

wirewheel

Innovating DSAR Fulfillment with
Microsoft and WireWheel



Welcome and Introductions



Judy Gordon
VP of Marketing
WireWheel



Rick Buck
Chief Privacy Officer
WireWheel



Hammad Rajjoub
Director, **Microsoft**
Purview and Priva
Ecosystem



Sheridan Clemens
Senior Engagement
Manager
WireWheel

Agenda

What are the requirements for Data Subject Access Request fulfillment and what are the challenges

Rick Buck

What are the challenges and pain points with fulfilling DSARs with unstructured data

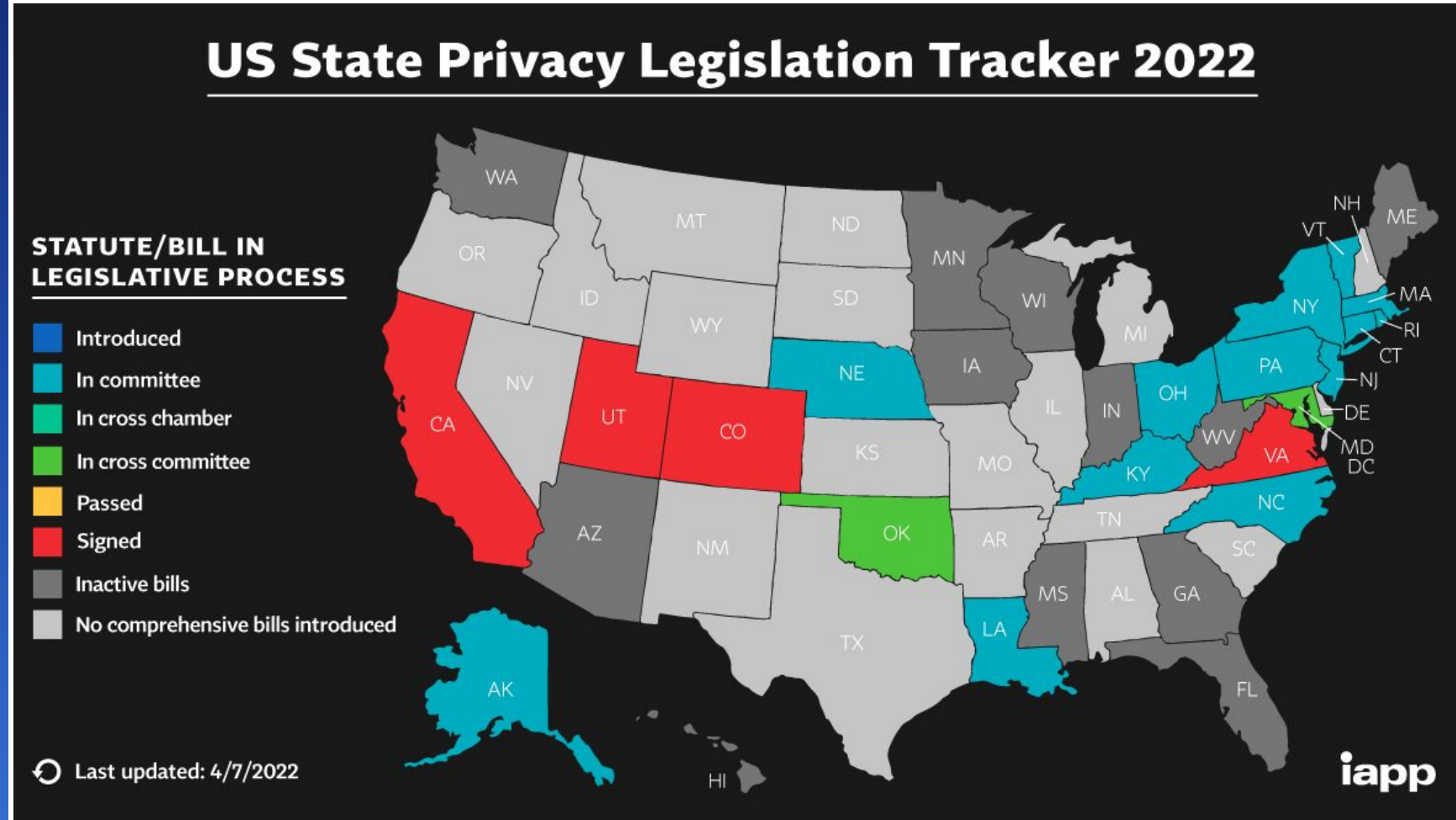
Hammad Rajjoub

How Microsoft + WireWheel integration will make the process run more effectively

Sheridan Clemens

State Overview

- 26 States introduced 51 bills
- 4 passed (CA, CO, VA, UT)
 - CT pending Governor signature
- Steeped in GDPR Principles
- Similar to existing State Laws



State Overview

- All have consumer rights
- All have slightly different requirements
 - Private Right of Action
 - Rectification
 - Automated Decision Making
 - Sensitive Data
 - Privacy Impact Assessments
 - Do Not Sell Requirements
 - Data Retention
 - Privacy Notices

US State Privacy Legislation Tracker

2022

Comprehensive Consumer Privacy Bills

STATE	LEGISLATIVE PROCESS	STATUTE/BILL (HYPERLINKS)	COMMON NAME	CONSUMER RIGHTS							BUSINESS OBLIGATIONS				
