

Accountability

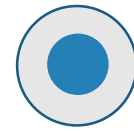
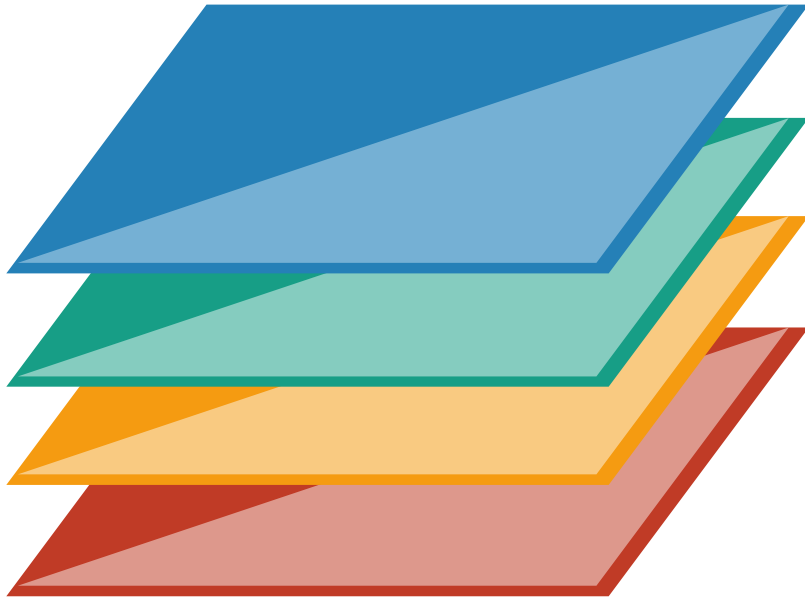
Processes and tools to prove it



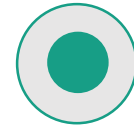
Bruxelles - October 15th 2019

Rosario Imperiali

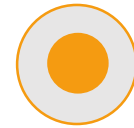
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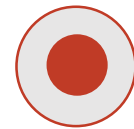
Why be accountable



