

How IBM transformed the company's global privacy program and strengthened client offerings

Case study





The introduction of the EU General Data Protection Regulation (GDPR) forced many organizations, including IBM, to accelerate development of their privacy programs. Although IBM had longstanding processes in place to manage compliance with privacy laws at a local level, the GDPR required a global approach.

To meet this challenge, the IBM Chief Privacy Office and Global Chief Data Office implemented a three-year corporate GDPR Readiness Program that mobilized thousands of resources from across the company to prepare for the enforcement deadline in May 2018. For IBM, this was far more than just a compliance exercise; it was an opportunity to develop new services and governance frameworks that would accelerate and facilitate future industry and regulatory compliance efforts at scale.

The challenge

In preparing for the GDPR, the principal challenge for a company the size of IBM was to harmonize and consolidate local legal requirements into a global privacy compliance framework.

This effort involved:

6K+

internal processing activities and assets

150K+

partners worldwide

45M

website URLs

13K

global suppliers

400+

legal entities across more than 170 countries

350K

employees worldwide

Furthermore, this global framework needed to be flexible to adapt to evolving organizational needs and future-proofed against the increasingly complex regulatory landscape.

Since the GDPR was introduced:



Over 200 new privacy laws, regulations and amendments have been adopted or proposed globally.



Public awareness of privacy issues, as well as regulatory enforcement, have continued to increase.



IBM has announced over 20 acquisitions and divestitures.



Nearly EUR 300 million (USD 350 million) in GDPR fines have been imposed.



New EU model clauses have been introduced.



The US Privacy Shield framework has been discontinued.



The solution

IBM's Unified Privacy Framework (UPF) builds on the success of IBM's GDPR Readiness Program. It enables a more proactive approach to compliance governance and reduces the time and effort required to comply with new regulations.

With the availability of [IBM Cloud Pak® for Data](#) and [IBM Knowledge Catalog](#), as part of IBM watsonx, IBM and our clients are primed to capitalize further on this framework with enterprise-level efficiencies resulting from improved automation enabled by AI and intelligent governance workflows.

The strategy

The IBM Unified Privacy Framework provides a metadata-driven approach and single trusted source of truth that has been fundamental in reducing IBM's exposure to regulatory risk. By classifying and consolidating metadata from thousands of existing data repositories into a central data catalog, IBM is able to quickly determine what types of personal information are being processed across the company, by whom, and where that data is stored. One benefit of this approach is that IBM's Chief Privacy Office team is able to respond accurately and in a timely manner to the increasing number of Data Subject Rights (DSR) requests received since the GDPR was introduced.

From a people perspective, the UPF provides enhanced organization, accountability, and reporting.

To improve organizational responsiveness, IBM formalized a new Business Unit Privacy Lead (BPL) role across all business units. Acting as trusted partners of the Chief Privacy Office, this global network of privacy specialists is accountable for implementing processes and tracking remediation efforts within each BU. In addition, the CPO is now part of the highest level of the organization with a global mission to infuse compliance efforts throughout the organization through a combination of tooling, standardized processes, and employee education programs.

The process component is where the most work was done

Underpinning the UPF is a common Personal Information Taxonomy that took experts from IBM's Chief Privacy Office and Global Chief Data Office over 12 months to develop. Building a business vocabulary was more than creating a word list; it required comprehensive assessment of industry and regulatory compliance by IBM legal analysts to create a reusable business vocabulary with definitions and business context.

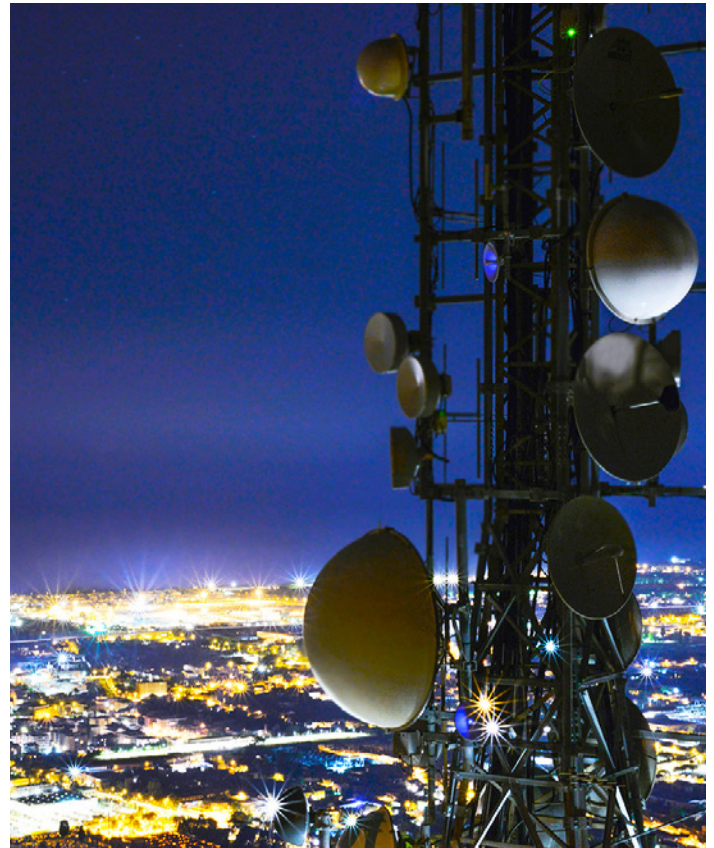
This analysis was then used to develop an Enterprise Privacy Baseline that consolidates all global privacy requirements into a single set of control points that drive the implementation of IBM's industry and regulatory compliance processes.