				Right of access	Right of rectification	Right of deletion	Right of restriction	Right of portability	Right to opt out of sales	Right against automated decision making	Private right of action	Opt-in default (requirement age)	Notice/transparency requirement	Risk assessments	Prohibition on discrimination (exercising rights)
LAWS SIGNED (TO DATE)															
California		CCPA	California Consumer Privacy Act (2018; effective Jan. 1, 2020)	X	X		X	X		L	16	X		X	
		Proposition 24	California Privacy Rights Act (2020; effective Jan. 1, 2023)	X	X	X	S	X	X	X	L	16	X	X	X
Colorado		SB 190	Colorado Privacy Act (2021; effective July 1, 2023)	X	X	X	P	X	X	X~	S/13	X	X	X	X
Virginia		SB 1392	Virginia Consumer Data Protection Act (2021; effective Jan. 1, 2023)	X	X	X	P	X	X	X~	S/13	X	X	X	X
Utah		SB 227	Utah Consumer Privacy Act (2022; effective Dec. 31, 2023)	X	X	P	X	X			13	X		X	

Rights

Rights	CA CCPA	CA CPRA	VA VCDPA	CO CPA	UT UCPA
Access	X	X	X	X	X
Correction		X	X	X	
Portability	X	X	X	X	X
Deletion	X	X	X	X	X
Limit Sensitive PI		X			X
Non-Discrimination	X	X	X		
Opt-Out Automated Decisionmaking		X			
Opt-Out Targeted-Behavioral Advertising		X	X		X
Opt-Out Profiling			X		
Opt-Out Processing				X	
Opt-Out Sale	X	X	X		
EMPLOYEE RIGHTS		X			

