



**IAPP GLOBAL  
PRIVACY SUMMIT 2017**

# WHO WE ARE

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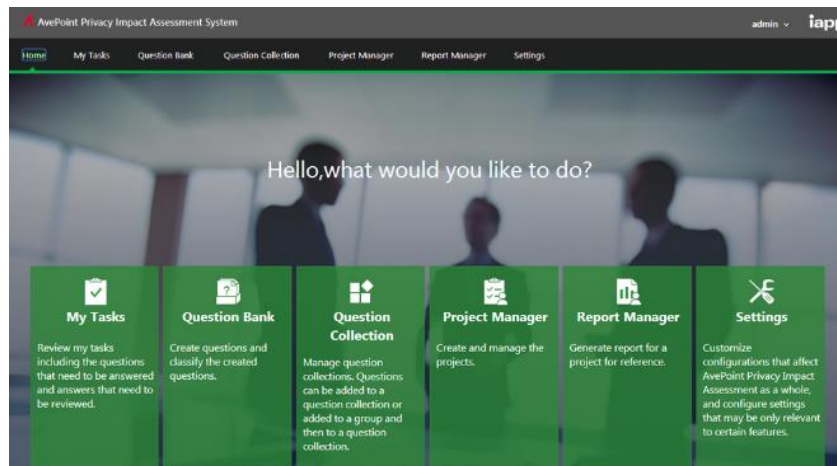
Speaker: Lisa Ruff, Business Development Manager, H3 Solutions  
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Speaker: Mack Sigman, Senior Manager, Accenture Federal Services  
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Speaker: James Koons, CPO, dotmailer  
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# WHAT'S APIA, ANYWAY?

- Co-developed by Avepoint
- Free to IAPP members
- Finishing year three of a seven-year support agreement
- Server-side
- A tool designed to make PIAs simpler and faster



#GPS17



# WHY APIA FOR H3?

1. Provide Privacy Impact Assessment (PIA) reports for our customers
2. Automated solution to increase our productivity
3. Ensure tasks are routed to key stakeholders, tracked and replied to in timely fashion



# WHY APIA FOR FEDSPUG?

1. There are a lots of tools out there but none that start at the source (the content owner) and work from the ground up. APIA did, so we used that as the basis of our Overall Privacy/Compliance/Governance approach.
2. The problem we had was enterprise policy and enforcement was usually at such a high level it didn't address the needs way down at the content owner level.
3. So our approach was work from the content up to the enterprise for policy and compliance automation.



# WHY APIA FOR DOTMAILER?

1. Centralization of PIAs: In the past, we were using a combination of email and Excel spreadsheets to manage PIAs; version control was a real issue and working copies tended to get either overwritten or lost
2. Process control: Using APIA allows me to better control the process (through use of automated emails, etc.) and keeps folks accountable to complete the question sets as well as get them reviewed and commented on
3. GDPR/ePrivacy Regulation: upcoming and emerging privacy regulations played a key role, as well

# SETTING UP APIA: H3

1. Cloud-based solution saved us effort and time to setup and use
2. Ensure standards relevance by leveraging provided privacy and security question bank and collections
3. Report generator available

# SETTING UP APIA: FEDSPUG

1. APIA (with some modifications) is our starting point, the content owner describes what they have (Privacy / ITAR / PII / HIPAA / Sensitive content)
2. We then tailor the compliance and governance enforcement tool specifically for that owner, based on their input
3. Lastly we layer in a Permissions Discovery and Management Tool so the owner can constantly review who has access to their content





# SETTING UP APIA: H3

## PRIVACY IMPACT ASSESSMENT

### INTRODUCTION

Providing our customers with the confidence that H3 Solutions and The Quad Solutions center ensures the highest level of protection of their privacy



**System Name:** The Quad Solution Center  
**System Acronym:** The Quad  
**System Owner:** H3 Solutions/Individual customers  
**Company/Agency Name:** H3 Solutions, Inc.

