

Managing privacy in complex global technology environment

International Conference on Privacy Protection in Corporate Governance

Mikko Niva
Director, Privacy
Nokia Corporation

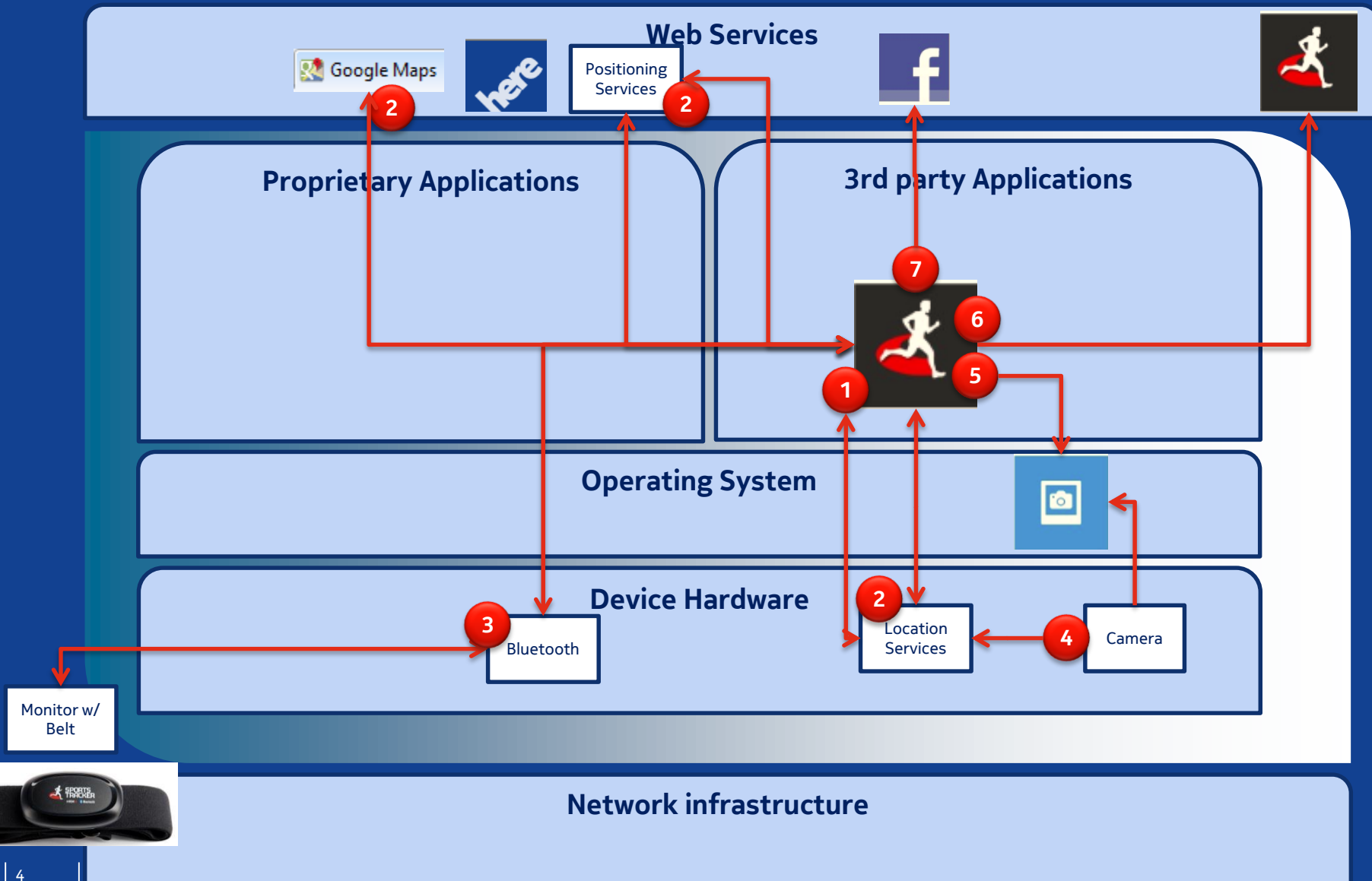


WHY?
WHAT?
HOW?

WHY MANAGE PRIVACY?

- Risk of not doing it right
- Data is an asset – Privacy defines essential rules
 - Privacy policies
 - Consents, permissions
- Getting so complex that impossible to get it right through uncoordinated, ad hoc activities

