

# Datenschutzkonformes Löschen von Daten

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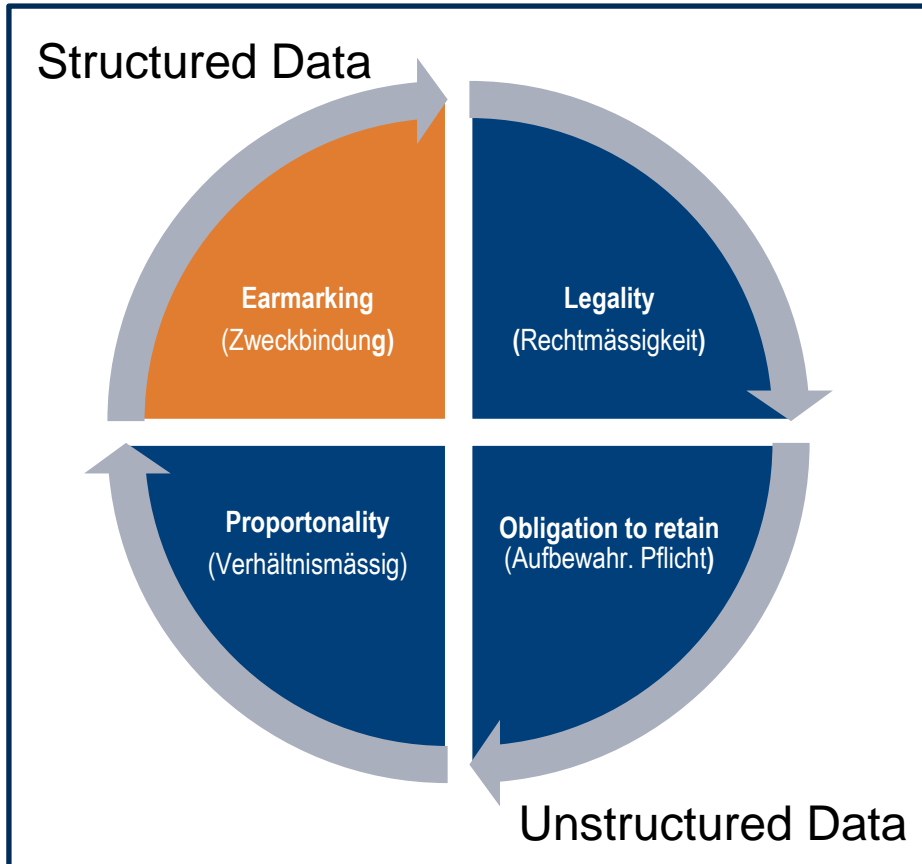
# Fragen an Teilnehmer

- Hat Ihre Organisation ein umfassendes Löschkonzept für personenbezogene Daten?
- Können Sie bestätigen, dass Ihre Organisation in der Lage ist, personenbezogene Daten datenschutzkonform zu löschen?
- Beinhaltet das Löschkonzept in Ihrer Organisation auch unstrukturierte Daten?

