

Data-Centric Security

GDPR and CCPA compliance in cloud and on-premises environments

About Informatica

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Executive Summary

Organizations today store sensitive customer, product, and other business-critical data across an increasing number and variety of platforms and physical locations across a global enterprise. This personal and sensitive data is often located across public cloud and on-premises repositories, including Software as a Service (SaaS) applications. With Informatica[®] Intelligent Cloud ServicesSM (IICS), for example, Informatica provides infrastructure data protection in the form of failover data centers, user authentication and access controls, network security protocols, and encryption with security layers at the operating system, database, and application levels.¹

Multi-cloud and on-premises environments provide new challenges for data privacy compliance and protection teams. The dynamic and complex interaction of data, users, and applications requires additional measures to ensure that the organization's critical data is tracked, understood for risk exposure, and protected based on priority. The risks are not hypothetical, as demonstrated in high-profile cloud and on-premises data security breaches, and by the fines from new regulations such as the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA), amongst many others that are continually evolving globally.

In these dynamic environments, you need metadata-driven intelligence and automation to ensure sustained data protection and privacy compliance, with the ability to answer questions such as the following:

- Where is all the data located that needs to be protected?
- Who is accessing data appropriately and with what applications?
- Does current access and use adhere to privacy regulations and data use policies?
- Is data protection appropriate and is data risk at acceptable levels, or are there conditions creating more risk exposure that we should remediate?

The results of sensitive data discovery and classification to gain visibility become the foundation for decision support regarding data risk exposure, protection priorities, and compliance status in a multi-cloud and on-premises data ecosystem.

This paper provides a framework of privacy and protection strategies for multi-cloud and on-premises environments with a data-centric approach that can:

- Apply analytics, automation, and artificial intelligence (AI) to identify and protect sensitive data from all sources in a multi-cloud and on-premises environment, using a single interface for dashboards and reporting.
- Comply with evolving data governance and security regulations.
- · Provide audit readiness.
- · Alert key stakeholders when anomalous user behavior occurs.

Informatica Data Privacy Management and Data Masking provide comprehensive risk management capabilities to perform these functions, adding an integrated, data-centric layer of security controls for all sensitive data sources in a multi-cloud and on-premises ecosystem.

¹ Monahan, David, "Informatica Cloud Security Architecture Overview," Enterprise Management Associates (EMA), March 2016

Data Protection for Your Environment

According to research firm IDC, the world is predicted to create 175 zettabytes of data in 2025, up from 33 zettabytes in 2018.2 Organizations across all industries rely on the accuracy, availability, and security of their data to generate revenue, serve customers and maintain their loyalty, increase productivity, and support other mission-critical business processes.

The continued exponential growth in data volume and use also includes sensitive data across multiple silos, both on-premises and in the cloud, and in a variety of data formats. These conditions have rendered traditional data security methods such as on premises system-centric controls and firewalls less effective, requiring a new approach to data protection across an organization that supports cloud hosted applications, data sharing and mobility.³

There is also the increased trend where a large percentage of the data an organization uses is ingested from external sources. It is critical to understand the sensitivity of this data at the time it is onboarded into the organization and before it is proliferated to multiple systems and analytics uses. However, most companies cannot accurately identify where all their sensitive data is located, especially if it is in unstructured formats or across various on-premises and cloud applications, relational databases, data warehouse appliances, and big data sources. This lack of knowledge increases an organization's risk, and for these reasons, data security breaches are currently the top IT security risk.4

With data security breaches on the rise, in tandem with the increased volume and proliferation of sensitive data, organizations must develop a risk exposure mitigation strategy that includes a data-centric privacy and protection solution with these key features:

- Visibility into all data sources to discover and classify sensitive data from across the organization
- Ability to implement protection mechanisms for sensitive data to mitigate security breaches
- Compliance with current data privacy regulations, including the use of metadata-driven intelligence, automation and AI to monitor user behavior and report anomalies in near real time
- Rich analytic visualization tools for sensitive data management
- Transparent and comprehensive reporting capabilities for audit readiness, including control attestation and remediation of risk exposure gaps

Gartner predicts that integrated protection products will replace disparate siloed data security tools in 40% of large enterprises, up from less than 5%.5 These data-centric privacy and protection solutions, including Informatica Data Privacy Management and Data Masking, provide a centralized view of risk exposure, so that all key stakeholders across an organization can track personal and sensitive data movement, and apply protection mechanisms as required by governance policies and data privacy regulations.

² IDC White Paper, "The Digitization of the World – From Edge to Core" (November 2018).

 ^{3 &}quot;Market Guide for Data-Centric Audit and Protection," Gartner, March 21, 2017.
4 "Data Breaches and Sensitive Data Risk," Ponemon Institute, February 2016.

⁵ "Market Guide for Data-Centric Audit and Protection," Gartner, March 21, 2017.

Four-Point Strategy for Protecting Personal and Sensitive Data

Data risk exposure is the impact of losing control of personal and sensitive data, and the leading cause of this loss is a data security breach from unauthorized access. A potential misconception is that simply locating sensitive data is enough to remediate risk. However, locating and classifying this data is only the first step in a comprehensive risk remediation strategy that considers data scope and prioritization in respect to compliance policies.