Need of trust



Accountability as risk management



IRM: Integrated Risk Management

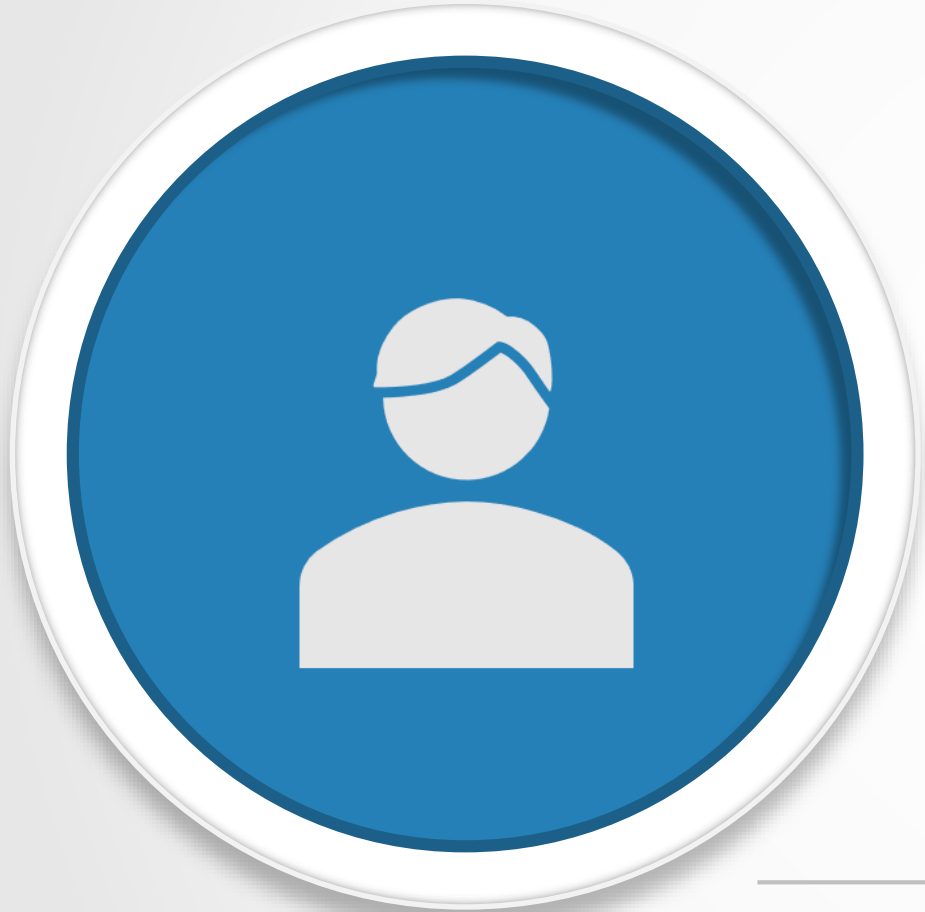


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Why be accountable



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

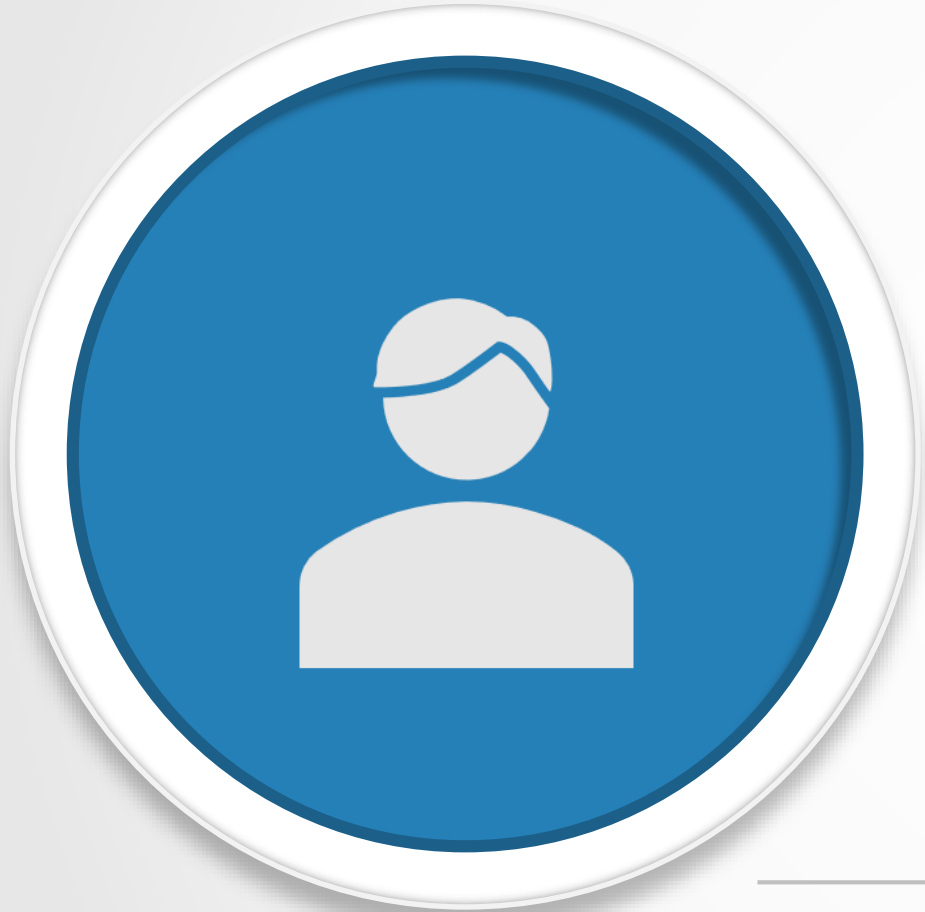
Source: ICO

Intention to fine Marriott International, Inc more than **£99 million** under GDPR for data breach

Date 09 July 2019

Source: ICO

Why be accountable – 2nd 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**

2010

Target exactly the audience you want

Location	Books
Country	TV shows
State	Education
City or Town	High school
Age	College
Gender	Marriage
Interests	Work
Activities	Political views
Music	Relationships



The future is private.

2019

Facebook CEO Mark Zuckerberg says the 'future is private'

