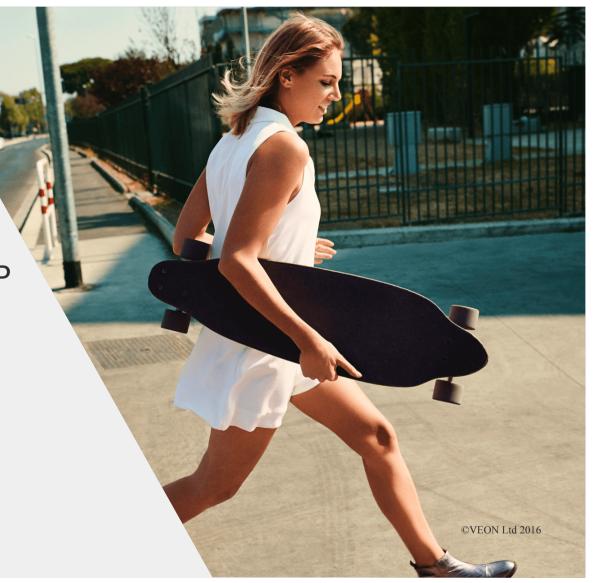


ITU CIS REGIONAL WORKSHOP

KEY ELEMENTS OF BIG DATA

- BETWEEN INNOVATION AND PRIVACY

DENIS LOW Associate General Counsel, Head of Data & Privacy 7 September 2017



OUR MENU TODAY....



WHAT IS BIG DATA?

PURPOSE OF DATA PROTECTION/ PRIVACY

PRIVACY BY DESIGN

DATA RESIDENCY/ LOCALISATION

CLOUD, SECURITY & PRIVACY

BRANDING & TRUST

WHAT IS BIG DATA?



- No standard definition
- Gartner's 3 "V"s Volume, Velocity (speed) & Variety
- I will add a 4th "Veracity (integrity and accuracy)
- Big Data does not necessarily need Personal Data...
- ...but Privacy and Data Regulation applies when it involves Personal Data

PURPOSE OF DATA PROTECTION



PRIVACY is not Secrecy

Distinguish from Confidentiality

SOCIALIBILITY - Not what you cannot do, but how you can do it responsibly and properly

WHY IS THIS FRAMING IMPORTANT?



We need to develop "an entirely new, flexible regulatory foundation for introducing digital technology in all areas of life."

President Putin St Petersburg Intl Econ Forum June 2017

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WHAT DOES DATA PROTECTION MEAN?

LEGAL BASIS FOR PROCESSING PERSONAL DATA

- o Service Provision/ Performance of Contract
- o Consent
- Legitimate Interest



KEY CONCEPTS

What is Personal Data?

Any data point that individually or collectively identifies an individual directly or indirectly

What is Processing?

Collection, organising, loading, access, updates, transfers, retention, anonymising etc.

Role of Data Controller/Operator and Data Processor

Any third party processing

Privacy by Design

Take privacy principles into account throughout whole engineering process

PRIVACY BY DESIGN



Incorporating Privacy principles in Product Design



Data minimization – collection, purpose specification and retention



Pseudonymisation

- Analyse data with random identifiers
- Access control, segregation of data & duties



DATA RESIDENCY/ LOCALISATION



What is it?

Requirement to host data within a certain territory

What are the reasons for data residency?

- Information Security reasons
- Concern that foreign authorities can access data
- Concern that law enforcement authorities cannot access data
- Concern that regulators cannot enforce laws against offshore/ cloud provider

Can these concerns be met without data residency?

- With right technology and split of responsibilities, cloud can safer than self run data centres
- Choice of location and due process. Use of Encryption
- Can be mandated via law and contracts

CLOUD & INFORMATION SECURITY



What are the most important factors to reducing impact on security breaches?

EARLY DETECTION	
AND CONTAINMEN	Τ

STRONG NETWORK
PROTECTION AND
INTERNAL CONTROLS

PROPER SELECTION OF VENDORS AND MOBILE DEVICE USE

USE OF CLOUD AND LOCATION OF DATA IS NOT NECESSARILY A FACTOR

- Incident response management

- Encryption

- Access controls

- Security assessment

- Device management

PRESENTATION TITLE - CLIENT NAME

INTERPLAY BETWEEN SECURITY, PRIVACY AND TELECOMS LAW





 Protecting Confidentiality, Authenticity and Integrity of Information

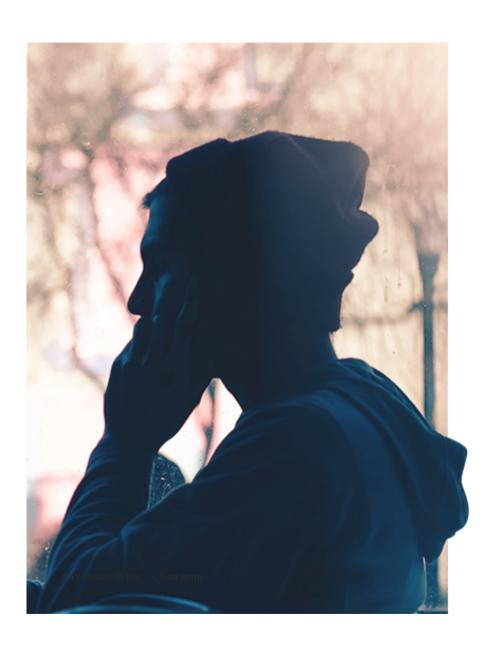


PRIVACY

- Relies on Security
- Lawful and Fair Use, Purpose Limitation, Minimisation, Transparency, Accuracy



- Confidentiality of Communications
- Confidentiality of Subscriber Information



BRANDING AND TRUST



TRANSPARENCY & CHOICE

- o Full disclosure
- o Benefits to users, not just companies
- o Real choice, not mechanical ones

DATA ETHICS

o Equivalent to Health and Safety issue

REGULATION AND EDUCATION

- Regulation is needed but will always be one step behind
- UK Channel 4 advertisement

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7 SEPTEMBER 2017

СПАСИБО

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