

# APEC CBPRs: A certified company's point of view

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# IBM at a glance



**400,000+** employees



**170+** countries

**First company  
to be CBPR-  
certified**



Cloud



Analytics



Mobile



Security



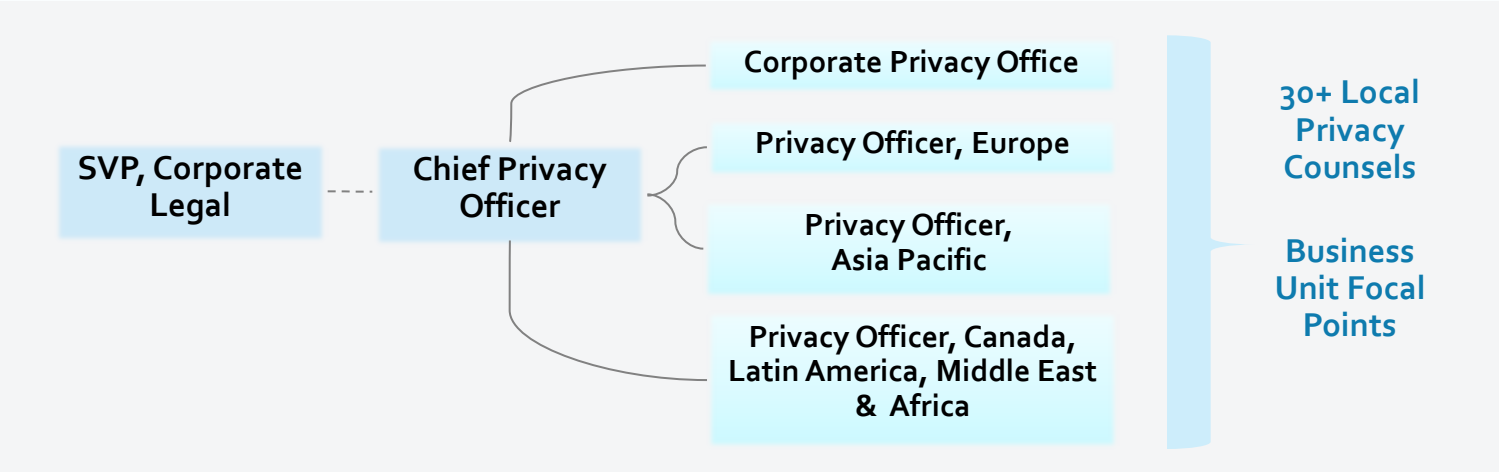
Cognitive  
Computing



Social

## Privacy management structure

Corporate Privacy Office, regional Privacy Officers & a network of local privacy counsels and business unit focal points



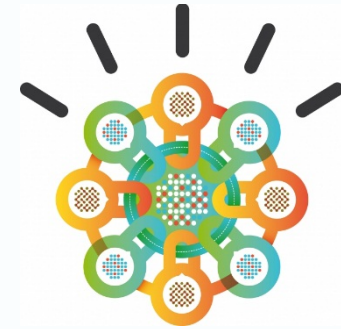
## Corporate policies

Stringent global policy and corporate instructions, guidelines and standards which govern the collection, use, disclosure, access, storage, retention, and protection of IBM-controlled personal information

## Global privacy programs

Put our corporate policies into practice and enable IBM to meet legal requirements and expectations, and manage risks

- global privacy assessment program, data incident reporting & management, global access request process, education & awareness



## Guidance

Topical guidance

- marketing, social data collection and use, cross-border data transfers, sharing PI with third parties, developing mobile apps, education completion tracking and sharing

