

Intellectual Property in Privacy Compliance Platforms

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What Do You Want in Operational Privacy Software?

- Assessments
- Benchmarking
- Data Mapping
- Data Subject Requests
- Vendor Risk Management
- Incident Response
- Cookie Consent

Let's Automate These

- Patents are all going to be automated systems and methods of doing something.
 - “computer executable instructions”
- Claims are most important part of patent.
- Many claims – focus on the independent ones

Vendor Patents

- Data processing systems for generating and populating a data inventory
- Data processing systems and methods for operationalizing privacy compliance via mobile applications
- Data processing systems and methods for implementing audit schedules for privacy campaigns

Data Processing Systems and Methods For....

- Modifying privacy campaign data via electronic messaging systems
- Efficient generation of privacy risk assessments
- Performing privacy assessments and monitoring of new versions of computer code for privacy compliance
- Identifying whether cookies contain personally identifying information

Continued

- Integrating privacy compliance systems with software development and agile tools for privacy design
- Measuring privacy maturity within an organization
- Prioritizing and fulfilling data subject access requests for fulfillment and related methods

Characteristics of Big Data

- The 4 V's
 - Volume (amount of data)
 - Velocity (speed of processing and pace of change to data)
 - Variety (sources of data and types of data)
 - Validation

Data Processing Methods for Measuring Privacy Maturity Within an Organization

- A Privacy Compliance Measurement System
 - Patent No. 10,242,228
 - Non transitory computer readable medium storing computer executable instructions for measuring....
 - Determining...
 - Automatically electronically analyzing privacy related attributes

Prioritizing Data Subject Access Requests For Fulfillment and Related Methods

- Patent No. 10,235,534
- A computer implemented method for prioritizing data subject access requests
- Obtaining one or more pieces of metadata associated with a data subject of the data subject access request, wherein the one or more pieces of metadata comprises:
 - A request type
 - A location from which DSAR is being made
 - Current sensitivities to world events
 - A status of the requestor issuing DSAR
 - Time

Data Processing Systems for Generating and Populating a Data Inventory

- US Patent No. 10,204,154
- A data inventory generation system configured to generate a data model and map one or more relationships between the aspects of the data inventory.
- Accessing a data model of a plurality of data assets
- Identifying, Determining inventory attributes
- Retrieving a data asset questionnaire template
- Generating assessment based on one or more questions that map to the plurality of inventory attributes

Communication Systems and Methods for Integrating Privacy Compliance Systems with Software Development and Agile Tools for Privacy Design

- Patent No. 10,181,019
- A privacy compliance monitoring system configured to track inputs and responses to questions regarding a particular privacy campaign in order to monitor any potential abnormal or misleading response.
- Actively monitoring a user context wherein the user context comprises
 - An amount of time the user takes to complete the computerized privacy questionnaire;
 - A deadline associated with the computerized privacy questionnaire;
 - A location of the user;
 - In response to determining abnormal user behavior, automatically flagging at least a portion of the computerized privacy questionnaire in memory.

Numbers At a Glance

Total Staff	
Compliance	([# Last Year])
Legal	([# Last Year])
[Other Departments]	([# Last Year])
Total Budget	\$
Products Using Protected Personal Information	
Amount of Protected Personal Information	[In GB, TB, or PB]
Number of Sub-Processors or Joint Controllers	
Data Breach Attempts/Success Percentage	(%)
Complaints/Data Subject Requests Handled	
Number of Privacy Impact Assessments this Year	

Ongoing Initiatives

- Have a dashboard for future projects and tasks to be assigned.

Data Profile for [Product]

Data Type Profile

- Consumer Health Information
- Consumer Personal Information
- Consumer Other Personal Information
- Other Sensitive Information
- Unprotected Information

Data Profile Observations

- This is key to have “attributes” associated with vendors/processors etc...
- The best software will have filters based on attributes with great visuals.

At a Glance

Legal Right/Responsibility	Number This Year	Number Last Year
Number of Reported Incidents		
Number of Actual Incidents		
Number of Reportable Incidents		
Attempted Intrusions		
Attempted DDOS Attacks		
Average Investigation & Response Time		
Total Unplanned System Downtime		



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Major Ongoing Investigations, Regulatory Actions, and Security- Related Suits

- Security Incidents over Last Year
- Average Incident Response time over last year
- Profile of Handled Security Incidents
- Security Incidents by Product

Legal Rights at a Glance

Legal Right/Responsibility	Number This Year	Number Last Year
Complaints by Data Subjects		
Data Access Requests by Data Subjects		
Rectification Requests by Data Subjects		
Unsubscribe Requests by Data Subjects		
Erasure Requests by Data Subjects		
Stop Processing Requests by Subjects		
Data Downloads by Data Subjects		

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Further Parameters At a Glance

Legal Right/Responsibility	Number This Year	Number Last Year
Privacy Impact Assessments		
Average Completion Time		
Data Protection Impact Assessments		
Average Completion Time		
Staff Receiving Privacy Training		
Percentage of All Staff	%	%

Top Tips for Data Controller Contracting With CSP

- Maintain Records of processing activities.
- Inquire about specific information security obligations
- Make CSP give convincing response to GDPR compliance. If not, prepare an exit strategy and start shopping around for a new data processor.
- Re-negotiate contracts to include 28(3) obligations.

Executive Summary At a Glance

- This year we completed [#] privacy audits.
- Our auditors were:
 - [List, include targeted business segments or products where relevant]
- [All of the major findings have already been presented/Some additional findings are:
 - List]
- The following things are still required for outstanding privacy audits:
 - [List]
- Some of our future audit challenges are:
 - [List]

Budget Profile

Total Budget: [\$,£,€,₹,¥ etc.][#]

Expenditures

- Staff Compensation
- Privacy Implementation Costs
- Auditing
- Compliance Program Roll-Outs
- [Etc.]
- Cybersecurity Implementation Costs
- Other Equipment
- Legal Expenditures
- Staff Training

Fines Paid Last Year by Country and Law

Total Fines: [\$,£,€,₹,¥ etc.][#]

Fines

■ [Country-Law 1] ■ [Country-Law 2] ■ [Country-Law 3] ■ [Country-Law 4]

Registered Data Privacy Officers by Country

Country	Registered Data Privacy Officer

Retained Privacy or Cybersecurity Legal Counsel by Case

Firm (Supervising Attorney)	Case

Questions



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