Use Case: Camera & Sports Tracker



Tools to deal with complexity

Regulation

Technology
& standards

Accountable
organization

Privacy
Engineering

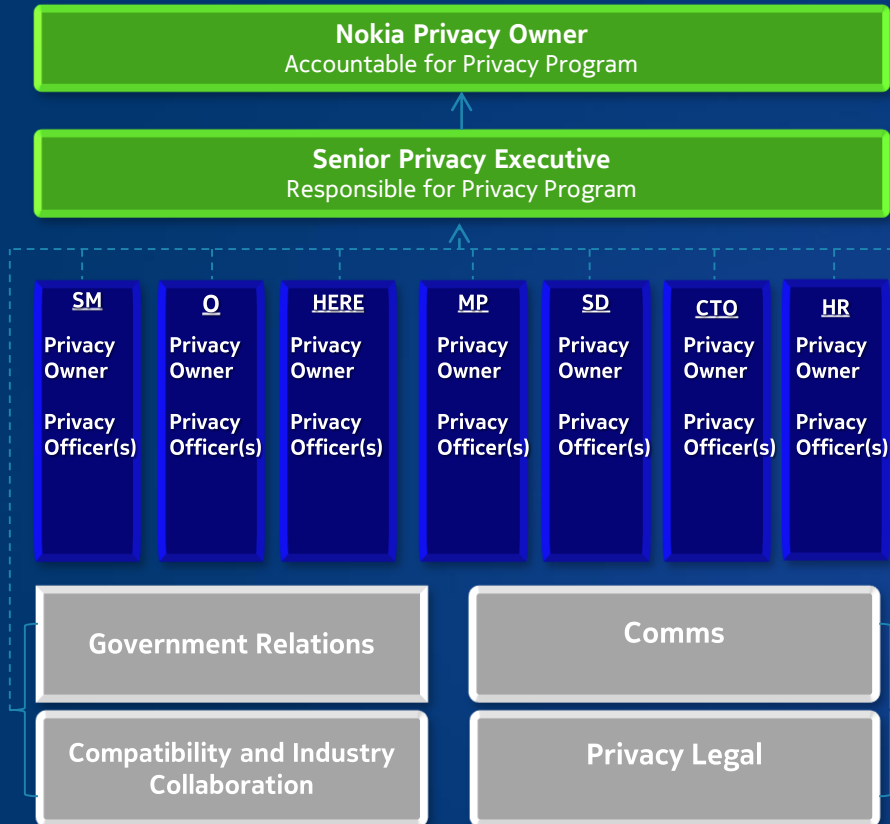
Industry best practice privacy program, based on Accountability model, with one Nokia wide privacy owner and operated in a Federated Governance Model

Our Privacy Vision and Principles



No hidden, uncontrolled, excessive or unsecure processing

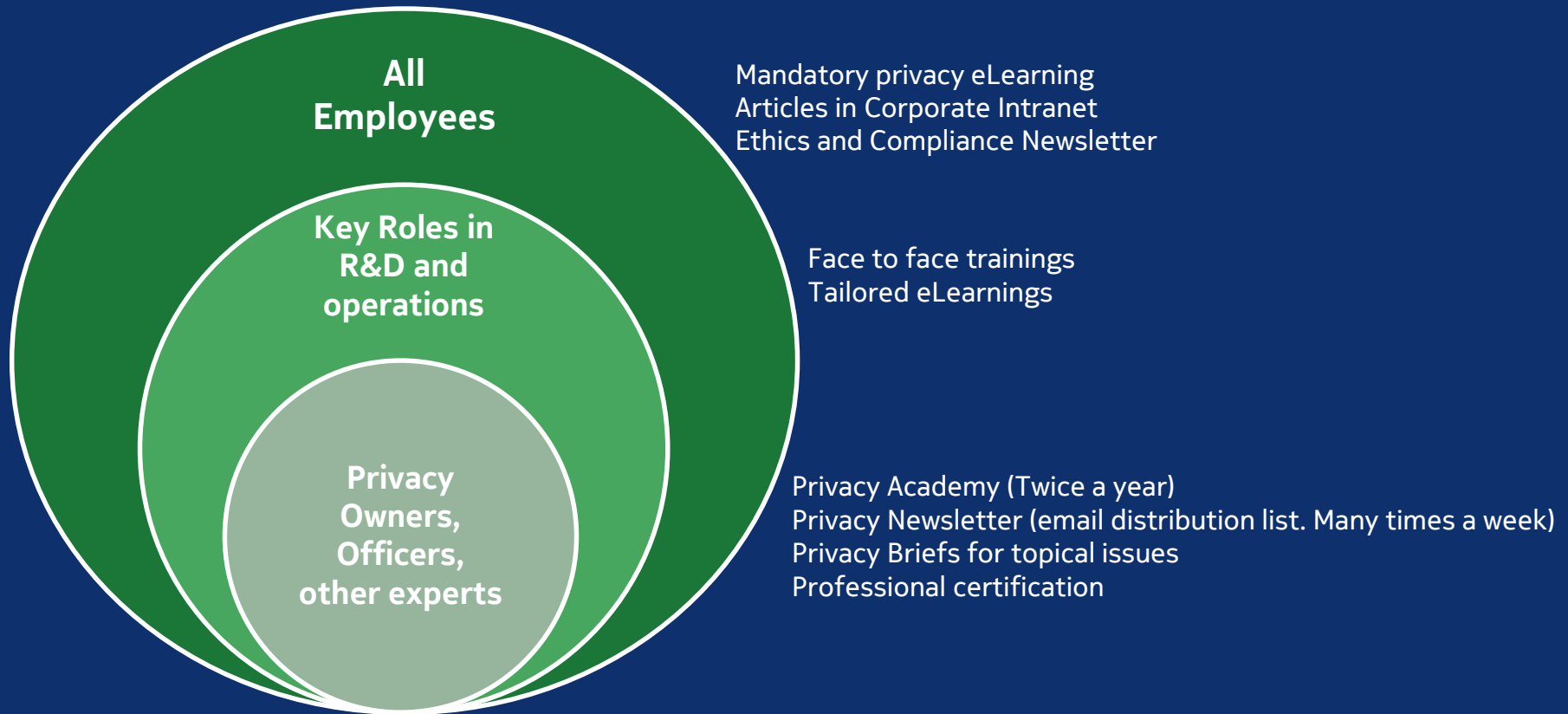
Privacy Program organization and essential elements



