

Data & More | DataSubject Manager™

Protecting digital privacy and minimizing the risk, cost, and liability of processing unstructured data

Data Privacy Compliance | Data Subject Access Request | Data Breach Mitigation

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Executive Summary

The new DataSubject Manager™ provides a comprehensive overview of all Data Subjects in your Microsoft 365 tenant and any Data Subject in On-Premises Mail, SharePoint, and File Shares.

Using the DataSubject Manager™, a DPO or CISO can quickly identify which Data Subjects they oversee and whether any of these subjects have Privacy Data at Risk. (**PDR**)

The total number of Data Subjects at Risk (**DSR**) serves as THE critical metric for any Data Protection Officer (DPO). For the first time, the Data & More Privacy Platform delivers this vital insight to any DPO.

Moreover, Data Subjects at Risk is not just a reporting metric; the DataSubject Manager also serves as the primary resource for Victim Analysis, Data Subject Access Requests (DSAR), Requests for Insight (RFI), or Requests for Ratification (RFR).

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Why manage Data Subjects?

All data privacy laws aim to protect Data Subjects from harm caused by the misuse of their data, and the entire legal framework for Privacy Laws, such as GDPR, CCPA, PIPEDA, and HIPAA, is centered on the rights of the Data Subject. This includes rights such as the right to notification in the case of a data breach, the right to insight, and the right to ratification.

However, the increasing volume and complexity of unstructured data pose significant risks to organizations in terms of data privacy and compliance.

Identifying, locating, and managing personal data scattered across various data sources becomes a daunting task. Failure to adequately protect Data Subject information can result in:

- **Legal and regulatory penalties:** Non-compliance with data privacy regulations like GDPR can lead to hefty fines and reputational damage.
- **Data breaches and security incidents:** Unprotected personal data is vulnerable to unauthorized access and malicious attacks, leading to financial losses and legal liabilities.
- **Erosion of trust and customer relationships:** Mishandling personal data can damage customer trust and negatively impact an organization's reputation.

Effectively managing Data Subjects is crucial for organizations to mitigate these risks and ensure compliance with data privacy regulations. **The DataSubject Manager provides the necessary tools to achieve this objective.**

Data Subject Access Requests (DSAR) are particularly challenging. If a company needs to deliver all documents from a specific Data Subject, it can be done easy if the company has key information to search for, like full name, social security number, or customer number. However, it is very complicated if documents don't contain key search parameters or if the name of the Data Subject is common.

Even if all the documents are found, the company will need to identify other Data Subjects in the same documents. This is because if a company does a DSAR without redacting the other Data Subjects, the company will be committing a data breach.



Key Features of the DataSubject Manager™

1. Centralized Data Subject Dashboard

The platform features a unified dashboard that gathers information on all recognized Data Subjects within the D&M Tenant. This dashboard showcases essential details, including the number and types of privacy documents each Data Subject possesses, along with their compliance levels. This provides Data Protection Officers (DPOs) with a clear understanding of the individuals under their oversight. By centralizing this information, the system removes the necessity for manual data gathering from various sources, thereby saving time and enhancing accuracy in overseeing data privacy responsibilities.

The dashboard provides a high-level overview of data subjects and their associated documents. It includes four summary cards: 'DATA SUBJECTS / DOCUMENTS' (1.3k+ / 90k+), 'DATA SUBJECTS WITH DOCUMENTS' (84 / 90k+), 'DATA SUBJECTS WITH PII' (20 / 2k+), and 'DATA SUBJECTS AT RISK' (12 / 434). Below these cards is a search bar and buttons for 'Add New' and 'Import AD'. The main table lists individual data subjects with columns for 'DATA SUBJECT', 'CREATED', 'PII DOCUMENTS', 'COMPLIANT', 'NON-COMPLIANT', and 'SOURCE'. Each row includes a checkbox, a profile icon, and a star icon.