Source: **The Verge**

2

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

01



02

Trust

Can be increased by the organizations' accountability on data protection



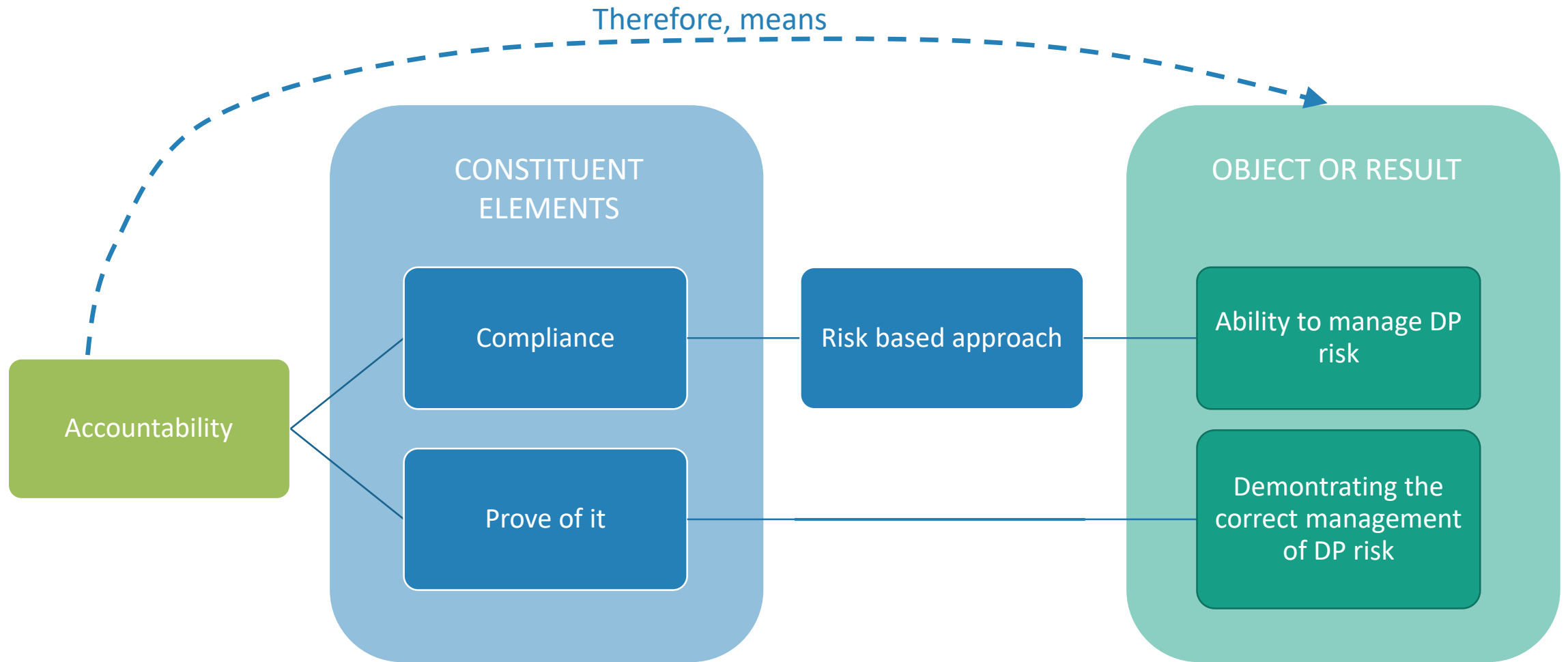
@Ros_Imperiali

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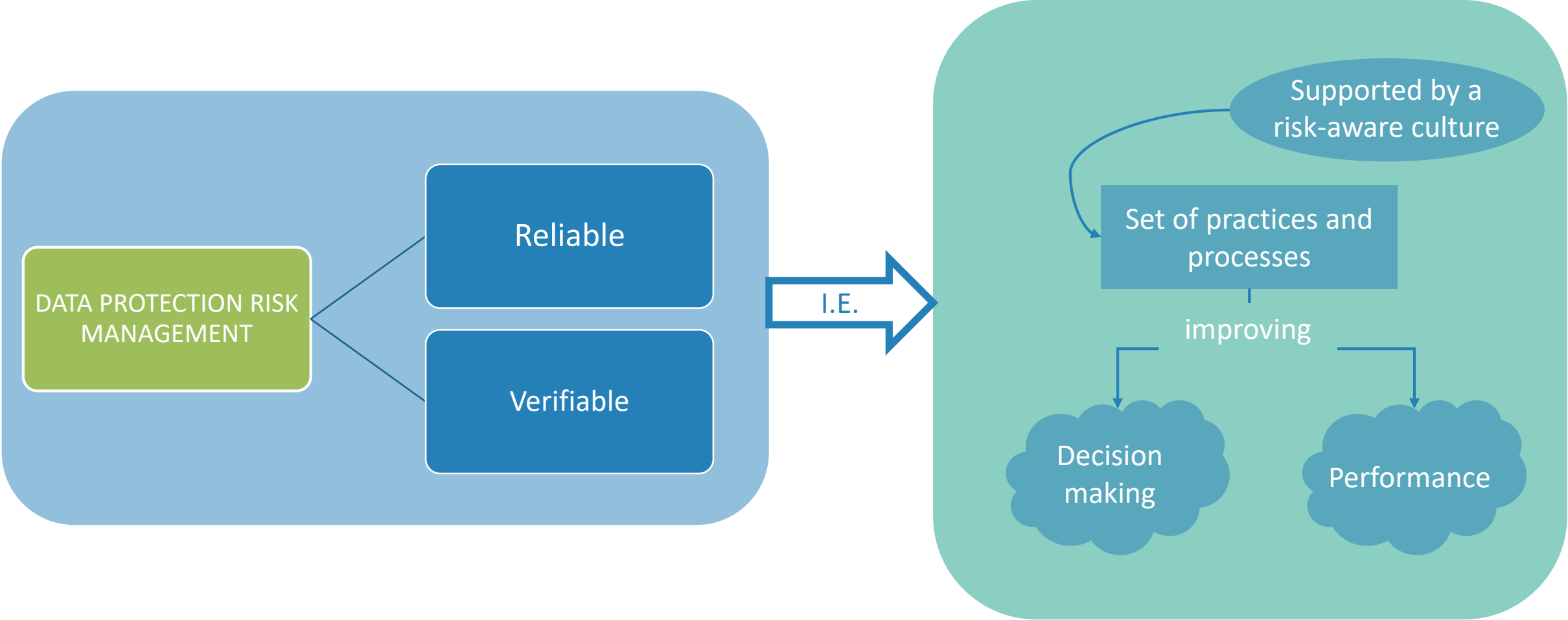
Accountability as risk management