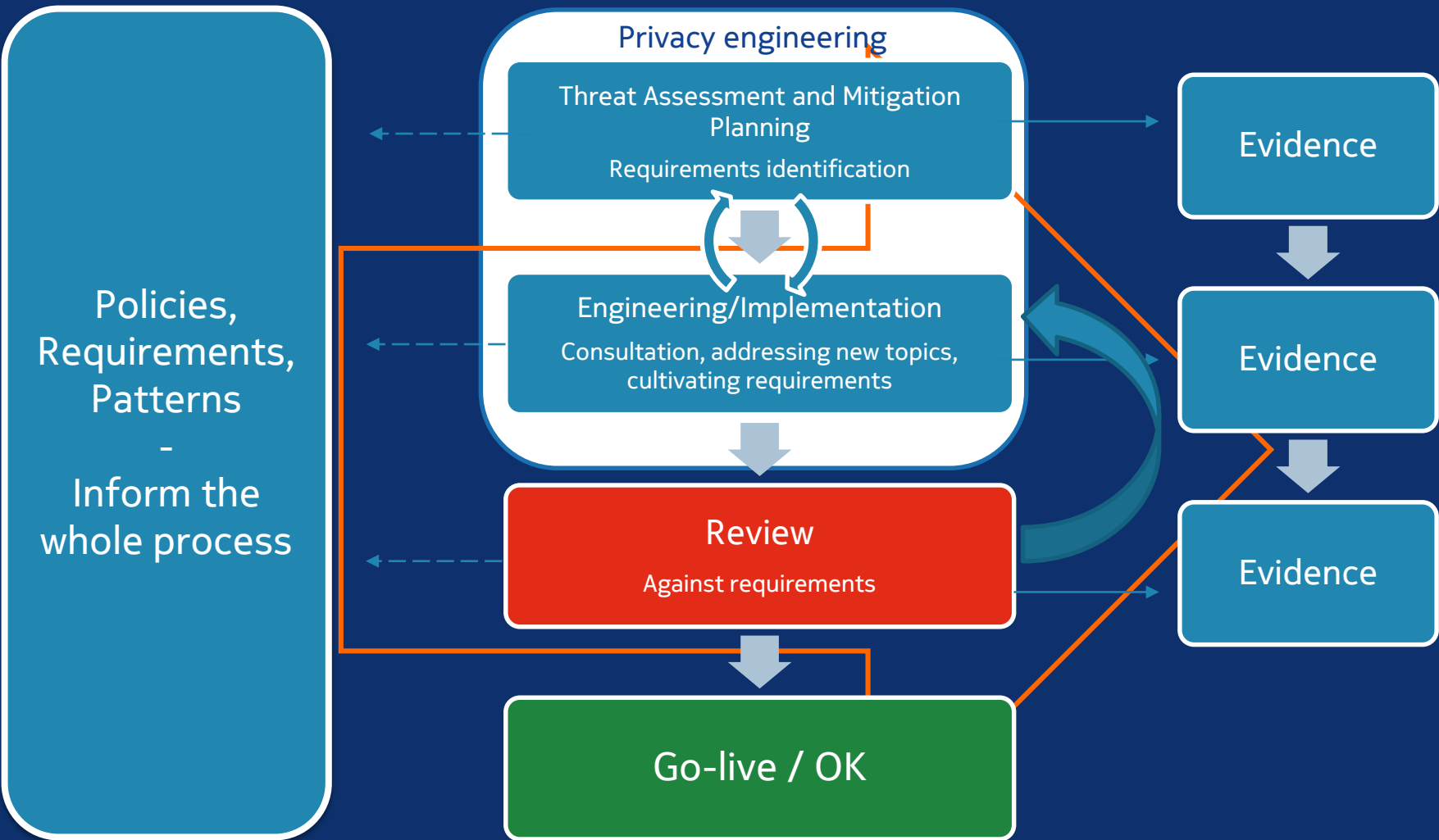
Essential Elements:

1. Executive Accountability and oversight
2. Policies and processes to implement them
3. Staffing and delegation
4. Education and awareness
5. Risk assessment and mitigation
6. Issue response management and complaint handling
7. Internal enforcement
8. Redress to individuals

Training and Awareness Process



Privacy Engineering and Assurance – high level process



Privacy Engineering: A set of proactive engineering activities to build privacy into Nokia products as part of their development

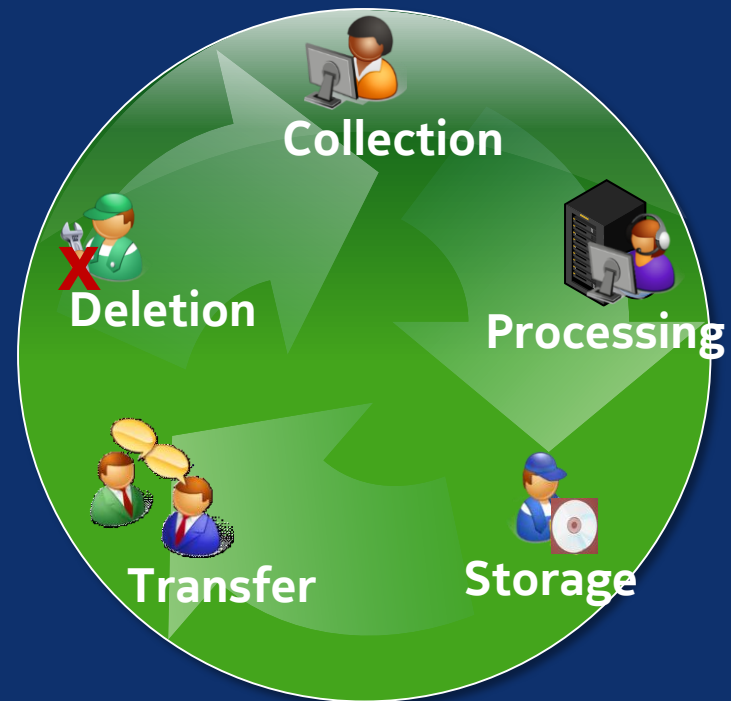
Privacy Assurance: Verifies compliance with Nokia's requirements and seeks proper evidence to support the understanding

Thank You!

