Transparency matters!

How to build trust for a new personal data ecosystem

GDPR, Personal Data Platforms and the Telco Industry

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Michele Nati
Lead Technologist Personal Data and Trust
Digital Catapult, London

@michelenati
https://www.linkedin.com/in/michelenati/

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The Personal Data Economy: The opportunity

- **Personal Data is driving organizations digital transformation (Source: DCMS)**

  241£ (66£ UK) billion growth between 2015-2020
  11% increase in customers, 10% new opportunities

- **… but where the value sits**

  (Source: BCG) Digital Health estimated growth: $54Bn -> **$213Bn**, $8Bn -> **$112Bn**
  (Source: BCG) Digital Manufacturing estimated growth: $1Bn -> **$6Bn**, $11Bn -> **$52Bn**

- **… and how we can unlock it**

  by allowing combination and re-use of data with benefits for both businesses and consumers
  (due to more personalization, prevention, automation)

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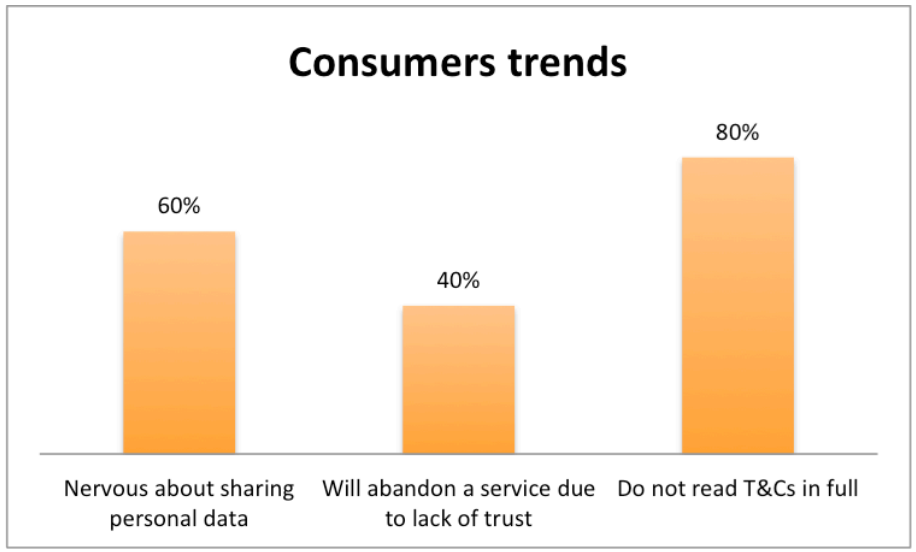
The Personal Data Economy: The risks

- **But hidden business models and lack of transparency are hindering this growth**



- **Savvy consumers demands for trustworthy apps (33%), with simple privacy statements (MEF Consumer Trust Report)**

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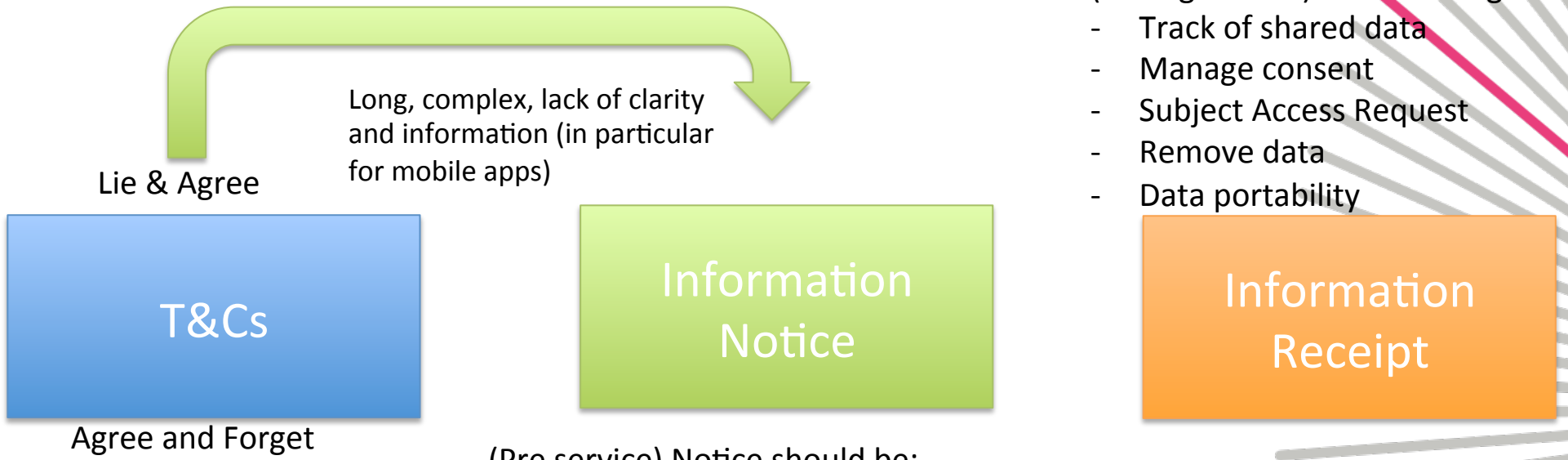
Transparency: Consumers pain points



