How Microsoft is taking Privacy by Design to Work

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7 May 2015
Agenda

• Introducing the New Microsoft
• Microsoft privacy principle
• Protecting privacy in Microsoft
• Implementing Privacy By Design in the Cloud
Introducing the new Microsoft
Technology Megatrends
Shift to a Data Driven Economy

- **Mobility**: By 2016, smartphones and tablets in service by 2.7 billion Asians.
- **Social**: Millennials will make up 59% of the Asian workforce by 2025.
- **Cloud**: 50% of organizations are either using or investigating cloud computing solutions in Asia by 2014.
- **Big data**: Digital content will grow from less than 0.5ZB in 2013, up 90% rocketing toward 4.8ZB by 2017.
- **IoT**: Devices will grow to 50B by 2020, with a market potential of 10 Trillion devices.

**1 ZB = 10^{21} bytes = 1 billion terabytes**
Big/bold ambitions
A PC on every desk and in every home

Empowering everyone
Realizing people’s unlimited potential

Productivity and platform
Reinvent productivity to empower every person and every organization to do more
We Are the Productivity and Platform Company for the Mobile-first and Cloud-first World!
Microsoft Privacy Principles
Privacy remains Microsoft’s #1 priority

**Microsoft**: Recognizes that trust is critical to customer relationships and the long-term success of the brand

**Customers**: Know that their privacy/personal information is protected

Comprehensive privacy program in place 10+ years

**Partners**: Influence customer trust as they communicate on Microsoft’s behalf

**Sales & Marketing**: Execute under Microsoft’s privacy practices

40+ full-time privacy professionals. Several hundred others with privacy-related responsibilities
No Big Deal? It’s everyone’s business!
Microsoft’s Privacy Policy

10 Privacy Principles

- Accountability
- Disclosure or Onward Transfer
- Notice
- Quality
- Collection
- Access
- Choice and Consent
- Security
- Use and Retention
- Monitoring and Enforcement
Protecting Privacy in Microsoft
Privacy in action for sales & marketing

Transparency

Tell customers what data we collect and how it will be used.

Compliance

Ensure our data practices comply with Federal, State, and International laws – we must be compliant to avoid penalties.

Control

Empower users to control collection, use, & distribution of their personal information.

Security

Establish protective measures to defend against hostile acts or influences. Provide assurance of defense.

Data Minimization

Collect only data that's necessary and retain only as long as there's a legitimate need.
Examples of protecting privacy in action

• Transactional vs. Promotional Emails
• Request Customer or Partner List
• Supplier Security & Privacy Assurance
• Sensitive Data storage
Implementing Privacy By Design in the Cloud
The Microsoft Trusted Cloud

200+ cloud services,
1+ million servers,
$15B+ infrastructure investment

1 billion customers,
20 million businesses,
90 countries worldwide

57% of Fortune 500
10,000 new subscribers per week

Microsoft Azure

3.5 million active users

Microsoft Dynamics CRM Online

300+ million users per month

5.5+ billion worldwide queries each month

1.2 billion worldwide users

Office 365

48 million members in 57 countries

XBOX

450+ million unique users each month

15
Cloud principles

It’s your data

You own it, you control it
We run the service for you
We are accountable to you

Built in security
Privacy by design
Continuous compliance

Transparent service operation
Privacy & Control in Commercial Cloud

Microsoft makes our commitment to the privacy of our customers a priority with independently audited policies and practices that include restricting the mining of Customer Data for advertising or similar commercial purposes.
Security without compromising experience

Techniques for securing the data should be specific to the type of cloud service

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<tr>
<th>IaaS</th>
<th>PaaS</th>
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<td>Applications</td>
<td>Data</td>
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<td>Middleware</td>
<td>O/S</td>
<td>Virtualization</td>
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<td>Servers</td>
<td>Storage</td>
<td>Networking</td>
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Service Provider security responsibility
The Microsoft Security Development Lifecycle

Goals
Protect Microsoft customers by
- Reducing the **number** of vulnerabilities
- Reducing the **severity** of vulnerabilities

Key Principles
Secure by design
- Eliminate security problems early
Prescriptive yet practical approach
Proactive – not just “looking for bugs”
Infrastructure protection

Cloud infrastructure includes hardware, software, networks, administrative and operations staff, policies and procedures, and the physical data centers that house it all.

