GDPR COMPLIANCE—YOU FORGOT YOUR DIGITAL ENVIRONMENT

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70%  $1-2M  52%
GDPR should not be taken lightly

SCOPE

CONSENT

EXTRA-TERRITORIAL

LIABILITY

BREACH NOTIFICATION
Your digital environment counts, too

DATA COLLECTION & CONSENT

PROFILING & ONLINE TRACKING

VENDOR MANAGEMENT

BREACH REPORTING

PRIVACY POLICY
POLL – Let’s get out our mobile phones

- Session ID: GRC-R12

- Do you know who’s in charge of your organization’s website?
  - A – Yes
  - B – No
  - C – Not sure

Who’s really in charge?

MARKETING

WEBSITE OPERATIONS

LEGAL

SECURITY

SALES/REVENUE

RISK
Currently, You’re not ready!

**MARKETING**
- 59% haven’t received any GDPR-related training
  - Institute of Direct & Digital Marketing
- 57% admitted they were “under-trained”
  - Direct Marketing Association

**PRIVACY**
- 46% have been preparing for > 1 year
  - Forrester, December 2017
- 46% require vendor compliance with privacy policies
  - PwC, January 2018

**IT/SECURITY**
- 70% don’t think they’re compliant
  - Forrester, January 2018
- 77% know company is not prepared
  - Erwin, November 2017
Digital is the new Wild, Wild West

50-75% executing code is not KNOWN or SEEN by the website operator
WHEN RISK IS REALITY

6 examples of real-world websites
It’s uglier than this
**ANALYSIS**

**AD/MARTECH CODE**
68% vs. 73%

**COOKIES**
212 vs. 177

**USER IDENTIFIER**
66% vs. 67%

**IDENTIFIER >1 YEAR**
40 vs. 36
RETAIL: Staples

ANALYSIS

AD/MARTECH CODE
73% vs. 74%

COOKIES
204 vs. 230

USER IDENTIFIER
68% vs. 70%

IDENTIFIER >1 YEAR
33 vs. 34
BRAND: Mattel

ANALYSIS

AD/MARTECH CODE
55% vs. 55%

COOKIES
58 vs. 71

USER IDENTIFIER
57% vs. 59%

IDENTIFIER >1 YEAR
8 vs. 9
TRAVEL: Lufthansa

ANALYSIS

AD/MARTECH CODE
73% vs. 77%

COOKIES
140 vs. 90

USER IDENTIFIER
73% vs. 75%

IDENTIFIER >1 YEAR
38 vs. 35
BANKING: HSBC (credit card)

ANALYSIS

AD/MARTECH CODE
66% vs. 69%

COOKIES
28 vs. 27

USER IDENTIFIER
19% vs. 19%

IDENTIFIER >1 YEAR
7 vs. 7
ANALYSIS

AD/MARTECH CODE
43% vs. 43%

COOKIES
1 vs. 1

USER IDENTIFIER
100% vs. 100%

IDENTIFIER >1 YEAR
1 vs. 1
Security failures are GDPR risks, too

UK government websites, ICO hijacked by cryptocurrency mining malware
US and Australian government domains were also affected by the bold cryptojacking scheme.

Cause for concern? Pro-ISIS hacking group targets 800 US school websites

Under Armour: unauthorized third party accessed 150 million MyFitnessPal accounts

Over 400 of the World’s Most Popular Websites Record Your Every Keystroke, Princeton Researchers Find

Panerabread.com Leaks Millions of Customer Records
You know the risks, right?

**RISK**
- Fines: €20,000 or 4% turnover
- Remediation costs
- Legal fees
- Lost Revenue
- Brand damage
- Compliance monitoring

**REALITY**

- **Belgium**: €250,000/day, Facebook to tracking via 3rd party websites  
  (Feb 2018)
- **Italy**: €11M across 5 firms for unlawful processing of personal data  
  (Mar 2017)
- **UK**: Doubling of enforcement actions in 2016.  
  (June 2017)
- **EU**: Roche AVOIDED penalty by taking violation notification seriously  
  (Dec 2017)
Steps to Digital Compliance, 1 month

1. ASSIGN a digital asset owner
2. IDENTIFY ALL executing code
3. ANALYZE role in rendering UX
Steps to Digital Compliance, 3 months

1. **ASSIGN** a digital asset owner
2. **IDENTIFY ALL** executing code
3. **ANALYZE** role in rendering UX
4. **ESTABLISH** legal basis for data collection
5. **UPDATE** privacy policy
6. **CREATE** a digital asset policy
7. **COMMUNICATE** policy to vendors
8. **ENFORCE** vendor compliance

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Steps to Digital Compliance, 9 months

1. ASSIGN a digital asset owner
2. IDENTIFY **ALL** executing code
3. ANALYZE role in rendering UX
4. ESTABLISH legal basis for data collection
5. UPDATE privacy policy
6. CREATE a digital asset policy
7. COMMUNICATE policy to vendors
8. ENFORCE vendor compliance
9. AUDIT: Prove you’ve taken control
10. ENABLE data requests by visitors
Your next step: Transparency

**KNOW YOUR DIGITAL ASSETS**

- Establish governance:
  - GDPR prep? Data risk framework? Vendor Risk Management?

- Connect & Communicate

- Demonstrate compliance

**WHERE ARE YOU?**

- 70%
- $1-2M
- 52%
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