian PI to an IBM entity located in another country. You must review and confirm that all IBM entities involved in the processing of Argentinian PI for your initiative will adhere to the requirements found within the applicable <a href="http://w3-03.ibm.com/ibm/privacy/datatransfer/argentina.html">Data Transfer Agreement (http://w3-03.ibm.com/ibm/privacy/datatransfer/argentina.html)</a> . If you have questions about this Agreement, contact the <a href="http://w3.ibm.com/ibm/privacy/contact2.html">Argentina privacy focal point (http://w3.ibm.com/ibm/privacy/contact2.html)</a> .
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

4

You have indicated transferring PI from Colombia to an IBM entity located in another country. Review the applicable [Data Transfer Agreement \(http://w3-03.ibm.com/ibm/privacy/datatransfer/colombia.html\)](http://w3-03.ibm.com/ibm/privacy/datatransfer/colombia.html) and confirm that all IBM entities involved in the processing of Colombian PI for your initiative will adhere to the requirements found within.

<b>Status</b>	No Issues
<b>Response</b>	I confirm
<b>Recommendation</b>	You have indicated transferring Colombian PI to an IBM entity located in another country. You must review and confirm that all IBM entities involved in the processing of Colombian PI for your initiative will adhere to the requirements found within the applicable <a href="http://w3-03.ibm.com/ibm/privacy/datatransfer/colombia.html">Data Transfer Agreement (http://w3-03.ibm.com/ibm/privacy/datatransfer/colombia.html)</a> . If you have questions about this Agreement, contact the <a href="http://w3.ibm.com/ibm/privacy/contact2.html">Colombia privacy focal point (http://w3.ibm.com/ibm/privacy/contact2.html)</a> .
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

5

You have indicated transferring PI from Korea to an IBM entity located in another country. Review the applicable [Data Transfer Agreement \(http://w3-03.ibm.com/ibm/privacy/datatransfer/korea.html\)](http://w3-03.ibm.com/ibm/privacy/datatransfer/korea.html) and confirm that all IBM entities involved in the processing of Korean PI for your initiative will adhere to the requirements found within.

<b>Status</b>	No Issues
<b>Response</b>	I confirm
<b>Recommendation</b>	You have indicated transferring Korean PI to an IBM entity located in another country. You must review and confirm that all IBM entities involved in the processing of Korean PI for your initiative will adhere to the requirements found within the applicable <a href="http://w3-03.ibm.com/ibm/privacy/datatransfer/korea.html">Data Transfer Agreement (http://w3-03.ibm.com/ibm/privacy/datatransfer/korea.html)</a> . If you have questions about this Agreement, contact the <a href="http://w3.ibm.com/ibm/privacy/contact2.html">Korea privacy focal point (http://w3.ibm.com/ibm/privacy/contact2.html)</a> .
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

6

You have indicated transferring PI from Malaysia to an IBM entity located in another country. Review the applicable [Data Transfer Agreement \(http://w3-03.ibm.com/ibm/privacy/datatransfer/malaysia.html\)](http://w3-03.ibm.com/ibm/privacy/datatransfer/malaysia.html) and confirm that all IBM entities involved in the processing of Malaysian PI for your initiative will adhere to the requirements found within.

<b>Status</b>	No Issues
<b>Response</b>	I confirm
<b>Recommendation</b>	You have indicated transferring Malaysian PI to an IBM entity located in another country. You must review and confirm that all IBM entities involved in the processing of Malaysian PI for your initiative will adhere to the requirements found within the applicable <a href="http://w3-03.ibm.com/ibm/privacy/datatransfer/malaysia.html">Data Transfer Agreement (http://w3-03.ibm.com/ibm/privacy/datatransfer/malaysia.html)</a> . If you have questions about this Agreement, contact the <a href="http://w3.ibm.com/ibm/privacy/contact2.html">Malaysian privacy focal point (http://w3.ibm.com/ibm/privacy/contact2.html)</a> .
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

7

You have indicated transferring PI from Morocco to an IBM entity located in another country. Review the applicable [Data Transfer Agreement \(http://w3-03.ibm.com/ibm/privacy/datatransfer/morocco.html\)](http://w3-03.ibm.com/ibm/privacy/datatransfer/morocco.html) and confirm that all IBM entities involved in the processing of Moroccan PI for your initiative will adhere to the requirements found within

<b>Status</b>	No Issues
<b>Response</b>	I confirm
<b>Recommendation</b>	You have indicated transferring Moroccan PI to an IBM entity located in another country. Review the applicable <a href="http://w3-03.ibm.com/ibm/privacy/datatransfer/morocco.html">Data Transfer Agreement (http://w3-03.ibm.com/ibm/privacy/datatransfer/morocco.html)</a> and confirm that all IBM entities involved in the processing of Moroccan PI for your process/asset will adhere to the requirements found within. If you have questions about this Agreement, contact the <a href="http://w3.ibm.com/ibm/privacy/contact2.html">Moroccan privacy focal point (http://w3.ibm.com/ibm/privacy/contact2.html)</a> .
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

8

You have indicated transferring PI from Senegal to an IBM entity located in another country. Review the applicable [Data Transfer Agreement \(http://w3-03.ibm.com/ibm/privacy/datatransfer/senegal.html\)](http://w3-03.ibm.com/ibm/privacy/datatransfer/senegal.html) and confirm that all IBM entities involved in the processing of Senegalese PI for your initiative will adhere to the requirements found within.

