IBM’s Journey to GDPR Readiness
At IBM, we have a deep rooted understanding that privacy is foundational to trust. We are approaching the GDPR in the same spirit, both internally and with respect to our client offerings. IBM’s legal and data privacy teams have been reviewing and assessing the new EU General Data Protection Regulation since its early draft stages, and as IBM’s Chief Privacy Officer, I recently published a statement that outlines IBM’s commitment to GDPR readiness.

Teams across IBM are adapting our internal processes and commercial offerings to prepare for when the GDPR comes into effect on May 25, 2018. These same experienced professionals are available to support you at each stage of your own GDPR readiness journey. And what better customer reference for IBM’s capabilities on GDPR, than IBM itself?”

– Cristina Cabella
IBM Chief Privacy Officer
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IBM has established a global readiness programme tasked with identifying the key impacts of the GDPR across IBM’s business and preparing IBM’s internal processes and commercial offerings for compliance with the GDPR.

The programme is organised into several work streams, staffed with IBM’s top data privacy and security professionals. Focal points in each Business Unit are responsible for implementing the GDPR-related policy, system and business process changes mandated by the various key work streams.
The IBM GDPR Framework

Our internal GDPR readiness activities are aligned with a global framework derived from lessons learned on our many security and privacy client engagements.

This framework takes a holistic approach that spans people, processes and technology. It translates GDPR obligations into the concrete actions and outcomes that are needed to progress towards GDPR readiness.

This close interlock helps to ensure that the best practices, solutions and services that IBM uses internally are the same as those we offer our clients.

Visit [ibm.com/gdpr](http://ibm.com/gdpr) and download our white paper [IBM pathways for GDPR readiness](http://ibm.com/gdpr) for more details on the IBM GDPR Framework and guidance on addressing your own organisation’s GDPR readiness challenges.
Assess

IBM is conducting global privacy assessments on both our internal systems and our client offerings, and is incorporating Technical and Organisational Measures into new and existing contracts to cover the GDPR’s requirements.

IBM's long standing services in data privacy and security bring dedicated and multi-disciplinary expertise to address the challenges of legal and regulatory compliance, project management and operational risk controls across more than 70 jurisdictions.

One key challenge for us was to standardise our taxonomy of data across all IBM Business Units. This is being achieved with the help of our advanced cognitive analytics solutions.

With clients and for ourselves, these assessment outputs include PIA (Privacy Impact Assessments), gap analysis, data mapping and compliance handbooks.

Projects for Fortune 750 Companies
60+ countries
100 years of collective experience

IBM’s long-standing Data Privacy Consulting Service was extended with the acquisition of Promontory Financial Group in 2016.

Promontory’s team blends experience as former regulators, in-house compliance managers, and global privacy consultants and is providing IBM with unique perspectives and expertise on GDPR readiness, data-mapping, and compliance strategies.

Visit [www.promontory.com](http://www.promontory.com) for more details on Promontory’s expertise and services.
IBM has deployed a number of corporate wide common services to accelerate and assist in programme execution across all of our business units. These include Programme Governance, Risk Management, Data Subject Rights Management and Processor/Controller Governance solutions.

We have developed range of internal communication and training initiatives to ensure employees are made aware of and enabled on GDPR duties, obligations, and proper data use. Additional self-service materials include approved content libraries, Q&A forums and knowledge base resources.

IBM’s GDPR solution provides clients with the same capabilities that we have developed internally to help accelerate their own journey towards GDPR readiness.
We are transforming all our business units globally to ensure consistent adoption of GDPR capabilities across IBM.

GDPR Common Services are being implemented in three main phases.

**Phase 1: Data & Risk Classification High Level Assessment**
- Regulatory Response Dashboard
- Privacy Risk Assessments
- Data Maps
- Data Sources Discovery
- Data Catalogues

**Phase 2: Detailed Assessment & Priority Data Remediation**
- Detailed Data Discovery
- Initial Record of Processing
- Priority Data Remediation
- Cognitive Analytics Solutions

**Phase 3: Operationalise GDPR Capabilities**
- Contract Management
- Customer Portal
- Vendor Repository & Workflow
- Compliance Validation
- Consent Management
- Data Subject Access Requests
- Incident Response
- Data Remediation
Key GDPR capabilities will be fully operational before the GDPR comes into effect in May 2018. At this point, IBM’s new GDPR way of working should become standard operating practice for interactions with our clients and their data.

Features and services integrated directly into our offerings will help protect privacy and meet our GDPR-related obligations, such as the ability for data subjects to manage their consent preferences (“privacy by design”) and submit data subject access requests (DSARs).

Incident Management and meeting the 72-hour breach reporting window is a key operational challenge for all organisations. IBM will use our Computer Security Incident Response Team (CSIRT) to address this challenge.
IBM draws on its extensive governance, consulting and practice knowledge with a wide range of global privacy and security regulations to help ensure compliance of our business operations worldwide.

This includes monitoring of Technical and Organisational Measures, security and privacy assessments, auditing and evaluating ongoing conformance to the GDPR and the provision of evidence of compliance to both internal and external stakeholders. IBM makes these same services available to clients.
Are you ready?

The work that IBM is doing internally to prepare for the GDPR reinforces the controls already in place that limit access to our clients’ personal data and will ensure that we continue to handle our clients’ most valuable assets in a compliant manner at all times.

The GDPR represents a unique opportunity to help strengthen your own privacy compliance posture and preserve the trust of your customers, while reducing your exposure to risk, and creating real competitive advantage.

Connect with our GDPR professionals or join us for one of our regular online or in-person briefings to learn more about how IBM is preparing for the GDPR and how we can support you on your own journey to GDPR readiness.

Visit ibm.com/gdpr for more details.