Information security: DP enabler

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This workshop

• Security as a fundamental **enabler** for data protection

• Security based on (information security) **risk management**

• The **involvement** of the DPO is of paramount importance
SECURITY ➔ CONTROL
SECURITY ➔ DP
Security as a DP enabler

Security principles

• Confidentiality
• Integrity
• Availability

DP principles

• Fair & lawful
• Purpose limitation
• Accurate and up-to-date
• Conservation periods
• Data subject rights
Information/IT security

- Identification
- Analysis
- Evaluation
- Treatment

Risk assessment
- Security requirements
- Implementation

Security measures
- Monitoring
- Auditing
- Review

Operation
- Security operations
- Service management

Monitoring
ISRM 101

- ISRM: Information Security Risk Management

- ISO 27005 (among others…)

![Flowchart showing ISRM process stages]
ISRM 101: Risk identification

1. Context establishment

2. Risk identification
   - Assets (p.d. and more…)
   - Vulnerabilities
   - Threats
   - Existing controls
   - Impact
ISRM 101: Analysis & treatment

3. Risk analysis
   – Methodology
   – Impact assessment
   – Likelihood assessment
   – Risk

4. Risk treatment
   – Avoid
   – Reduce
   – Transfer
   – Accept
ISRM 101 – Outcomes

- Security plan
- Residual risk
- Monitoring and review

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Risk management process: systematic application of management policies, procedures and practices to the activities of communicating, consulting, establishing the context and identifying, analysing, evaluating, treating, monitoring and reviewing risk*

*ISO 27000

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**Information security:** preservation of confidentiality, integrity and availability of information*

*ISO 27000
“The Data Protection Officer (DPO) is fundamental in ensuring the respect of data protection principles within institutions/bodies.”

Professional Stds. DPO

• 3.5.1. Advice on application of DP provisions:
  – Discusses any legal, practical or technical issues having impact on DP;

• Best practices. Involvement in relevant discussion groups: “For instance, the DPO should be involved in the work of the security committee, if existing”

• Art. 24 Reg 45/2001 - […] tasks of the DPO
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• “1.(c) ensuring in an independent manner the internal application of the provisions of this Regulation;”

• “[The DPO] shall thus ensure that the rights and freedoms of the data subjects are unlikely to be adversely affected by the processing operations.”
How?

• (The DPO) Not alone!!

• With the LISO/SSO/SO…
  – Information Security complex enough → specific professionals!

• Controller accountable but DPO also a very important role “fundamental in insuring the respect of data protection”
Accountability

- (GDPR):
  - measures to be able to **demonstrate** that the processing […] is performed in compliance with this Regulation.
  - mechanisms to **verify** the effectiveness of the measures taken.

- Controller's accountability instruments:
  - Policies
  - Security requirements
  - Data Protection Officer
  - Audits
(Other) Stakeholders

- Information Security Officer (LSIO/SSO/SO…)
- Data Protection Officer

- Business process owners (controllers)
- Process/Project officers
- Documents Manager
- …
Recap

- **InfoSec DP enabler** (control)
- **InfoSec based on ISRM**
- **Together (DPO & Sec)!!!!!**
Some Q’s for you

• Approach to Art 22. of Reg 45/2001

• Relation with the LISO/SSO/SO…

• Involvement in security governance