# Agenda

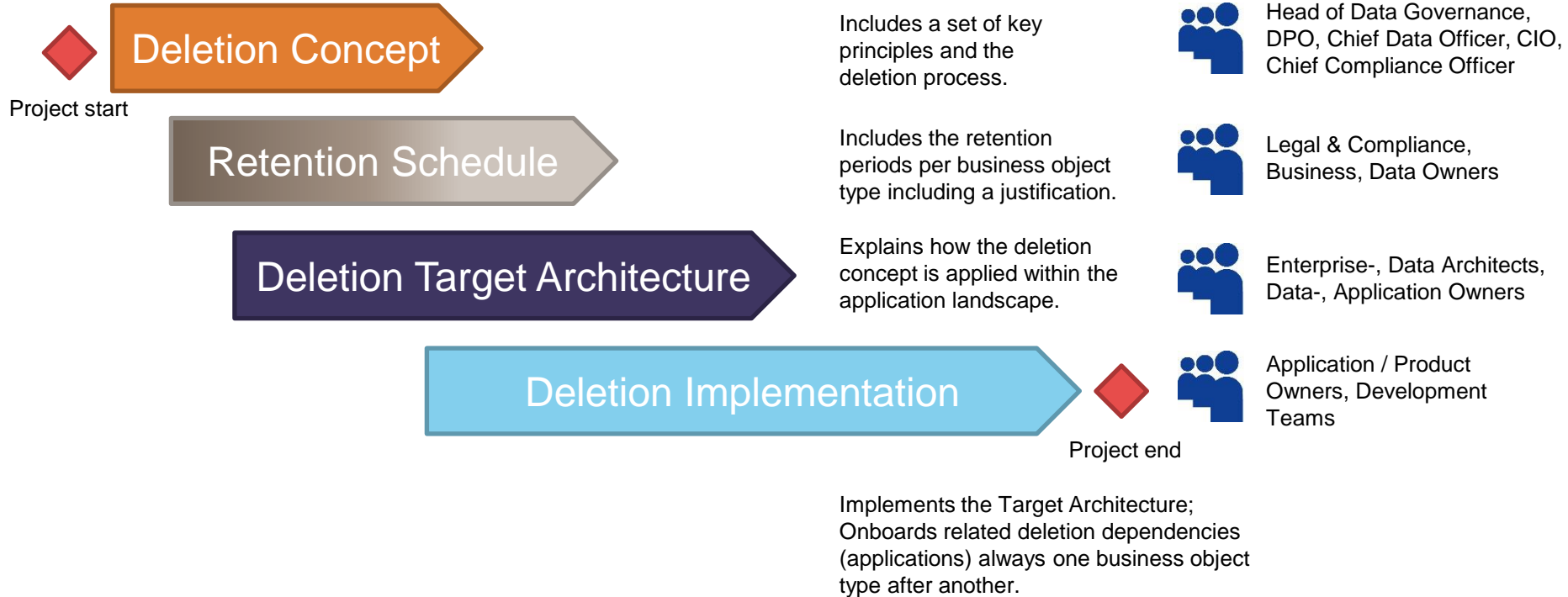
- 1. Introduction
  - Retention and Deletion
- 2. Starting a Project
  - Proceeding
  - Deletion Principle
  - Accelerators
  - Challenges
- 3. Unstructured Data
  - Differentiation
  - Integration in Deletion Process
- 4. Summary and Conclusions

# Keep or delete Data?



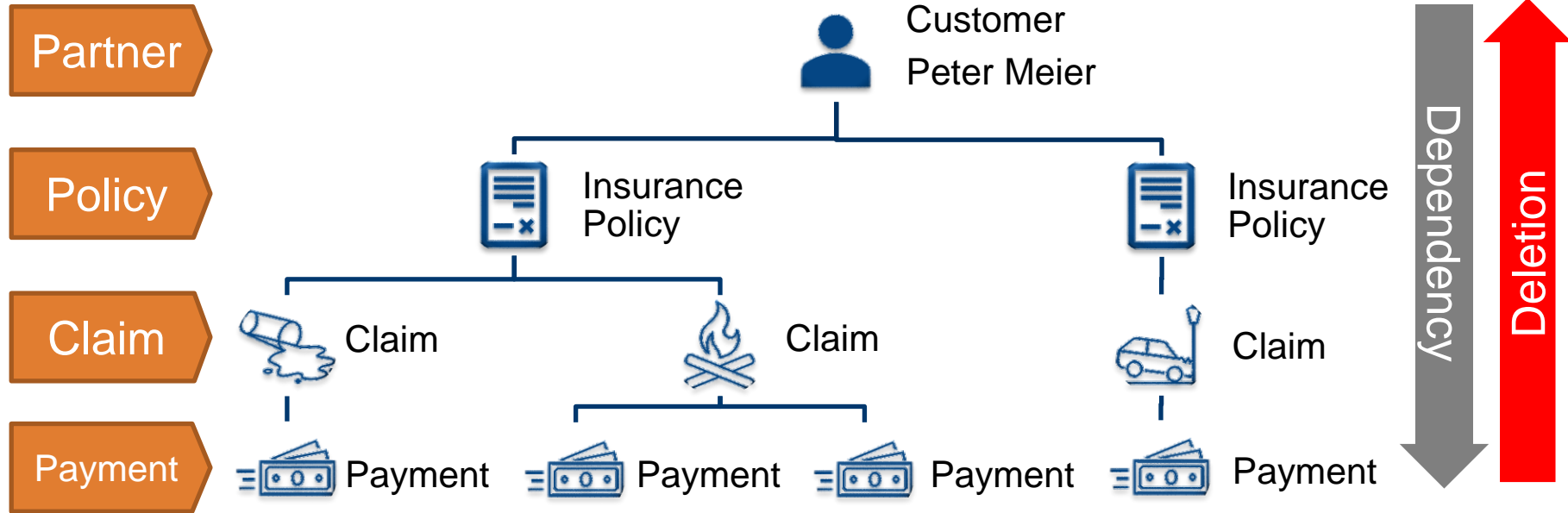
- Where is the relevant data?
- What do we need to delete?
- What shouldn't we delete?
- When do we delete?
- What is the coherence and dependencies of data?
- Can we centrally manage and automate the processes?