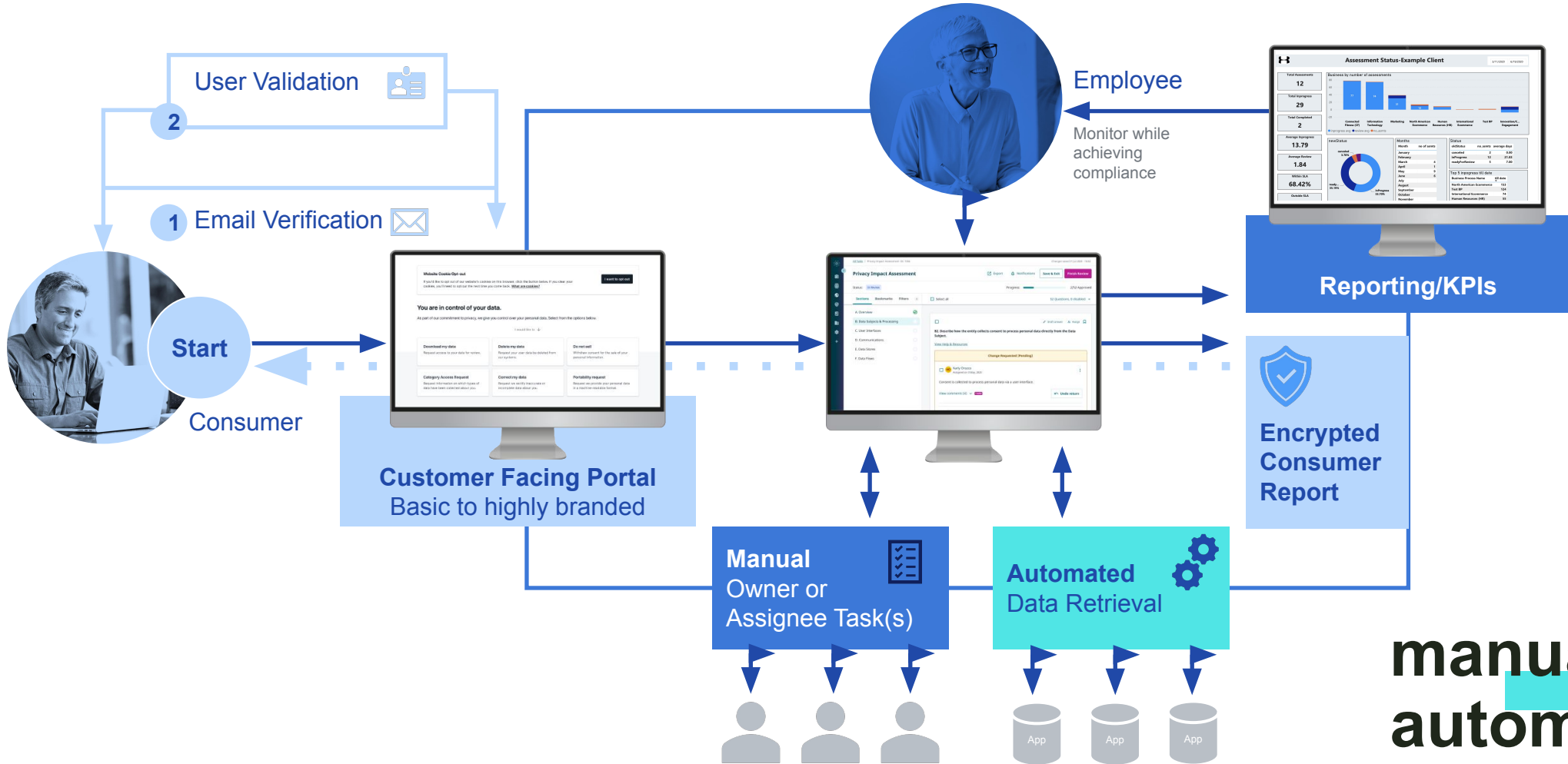
Structured vs Unstructured Data

- Structured Data
 - Uses a predefined and expected format
 - Is in a predefined and fixed format
 - Enables easy entry, querying and analysis
 - CRM forms, online transactions, website forms
- Unstructured Data
 - The common thread with all unstructured data is a lack of definition
 - Lacks metadata tags such as time stamps, file names, field definitions
 - Makes up about 80% of an organization's data
 - PDFs, Word/Excel/PowerPoint, Salesforce, images, emails, texts, social media