We need best practices to increase transparency and control

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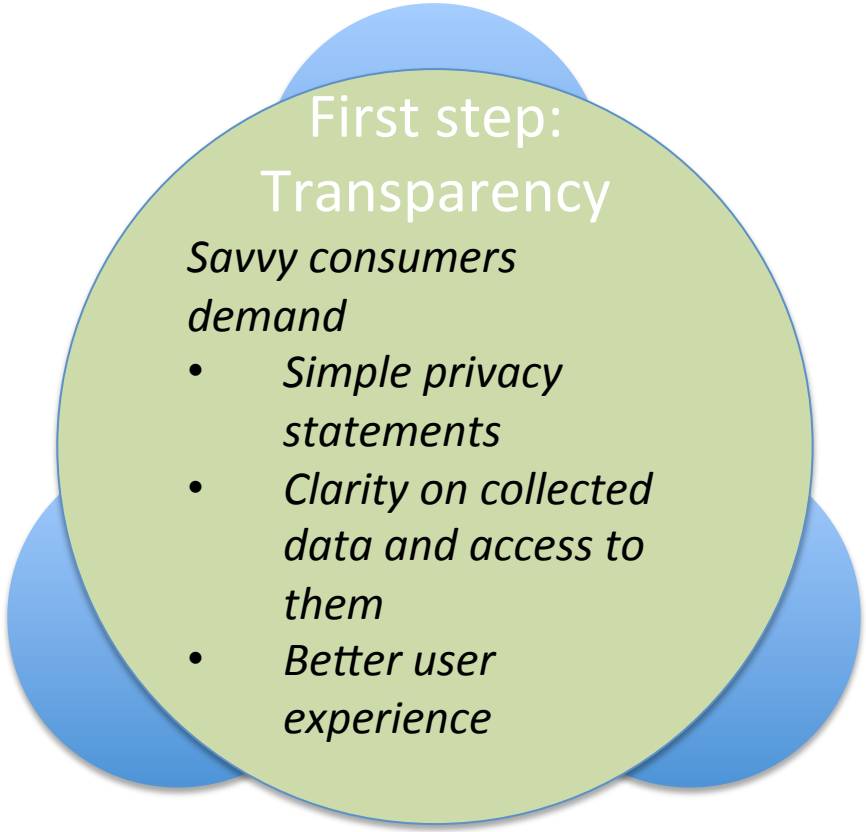
GDPR:
Innovation opportunities



- **Transparency (Article 12-14, Information notice)**
- **Accountability (Article 4 and 7, Consent)**
- **Level of Control (Article 17-19, Data erasure and portability)**

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The Challenge

Problem Statement: *How to increase consumers' trust and businesses' transparency by developing a GDPR compliant solution that takes into account the user experience and help to reduce consumers pain points and organizations compliance burden related to the provisioning of digital services using personal data?*

Personal Data Receipts (PDRs), a *human-readable record summarizing* in a *simple and clear* way what personal data an organization is *collecting about an individual, for what purpose, how they are stored and for how long and if any third party sharing is allowed.*