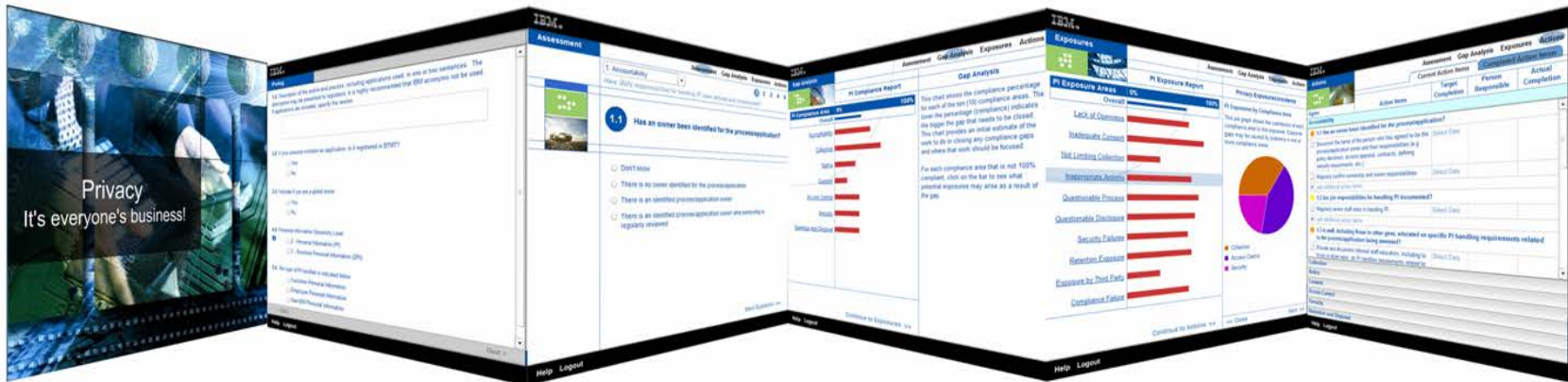
## Ongoing verification

Monitor and test as appropriate samples of activities that present considerable risks or are subject to certification (e.g. CBPR; EU/US Privacy Shield)



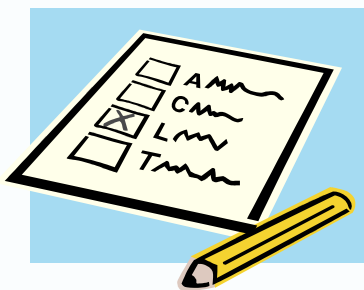
## Cornerstone of IBM's approach to privacy compliance & risk management

- Enables business processes and applications that process IBM-controlled personal information to undergo self-assessments to evaluate compliance with corporate privacy policies and local privacy laws, remediate exposures, and mitigate risks
- Flags processing which requires legal reviews and regulatory filings
- Incorporates the privacy legal requirements of 80+ countries with comprehensive data privacy laws





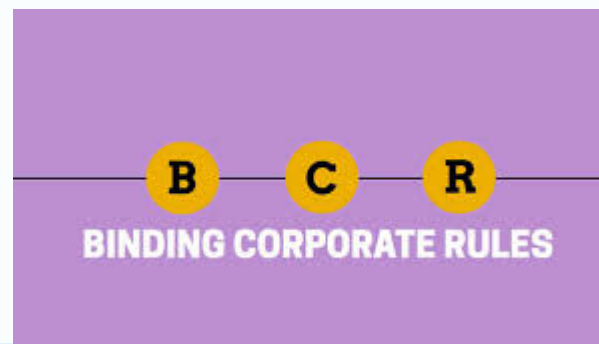
**EU/US Privacy Shield**



**Adequacy**



**Data Protection Authority**

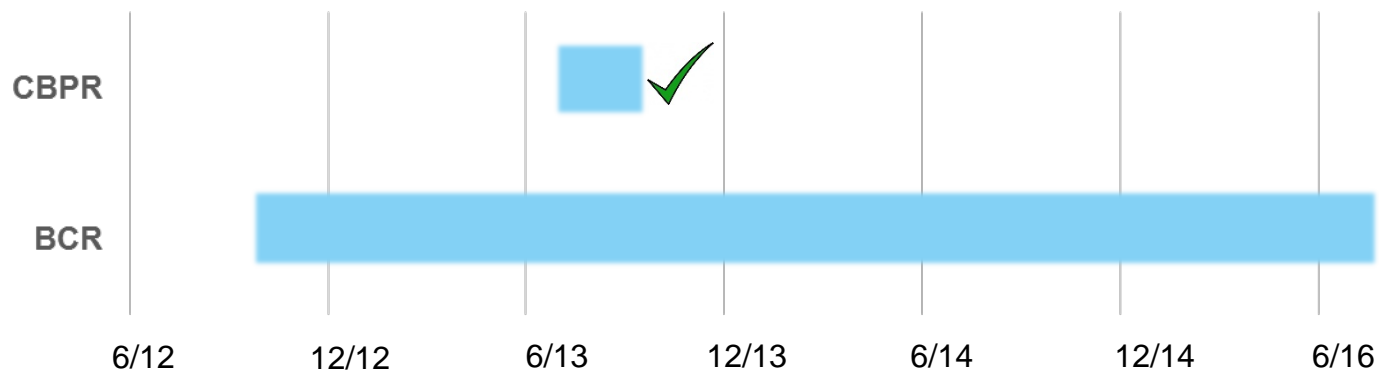


## IBM's CBPR certification

- Certification covers all personal information collected through ibm.com websites and further processed thereafter (whether online or offline)
- Certification submitted to TRUSTe June 19 and approved Aug 2, 2013; first company to be CBPR- certified