Redaction

- Definition
 - Obscuring or hiding text to remove sensitive or unrelated information from otherwise disclosable records
- Challenges
 - Identifying all pieces of information that may be hiding across multiple systems, programs, devices
 - Thoroughly redacting that information prior to production of information being requested
 - **This is particularly relevant to employee access requests where other employee data may be exposed**

With WireWheel, intake, manage and fulfill DSARs...



manually or automatically

Organizations need to manage numerous requirements to safeguard customer & employee privacy



Vendor risk management
Data breach notifications



De-identification
Data minimization



Personal data record-keeping
Privacy impact assessments



Privacy training
Regulation tracking

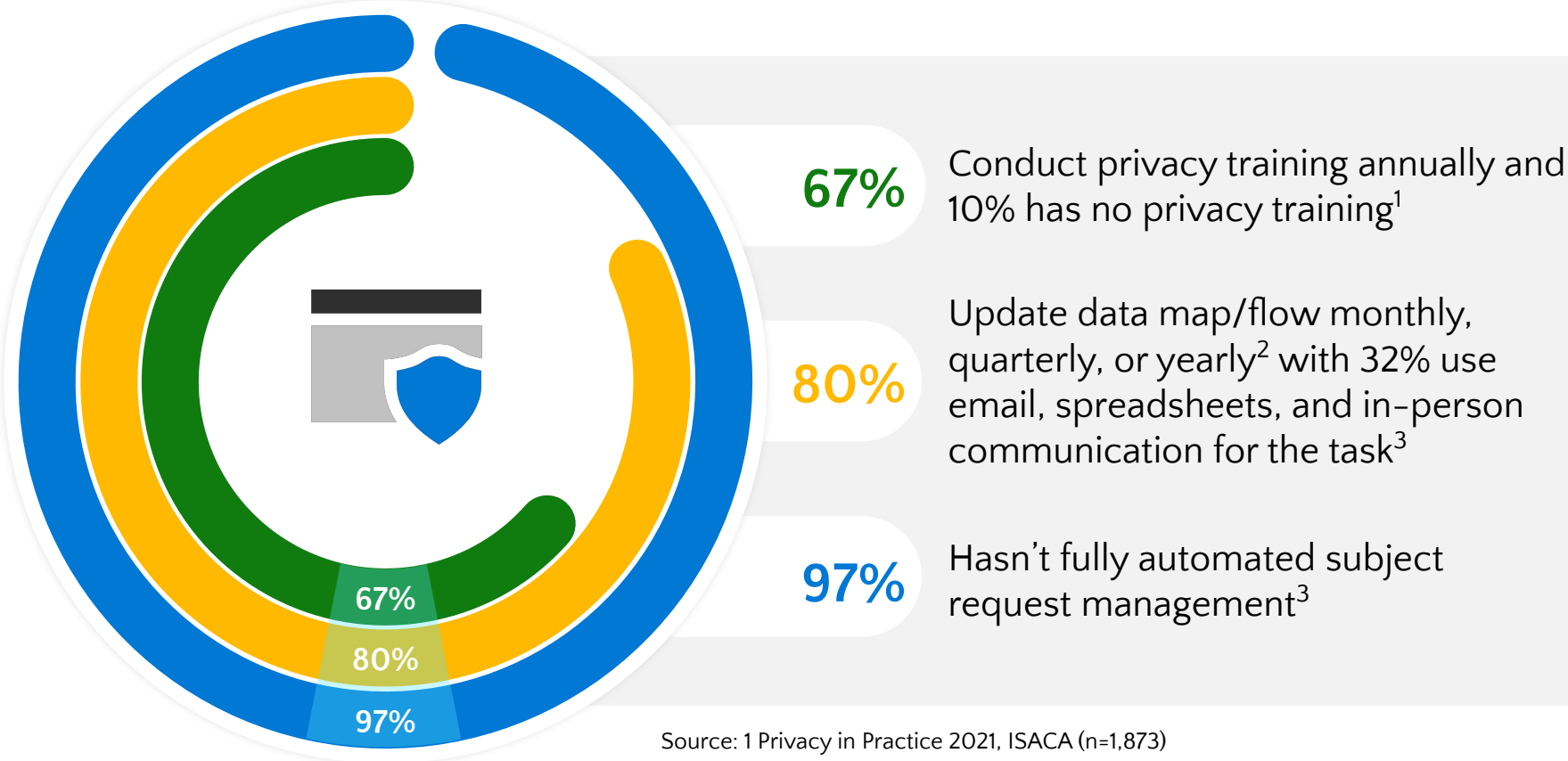


Subject requests management
Access governance/ minimization



Cross-border data transfers/ residency
Consent and preference management

Organizations use manual and point-in-time controls that result in inefficiency and high costs



Source: 1 Privacy in Practice 2021, ISACA (n=1,873)
2 Data Protection and Data Privacy Survey Dec 2020, IDC (n=325)
3 IAPP-EY Annual Privacy Governance Report 2021 (n=473)

Cost of Data Subject Access Requests (DSARs) per month

\$1,702.28	Average cost per DSAR
135.61	Average number of DSARs per mo
\$230K	Total monthly cost

