

Paris, 16-18 October 2018



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Test data preparation for GDPR compliance

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Paris, 16-18 October 2018



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GDPR core principles

Data subject rights

GDPR core principles – data subject rights

- Breach Notification (within 72 hours)
- Right to Access by the Data Subject
- Right to be Forgotten / Right to Erasure
- Right to Object Processing & Right to Restriction of Processing
- Data Portability
- Privacy by Design

→ How does it impact sample datasets used for tests?

→ What can be considered as “Personal data”?

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GDPR core principles

Right to be Forgotten

GDPR core principles – Right to be Forgotten

- How do we know when we should remove data from a dataset?
- How long should we keep our datasets?
- Conditions for erasure?

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GDPR core principles

Right to Object Processing
& Right to Restriction of Processing

GDPR core principles – Right to be Object

- Articles 18 and 21 are related to each other
- Using data for testing purposes can be considered processing
- The data subject can oppose the erasure of the personal data and request the restriction of their use instead

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GDPR core principles

Privacy by Design

GDPR core principles – Privacy by Design

- Data protection through technology design
- Pseudonymisation is not enough
- Basic data obfuscation is certainly not enough
- Why do we use production data, or data derived from production data, for testing?

GDPR core principles – Privacy by Design

- What can we use to identify an individual?

Think about a few examples and write them down.

GDPR core principles – Privacy by Design

- Think beyond social security numbers, names and dates of birth.
- Can you identify an individual with combination of « insensitive » data types?
- In this dataset, what can be used to identify an individual?

GDPR core principles – Privacy by Design

A	B	C	D	E	F	G	H	I	J
ID	Social security number	Name	Surname	Address	Postcode	City	Birth date	Car plate	Invoice number
0	290021580044266	Laure	Joly	292 passage Michaël Henry	84570	MORMOIRON	1956-07-28	ZS-795-OR	393
1	237118945286757	Laura	Vincent	184 avenue Annie Garcia	14700	ST PIERRE CANIVET	2009-04-06	OV-818-NK	393
2	145064057880949	Frédéric	Martin	333 impasse Adrien Aubry	38080	ST MARCEL BEL ACCUEIL	1902-05-18	UB-988-VY	393
3	171098435070322	Yannis	Guichard	242 avenue Joël Menard	18400	LUNERY	1974-11-10	XD-733-TE	393
4	135056388080957	Benoît	Barthelemy	54 impasse Cécile Rodriguez	28170	THIMERT GATELLES	1961-02-16	ZP-660-HA	393
5	188088142940097	Jean-Paul	Vasseur	323 passage Michel Baron	63800	PERIGNAT SUR ALLIER	1952-11-02	XD-733-TE	393
6	181030394272738	Michaël	Aubry	304 route Jean-François Roussel	39310	BELLECOMBE	2008-02-21	YX-384-BV	393
7	16605473786716	Laurent	Vasseur	231 boulevard Raphaël Lambert	45310	LA CHAPELLE ONZERAIN	2010-03-05	MA-520-NF	1999-04-18-3411944
8	142083235334988	Laurent	Moulin	56 impasse Laura Klein	52170	FONTAINES SUR MARNE	1939-03-21	FF-719-GY	393
9	125015870049824	Georges	Leroux	204 chemin Gilles Barre	14480	LANTHEUIL	1974-08-15	IB-641-AP	393
10	241039612843989	Charlotte	Baron	259 passage Claude Guerin	67140	ITERSWILLER	1941-08-21	AB-150-XK	393
11	129015978515024	Laurent	Tessier	114 impasse Jocelyne Bouvier	56920	CROIXANVEC	1900-08-10	ZJ-448-YI	393
12	219012953542857	Sophie	Millet	186 place Nadine Blanc	69440	TALUYERS	1971-03-31	PS-429-TA	393
13	228078547029391	Sylvie	Laporte	102 passage Charlotte Bernard	85320	CORPE	1961-09-27	RB-552-CE	393
14	23802121042466	Aurélié	Noel	319 boulevard Alexandre Remy	63490	SUGERES	1946-12-29	FA-529-SA	393
15	292038337661327	Christiane	Gauthier	171 impasse Isabelle Legrand	39300	BOURG DE SIROD	1981-08-18	NO-230-MD	393