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Personal Data Receipts

Multi-disciplinary team:

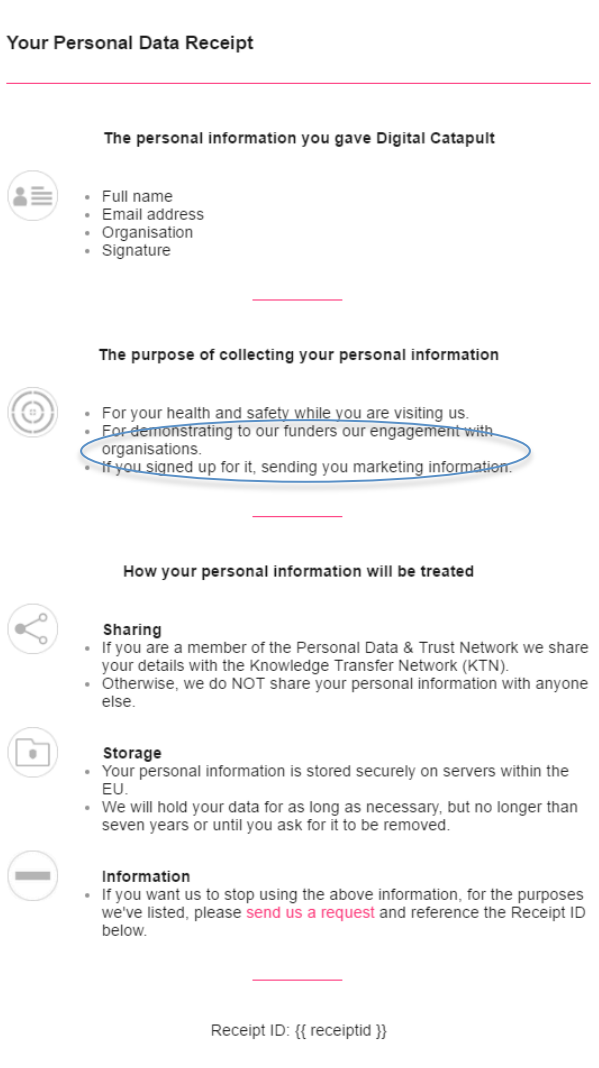
- UX Lead
- Marketing experts
- Lawyer
- Lead Tech

Beyond Consent:

According to DPA, consent is not required for:

a) the “legitimate interests” of the data controller so long as they do not override the fundamental rights of the data subject;

b) data that it is necessary to collect or process to fulfill a contract the data subject asked to enter



Your Personal Data Receipt

The personal information you gave Digital Catapult

- Full name
- Email address
- Organisation
- Signature

The purpose of collecting your personal information

- For your health and safety while you are visiting us.
- For demonstrating to our funders our engagement with organisations.
- If you signed up for it, sending you marketing information.

How your personal information will be treated

Sharing
- If you are a member of the Personal Data & Trust Network we share your details with the Knowledge Transfer Network (KTN).
- Otherwise, we do NOT share your personal information with anyone else.

Storage
- Your personal information is stored securely on servers within the EU.
- We will hold your data for as long as necessary, but no longer than seven years or until you ask for it to be removed.

Information
- If you want us to stop using the above information, for the purposes we've listed, please send us a request and reference the Receipt ID below.

Receipt ID: {{ receiptid }}

- PDRs are a super-set of a consent receipt
- First full transparency, then control