DATA SUBJECT	CREATED	PII DOCUMENTS	COMPLIANT	NON-COMPLIANT	SOURCE
<input type="checkbox"/> Helvetia Schweizer	2024/10/23 07:17	2	1	1	Document
<input type="checkbox"/> Erika Mustermann	2024/11/19 18:01	17	3	14	Document
<input type="checkbox"/> Quo Vadis	2024/11/20 06:16	4	1	3	Document
<input type="checkbox"/> Susanna Sample	2024/11/21 00:35	1	1	0	Document
<input type="checkbox"/> Ketty Maus	2024/10/23 07:54	4	3	1	Document
<input type="checkbox"/> Quo Vadis	2024/11/20 00:17	0	0	0	Document
<input type="checkbox"/> Alexandra Musterfrau	2024/11/18 06:02	3	1	2	Document
<input type="checkbox"/> Hanne Oestergaard	2024/11/20 06:12	7	6	1	Document
<input type="checkbox"/> Mehdi Ghezali	2024/11/20 06:11	0	0	0	Document
<input type="checkbox"/> Shuguang Zhou	2024/10/23 07:52	1	0	1	Document
<input type="checkbox"/> Andreas Strabek as@365.dataandmore.com	2024/10/21 10:20	1338	60	1278	AD
<input type="checkbox"/> David Junge dj@dataandmore.com	2024/12/12 16:01	1868	157	1711	AD

(Data Subject Manger™ Dashboard)



2. Risk Identification for Data Subjects

The tool equips DPOs with the ability to quickly identify and prioritize Data Subjects at Risk (DSAR). These individuals may be exposed to compromised or breached data, requiring immediate attention to prevent further issues. By providing instant visibility into risk levels, the platform allows organizations to proactively mitigate potential data privacy incidents, ensuring that sensitive information is protected and regulatory deadlines are met.

DATA SUBJECT	CREATED	PII DOCUMENTS	COMPLIANT	NON-COMPLIANT
<input type="checkbox"/> H Helvetia Schweizer	2024/10/23 07:17	2	1	1
<input type="checkbox"/> E Erika Mustermann	2024/11/19 18:01	17	3	14
<input type="checkbox"/> Q Quo Vadis	2024/11/20 06:16	4	1	3
<input type="checkbox"/> K Ketty Maus	2024/10/23 07:54	4	3	1
<input type="checkbox"/> Q Quo Vadis	2024/11/20 00:17	0	0	0
<input type="checkbox"/> A Alexandra Musterfrau	2024/11/18 06:02	3	1	2
<input type="checkbox"/> H Hanne Oestergaard	2024/11/20 06:12	7	6	1
<input type="checkbox"/> M Mehdi Ghezali	2024/11/20 06:11	0	0	0
<input type="checkbox"/> S Shuguang Zhou	2024/10/23 07:52	1	0	1
<input type="checkbox"/> Andreas Ströbek abs@365.dataandmore.com	2024/10/21 10:20	1336	45	1291
<input type="checkbox"/> David Junge dj@dataandmore.com	2024/12/12 16:01	1090	99	991

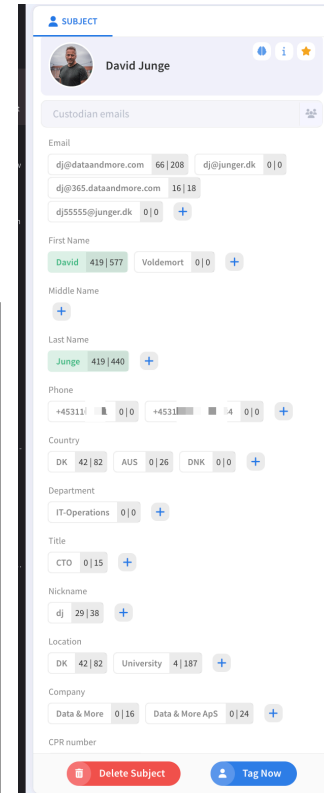
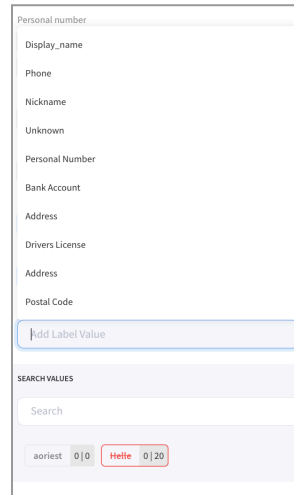
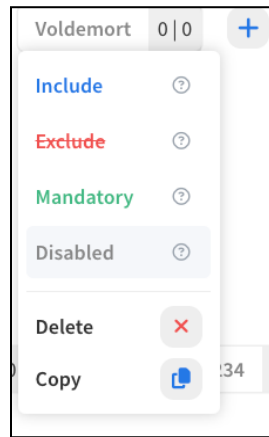
3. Streamlined Request Management