Background slides

Privacy data lifecycle

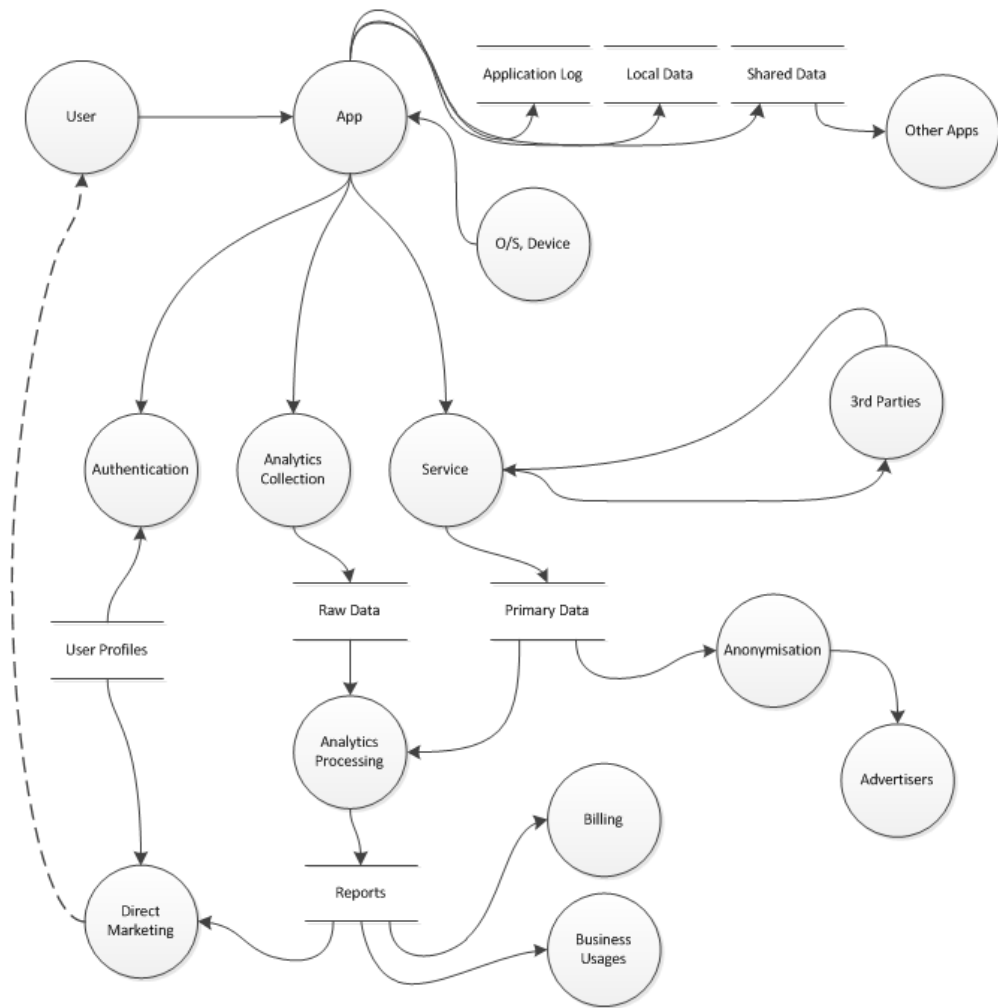
- It's not enough to look at the product alone!
- Consider the complete lifecycle for the associated personal data.



EXAMPLE DATA FLOW

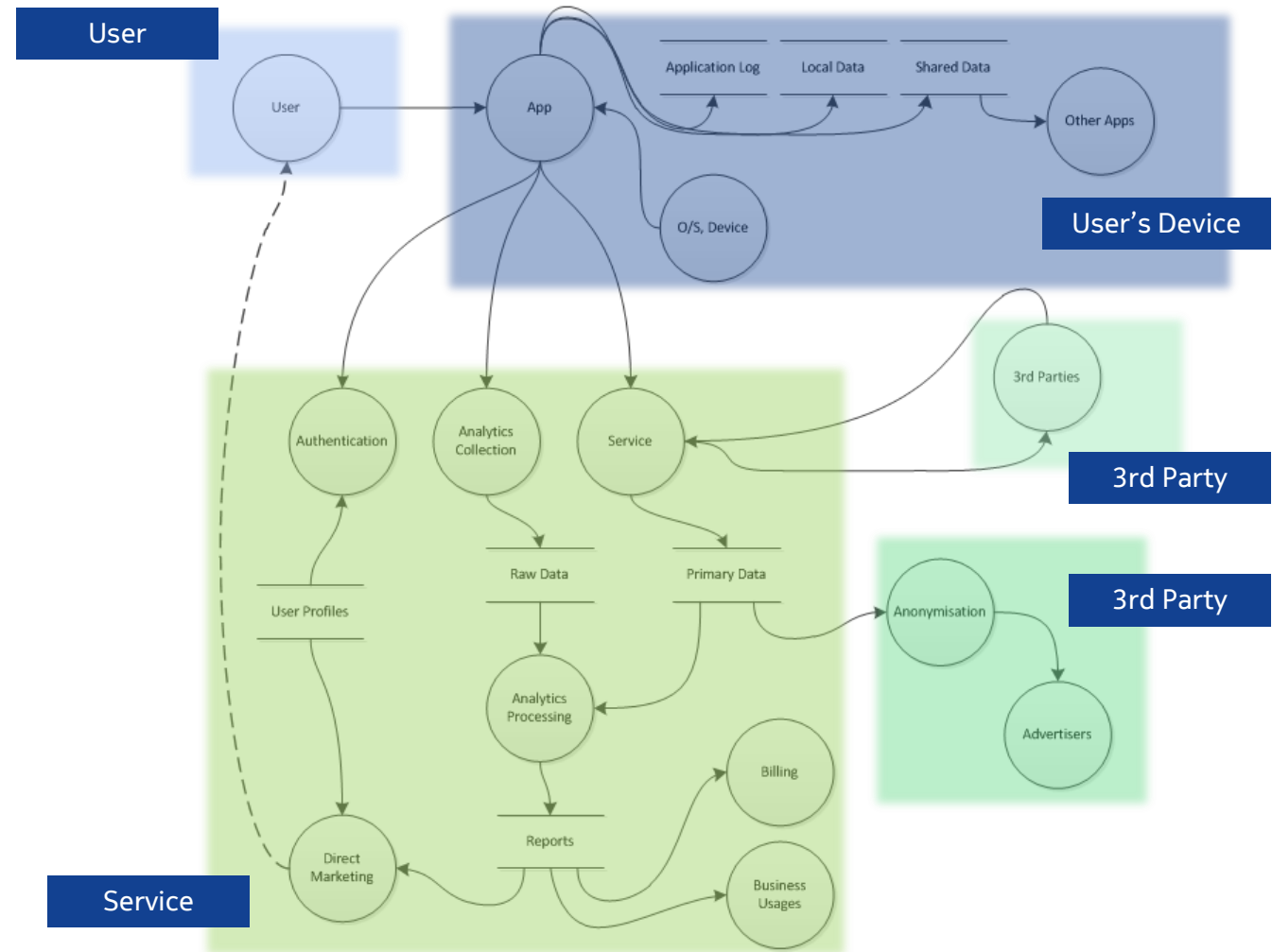
For example, the typical dataflow from user via his/her app/device to the supporting backend systems, marketing, analytics and advertising...