Accountability is ...



Data protection risk management

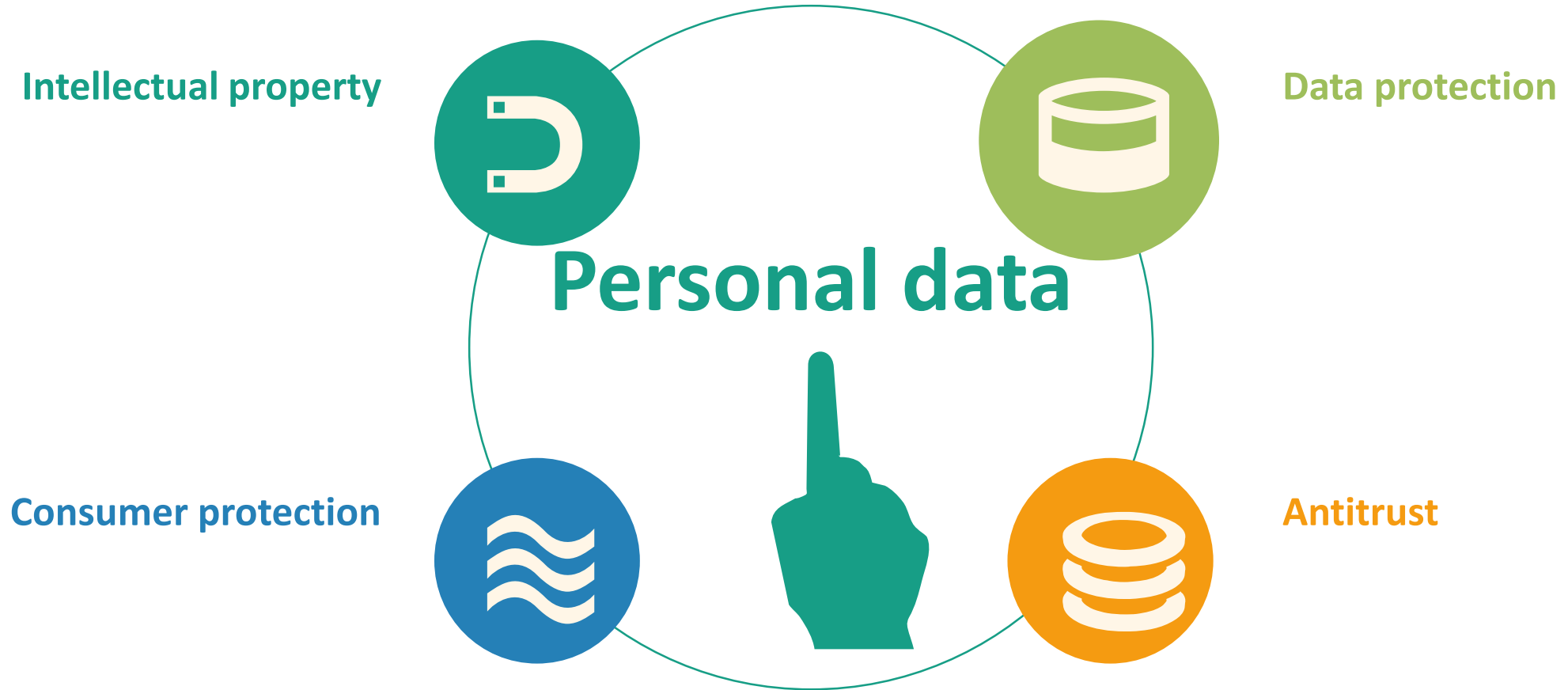


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IRM: Integrated Risk Management



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



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Thank you



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