The system acts as a centralized hub for managing various types of Data Subject requests, including Data Subject Access Requests (DSAR), Requests for Insight (RFI), and Requests for Ratification (RFR). This functionality simplifies the often complex process of handling data-related inquiries and requests by automating workflows, organizing documentation, and reducing response times. This ensures a smoother experience for both the organization and the data subject.



4. Efficient Data Discovery and Retrieval

Data discovery is often a time-consuming task, especially when dealing with large volumes of unstructured data. The platform streamlines this process by allowing DPOs to quickly locate and retrieve all documents containing data related to a specific Data Subject. This capability not only accelerates data retrieval using multi-semantic search criteria but also ensures that no relevant information is overlooked, making it easier to respond to privacy requests and regulatory audits.



5. Comprehensive Reporting Tools

The platform includes robust reporting capabilities, enabling DPOs to generate detailed reports that list all documents associated with a specific Data Subject. These reports are particularly useful for tasks such as validation and redaction, providing a clear record of what data exists, where it is stored, and how it has been handled. This transparency is essential for compliance with data privacy regulations like GDPR and CCPA.



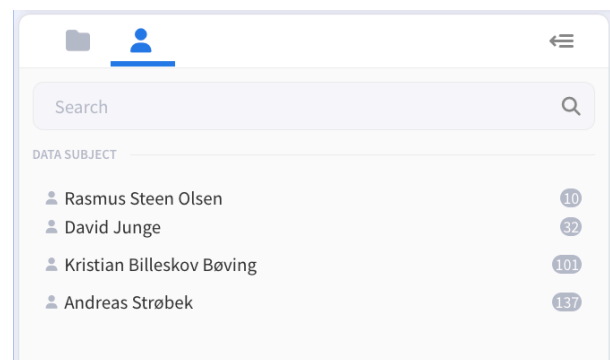
6. Redaction of Sensitive Data

Ensuring the privacy of sensitive data is a critical component of compliance. The platform offers advanced tools for redacting personal information within documents, helping organizations comply with regulations by preventing unauthorized disclosure of data. This feature minimizes the risk of data breaches during document sharing or while responding to Data Subject Access Requests, safeguarding both the individual's privacy and the organization's reputation.

```
Creation date time: 2019-07-11T06:18:17
Text: (TEXT_START)
Digital straffeattest (ID 3983883 Sprog Dansk) PDF
Bestillings ID: 3983883
11. juli 2019
side 1 af 2
PRIVAT STRAFFEATTEST
[REDACTED]
cpr.nr. [REDACTED]
er ikke registreret med afgørelser i henhold til § 11 i bekendtgørelse om behandling
af personoplysninger i Det Centrale Kriminalregister.
[REDACTED]
Rigspolitichef
Udstedt i medfør af § 11 i Justitsministeriets bekendtgørelse om behandling af
personoplysninger i Det Centrale Kriminalregister (se næste side).
```

7. Warnings for Multiple Data Subjects in Documents

When responding to DSARs, it is crucial to ensure that personal information about other Data Subjects is not inadvertently disclosed. The platform includes features that flag documents containing data about multiple individuals, prompting detailed analysis before release. This helps DPOs avoid creating new data breaches while complying with requests, ensuring that the organization meets its obligations without additional risk.



8. Data Subject Graph™ Technology

At the core of the system is the Data Subject Graph™, a sophisticated data model that connects a Data Subject with their associated data. It leverages strong keys (e.g., Social Security Numbers and Passport Numbers) for precise identification, while weak keys (e.g., Full Name and Mobile Number) help refine the search for related data. This innovative approach ensures accuracy in identifying and managing Data Subjects, even in complex datasets.