...and this is a simple case...



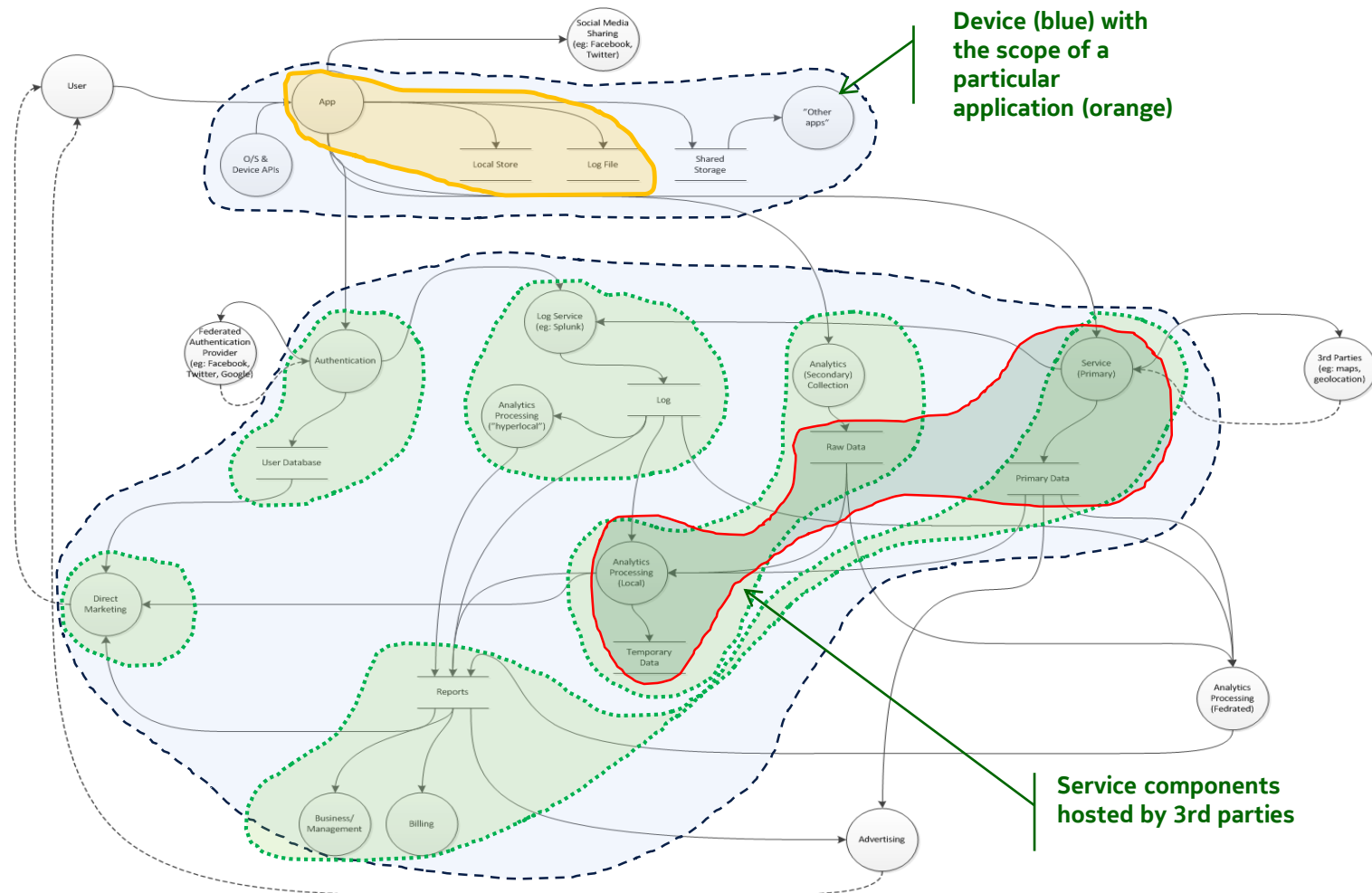
Based on the work of Dr. Ian Oliver, Privacy Architect, [HERE](#)

