

AWS Webinar

Navigating GDPR Compliance on AWS

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What is the GDPR?

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- The "GDPR" is the General Data Protection Regulation, a significant new EU Data Protection Regulation
- Introduces robust requirements that will raise and harmonize standards for data protection, security, and compliance across the EU
- The GDPR is enforceable May 25th, 2018 and it replaces the EU Data Protection Directive (Directive 95/46/EC)
- Territorial scope: Organisations established in the EU and Organisations without an EU presence who target or monitor EU individuals

Content vs. Personal Data

Content

= anything that a customer (or any end user) stores, or processes using AWS services, including:

Software | Data | Text | Audio | Video

Personal Data

- = information from which a living individual may be identified or identifiable (under EU data protection law)
- Customer's "content" might include "personal data"



The Right to Data Portability

The Right to Be Forgotten Privacy By Design

Data Breach Notification

Individuals have the right to a copy of all the personal data that **controllers** have regarding him or her. It also must be provided in a way that facilitates reuse.



The Right to Data
Portability

The Right to Be Forgotten

Privacy By Design Data Breach Notification

This gives individuals the right to have certain personal data deleted so third parties can no longer trace them.



The Right to Data
Portability

The Right to Be Forgotten

Privacy by Design

Data Breach Notification

This helps to facilitate the inclusion of policies, guidelines, and work instructions related to data protection in the earliest stages of projects including personal data.



The Right to Data
Portability

The Right to Be Forgotten

Privacy By Design

Data Breach Notification

Controllers must report personal data breaches to the relevant supervisory authority within 72 hours. If there is a high risk to the rights and freedoms of data subjects, they must also notify the data subjects.



How AWS can help customers achieve GDPR compliance

Bringing it all together





Data Subjects



Customers are **Controllers**



AWS as Processor

Controllers <u>and</u> Processors have obligations under GDPR

Bringing it all together





Data Subjects



Customer's customer as Controller



Customer as **Processor**



AWS as Processor

Controllers <u>and</u> Processors have obligations under GDPR

GDPR in practice: implementing TOMs



Under GDPR **Controllers** and **Processors** are required to implement appropriate Technical and Organization Measures ("TOMs") ...

(1) Pseudonymisation and encryption of personal data

(2) Ensure ongoing confidentiality, integrity, availability, and resilience of processing systems and services

(3) Ability to restore availability and access to personal data in a timely manner in the event of a physical or technical incident

(4) Process for regularly testing, assessing, and evaluating the effectiveness of TOMs

