



31

Mañana, 4, 5 y 6 de noviembre 2009  
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de datos y privacidad

# 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*



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- *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*



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### 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

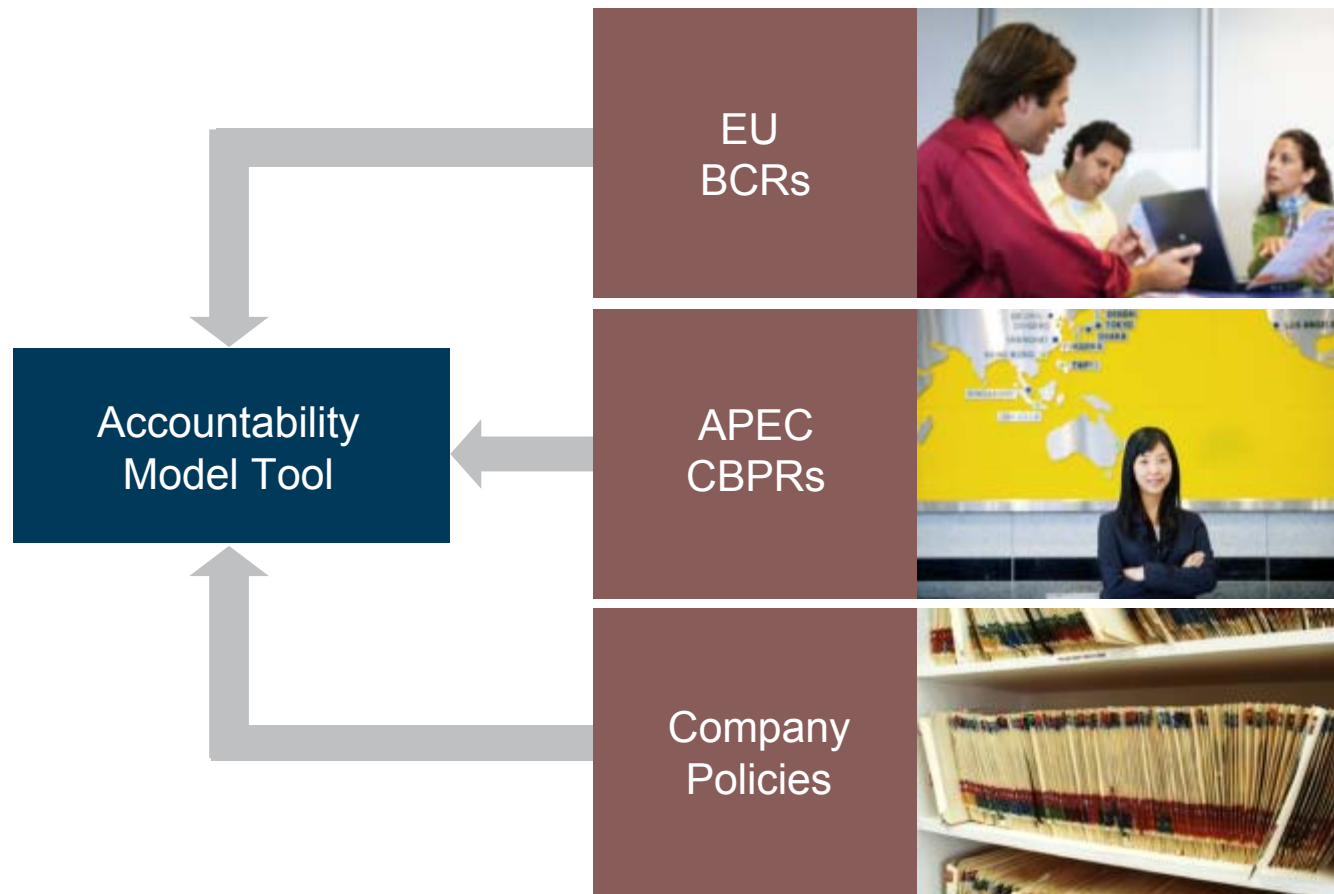
# Accountability Model Tool

## *Supporting Regulatory Frameworks*



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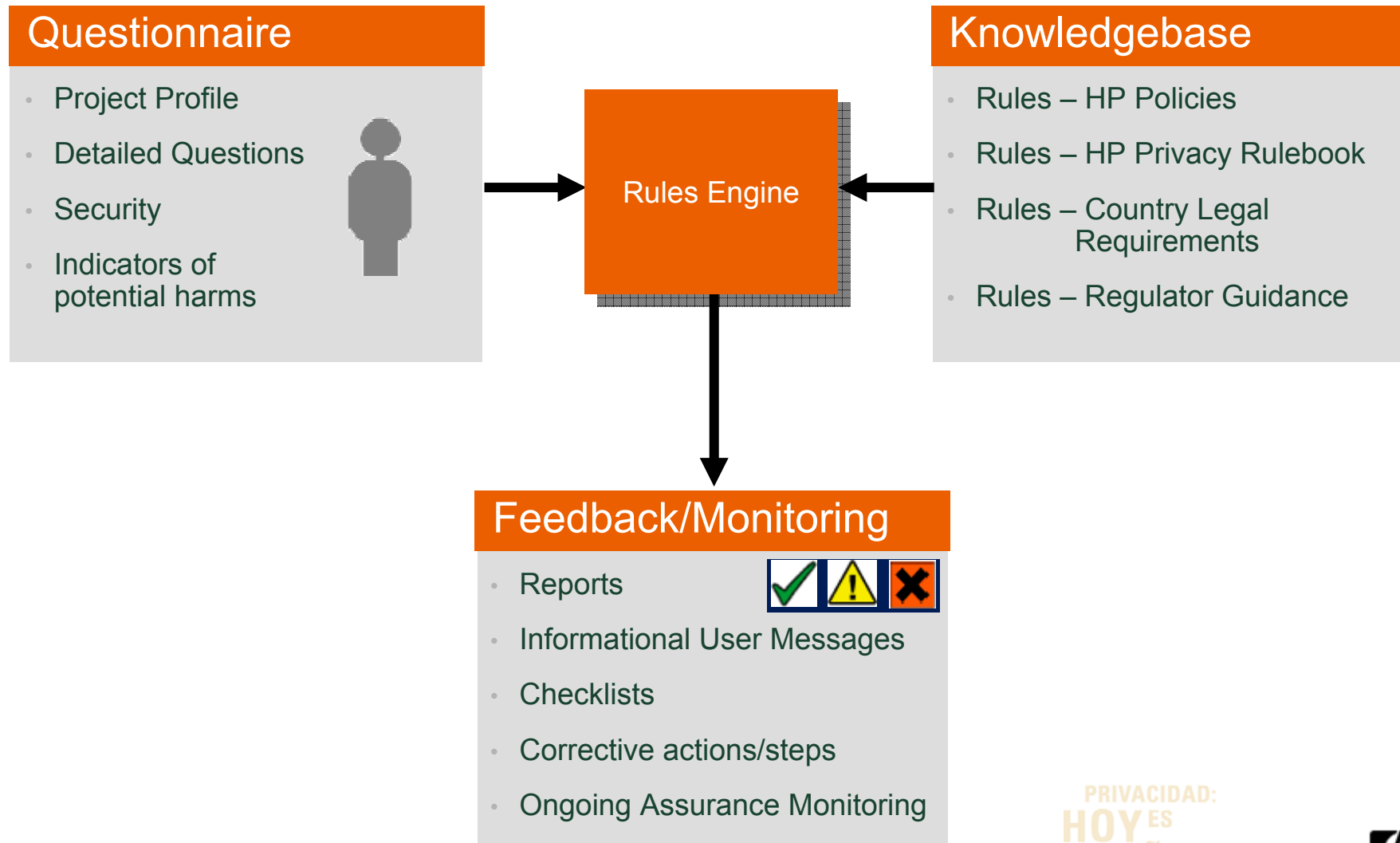
# Accountability Model Tool

