



B1: Information Protection & Privacy: Cooperative Education & Awareness

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Overview

- Benefits of cooperation
- Developing a plan
- Implementing training & ongoing awareness

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Benefits of Cooperation

- Alliances
- Visibility
- User mind share
- Reduced costs
- Reduced conflict and redundancy
- Increased impact

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Creating a Plan

- Objectives
- Key messages
- Audiences
- Tools & resources
- Ongoing reinforcement
- Coordination with related initiatives

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Objectives

- Notify users of responsibilities
- Educate users to use tools & resources
- Drive cultural change
- Assist users in making judgment calls
- Facilitate implementation of protection goals—e.g. information classification
- Demonstrate importance to the business

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Key Messages

- Protecting confidential & private information is a strategic imperative
- The company is vulnerable without protection
- Regulations and contracts impose obligations
- Users are responsible; it's their job (and relevant to what they do)

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CSISX
SECURITY EXCHANGE

Conceptual Framework

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CSISX
SECURITY EXCHANGE

Privacy & IP Laws/Regulations

- Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (**USA PATRIOT Act**)
- Children's Internet Protection Act of 2001 (**CIPA**)
- **Economic Espionage Act of 1996**
- Gramm-Leach-Bliley Financial Services Modernization Act of 1999 (**GLBA**)
- Fair Credit Reporting Act of 1999 (**FCRA**)
- Children's Online Privacy Protection Act of 1998 (**COPPA**)
- Health Insurance Portability and Accountability Act of 1996 (**HIPAA**)
- Telecommunications Act of 1996
- Electronic Freedom of Information Act of 1996 (**E-FOIA**)
- Family Education Rights and Privacy Act of 1974 (**FERPA**, also know as the Buckley Amendment)
- Right to Financial Privacy Act of 1978 (**RFPA**)
- Privacy Protection Act of 1980 (**PPA**)
- Cable Communications Policy Act of 1984 (**Cable Act**)
- Electronic Communications Privacy Act of 1986 (**ECPA**)
- Computer Security Act of 1987
- Video Privacy Protection Act of 1988
- Telephone Consumer Protection Act of 1991 (**TCPA**)
- Driver's Privacy Protection Act of 1994
- Communications Assistance for Law Enforcement Act of 1994 (**CALEA**)
- Computer Fraud and Abuse Act of 1986 (**CFAA**)
- California Senate Bill 1386 (**SB 1386**)
- Fair and Accurate Credit Transactions Act (**FACTA**) of 2003
- Controlling the Assault of Non-Solicited Pornography and Marketing (**CAN-SPAM**) Act of 2003
- Uniform Trade Secret Act and related state laws
- Other U.S. Privacy Related Laws
- European Union Data Protection Directive of 1998
- Canada: Personal Information Protection and Electronic Data Act (PIPEDA) of 2000 (Bill C-6)
- Japan: Personal Information Protection Law
- Australia: Privacy Act of 1988
- New Zealand: Privacy Act, May 1993; Privacy Amendment Act, 1993; Privacy Amendment Act, 1994
- Other International Laws

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Complementary Messaging

Risk of loss	IP	Privacy
Reputation & customer trust	√	√
Competitive advantage	√	
Intellectual property	√	
Identity theft		√
Remediation costs	√	√

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Complementary Messaging

Privacy Principles	Privacy	IP
Limit intake/collection	√	√
Ensure data quality	√	
Purpose Specification	√	√
Use limitation	√	√
Security safeguards	√	√
Openness of policies and practices	√	
Individual Participation	√	
Accountability	√	√

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Complementary Messaging

Information Protection Practices	Privacy	IP
Require NDAs		√
Label and mark confidential/private	√	√
Security safeguards—physical & electronic	√	√
Remind others of confidentiality	√	√
Obtain authorization before making public	√*	√
Report improper disclosures/vulnerabilities	√	√

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Complementary Messaging

Information Security Practices	Privacy	IP
Strong passwords	√	√
Encryption	√	√
Anti-spyware	√	√
Firewalls	√	√
E-mail filtering	√	√
Safe Web browsing	√	√
Email etiquette	√	√
Wireless security features	√	√
Software updates & patches	√	√
Safe disposal of media & files	√	√

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Audiences

- Executive management
- Managers
- Specific groups (e.g. R&D)
- Employees
- New hires
- Contractors

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Tools & Resources

- Policy & procedure documents
- Handbooks, including standards of conduct
- NDAs and other agreements
- Training
- Focused communications
- Gadgets, logos, games, prizes, etc.

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Reinforcement

- Ongoing awareness-raising communications
 - Planned
 - Opportunistic
- Audit & accountability
- Disciplinary action

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Coordination with Related Initiatives

- Integration of protection procedures into key business processes
- Contractor and business partner accountability for information protection
- Strengthened termination procedures
- Conflict of interest
- Intellectual property

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Implementing Coordinated Training & Awareness

- Training Plan Design
- Content Organization
- Training Demonstration

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Coordinated Training & Awareness

Reporting

- You must report improper disclosures/vulnerabilities
 - Your immediate supervisor
 - Alternatives:
 - Information Security
 - Legal Department
 - Hotline

Missing Laptop Scenario



Employee Training is the same
Manager Training must be specific

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Coordinated Training & Awareness

Limit Disclosure

- Avoid being overheard
- Be aware in public places
- Verify identity
- Store information out of view
- Limit information shared

Inadvertent email Scenario



Info Protection & Privacy training overlap
Additional specific bullets required for each

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Coordinated Training & Awareness

Inbound Information

Information Protection

- Trade Secrets

Privacy

- Limit to required data
- Data quality
- Right to inspect & copy
- Right to amend

Inbound Information Scenarios



Requires separate specific training
for each discipline

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Summary

- Many benefits of cooperation
- Complementary objectives, messages & implementation
- Audience-focused training and awareness ensures optimum results for both missions

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Questions?

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