<b>Status</b>	No Issues
<b>Response</b>	I confirm
<b>Recommendation</b>	You have indicated transferring Senegalese PI to an IBM entity located in another country. Review the applicable <a href="http://w3-03.ibm.com/ibm/privacy/datatransfer/senegal.html">Data Transfer Agreement (http://w3-03.ibm.com/ibm/privacy/datatransfer/senegal.html)</a> and confirm that all IBM entities involved in the processing of Senegalese PI for your process/asset will adhere to the requirements found within. If you have questions about this Agreement, contact the <a href="http://w3.ibm.com/ibm/privacy/contact2.html">Senegalese privacy focal point (http://w3.ibm.com/ibm/privacy/contact2.html)</a> .
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

9

You have indicated transferring PI from Tunisia to an IBM entity located in another country. Review the applicable [Data Transfer Agreement \(http://w3-03.ibm.com/ibm/privacy/datatransfer/tunisia.html\)](http://w3-03.ibm.com/ibm/privacy/datatransfer/tunisia.html) and confirm that all IBM entities involved in the processing of Tunisian PI for your initiative will adhere to the requirements found within.

<b>Status</b>	No Issues
<b>Response</b>	I confirm
<b>Recommendation</b>	You have indicated transferring Tunisian PI to an IBM entity located in another country. Review the applicable <a href="http://w3-03.ibm.com/ibm/privacy/datatransfer/tunisia.html">Data Transfer Agreement (http://w3-03.ibm.com/ibm/privacy/datatransfer/tunisia.html)</a> and confirm that all IBM entities involved in the processing of Tunisian PI for your process/asset will adhere to the requirements found within. If you have questions about this Agreement, contact the <a href="http://w3.ibm.com/ibm/privacy/contact2.html">Tunisian privacy focal point (http://w3.ibm.com/ibm/privacy/contact2.html)</a> .
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

## Accountability- Section 14

1

Have you identified and implemented the privacy controls required for your initiative?

<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	Identify and implement the privacy controls required for your initiative.
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

2

Do individuals involved in your initiative understand their roles and responsibilities regarding PI?

<b>Status</b>	No Issues
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<b>Response</b>	Yes
<b>Recommendation</b>	Communicate to the individuals involved in your initiative their responsibilities when processing PI and document such communication.
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

3

Do individuals involved in PI processing for your initiative understand what constitutes a data incident and how to report it?

<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	Communicate/educate the individuals involved in processing PI for your initiative on what a data incident is and how to report one.
<b>Comments</b>	<i>No comments</i>
<b>Attachments</b>	<i>No attachments</i>

5

If requested, you will need to provide a copy of all PI related to a specific individual contained within your initiative. Such PI will need to be made available in a readable format within 5 business days of the request being received. Do you have a process in place to support this requirement?

<b>Status</b>	No Issues
<b>Response</b>	Yes
<b>Recommendation</b>	Establish a process where PI on a specific individual can be extracted in a readable format within 5 business days.
<b>Comments</b>	<i>No comments</i>



<b>Attachments</b>	<i>No attachments</i>
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6

Is there a process to correct and update PI handled by your initiative?

<b>Status</b>	No Issues
<b>Response</b>	N/A
<b>Recommendation</b>	Implement a process to correct and update PI handled by your initiative.
<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/13/17 10:29 AM</b> PI data within the Enterprise Data Lake is obtained through upstream originating data sources. All updates and corrections to PI is managed by the originating data source, and resent to the EDL through scheduled data feeds.
<b>Attachments</b>	<i>No attachments</i>

6.1

Explain why having a process to correct and update PI is not applicable to your initiative.

<b>Status</b>	-
<b>Response</b>	-
<b>Recommendation</b>	-
<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/13/17 11:46 AM</b> PI data within the Enterprise Data Lake is obtained through upstream originating data sources. All updates and corrections to PI is managed by the originating data source, and resent to the EDL through scheduled data feeds.
<b>Attachments</b>	<i>No attachments</i>

7

Was a privacy assessment already completed for this initiative?

<b>Status</b>	No Issues
<b>Response</b>	No
<b>Recommendation</b>	-
<b>Comments</b>	<b>Stephen A. Cureton commented d on 1/13/17 10:31 AM</b> The Enterprise Data Lake is a fairly new initiative/asset, and is completing the GPA for the first time.
<b>Attachments</b>	<i>No attachments</i>

# Tasks

Priority	Task Name	Type	Assigned To	Created By	Due Date	Status
Med	<a href="#">CPO Action</a>	REMEDIATION	IBM Privacy Office.	Charles Hill	2/18/17 9:33 AM	Pending
Med	<a href="#">Isreal Review Action</a>	REMEDIATION	EU Legal Admin	Charles Hill	2/18/17 9:33 AM	Pending
Med	<a href="#">Austria Filing Action</a>	REMEDIATION	EU Legal Admin	Charles Hill	3/20/17 10:33 AM	Pending
Med	<a href="#">EU Review Action</a>	REMEDIATION	EU Legal Admin	Charles Hill	2/18/17 9:33 AM	Pending
Low	Enterprise Data Lake	ACCEPTANCE				Pending

# Logs

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Date Created	Action	Taken By
1/19/17 10:15 AM	Manual Task Reassigned CPO Action	reassigned from cureton1@us.ibm.com to privacyq@ca.ibm.com by lavery0@ca.ibm.com
1/18/17 4:27 PM	Survey Submitted	
1/18/17 4:27 PM	Survey Completed	
1/13/17 8:50 AM	Survey Sent	
1/13/17 8:50 AM	Project Published	
1/12/17 8:42 PM	Project Created	