PHYSICAL SEPARATION OF DATA-FLOW COMPONENTS



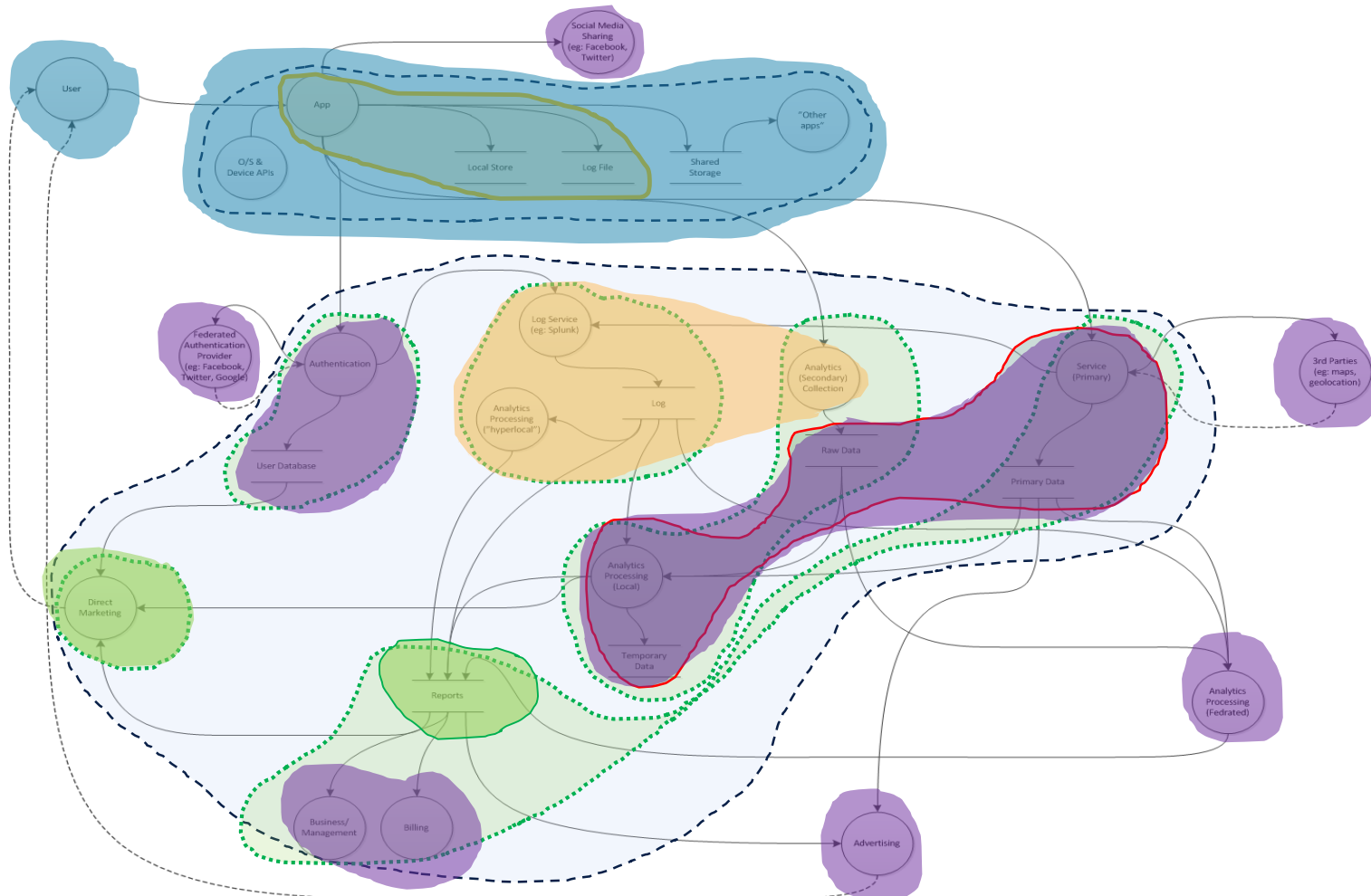
Based on the work of Dr. Ian Oliver, Privacy Architect, [HERE](#)

EXAMPLE – DIFFERENT DE FACTO CONTROLLERS



Based on the work of Dr. Ian Oliver, Privacy Architect, [HERE](#)