9. Metrics for Oversight and Risk Management

The platform tracks vital metrics, such as the total number of Data Subjects and those classified as at-risk, providing DPOs with a real-time overview of their responsibilities. These metrics support informed decision-making and help prioritize actions based on urgency and importance. By maintaining a clear picture of these key figures, organizations can allocate resources effectively to address potential risks.

10. Enhanced Compliance and Governance

By consolidating tools for data discovery, request handling, reporting, and redaction, the platform ensures that organizations can meet data privacy regulations efficiently. These capabilities support privacy compliance with frameworks like GDPR and CCPA while promoting good governance practices. The platform's holistic approach simplifies complex workflows, reduces errors, and reinforces the organization's commitment to data privacy.

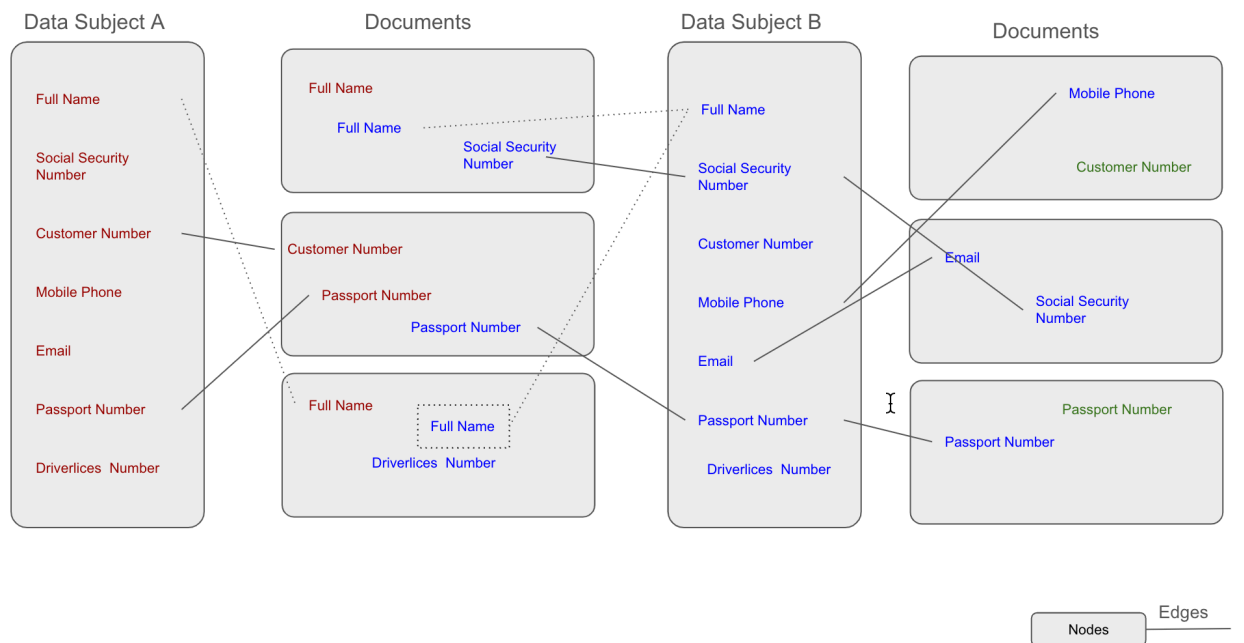


Understanding the Data Subject Graph™

At the core of the DataSubject Manager lies the innovative **Data Subject Graph™**, a **data model that links a Data Subject with their corresponding data**. This graph employs a system of strong and weak keys to define and identify Data Subjects.

- **Strong keys** are unique attributes like Social Security and Passport Numbers, providing unambiguous identification of a Data Subject.
- **Weak keys** such as Full Name and Mobile Number help narrow down the data scope and aid in identifying potential Data Subjects.

Within the Data Subject Graph, Data Subjects are represented as nodes, with edges connecting them to their associated data. This structure enables a comprehensive view of a Data Subject and its data footprint within an organization's systems.



The strong and the weak keys are used as the foundation of the graph creation, linking the Data Subjects to their data.

