Privacy by Design

HP’s Accountability Model Tool

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Situation

- Complex environment
  - Data flows increasingly Global & dynamic
  - Exponential needs and trends (Cloud computing…)
  - Laws are critical but often lagging behind new technologies

- Advanced technology and analytic techniques
  - Strains traditional compliance frameworks
  - Make failure even more severe (…Computing Storms)
  - Solutions & remediation more complex…

- Easier and more extended data access
  - Greater probability for misadventure to occur.
  - Access governance or security cannot solve alone
  - Human factor often the weakest link…
What do we need then...

- Companies need to build mechanisms...
  - to ensure they can balance the tensions of using information robustly.
  - to demonstrate the capacity & willingness to meet obligations under current frameworks.
  - To ensure responsible and accountable decisions at Global, Local and Individual levels.

→ Do this with 400,000 employees using data in every business line & every corner of the world
Accountability Model
A Holistic Approach

Policies & Commitment

- Solid policies
- High-level commitment to protect individual privacy
- Meaningful transparency
- Willingness to demonstrate capacity to uphold promises and obligations

Implementation Mechanisms

- Robust internal standards and controls that integrate privacy into the design
- Processes to guide and support decision-makers
- Practices that incorporate ethics and values-based considerations and fully consider risks

Assurance Practices

- An ability to monitor and evaluate how you are doing and to make real-time course corrections where necessary
Accountability Model Tool
Privacy by Design

- HP has built a process and tool that ensures important privacy principles are built into our products, programs and services
- It helps to guide our businesses to fully consider decisions
  - Make the right choices in balancing the tensions between the use of information or technology and ensuring their decisions are responsible
- Requires self-certification of their plans and uses of data
- Drives accountability and reduces risks to users and HP -- and supports a trusted relationship
Accountability Model Tool
Privacy Across the Lifecycle

Guidance Mode:
1. Design
2. Development

Assessment Mode:
3. Pre-deployment validation
4. Deployment
5. Maintenance
6. End-of-lifecycle

Reports
- Compliance
- Non-compliance
- Corrective steps
- Seek help
Accountability Model Tool
Supporting Regulatory Frameworks

- EU BCRs
- APEC CBPRs
- Company Policies

Accountability Model Tool
Accountability Model Tool

Functional Overview

**Questionnaire**
- Project Profile
- Detailed Questions
- Security
- Indicators of potential harms

**Knowledgebase**
- Rules – HP Policies
- Rules – HP Privacy Rulebook
- Rules – Country Legal Requirements
- Rules – Regulator Guidance

**Rules Engine**

**Feedback/Monitoring**
- Reports
- Informational User Messages
- Checklists
- Corrective actions/steps
- Ongoing Assurance Monitoring
Click here……..

AMT Video Demonstration
In Summary

• As privacy and data protection becomes more complex, companies need to do our part
  
  – To **do what we say… say what we do**… and be willing to demonstrate our methods of accountability to regulators, authorities, advocacy groups, and accountability agents

• More than ever, it is critical that we design privacy into our programs from the earliest stages
Thank you!