EXAMPLE - GEOGRAPHICAL DISTRIBUTION

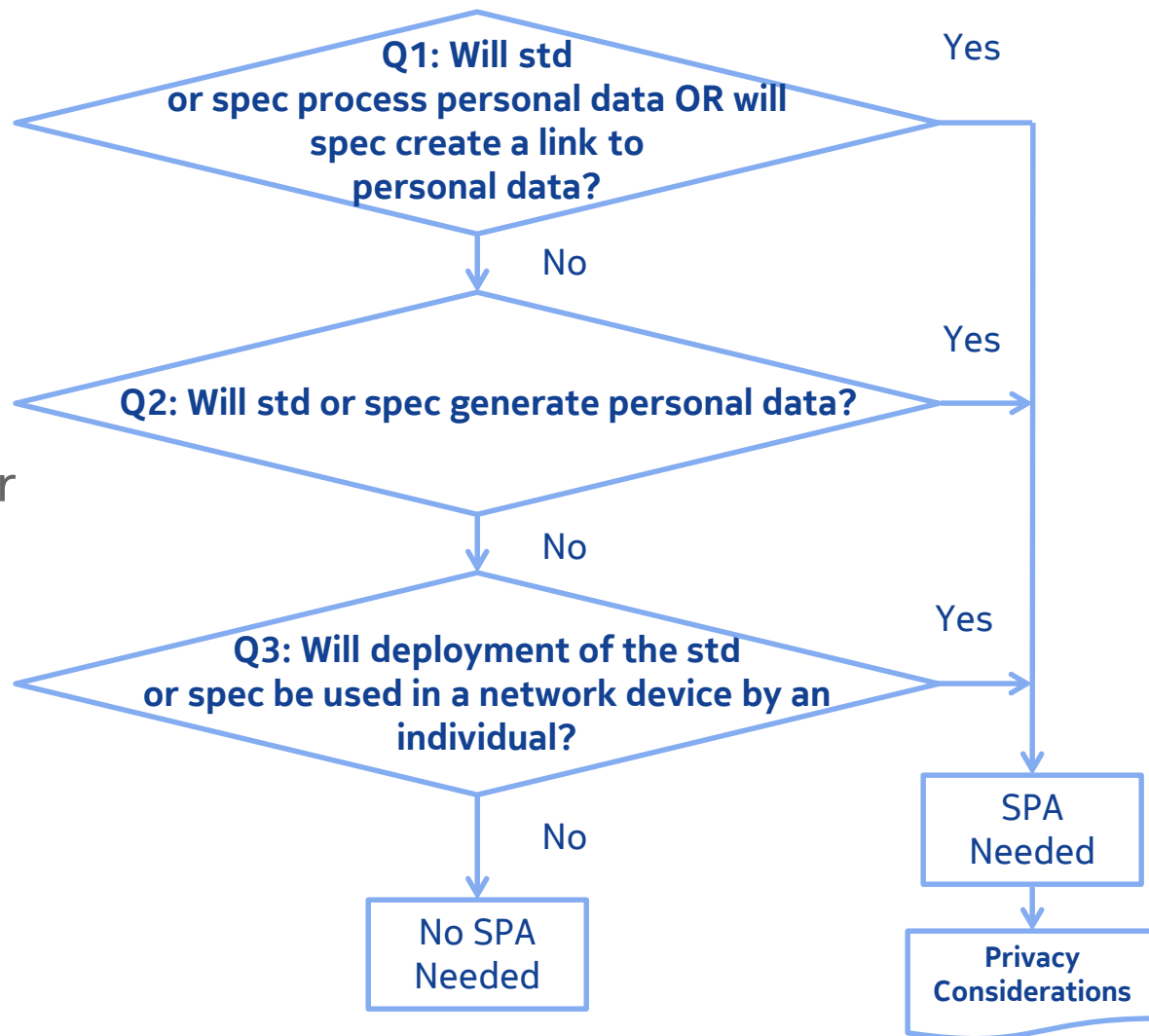


Based on the work of Dr. Ian Oliver, Privacy Architect, HERE

Technology standardization is
one important piece in solving
the privacy puzzle

Standards Privacy Assessment (SPA)

- Nokia initiative to include privacy considerations to technology standardization
- Methodology for analyzing the privacy impact of a standard or specification
- A risk assessment to harm caused by the technology to the consumer or data subject
- E.g. In ISO, Oasis

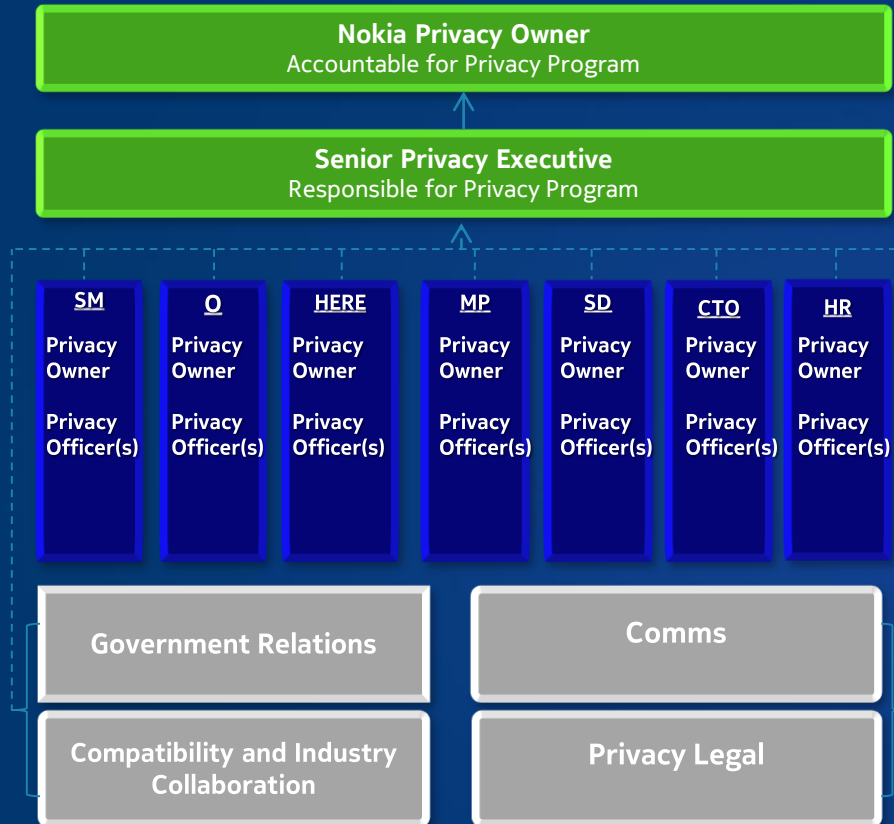


Outline of Privacy Considerations

- Every specifications should include a *Privacy Considerations* section that:
 - Catalogs the personally identifiable information (PII) and data flows;
 - Identifies and list privacy threats;
 - Identifies appropriate privacy safeguards/controls
 - Identifies recommendations such as uses of privacy controls, by organization deploying the standard, that would additionally thwart the associated threats.

NOTE: A risk assessment (identified harm, level of harm, probability of harm) should be completed, at least, by the organization deploying the standard

Privacy Program organization and essential elements



Essential roles and responsibilities

Nokia Privacy Owner: Ultimate accountability

Senior Privacy Executive: Responsibility for day to day operation of Nokia's Privacy Program

Unit Privacy Owner: Accountable for deploying the program into the Unit.