Together with a new Privacy Information Management System that automates the delivery and tracking of privacy assessments, these process changes have streamlined the governance of IBM's Global Privacy Assessment Program and significantly reduced the time required to reach compliance. As a result, preparing for a new regulation such as the California Consumer Privacy Act (CCPA) required just a fraction of the time and effort that was required for the GDPR.

These process improvements bring other tangible enterprise-level benefits. Improved real-time reporting capabilities and supplier risk management processes mean that IBM is able to respond more quickly and effectively to client privacy and security questionnaires. With more and more clients requiring that their suppliers provide reassurances of compliance with privacy laws, this capability further reinforces IBM's reputation as a responsible data steward and represents a real competitive advantage.

From a technology standpoint, the most important component was common privacy services.

These use a combination of custom-developed tools, IBM software solutions, and third-party services to manage data discovery, automate the processing of DSR requests, and facilitate overall privacy program management. Common privacy services have already provided significant value, particularly to IBM Business Unit Privacy Leads who now have access to real-time insights that help focus efforts on the highest-risk areas.





Putting it into practice

IBM's investments in preparing people, processes, and technology to address the challenges of GDPR compliance have brought real benefits. IBM's Personal Information Taxonomy, for example, drives consistency in the way that IBM describes its processing activities and types of personal data. This, in turn, facilitates the automation of solutions designed to help meet IBM's obligations for Record of Processing under the GDPR and other data privacy regulations.

The lessons learned and the technology solutions developed in building the UPF are now helping strengthen IBM's client offerings. For example, IBM's Personal Information Taxonomy is now included as a [Knowledge Accelerator](#) within [IBM Cloud Pak for Data](#), providing clients with a structured list of over 150 data types, including PI, SPI, employee and customer data. With this taxonomy, companies can now accelerate their regulatory compliance efforts out of the box by better aligning their business data with concepts from key industry regulations and standards. This provides several benefits:

Shorter time to value

The comprehensive Business Core Vocabulary greatly reduces the time that it takes for a business to implement their data governance program, potentially saving person-years in time and money.

Continual enrichment

More business assets are continually classified within [IBM Knowledge Catalog](#) and assigned to related business terms in the vocabulary. Therefore, over time the Business Core Vocabulary can become a more comprehensive repository of knowledge for the entire business, enabling enterprise search to provide a true "everything to everyone" view of data and responsibilities within the organization.

Better DataOps ROI

Knowledge Accelerators help you quickly catalog enterprise information assets and assign business context to the predefined business vocabulary. In doing so, they support the centralized repository of business knowledge that is necessary for the [DataOps](#) methodology—providing the foundation to coordinate operations for the Data Steward, Business Analyst, and the Data Engineer roles and ultimately leading to better returns from your DataOps initiatives.

Learn more

If you are looking to transform and scale your own corporate privacy compliance program, you can now benefit directly from IBM's experience and investment in data governance and privacy. The organizational governance best practices and technologies developed to support IBM's global privacy program, coupled with the automation capabilities and latest advances in AI, are embedded in solutions that can help dramatically increase your own speed to compliance. These include the PI taxonomy Knowledge Accelerator within IBM Cloud Pak for Data; the [IBM OpenPages®](#) unified governance, risk and compliance solution; and the cataloging and active metadata management capabilities in [IBM Knowledge Catalog](#).

Contact an IBM expert to learn more by booking a [free 30-minute consultation](#).



© Copyright IBM Corporation 2023

IBM Corporation
New Orchard Road, Armonk, NY 10504

Produced in the United States of America
September 2023

IBM, the IBM logo, IBM Cloud Pak, OpenPages, and are trademarks or registered trademarks of International Business Machines Corporation, in the United States and/or other countries. Other product and service names might be trademarks of IBM or other companies. A current list of IBM trademarks is available on ibm.com/trademark.

This document is current as of the initial date of publication and may be changed by IBM at any time. Not all offerings are available in every country in which IBM operates.

It is the user's responsibility to evaluate and verify the operation of any other products or programs with IBM products and programs. THE INFORMATION IN THIS DOCUMENT IS PROVIDED "AS IS" WITHOUT ANY WARRANTY, EXPRESS OR IMPLIED, INCLUDING WITHOUT ANY WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE AND ANY WARRANTY OR CONDITION OF NON-INFRINGEMENT. IBM products are warranted according to the terms and conditions of the agreements under which they are provided.

The client is responsible for ensuring compliance with laws and regulations applicable to it. IBM does not provide legal advice or represent or warrant that its services or products will ensure that the client is in compliance with any law or regulation.

Note: all numbers are approximate and subject to change over time.