# Starting a deletion project – How to proceed?



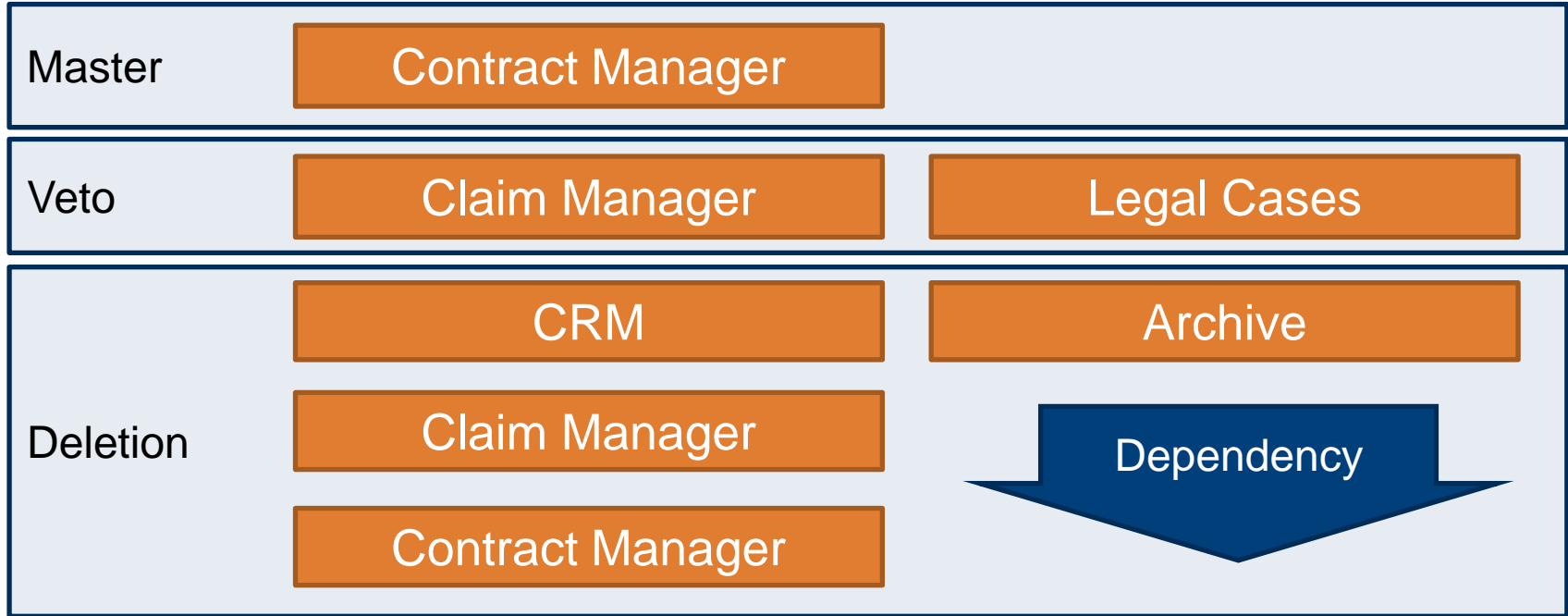
# Deletion principle – how to delete data?

**Business Object Types** in a sample insurance company



# Application roles & dependencies

Sample for Business Object Type **Policy**



# Challenges in data deletion projects

## Organisational

- Data Deletion may concern all your core applications.
- Data Deletion may concern all your departments and various stakeholders.

## Bad Data Quality

- Bad data quality might increase amount of dependencies and lead to implementation of rollback solutions.

## Legacy applications

- Legacy applications might not be capable of deletion require specific solutions.
- Extensions to legacy applications rarely justify further investment.

## Unmanaged data stores (Shadow IT)

- All data stores that are used autonomously by the business departments are not integrated into the service management of the central IT department.

## Archives and Backups

- Archives are part of the deletion process.
- Backups will be overwritten automatically.



