Accountability
Processes and tools to prove it

Bruxelles - October 15th 2019

Rosario Imperiali
Table of contents

- Why be accountable
- Need of trust
- Accountability as risk management
- IRM: Integrated Risk Management
Why be accountable
Why be accountable – 1st option

Because of the heavy sanctions set out in the GDPR

Is this true?
Are sanctions really dissuasive?

Facebook's $5 Billion Privacy Settlement Argued Consumers Weren't Harmed. Experts Think the Damage Was Incalculable

Source: Fortune

20 July 2019

The CNIL's restricted committee imposes a financial penalty of 50 Million euros against GOOGLE LLC

21 January 2019

Source: CNIL

Intention to fine British Airways £183.39m under GDPR for data breach

Date 08 July 2019

Source: ICO

@Ros_Imperiali
Why be accountable – 2\textsuperscript{nd} option

Because market/consumers require fair personal data management

Is this true?
An example: Zuckerberg and Privacy

Privacy no longer a social norm, says Facebook founder

Source: Guardian

The future is private.

Facebook CEO Mark Zuckerberg says the ‘future is private’

Source: The Verge
Need of trust
Market needs trust

Data subjects are more willing to share their personal data to receive customized products and services.

Organizations are more able to target customers/prospects as per specific profiles.

Trust
Platform for the new deal between businesses and consumers in the Information Society

Trust
Can be increased by the organizations’ accountability on data protection

@Ros_Imperiali
Accountability as risk management
Accountability is ...

Therefore, means

CONSTITUENT ELEMENTS

Compliance

Prove of it

Risk based approach

OBJECT OR RESULT

Ability to manage DP risk

Demonstrating the correct management of DP risk
Data protection risk management

- Reliable
- Verifiable

Set of practices and processes

Supported by a risk-aware culture

Decision making
Performance

I.E.

@Ros_Imperiali
IRM: Integrated Risk Management
Therefore, accountability in terms of personal data must be managed with an integrated risk management (IRM) policy.
Accountability

Processes and tools to prove it

Rosario Imperiali

*Thank you*

- rosario.imperiali@imperiali.com
- Ros_Imperiali
- Rosario Imperiali
- Rosario Imperiali