

# *GDPR General Remarks*

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# About... (ISC)<sup>2</sup>®

INSPIRING A SAFE AND  
SECURE CYBER WORLD®

- (ISC)<sup>2</sup> = *International Information Systems Security Certification Consortium*
- Established in 1989
- Non-profit consortium of information security industry leaders
- Supports security professionals throughout their careers
- Global Standard for information security: (ISC)<sup>2</sup> CBK®
- Over 100,000 certified professionals; over 160 countries

- Official (ISC)2 Chapter (No: 128), 8/7/2014
- Non-Profit Association (No: 30693), 24/6/2015
- Our Mission:
  - *Exchange of ideas and dissemination of knowledge among (ISC)2 members, information security professionals and the public, as well as the promotion (ISC)2 Certifications in the region.*
- Members: **Information Security Professionals** and **(ISC)<sup>2</sup> credentialed.**



# Regulation: IT measures as a legal tool

- **Personal data Breach = breach of security**

*“means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed”*

- **Appropriate security = data processing rule**

*“Data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (“integrity and confidentiality”)”.*

- **Data protection by design/by default**

- **Seals – Certifications and Codes of Conduct**

- **DPIAs**

- **Appointment of a DPO (Υπεύθυνος για τα Προσωπικά Δεδομένα)**

- **Data Breach Reporting – Implementation of Robust Security Measures**



# Privacy vs Security

## Information (Data) Security

- Covers Confidentiality, Integrity and Availability of ALL Critical Data.
- Ensures that data is accurate and available when those with authorized access need it.
- Data can be highly secured while violating privacy principles.
- Information-security practitioners often don't understand the human side of privacy.

## Data Privacy

- is suitably defined as the Appropriate Use of Personal Data.
- Governs how information pertaining to individuals is collected, processed and protected.
- Privacy has a very human face, and unlike information-security controls, is less measurable.
- Privacy professionals may not always understand the implementation of technology controls.

Privacy of electronic information would not be possible without security safeguards (appropriate people, policies, process and technology).

# Typical Security Controls

## Organizational Controls

### People



- Training
- Awareness
- HR Policies
- Background Checks
- Define Roles
- Responsibilities
- Performance Management ...

### Policies / Procedures



- Risk Assessment
- Asset Management
- Data Classification
- User Access Management
- Access Management
- Change Management
- Patch Management
- Configuration Mgmt
- Incident Response
- Business Continuity
- Legal & Regulatory Compliance
- Secure SDLC ...

### Technology (Products)

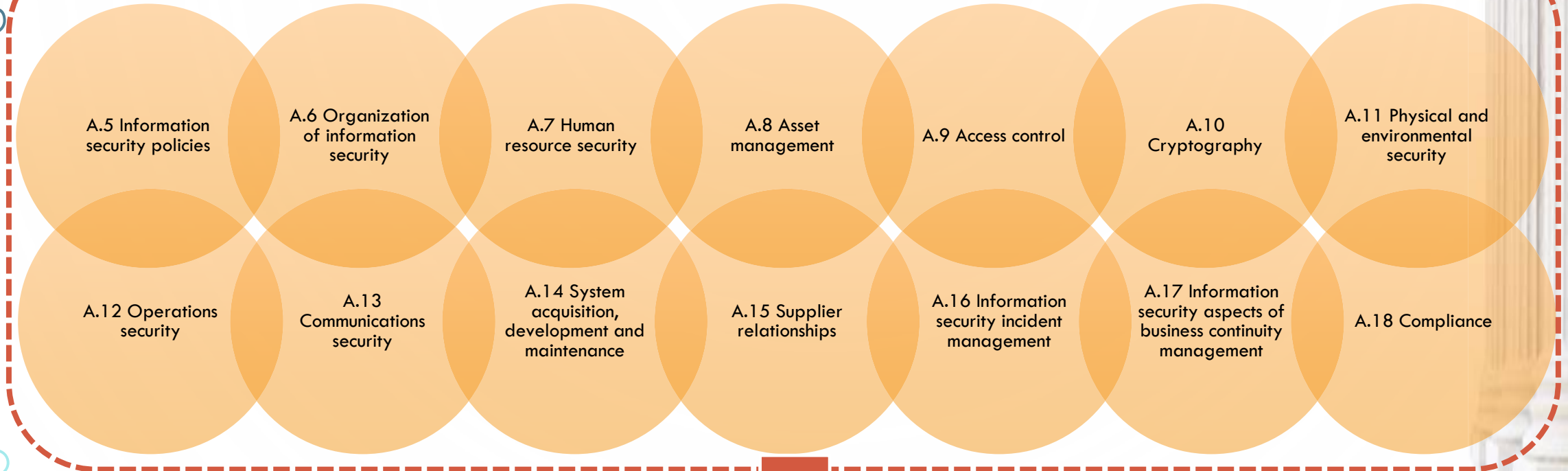


- Physical Security
- UTM, Firewalls
- System Security (FIM)
- IDS/IPS
- Web Content Security
- Email Content Security
- Vulnerability Assessment
- Penetration Testing
- Web Application Firewall
- DB Firewall
- Log Management, SIEM
- Managed Services & Cyber Intelligence
- Data Leak Prevention
- Data Classification
- Identity Management
- Encryption (DB, File, Mail, VPNs ...)
- Patch Management
- WiFi Security
- Mobile Device Management
- APTs Defense
- Password Management
- Antivirus ...