# Accelerators for the deletion project

## Information Models

- Information models can serve as conceptual frameworks for the analysis phase. (eg. BOM)

## Data catalogs

- A data catalog gives you visibility into all your (personal) data, regardless of where it is stored.

## Deletion orchestration service

- A deletion orchestration service gives you control over the deletion of data objects across multiple deletion dependencies.

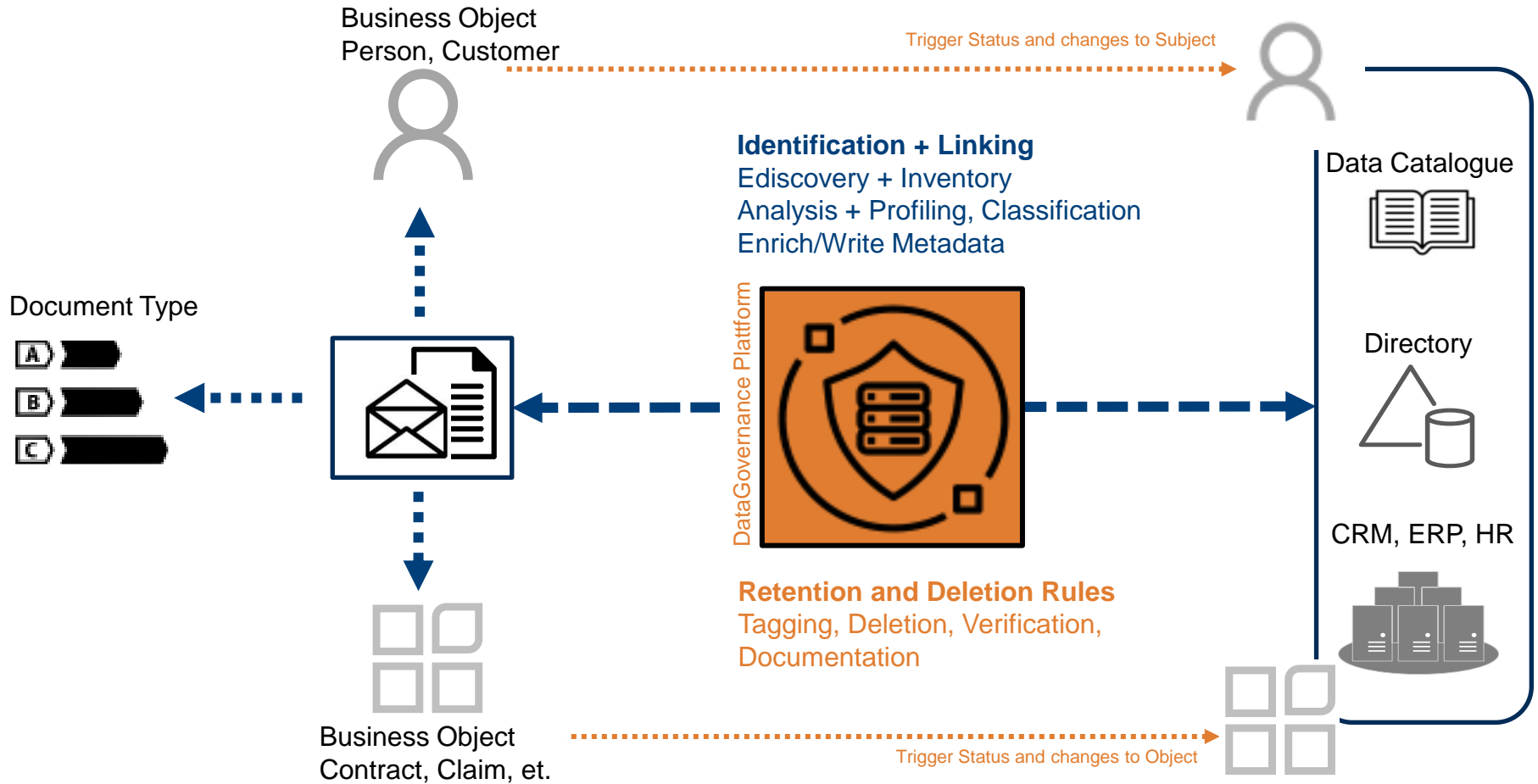
## Management of unstructured data

- Appropriate methods and tools allow the management of personal data even in unstructured data.

