EMBEDDING PRIVACY IN SOFTWARE DEVELOPMENT: IMPLEMENTATION ASPECTS

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OVERVIEW

1. Privacy analysis life cycle
2. Privacy analysis approach
3. Role of stakeholders
4. Specifics depending on development methodology
5. Use of third parties
2. PRIVACY ANALYSIS APPROACH

Data processing types
- Collecting
- Transferring
- Analysing
- Archiving
- Storing

Application structure
- Data at rest
- Application layer, including integration with other IT systems
- Data transition layer
- Front-end

Implementation
- Minimise
- (Pseudo-)anonymise
- Encrypt/hide
- Inform
- Control
- Demonstrate

Consequences
- Ensure integration with existing IT systems
- Avoid delays and changes to initial architecture
- Technical, privacy and business aspects adjusted and included from the outset
3. ROLE OF STAKEHOLDERS

- Privacy team
- Business owner
- IT security team
- Internal IT team
- Developers
- Risk department
4. SPECIFICS DEPENDING ON DEVELOPMENT METHODOLOGY

**Waterfall**

- **Outset of project** – the general requirements are detailed
- **End of project** – formal assessment of project

**Agile/Scrum**

- **Each sprint** – analysis of privacy implications for proposed actions for the upcoming sprint
- **Each meeting** – real-time awareness of changes to architecture
5. USE OF THIRD PARTIES

**Audit**
- DSR and incident identification/investigation
- Use of third party source code

**Mixed teams**
- Trainings at the outset
- Inclusion in all project meetings related to privacy

**External developers**
- Initial requirements and periodical follow-ups
- Triggers for additional privacy analysis
THANK YOU

QUESTIONS?