What AWS provides







Tools and Services





ISO Compliance Framework

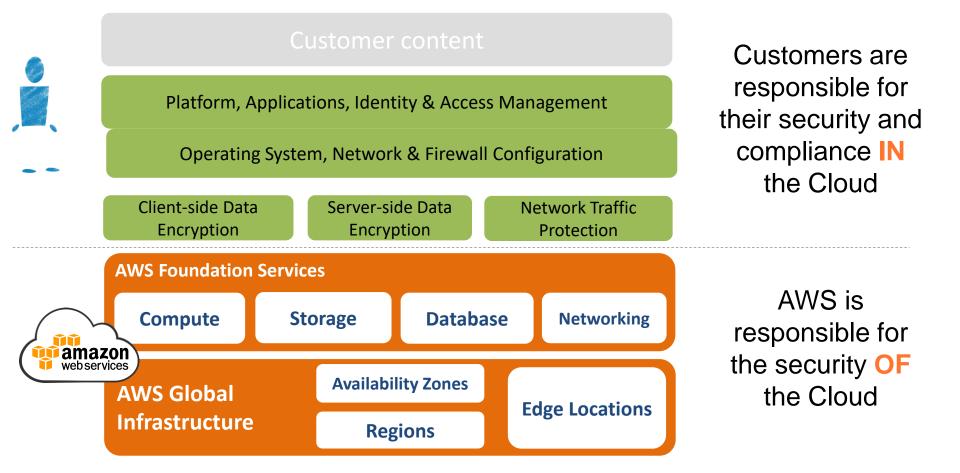


Partner Network



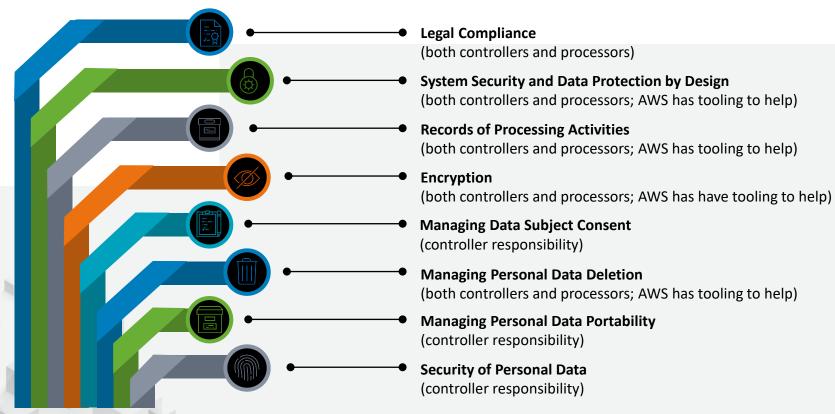
Data Protection Terms

AWS Shared Responsibility Model



GDPR is also a "shared responsibility"



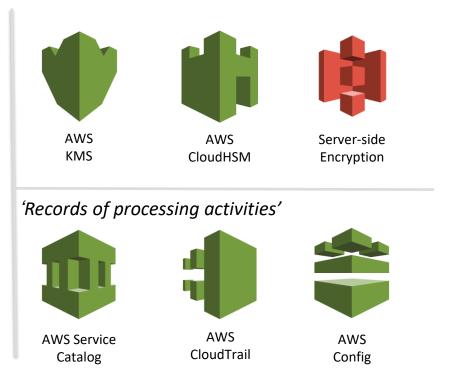


Navigating GDPR Compliance with AWS Services

'Data protection by design and default'



'Security of processing'



GDPR Compliance Tools



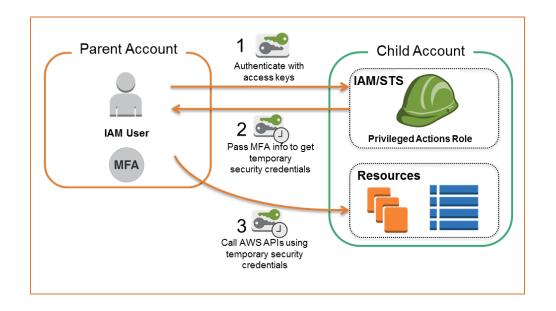
Data Access Control Monitoring of Access Activities

Data Encryption Strong Compliance Framework

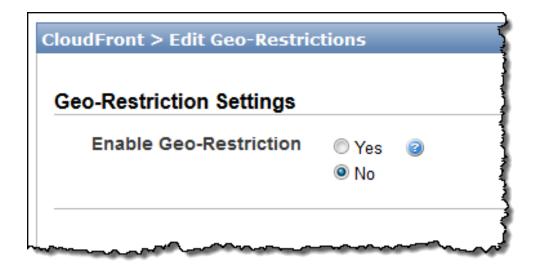
The **controller** "shall implement appropriate technical and organizational measures for ensuring that, by default, only personal data which are necessary for each specific purpose of the processing are processed."

Multi factor authentication
API-Request Authentication
Temporary Access Tokens

Access Control



Access Control



GDPR Compliance Tools



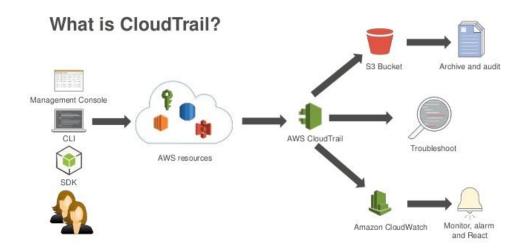
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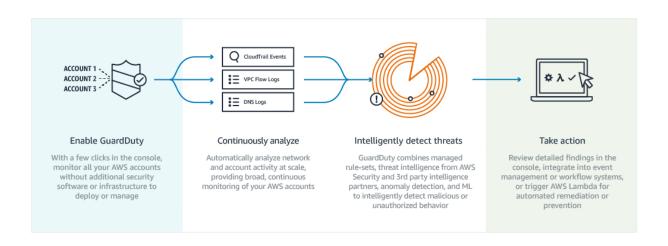
"Each **controller** and, where applicable, the controller's representative, shall maintain a record of processing activities under its responsibility."

