Information Accountability

Evolution of a Privacy Program

Agenda

- Information Accountability

- Privacy & Data Protection Program

- Information Governance

- Questions

Information accountability means that *information usage should be transparent* so it is possible to determine whether a use is appropriate under a given set of circumstances

Current Environment

Big Data

- Data analysis
- Large Scale
- Inter-connected
- Extracts new insights
- Creates new values
- Changes relationships between markets, organizations, citizens & governments

Data Protection

- Data protection & privacy laws are based on the cultures of different countries & regions
- Lack of global consistency
- Explosion of information has created an area for increased regulation
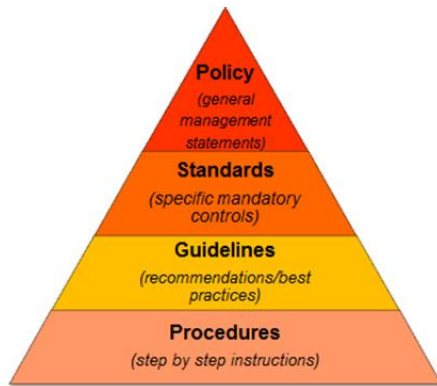
MasterCard

- Global business – managing data protection risk complex
- Context-based usage requires scrutiny of business practices
- Increasing complexity of business systems & processes
- Desire to further utilize information assets

February 11, 2014

Privacy Program at MasterCard: Comprehensive

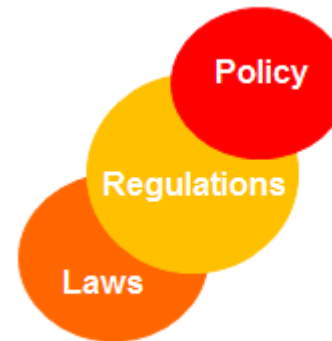**MasterCard**

Compliance

- Legal & Data Inventories
- Policies, Standards, Procedures
- Regulatory Filings
- Data Transfer solutions

Privacy By Design

- Integrate in product development process
- Work as a key business advisor
- Ensure accurate system and process implementation

Regulatory

- Monitor new and pending laws and regulations
- Regulatory outreach to explain business implications
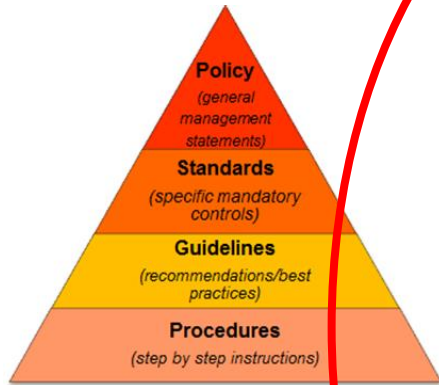
Organization Engagement

- Provide training
- Understand privacy requirements in all business areas
- Create key partnerships and controls

Information Governance

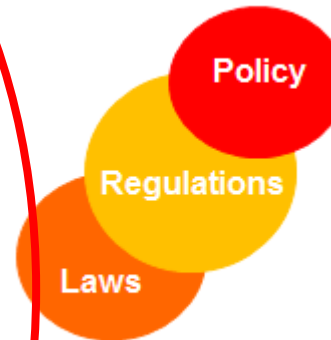# Privacy Program at MasterCard: Comprehensive

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Information Governance

Privacy by Design

"Each individual is continually engaged in a personal adjustment process where he balances the desire for privacy with the desire for disclosure and communication"

Dr. Alan Westin
1967
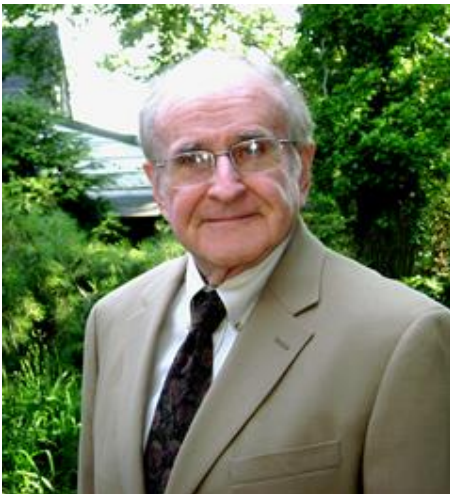
Privacy By Design – An example

Product Construct:

- **Priceless Cities operates 22+ websites around the world that collect personal data**

- **Data currently collected is used mainly for offer fulfillment and email marketing purposes.**

Issues to Address:

- **Compliance with different data protection regulations is a challenge**

- **Cross-border promotions bring additional complexity as legal requirements vary on a country by country basis.**

- **Desired uses of data are broader than current scope of consent.**
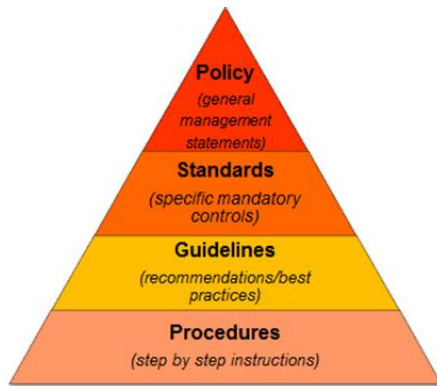
Solutions

- **MasterCard creates MasterCard ID ("MCID") to implement consistent data collection practices across all sites and enable users to manage their preferences through a centralized infrastructure.**

- **MCID will be able to recognize the cardholder country of origin and serve offers in a manner it is consistent with the notice given and consent obtained.**

- **Will be used in the future to obtain additional consents as use of data evolves**

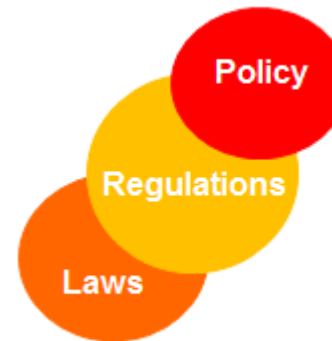# Privacy Program at MasterCard: Comprehensive

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Information Governance

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Information Governance is the process of ensuring a consistent and comprehensive approach for the use and protection of MasterCard information assets across all business initiatives in order to create better efficiencies, practices and processes for data use.

The Information Governance function at MasterCard is responsible for establishing a comprehensive process to improve data-driven decisions across the enterprise, balancing innovation, information ethics, privacy and regulatory requirements while meeting customer & market expectations.

Information Governance – Key Elements