



Catalyst Pitchback

GDPR Compliance
using Qiy Scheme

Companies



Champion Confirmed	Champion Tentative	Participant Confirmed	Participant Tentative
Vodafone		Qiy Foundation	IBM
Orange		UXP Systems	Accenture
			Telefonica

We are still looking for:

- As a Data Controller or Processor
- I need to empower Data Subjects with solutions to that they can realise their rights to data portability, right to be forgotten, ...
- So that I can be compliant to GDPR requirements
- To do this, I need innovative solutions and interoperability with other CSP or third parties
- I know I am successful when I manage to do this and develop new business at the same time

Why is this an important problem to solve?



Accountability and Demonstrable Compliance

- **Privacy by Design** –ensure privacy is baked into the design of products and services (instead of an afterthought).
- **Data minimization** – processing only data that is necessary.
- **Consent** – Parental approval of Minor's consent
- **Data management:** Records of what data and how is being processed, by whom, where. Controls to make rights and obligations effective.
- **Supplier management** – selection, assurance, data protection and security agreement.
- **Security for privacy** – technical and organisational security measures to protect data, anonymisation and pseudonymisation.



International data transfer compliance

Obligations towards regulators

- **Breach notification** to regulator (within 72 hours)
- **Data protection officer** to oversee implementation of controls, reporting to highest level of management
- **Assessment** to all High Risk data processing
- **Prior consultation with the regulator** in case of high risk processing of personal data (Risk remains high after mitigations have been implemented)



Rights of individuals (e.g. Users, employees)

- **User Transparency** - informed about processing of personal data
- **Choice** - Explicit, revocable consents, e.g. sensitive personal data
- **Right to know** what data is actually processed
- **Right to object** to automated decision making, profiling
- **Right to be forgotten** - deletion of personal data
- **Data portability** – Right to take information to a different organisation
- **Breach notification** in case of data breach which may seriously impact the individual

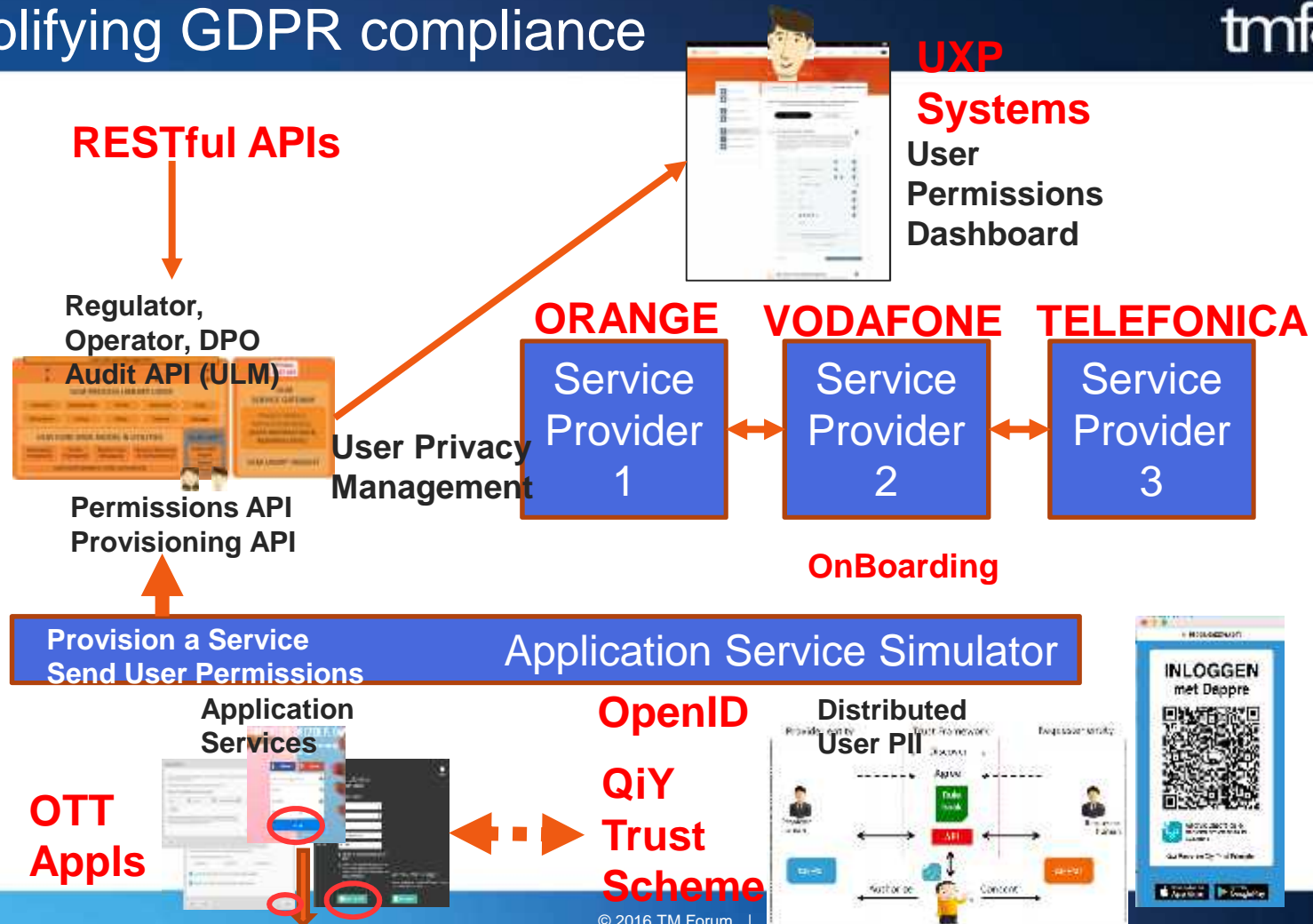


Powers of regulators

- **Investigations**, related information requests (cost of remediation)
- **Orders to comply** with the law
- **Orders to delete data** which was unlawfully collected
- **Warnings**
- **Fines** up to 4% of annual Vodafone Group global turnover
- **Comes effective 25th May 2018!!**

- 1. Onboarding
 - a. Install Dappre app, create a QR code
 - b. Go to the CSP portal and scan the QR code
 - c. Pre-populate Qiy with personal information
 - d. Using OpenID connect (mentioned by Bram to John of UXP)
- 2. Giving consent to share personal data (part of onboarding)
- 3. Data Portability example
- 4. Audit trail (historical log of who requested what and when, so if it's challenged)
- 5. User Dashboard (transparent access to PII)
- 6. Right to Be Forgotten
- 7. Parental Approval

Simplifying GDPR compliance



What new areas do you plan to explore?

- *OpenID and Privacy Management APIs*
- *Communication between operators for data portability (format, APIs, ...)*
- *Using network solutions instead of platform solutions*