Source: Data protection and privacy survey December 2020 (n=336), IDC

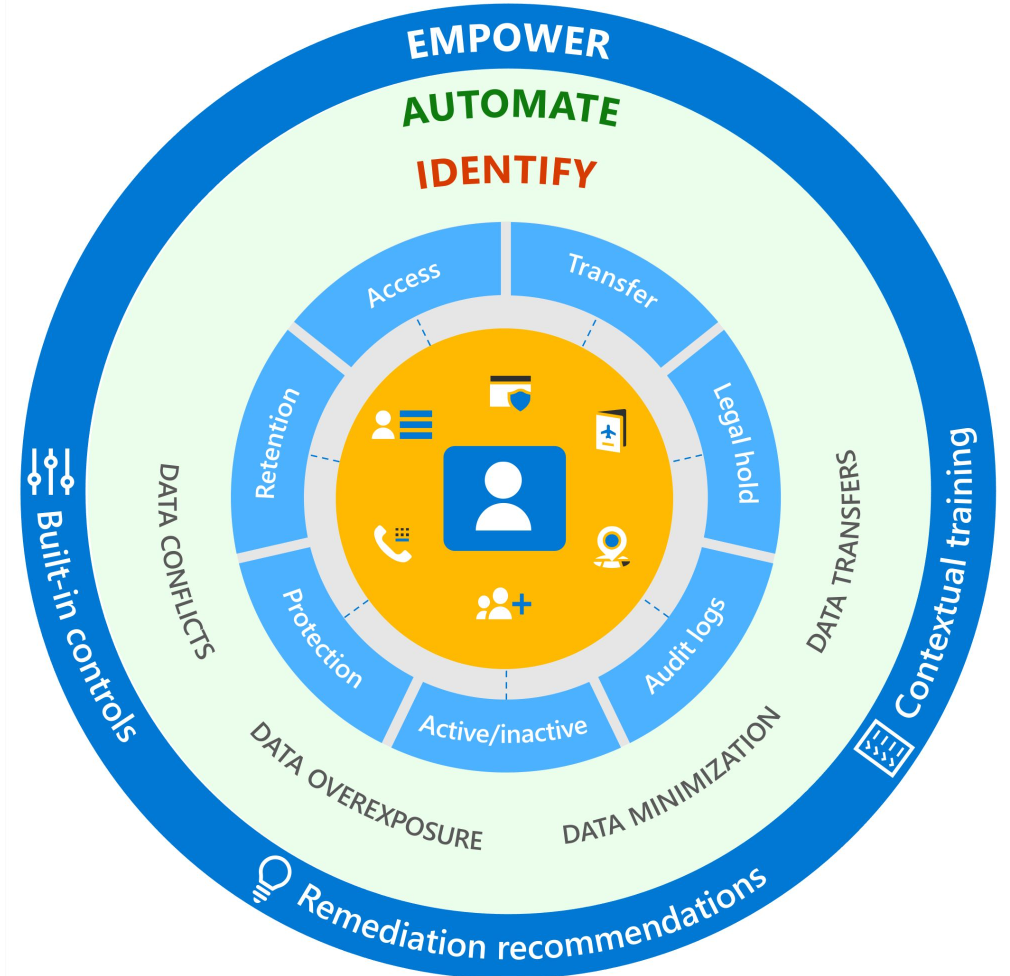
Microsoft Priva