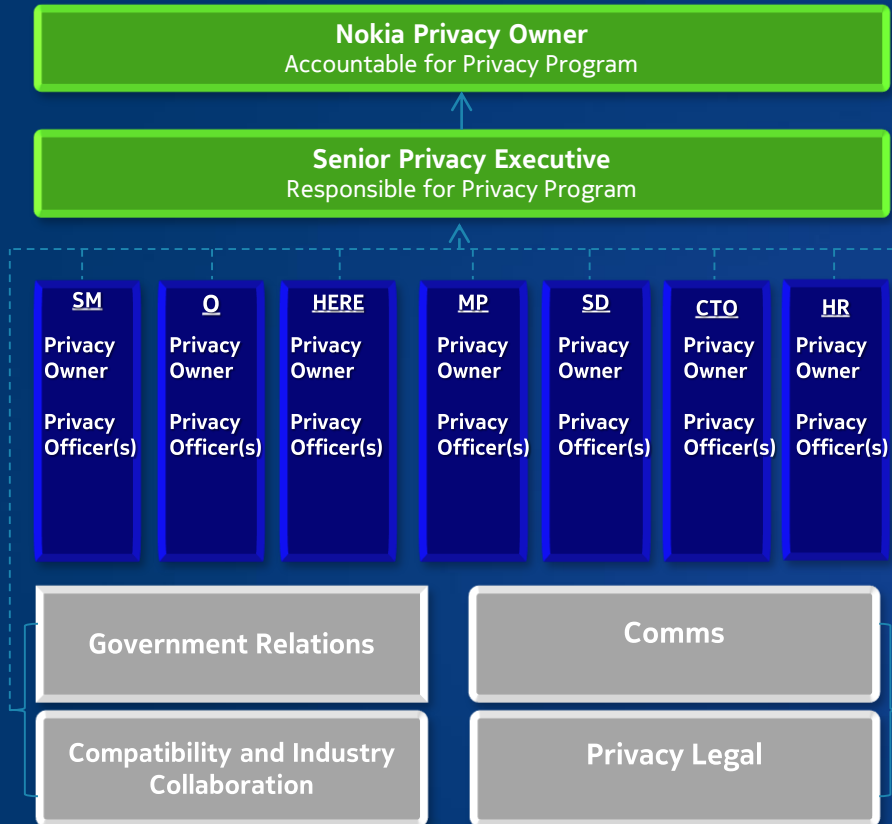
Privacy Officer: Operational privacy expert responsible for proactive privacy work

Global Privacy Counsel: Responsible for privacy legal support across Nokia.

Training and Awareness Officer: Develops, drives and oversees our training and awareness building

Privacy Leadership Team: Led by Senior Privacy Executive, and consisting of Unit Privacy Owners, Global Privacy Counsel and Industry and Regulatory representatives.

Privacy Program organization and essential elements



Essential policies

Nokia Code of Conduct

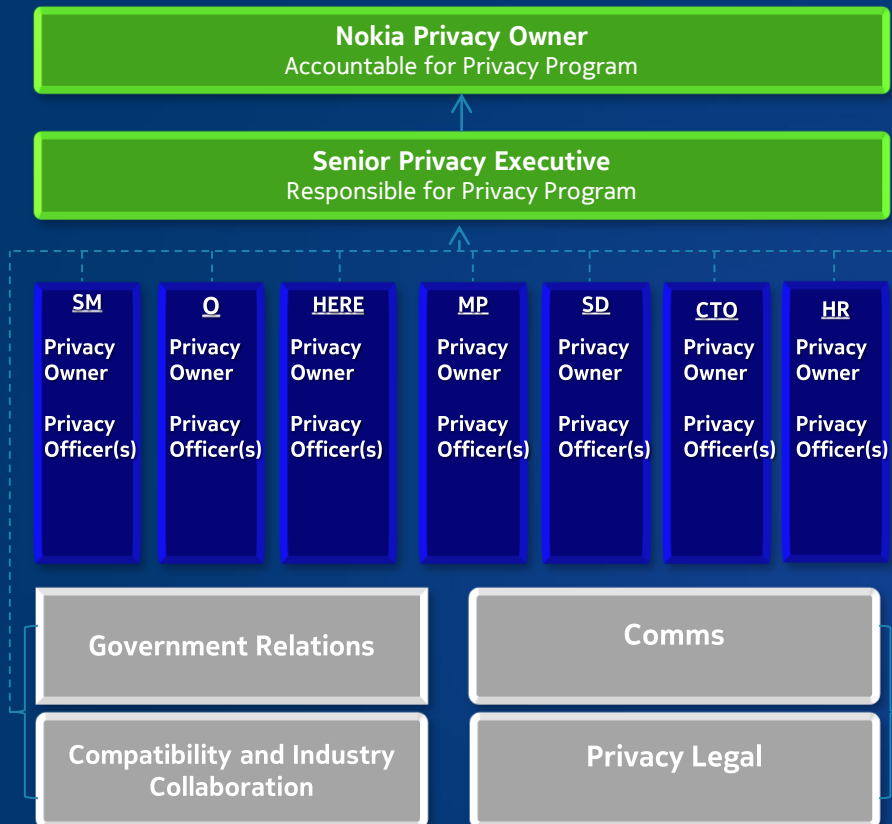
Nokia Privacy Management Policy.

Nokia Privacy Requirements, guidelines, patterns

Nokia's Privacy Statements

Topic specific policies and processes

Privacy Program organization and essential elements



Essential processes that implement the policies

Privacy Engineering and Assurance

Risk Management Process

Issue Response Management Process

Authority Requests and Lawful Interception Process

Privacy Statement Publication Process

Data Subject Request Process

Training and Awareness Process

National Privacy Compliance activities

Data Inventory activities

Regulatory and Industry influence activities