- **24 hour monitored PHYSICAL SECURITY**
- **Centralized MONITORING AND ALERTS**
- **Update MANAGEMENT**
- **Anti-Virus/Anti-Malware PROTECTION**
- **Red Teaming PENETRATION TESTING**
- **FIREWALLS**
Microsoft privacy principles are designed to facilitate the responsible use of customer data, be transparent about practices, and offer meaningful privacy choices.

Guidelines that help ensure privacy is applied in the development and deployment of products and services.

We use logical isolation to segregate each customer’s data from that of others.
When a customer utilizes our cloud services, they retain exclusive ownership of their data.

- **Control over data location**: Customers choose data location and replication options.
- **Role based access control**: Tools support authorization based on a user’s role, simplifying access control across defined groups of users.
- **Encryption key management**: Customers have the flexibility to generate and manage their own encryption keys.
- **Control over data destruction**: Deletion of data on customer request and on contract termination.
### Data protection

We provide customers with strong data protections – both by default and as customer options.

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<th>Data isolaion</th>
<th>At-rest data protection</th>
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<td>Logical isolation segregates each customer’s data from that of others is enabled by default.</td>
<td>Customers can implement a range of encryption options for virtual machines and storage.</td>
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<th>In-transit data protection</th>
<th>Encryption</th>
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<td>Industry-standard protocols encrypt data in transit to/from outside components, as well as data in transit internally by default.</td>
<td>Data encryption in storage or in transit can be deployed by the customer to align with best practices for ensuring confidentiality and integrity of data.</td>
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<th>Data redundancy</th>
<th>Data destruction</th>
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<td>Customers have multiple options for replicating data, including number of copies and number and location of replication data centers.</td>
<td>Strict standards for overwriting storage resources before reuse and the physical destruction of decommissioned hardware are by default.</td>
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Restricted data access

Customer data is only accessed when necessary to support customer’s use of the services (e.g. troubleshooting or feature improvement), or when required by law.

When granted, access is controlled and logged. (Lock Box)

Strong authentication, including MFA, helps limit access to authorized personnel only.

Access is revoked as soon as it’s no longer needed.

Access controls are verified by independent audit and certifications.
Microsoft does not disclose Customer Data to law enforcement unless as directed by customer or required by law, and will notify customers when compelled to disclose, unless prohibited by law.

The Law Enforcement Request Report discloses details of requests every 6 months.

Microsoft doesn’t provide any government with direct or unfettered access to Customer Data.

Microsoft only releases specific data mandated by the relevant legal demand.

If a government wants customer data it needs to follow the applicable legal process.

Microsoft only responds to requests for specific accounts and identifiers.
ISO/IEC 27018

Microsoft is the first major cloud provider to adopt the first international code of practice for governing the processing of personal information by cloud service providers.

Prohibits use of customer data for advertising and marketing purposes without customer’s express consent.

Prevents use of customer data for purposes unrelated to providing the cloud service.
### Contractual commitments

- **Adopt ISO/IEC 27018 code of practice**

- **Offer customers E.U. Standard Contractual Clauses** that provide specific contractual guarantees around transfers of personal data for in-scope services.

- **Have European data privacy authorities validate** that its enterprise agreement meets EU requirements on international data transfers.

- **Abide by US-EU Safe Harbor Framework** and the **US-Swiss Safe Harbor Program**.

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**Microsoft was the first major cloud service provider to...**
Contracting for Cloud Services

1. Service Provider Reputation and Competence
2. Review, Monitoring and Control
3. Audit / Inspection Rights
4. Confidentiality and Certified Security Standards
5. Resilience and Business Continuity
6. Data Location and Transparency
7. Limits on Data Use (No secondary use)
8. Data Segregation / Isolation
9. Conditions on Subcontracting
10. Conditions on Termination