

WHITE PAPER

# DATA MANAGEMENT

## GDPR - Data Management and Governance Re-imagined



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customers' data is the core information available to any business. With the advent of GDPR, securing personal data and an individual's privacy has become the foremost for any organization.

Looking at it holistically, this is indeed an evolution of the same data management practices that every business ought to follow. But unexpectedly, the adoption of GDPR is being looked upon as a revolution than an evolution in Europe and other countries, where organizations are processing EU citizens' data.

With hefty penalties and business reputation at stake, it is seen more as an obligation cum burden.

We believe that a thorough understanding of the GDPR compliance and its associated principles, will pave the path for a revamp of personal data landscape, improvement in operational efficiency and monetization of organizational data. In essence, it will ultimately result in a larger benefit and business value to all stakeholders.



## The activities driven by GDPR drives data management efficiency that translates to larger business value for the organization

At a fundamental level, GDPR talks about an efficient management of personal data. Hence, if any organization works diligently and adopts data management and follows robust data governance policies, there is no need for the organization to adopt or implement any special methodology to achieve GDPR compliance. Best data management practices, as a whole, plays a crucial role in supporting organizations' adherence to GDPR guidelines, inherently.

## What are the major data challenges? And how to get started?

The major issue faced by organizations is, not thoroughly understanding their data landscape, and not knowing where and what kind of personal data exists across different systems within the organization.

This challenge is accentuated now with GDPR, asking about rights of data subjects that allows individuals to raise a request to access, modify, erase or port their personal data, as and when required. This important obligation from GDPR compliance is totally driven by the requirement to be able to

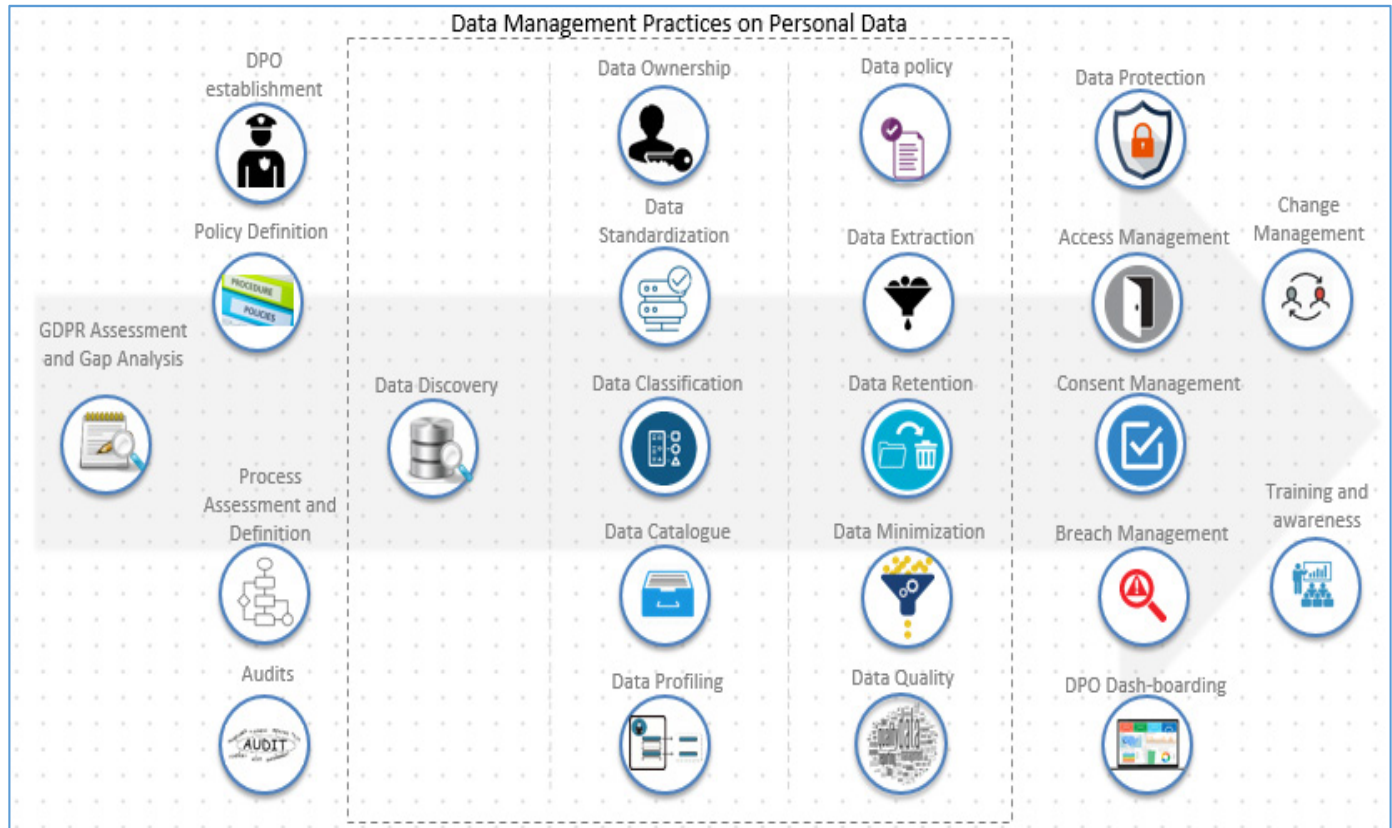
locate and segregate personal record or information of a data subject in an unambiguous manner, maintain updated records, have a legitimate purpose to store or retain and process the information and allow the data in a portable form to be retrieved.