CloudTrail
Inspector
Macie
AWS Config

Monitoring and Logging



Amazon Guard Duty





GDPR Compliance Tools



Data Access Control Monitoring of Access Activities

Data Encryption Strong Compliance Framework

Organizations must "implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including the pseudonymisation and encryption of personal data."

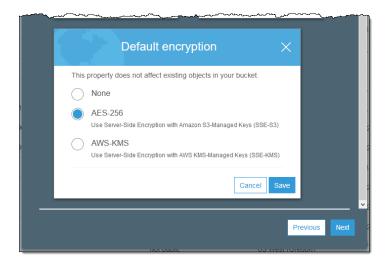
Encryption of your data at rest with AES256 (EBS/S3/Glacier/RDS)

Centralized (by Region) managed Key-Management (KMS)

IPsec tunnels into AWS with the VPN-Gateways

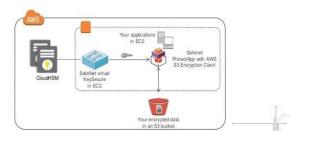
Dedicated HSM modules in the cloud with CloudHSM

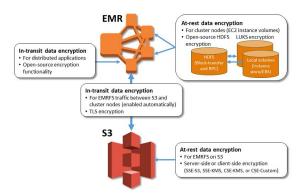
Encryption



S3 Encryption

Encryption of S3 objects using master keys in CloudHSM





Amazon Key Management Service (KMS)

SSE using KMS



Keys managed centrally in Amazon KMS with permissions and auditing of usage

GDPR Compliance Tools



Data Access Control Monitoring of Access Activities

Data Encryption Strong Compliance Framework

Appropriate technical and organizational measures may need to include "the ability to ensure the ongoing confidentiality, integrity, availability, and resilience of the processing systems and services."

Meet your own security objectives

Your own accreditation

GDPR
Code of Conducts





Customer scope and effort is reduced

Better results through focused efforts



Built on AWS consistent baseline controls

GDPR – Codes of Conduct



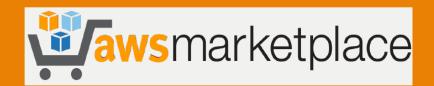
CISPE Code (Cloud Infrastructure Service Providers in Europe)

The CISPE Code of Conduct:

- An effective, easily accessed framework for complying with the EU's GDPR
- Excludes the re-use of customer data
- Enables data storage and processing exclusively within the EU
- Identifies cloud infrastructure services suitable for different types of data processing
- Helps citizens to retain control of their personal and sensitive data
- AWS CISPE certified
- CISPE Code of Conduct in evaluation by Article 29 WP



AWS Marketplace: One stop shop for familiar tools



Advanced Threat Analytics





Application Security







Identity and Access Mgmt







Server & Endpoint Protection





Network Security









Encryption & Key Mgmt







& ' :







AWS Partner Network (APN) & GDPR

Consulting Partners

APN consulting partners can help your customers get ready for GDPR.

Technology Partners

APN technology partners offer security & identity solutions to help with GDPR.



ProServe Offering Development: Technical Solution supporting Privacy-by-Design

- SRC ProServe team is in discovery efforts to understand what our customers are seeking to learn with regard to GDPR. If you have anything you would like to share please reach out to the ProServe contacts below.
- Current activities underway include:
 - Offering Development: Sales & Delivery Assets targeted for February (legal dependencies)
 - Partner Development: Working with some of our Partners to build/create go to market information.
 - Customer Engagement: Webinars are planned to support Venture Capital Business; if you are interested please reach out.
 - Security Summit/Lofts: Will be present to at several events to support customers onsite





Thank You