K	L	M	N	O	P
Password	Company	Profession	Student number	Phone number	Email
GIFbuSn2u47lcor6u7D4AhNel	Orange	Ouvriers de production non qualifiés du travail du bois et de l'ameublement	sans objet	719571627	laure.joly@cappemini.fr
juM6cs4z4PNrWvkTFyf8bMOKAdUH	Mairie de Paris	Vendeurs en ameublement, décor, équipement du foyer	sans objet	850858581	laura.vincent@cappemini.fr
PZfVxWfzIS5vB	Valeo	Vendeurs par correspondance, télévendeurs	sans objet	757796904	francois.martin@cappemini.fr
4bEP6BoOC3fnFDQzYzQKriXhznZ6	Saint-Gobain	Agents de voyage et auxiliaires de transports indépendants, de 0 à 9 salariés	sans objet	894351930	yannis.guichard@cappemini.fr
UV8Dmk78Sgwtymuux2x	Air liquide	Responsables commerciaux et administratifs des transports de marchandises (non cadres)	sans objet	415300908	benoit.barthelemy@cappemini.fr
KwbVZe7BgMO05utCreZiGEWZTVc2cg	Société générale	Ingénieurs et cadres d'étude du bâtiment et des travaux publics	sans objet	535650086	jean-paul.vasseur@cappemini.fr
k0ssajzAEBFNE4cmTMkwbK4	Employeur	Personnes diverses sans activité professionnelle de 60 ans et plus (sauf retraites)	sans objet	130209944	michael.aubry@cappemini.fr
cZRC7Kk5vEBWUz	Groupe PSA	Ouvriers qualifiés divers de type industriel	sans objet	841092942	laurent.vasseur@cappemini.fr
lOqww1htoUVK6qj1WaPLj	Engie	Ouvriers de production non qualifiés : métallurgie, production verrière, céramique, matériaux de construction	sans objet	639232354	laurent.moulin@cappemini.fr
GYJJJa3i8A4CavjrachK0uF9jhutlzPc	Axa	Clergé régulier	sans objet	328668407	georges.leroux@cappemini.fr
MzMS3UeImGloO23oEZdyj8	Total	Employés administratifs des services techniques de la banque	sans objet	782688061	charlotte.baron@cappemini.fr
MIM6uWLWLh40CUC6efisEFK08E4aTcvW	Engie	Directeurs techniques des grandes entreprises	sans objet	537610367	laurent.tessier@cappemini.fr
r5ssYOzSECRJFnhzSOF	Société générale	Conducteurs de véhicule routier de transport en commun (salariés)	sans objet	284056039	sophie.millet@cappemini.fr
V6Qx6xrvd8H3xQW7A	Sanofi	Agents de maîtrise en construction mécanique, travail des métaux	sans objet	660137274	sylvie.laporte@cappemini.fr
RgC6IT4vOb4cGS09	Crédit agricole	Responsables commerciaux et administratifs des transports de marchandises (non cadres)	sans objet	745660941	auriel.noel@cappemini.fr
31kU7OQPuXMowmRI	Michelin	Dockers	sans objet	843769531	christiane.gauthier@cappemini.fr
2OFdfNvdIGbsGmfH8	Publicis Groupe	Agents de service de la fonction publique (sauf écoles, hôpitaux)	sans objet	338320070	franck.chevalier@cappemini.fr
Ml2Ax2jyPUeb0YhZOHUO16DGGxAjh	ArcelorMittal	Ingénieurs et cadres de fabrication des autres industries (imprimerie, matériaux souples, ameublement et bo)	sans objet	854815458	laetitia.philippe@cappemini.fr
74w6lmSZhbUSAt3n8Wa	Engie	Inspecteurs et autres personnels de catégorie A des Impôts, du Trésor et des Douanes	sans objet	778345202	sonia.faure@cappemini.fr

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How to solve the privacy issue

Put on your white hat

How to solve the privacy issue when you test with production data

- Analyze, clean and organize your data
- Minimize your datasets
- Do not store datasets that are bigger than necessary
- When it is possible, use randomly generated data
(NOT production data)

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Advocate for Privacy by Design

Why does it matter?

Advocate for privacy by design

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actor:
  username: "Zach-Percevecz"
  picture: "https://venmopics.appspot.com/u/v1/m/dd455364-3006-4899-9722-91c375e9d992"
  is_business: false
  name: "Zach Percevecz"
  firstname: "Zach"
  lastname: "Percevecz"
  cancelled: false
  date_created: "2016-04-30T17:39:41"
  external_id: "1940033212776448136"
  id: "10454914"
  transactions:
    0:
      target:
        username: "Martin-Bodenheimer"
        picture: "https://graph.facebook.com/v2.10/10211859898042335/picture?type=large"
        is_business: false
        name: "Martin Bodenheimer"
        firstname: "Martin"
        lastname: "Bodenheimer"
        cancelled: false
        date_created: "2017-02-07T00:06:56"
        external_id: "2144614878281728263"
        id: "18121184"
      created_time: "2018-09-27T20:23:21Z"
      mentions: []
      message: "Dope noms."
      type: "payment"
      likes:
        count: 0
        data: []
  
```

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Questions?