Gauging current scenario statistically (as reported by SAS Institute), 48% of the respondents accepted that they face challenge in finding stored personal data, 50% struggle with controlling access to personal data, 58% find it hard to manage data portability and 'right to be forgotten', and 36% of the respondents face hardships in management of personal data quality.

## How to go about it?

**GDPR is not a set of isolated activities pertaining to legal, consulting or data management, but a combination of different processes working integrally**

These processes, primarily, consists of various data management activities (as depicted in the figure), and focus more on personal data than any other organizational data.



Identifying where sensitive and personal data is stored within an organization is the first step in the GDPR implementation. Personal information can be found in structured databases, in multiple XML files, various unstructured formats, and in cloud based repositories.

Data Discovery helps in identifying all personal data lying in all these fragmented or scattered systems. The identified data then need to be categorized or classified to help admin level personnel in understanding the type of data they have within the organization and associated risk of exposure, as guided by GDPR.

The classified data then needs to be catalogued - like, where data is stored,

what type of data is it, by whom it has been stored and why is it there in the database. This information constitutes the metadata, enabling organizations to understand and form data relationships to various business processes regardless of its sources and platforms.

Data Standardization ensures cleansing and consistent formatting of data coming from disparate sources subjecting it to further transformation. Data Profiling ensures data accuracy and its completeness in a mechanized fashion without applying any specific business logic to the same.

Further, challenges appear when organizations have no defined policies to secure and govern data. These challenges

begin with the question: Who owns and manages data subject's personal data? This question further interrogates organizations' Data Privacy and protection policies.

GDPR compliance demands stringent criteria of access control with respect to personal data and clear specification of data controller's rights while modifying and deleting personal information of an individual. It also advocates for recording consent of data subjects' for storing and processing their personal data.

Data policies in accordance with business logic or rules should therefore be used to validate and qualify personal data; all of which comes under the ambit of Data Quality.



## For how long should an organization retain this data?

It is vital to identify and categorize information to have proper retention policies in place. Different industries have specific guidelines or standard agreed practices to retain personal information. The information is retained as per their category and usage. Some information is required to be archived (to be referenced for future use), whereas some need to be updated or deleted after use.

Concept of Data Minimization is closely

related with the mechanism of Data Retention. Ingesting and storing only useful or purposeful data and disposing off unnecessary and obsolete information is what is prescribed by data minimization principles. This is again in accordance with GDPR's recommendation of avoiding undue data exposure, as, less the personal data, lesser the risk. This risk minimization not only accelerates the compliance, but also reduces the overhead of data protection methods and data maintenance or storage costs, thus reducing total cost of ownership and enhancing business value.

Overall, it is perspicuous that GDPR at its core, is based on sound and robust data management principles, and thus, reinforcing and fortifying these processes would lead to not only just being compliant, but also embracing a transformed way of doing business. GDPR should not be viewed as a regulation, but as a strategic business opportunity and a catalyst to understand data in its entirety, this would not only aid improved data mining leading to better business decisions, but also improve customer trust and loyalty, hence the revenue.

## About the Authors



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Anup Bose heads the GDPR Practice of Data & Analytics unit in Infosys and has more than 14 years of experience in management and operational processes, statutory and management reporting, business intelligence and Enterprise Performance Management. Anup spearheads Infosys' GDPR service offering and has been instrumental in conceptualizing and crafting Infosys' GDPR solution framework and methodology. Anup has significant experience in information governance, data management, business analytics and domain consulting. He has worked across various industries (High Tech, CPG, Retail, Pharma and Insurance) focusing in areas Data Governance, Analytics, Digital Marketing, Consumer Insights, Data Management and Product Management.

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