Safeguard personal data and build a privacy resilient workplace

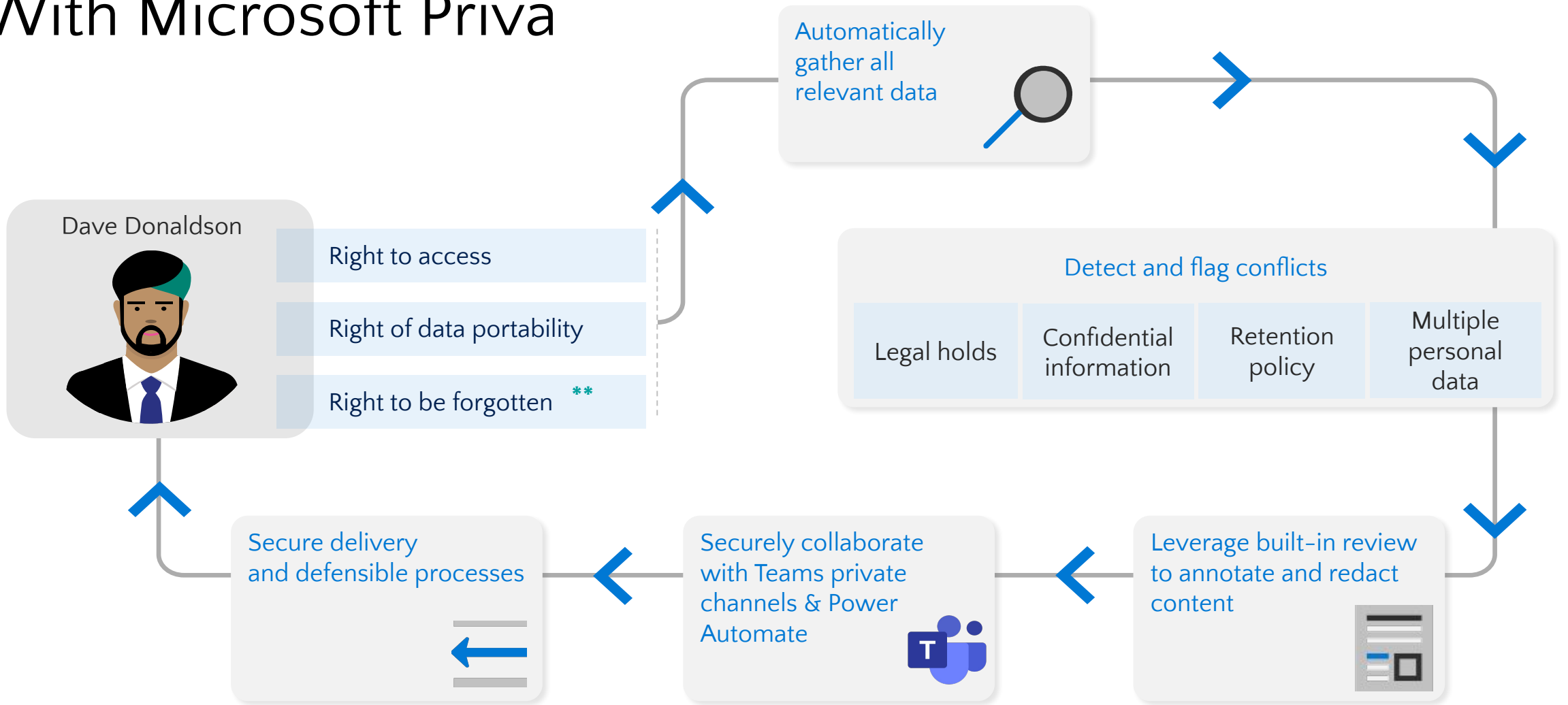
Identify critical privacy risks and conflicts