## IBM's BCR approval

- Seeking approval for all personal data processed by IBM as a data controller (in a HR & business context)
- Submitted to UK ICO as lead authority on August 8, 2012; reviewed by the Dutch and German (Baden Württemberg) authorities, IBM's BCR secondary reviewers; approved June 2016



# Certified accountability - stakeholder benefits of CBPR

## **Business**

- Increased trust from stakeholders
- More robust privacy programs and practices creating uniformity across the organization
- Facilitates compliance with local standards
- Ability to demonstrate good faith efforts in case of enforcement
- Facilitates efficient cross-border transfers

## **Individuals/consumers**

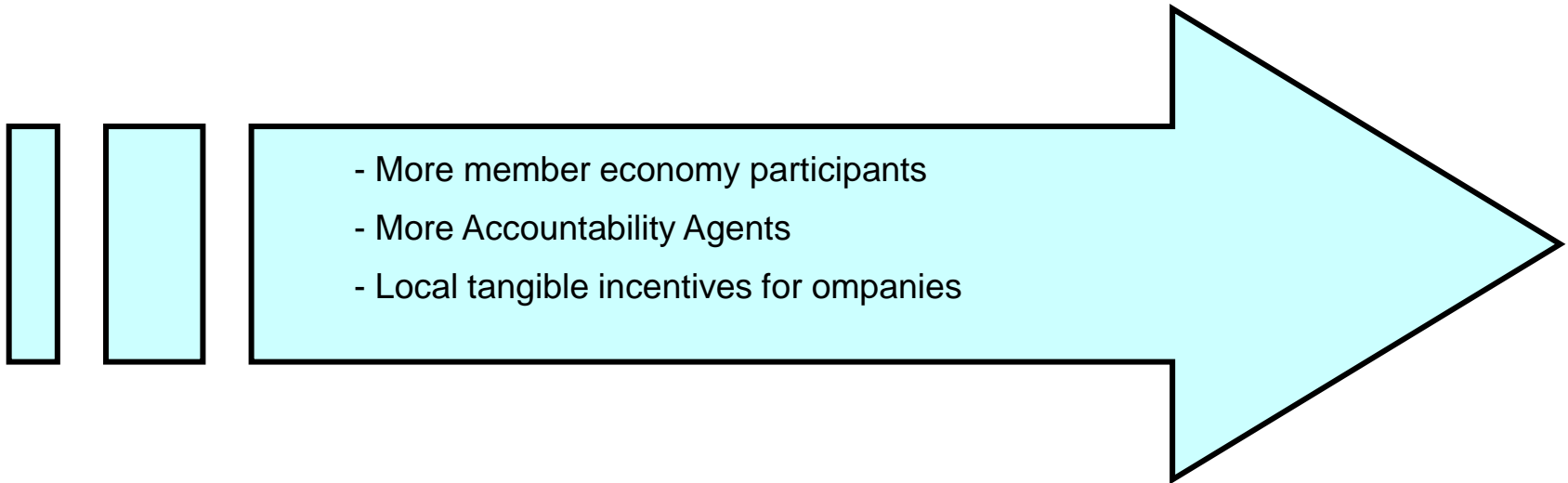
- Enhanced privacy protection
- Improve trust through strong rules, and systemic approach towards compliance (AA oversight)
- User-friendly and streamlined complaint handling
- Coordinated government enforcement
- Ability to continue to embrace innovative products and services that benefit them

## **Government**

- At political level – facilitates trade while creating credibility in privacy
- At enforcement level - facilitates cross-border cooperation
- Front line enforcement by AA augments resources and extends reach of privacy authorities
- Provides for greater economic rewards



# The road to success to further adoption



- More member economy participants
- More Accountability Agents
- Local tangible incentives for ompanies