The next steps involve assessing your organization's risk exposure, based on the results of the location and classification analysis, and determining a strategy for reducing the risk that involves all key stakeholders—not just the IT organization—with automated controls that enforce data governance policies. Your strategy must also include implementing a comprehensive data-centric privacy and data protection solution that provides capabilities to enforce regulatory compliance, rich analytic visualizations of sensitive data in dashboards for audit reporting, and protection for all personal and sensitive data types across the organization. The solution must also protect sensitive data across all sources in your multi-cloud and on-premises environment: public and private cloud, including SaaS applications, and on-premises applications and databases, unstructured and structured data, and data warehouse appliances, as well as other repositories.

1. Discovery and Classification

A common manual approach to discovery is to review existing sources and send questionnaires. However, this is inadequate because it consumes valuable time and resources, and it is often inaccurate being prone to errors, and quickly out-of-date, with reliance on self-reporting rather than close to real time monitoring of user behavior and data movement.

Organizations need to ask themselves:

- What data do we store, who has access to it, and for what appropriate purposes?
- · How do we manage user access privileges and data access entitlements?
- How will we protect sensitive data and ensure that the appropriate controls are in place?

Other considerations for discovery and classification compliance include:

- Defining and understanding your data landscape, including on-premises and cloud databases, applications, and structured as well as unstructured data.
- Building a plan to manage externally sourced data.
- · Mapping which systems contain sensitive data.
- Procuring a solution that can map the movement of the data across your ecosystem, while maintaining a near-real-time view with analytics and reporting tools.

2. Privacy Compliance

Organizations struggle to identify, monitor, and remediate data risk exposure to comply with data privacy regulations. Further, they must monitor, analyze, and alert on data access or movement that could jeopardize compliance.

The GDPR, enforceable as of May 25, 2018, was adopted with the intent to strengthen and unify data protection for all individuals within the European Union, thereby simplifying the regulatory environment for international business. Many businesses have not yet fully prepared for this regulation and are not sufficiently compliant; but noncompliance could result in significant fines and reputational damage. On the other hand, compliance can provide the opportunity for competitive advantage as a sensitive data privacy and security differentiator that builds customer trust and maintains loyalty, while also driving data-driven digital transformation outcomes. In addition, as the CCPA and other global privacy regulation goes into effect, you'll need a reliable

and repeatable framework to scale as privacy mandates continue to evolve.

Organizations need to enforce data privacy policies that take advantage of metadata-driven intelligence to identify data stores that contain GDPR-, CCPA-, etc. relevant "data domains." These policies are multifactor, with AI logic that determines which combinations pose the greatest privacy threats.

3. Data Protection

In 2019, as of Q3, there were over 5,000 data breaches with nearly 8 billion records exposed.⁶ Despite large investments in infrastructure-level privacy and data protection, critical data remains vulnerable. Organizations need to continuously secure high-risk data, identify suspicious behavior and unauthorized use or movement of critical data assets, and automate and orchestrate remediation

Organizations should identify critical data risks and remediate them with data-centric controls (rather than traditional cybersecurity tools, such as system-centric access controls and network firewalls). For example, effective data-centric protection controls include data masking and encryption solutions. In addition, organizations must monitor user access and data use behavior. Inappropriate data access or unusual behavior can indicate that users are not compliant with privacy policies or that their credentials have been compromised.

⁶ "Risk Based Security's Q3 2019 Data Breach QuickView Report.

4. Audit Readiness and Response

Companies are subject to more privacy audits and risk exposure assessments for personal and sensitive data than ever before. However, they struggle to provide proof to auditors that they have visibility into data privacy controls and sufficient data protection.

Organizations must be able to immediately respond to audit inquiries to provide evidence that they know where and what data exists, which data exposure risks are a priority, and how the data is protected and appropriately used. They should consider that auditors will want reports and visualizations that are abstracted for departments or locations, and provide the ability to drill-down across specific data domains.

Conclusion

Reliable infrastructure data privacy governance policies and protocols are necessary to protect any multi-cloud and on-premises environment that shares confidential personal data on users, across data center servers across the globe, and including throughout cloud applications. The continued onslaught of data security breaches and growing privacy compliance requirements indicate that organizations must implement adequate processes and tools for identifying, analyzing, and protecting personal and sensitive data.

In the current climate of heightened privacy risk exposure and routine data security breaches, companies must develop a comprehensive digital privacy and data protection strategy to continuously monitor, analyze, and remediate risks to personal and sensitive data. They need to monitor data in near real time for visibility into data misuse or security breach, inappropriate access, unusual behavior, or improper cross-border transfers. With data-centric privacy and data protection solutions such as Informatica Data Privacy management and Data Masking, organizations can improve their data risk exposure posture to help reduce the impact of data security breaches and internal misuse, and meet the stringent requirements of regional and industry privacy regulations.

Recommendations

- 1. Perform a risk assessment to gain a clear understanding of where your sensitive data is located, how far it proliferates throughout your data ecosystem, and which sets of sensitive data are most vulnerable for priority risk remediation.
- 2. Based on your assessment results, prioritize your organization's top priority sources of the most sensitive data at risk; determine a strategy and enable a solution for protecting it; and implement the strategy for data privacy that is repeatable across multiple regulations.
- Define, document, and distribute your organization's compliance policies and the key stakeholders that are accountable for GDPR, CCPA or other regional and industry privacy compliance. Build a strategic plan that offers a repeatable model for GDPR, CCPA and beyond.

More Information

For more information about sensitive-data security risks and protection considerations, refer to the following publications:

<u>Informatica Data Privacy Management</u> White Paper: <u>Intelligent Data Privacy</u>

Bloor Research: Discovering Sensitive Data