Friday, April 14, 2017

### Qualification Questions

1.1. Does your system collect any information in identifiable form (personal data) on the general public?

Yes

### Comments:

The System (The Quad) collects the following from the individual user who accesses it from the Office Store  
First Name; Last Name, Email address and role/title



# SETTING UP APIA: DOTMAILER

1. Acquisition and install: Very easy through the IAPP website and quick-start guide, the software was installed and set up for use within 20 minutes.
2. Shared question collections: Used the shared question collections provided through the IAPP website to get started and eventually started building my own
3. Championship and adoption: At my level (C-level) championed the use of the system through privacy awareness training as well as highlighted that the use of APIA strengthens our commitment to data privacy and data protection overall (using this gives us more privacy awareness)

# SETTING UP APIA: DOTMAILER

AvePoint Privacy Impact Assessment System James Koons ▾ iapp

Home My Tasks Question Bank Question Collection Project Manager Report Manager Settings

### Questions

- 1 ▾ Group: Privacy Impact Assessment Screening
  - 1 ▾  Will the project compel individuals to provide information about themselves?
  - 2 ▾  Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recog...
  - 3 ▾  Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?
  - 4 ▾  Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
  - 5 ▾  Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?
  - 6 ▾  Will the project involve the collection of new information about individuals?
  - 7 ▾  Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records o...
  - 8 ▾  Will the project require you to contact individuals in ways that they may find intrusive?
- 2 ▾ Group: PIA Need
  - 1 ▾  Summarise why the need for a PIA was identified (this can draw on your answers to the screening questions).
  - 2 ▾  Do you have any links to other relevant documents related to the project, for example a project proposal?
  - 3 ▾  Explain what the project aims to achieve.
  - 4 ▾  What will be the benefits will be to the organisation, to individuals and to other parties?
- 3 ▾ Group: Information Flows
  - 1 ▾  How many individuals are likely to be affected by the project?
  - 2 ▾  Describe the collection, use and deletion of personal data. Provide any flow diagrams to help explain data flows.
- 4 ▾ Group: Consultation Requirements
  - 1 ▾  Who should be consulted internally and externally? How will you carry out the consultation?
  - 2 ▾  Explain what practical steps you will take to ensure that you identify and address privacy risks.
- 5 ▾ Group: Identifying Privacy and Related Risks
  - 1 ▾  Describe the actions you could take to reduce the risks, and any future steps which would be necessary (eg the production of new guidance or future sec...
  - 2 ▾  Identify the key privacy risks and the associated compliance and corporate risks in the following format: a. Privacy Issue b. Risk to Individuals c. Complia...
- 6 ▾ Group: Sign-Off and Outcome Recording
  - 1 ▾  Who has approved the privacy risks involved in the project?
  - 2 ▾  What solutions need to be implemented?
- 7 ▾ Group: Integrating PIA Outcome Back Into Project Plan



# FUTURE OF APIA: H3

1. Easy access/availability of familiar tool for new cloud solutions we bring to market
2. Tools to ensure custom solutions for our clients also meet privacy standards and provide CPO with PIA
3. Cloud solution is updated with any emerging new standards questions critical to our customers' needs

# FUTURE OF APIA: DOTMAILER

1. Vendor assessments: A new question set has been added and we are working out the process behind it to add vendor assessments to the APIA system
2. Use for InfoSec: ISO/IEC 27001 and 27002, more use of the system by my information security folks
3. Custom questions sets for each process/PIA/assessment based on geographic area: U.K., EU, South Africa, Australia, Singapore, Belarus and USA where the dotDigitalGroup has offices

# FUTURE OF APIA: FEDSPUG

1. We will be holding training sessions for our user community on how we did it and how they can do it for their agency or customer, the target date for those sessions is May 2017 and will have a Skype session as well for remote persons <https://www.meetup.com/fedspug-wspdc>

# HOW DID THINGS GO? (WE REALLY WANT TO KNOW)

Did you enjoy this session? Is there any way we could make it better? Let us know by filling out a speaker evaluation.

- Start by opening the IAPP Events mobile app
- Select this session and tap “Click the following link for speaker evaluations”
- Once you’ve answered all three questions, tap “Done” and you’re all set
- Thank you!

