



CASE STUDY

**Blackboard Sets a
New Standard for Data
Privacy Management
with Wirewheel**



**Advanced
Technology
Partner**

Security Competency

THE CHALLENGE

Blackboard, a leading education technology company, has always prioritized data privacy within its operations, product development and customer relationships.

Blackboard manages a sophisticated data ecosystem on behalf of its clients and shoulders a mix of roles and responsibilities related to data privacy:

- As a Software-as-a-Service [SaaS] provider to educational institutions, Blackboard manages sensitive data of millions of students on behalf of its clients.
- As a technology company, Blackboard maintains relationships with third-party vendors it uses to deliver its products. These relationships impact how data is collected, stored and processed within its products.
- As a global employer, Blackboard manages employees' personal data within its internal IT systems and operations.



In order to keep pace with increasing compliance requirements and respond to growing client privacy questions, Blackboard needed an innovative solution to streamline its processes and become more efficient. Blackboard's privacy team, led by Stephan Geering, Global Privacy Officer and Associate General Counsel, evaluated several options and decided to implement WireWheel.

THE BENEFITS

WIREWHEEL AS A CENTRAL HUB FOR DATA PRIVACY MANAGEMENT

WireWheel helps Blackboard track personal data on its SaaS products as it comes into the organization, as it is processed and as information is shared with clients.

WireWheel's methodology allows Blackboard to accurately and efficiently answer four questions that are fundamental to data privacy:

- **What data is collected, processed, and stored?**
- **Where data is stored?**
- **Where data is computed?**
- **What third parties are doing with it?**

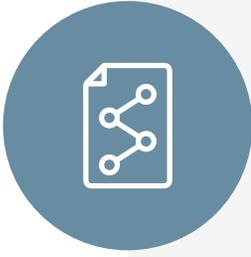
ENHANCING CLIENT EXPERIENCE

Sixty-five percent of organizations have delays in their sales cycle due to privacy concerns, with an average delay of almost eight weeks¹. At minimum, sales delays cause deferred revenue. Worse, they can cause customers to select other vendors.

Blackboard has faced similar challenges. As part of the sales process, Blackboard receives requests for information about its data privacy compliance almost daily.

“Our clients expect transparency. They rightly expect vendors to answer their questions about data privacy without any barriers or delays,” says Stephan. As

Blackboard can clearly demonstrate its commitment to privacy more systematically and with more detail and also show its clients how to do more to protect the privacy of student data. As a result, Blackboard's sales cycle is expected to be significantly expedited.



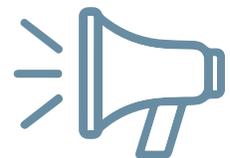
With WireWheel, Blackboard will be able to respond more quickly than before, with more detailed and up-to-date information as well as guidance and support for clients implementing their own privacy programs.

PRIVACY AS A **COMPETITIVE DIFFERENTIATOR**

Building trust with clients gives Blackboard a unique advantage over its competition. “We aim to be the privacy leader in education technology and know that privacy automation is a core component to achieve this,” Stephan explains.

As a SaaS partner, Blackboard helps clients manage compliance with data privacy requirements. “Using WireWheel, Blackboard makes it easier for our clients to address privacy compliance.”

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THE SOLUTION

PRIVACY BY DESIGN

Blackboard has implemented a privacy by design approach for the development of any new product, with features such as data minimization, pseudonymization, and privacy-friendly settings. Using WireWheel's review framework that supports this privacy by design approach. Privacy questionnaires must be completed before agreements with vendors can move forward. "Stephan describes the benefits, "We have over 25 different products and numerous suppliers. It's time intensive to track all of the vendor questionnaires. Now, we can manage them centrally and consistently."

STREAMLINING DATA WORKFLOWS, CLASSIFICATION AND COMPLIANCE

Blackboard's operational challenges are typical of many enterprises: distributed information, many third-party vendors, and data managed by various departments. Additionally, Blackboard has grown through numerous acquisitions, which makes implementing consistent privacy controls across the whole company more important and more difficult to achieve.

Prior to implementing WireWheel, Blackboard was managing its privacy processes manually. "We were tracking privacy checklists with Word and Excel. It wasn't scalable or sustainable. "You'd have to chase emails, send reminders, and track everything manually," Stephen recalls. What's more, he says, data is constantly changing. "With a manual process it's difficult to always have up to date and complete information."

Through direct integration with Amazon Web Services (AWS), WireWheel is able to map Blackboard's data and automatically classify it - with only 20 minutes of set up. WireWheel's maps translate data flows to a geographic view, critical for complying with various data privacy requirements around the world. This transparent, robust data mapping gives Blackboard key privacy insights into whether its databases are encrypted, whether IP addresses are publicly visible, and whether any databases are replicated in real time. Data flows are easily visualized, both logically and



WireWheel provided Blackboard a central location for all of its privacy compliance documentation: its Record of Processing privacy by design checklists, its privacy impact assessment, vendor questionnaires, and data mapping, individual maps, data classification and Sub-Processor approvals.

geographically, to help ensure compliance with the GDPR's data transfer and record keeping requirements.

As the WireWheel solution continues to roll out, Blackboard will be able to display, in real-time, where each of its SaaS client's data is stored, processed or transferred throughout its infrastructure, and identify when that data is encrypted, replicated or accessed. Blackboard can then provide this critical information to its clients when they need it for their own compliance needs.

"Now the information will always be accurate, up-to-date and available at the push of a button. This would be difficult, if not impossible, without automation," added Stephan.

IMPROVING THE **PRIVACY EXPERIENCE**

Blackboard's goal is to remove all bottlenecks in the privacy process through automation and by making people more self-sufficient. In the next phase of the WireWheel implementation:

- + Internal teams will have direct access to create data privacy reports and share them with prospective clients, so the RFP, client due diligence and sales process can move even faster.
- + Once this internal portal works successfully, Blackboard is considering making the data privacy information directly available to the clients through a client privacy portal, without having to request it from the Blackboard team and wait for a response.

"It's important that we are transparent to our clients and can maintain their trust." notes Stephan. "We've been able to shape the development of WireWheel and to make people more self-sufficient because WireWheel really listens to what we need, and they've been so supportive."

Stephan views tools such as WireWheel as the future of data privacy. "It's already well established that privacy leaders need frameworks, policies and efficient privacy governance. The next phase of privacy maturity having standard tools to automate privacy compliance. In 5-10 years' time everyone will have tools like this."

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