## Functional Overview



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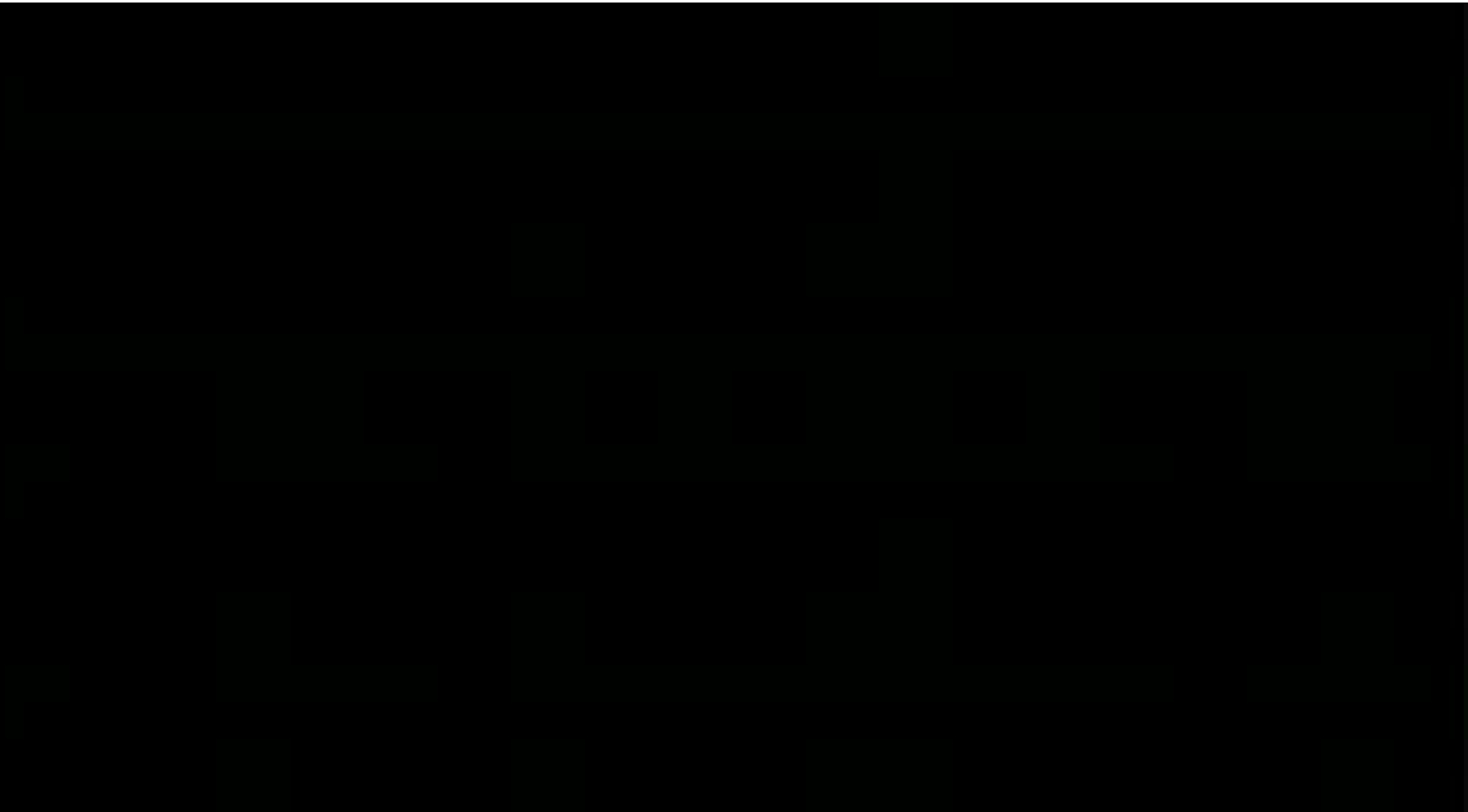
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# AMT Video Demonstration





# 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

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# Thank you!