# Deleting unstructured data - Differentiation

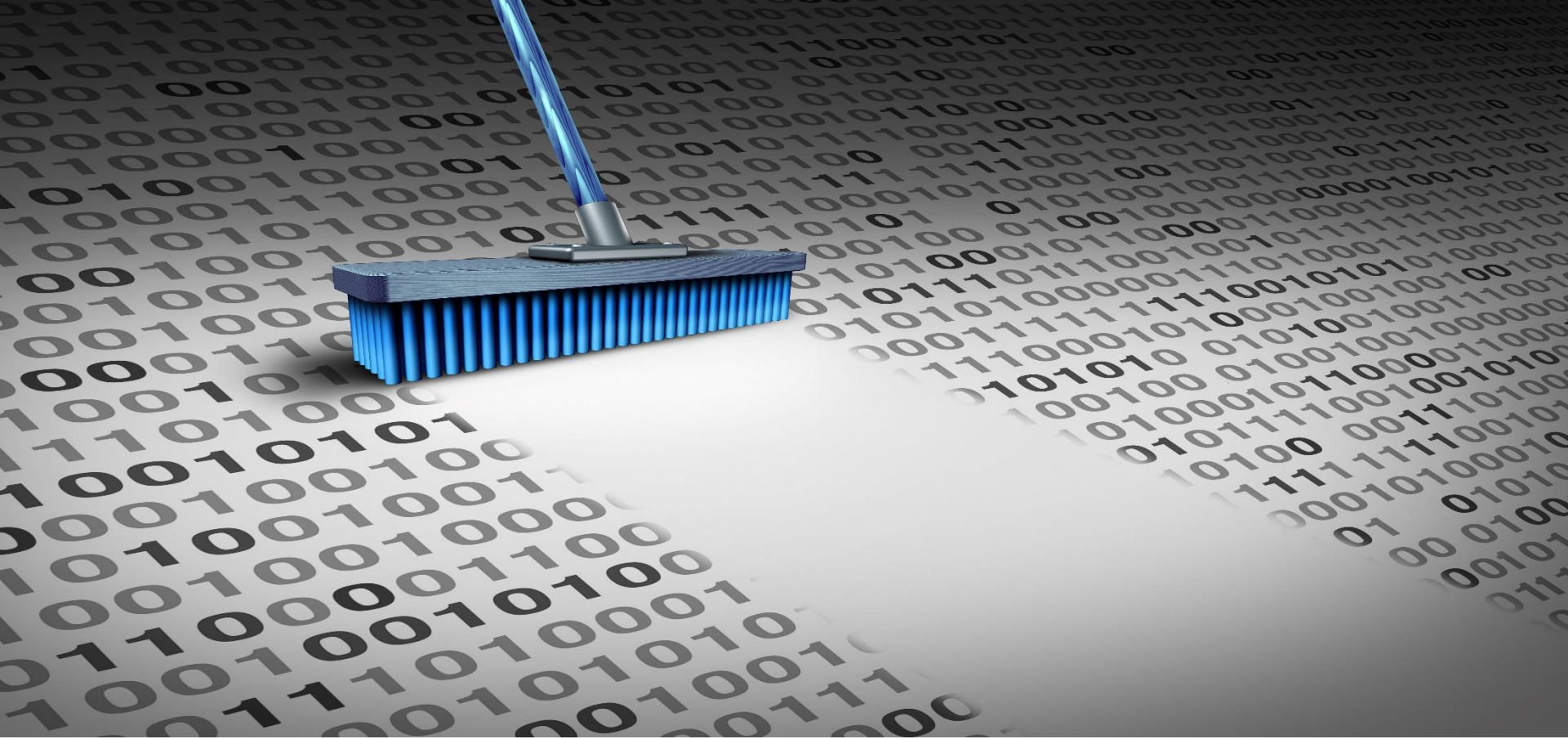
- Characteristics
  - Mostly dark data, unmanged
  - Has only little or no Metadata
  - Standalone data objects, generally not linked to other data
- Challenges
  - Identify relevent information
  - Reading and interpreting data
  - Assigning a document to an individual subject
  - Following Business dynamics

# Integration in Deletion Process



# Summary and Conclusions

- Organizations need to delete data by purpose rather than by person
- A convincing Deletion Concept is mandatory to demonstrate compliance with regulations
- Close collaboration between data owners, data protection officer, legal, software development, IT infrastructure and operations teams is necessary
- Concepts of Privacy by design and Privacy by default are pursued in the organisation
- Deletion orchestration shall be automated and include structured and unstructured data



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