Automate privacy operations and response to subject rights requests

Empower employees to make smart data handling decisions



With Microsoft Priva



Data Subject Access Requests

Use automation and secure collaboration to fulfill requests at a much faster pace, reducing cost and compliance risk

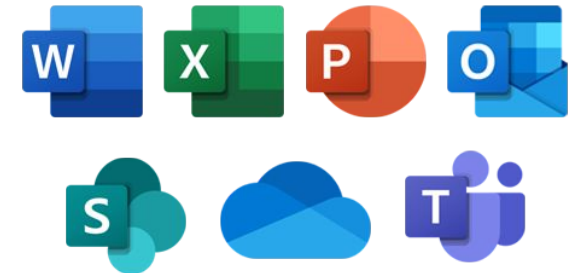
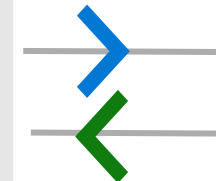
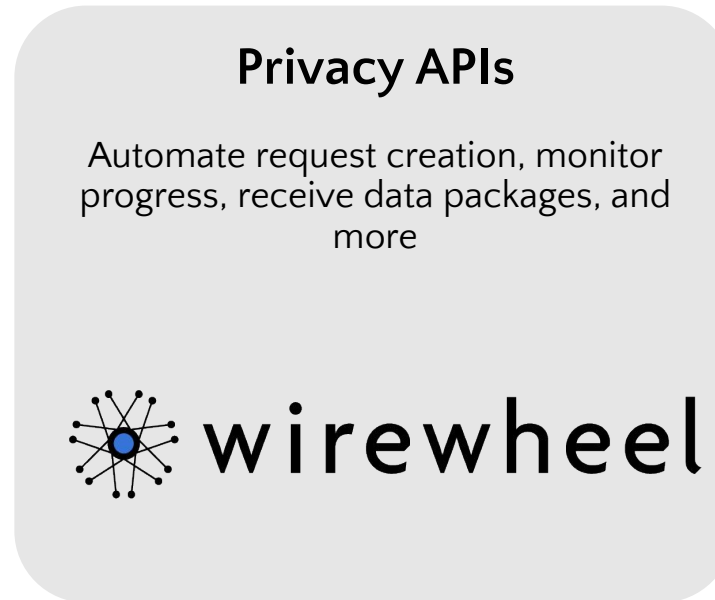
** we provide a Power Automate template to help with custom actions

Integrating Microsoft Priva with Ecosystem

A customer/employee submits a subject access request

WireWheel automatically creates a request in Microsoft Priva via open APIs

The request is processed in Microsoft Priva



The data subject can access personal data including Microsoft content

WireWheel informs and share all data access content across systems with the data subject

Monitor progress of request. Once complete, a secure link to access data is automatically shared via the API

Demo

Questions

SPOKES

Privacy Technology Conference

POLICY / COMMUNITY / TECHNOLOGY

June 22-23, 2022

Register at wirewheel.io/spokes

Past topics include



Preparing for CPRA and CDPA and other Emerging State Privacy Laws



Privacy Operations in Practice



The Challenge of Managing Employee Healthcare Data



Digital Advertising and the Global Privacy Patchwork



Practical Steps to Implementing Privacy Engineering



National Security and Privacy



Explaining AI



Privacy in the Metaverse



VC Investments in the Privacy Space

Thank you

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