**Beware of Security Controls conflicting with Privacy (e.g. DLP)!**

# “State of the Art” ... “Standards” and “Best Practices”?

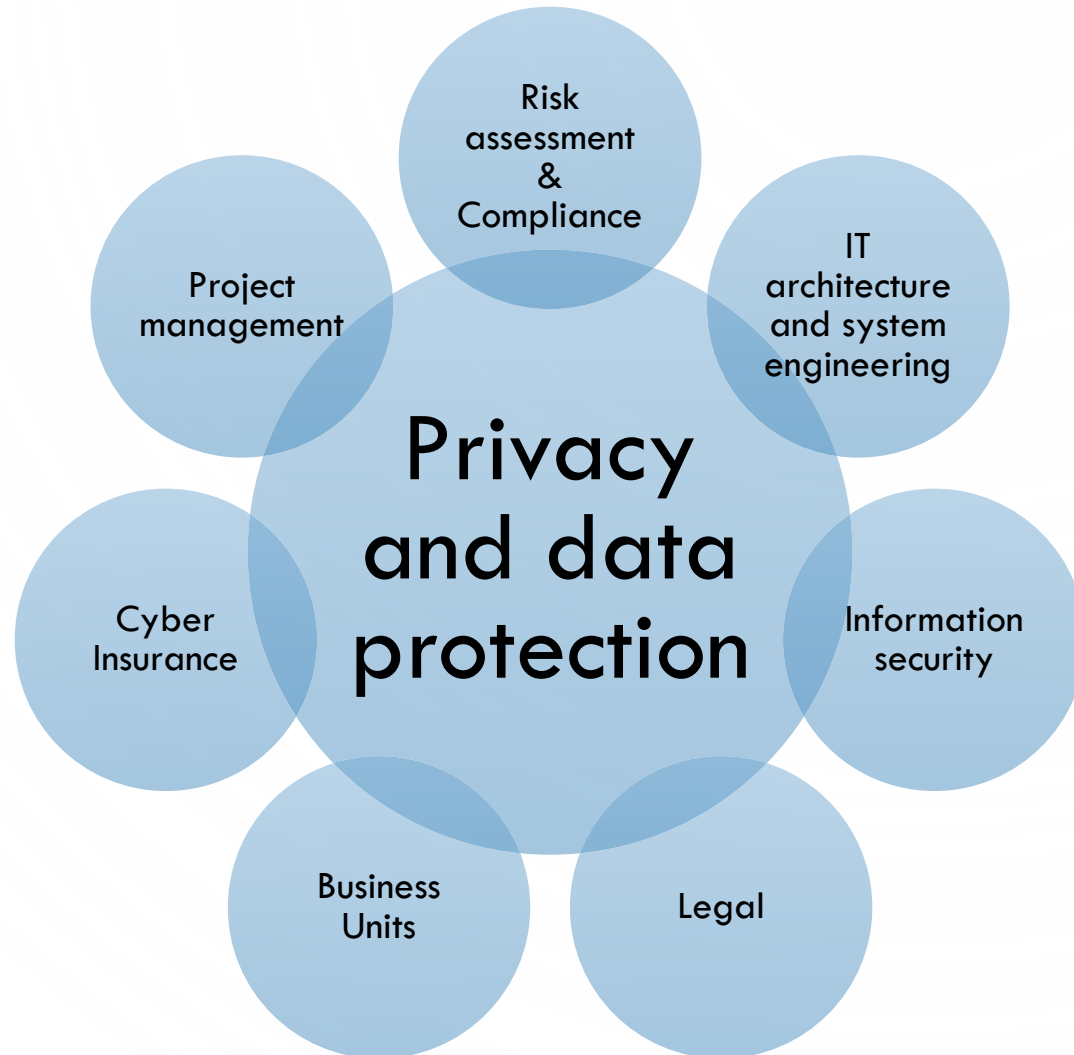
## ISO 27001: Annex A Domains



## ISO 27018:

**Code of practice** for protection of personally identifiable information (PII) in public clouds acting as PII processors.

# Multidisciplinary Team & Combined Expertise



# Overall Compliance Strategy

## GAP Analysis

- Define Data Privacy Scope
- Identify Privacy Stakeholders And Influencers
- Decide what Personal Data is essential for business
- Map Legal with Business Requirements
- Identify systems processing personal data
- Identify GAPS with Regulation & Guidelines

## Establish Governance Framework

- Determine Organizational Roles & Responsibilities
- Define Methodology & Perform DPIA (if required)
- Develop Privacy Compliance Roadmap
- Align Privacy Roadmap with Security Roadmap

## Develop & Deploy Controls

- Privacy Related Policies & Procedures
- Information Security Related Controls (organizational & technical)

## Compliance Monitoring

- Evaluate Effectiveness of Existing Controls
- Update with new Regulations & Guidelines

User Training & Awareness



# Thank You!