- 4 weeks development/integration
- Including data discovery phase

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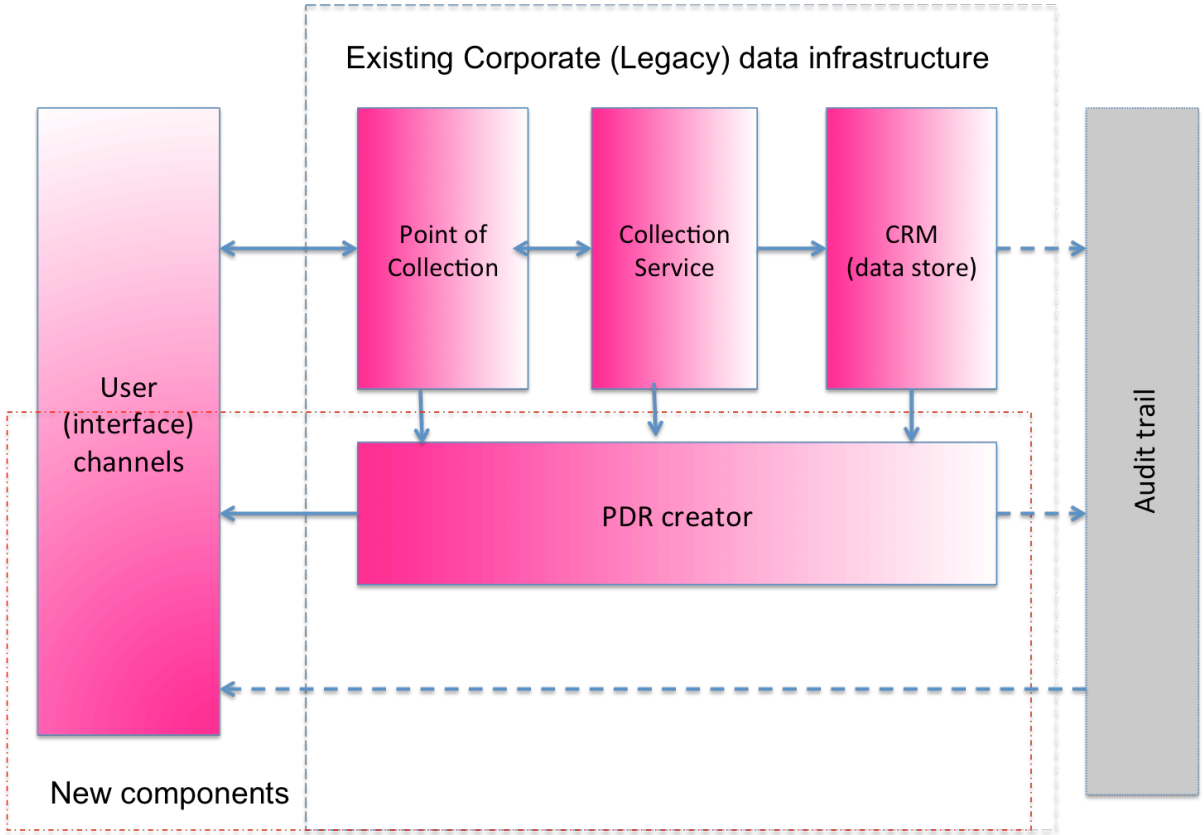
A simple framework



User interfaces: collect, stores and manage PDRs and associated Personal Data

PDR creator: uses secure APIs from different corporate legacy systems (e.g. Salesforce)

Audit trail: authenticity, integrity, confidentiality, non-repudiability

Personal Data Receipts: Increasing transparency and trust. White Paper. **Add link**
Michele Nati, Lead Technologist Data and Trust. Digital Catapult.

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PDRs: the benefits

Individuals (Savvy consumers):

- Privacy policies become human and simplified
- Track and control on personal data sharing is simplified (and possible!!)
- Reassurance that data will not end in the wrong hands is possible (3rd party sharing highlighted)

Services and apps become more trustworthy and more data are shared

Organizations:

- Attitude to personal data become user-centric
- Open new personal comm channel with their uses

Consumers trust increases and churn is avoided, while more data are accessed

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GDPR compliance

- **Article 12-14, Information notice**
- Use of icons and simple text to explain: what, how and for what purpose
- *(could be extended to target different demographic groups)*
- **Article 4 and 7, Consent**
- Provides a record for both individual and organization
- Includes data collected under consent
- *(currently only in human-readable format; could be extended with link to consent management platforms)*
- **Article 17-19, Data erasure and portability**
- Provides link to contact Data Controller or to data management platform
- *(could be extended with link to automatically trigger data erasure or portability; but needs strong identity and identification, Article 29 WP)*

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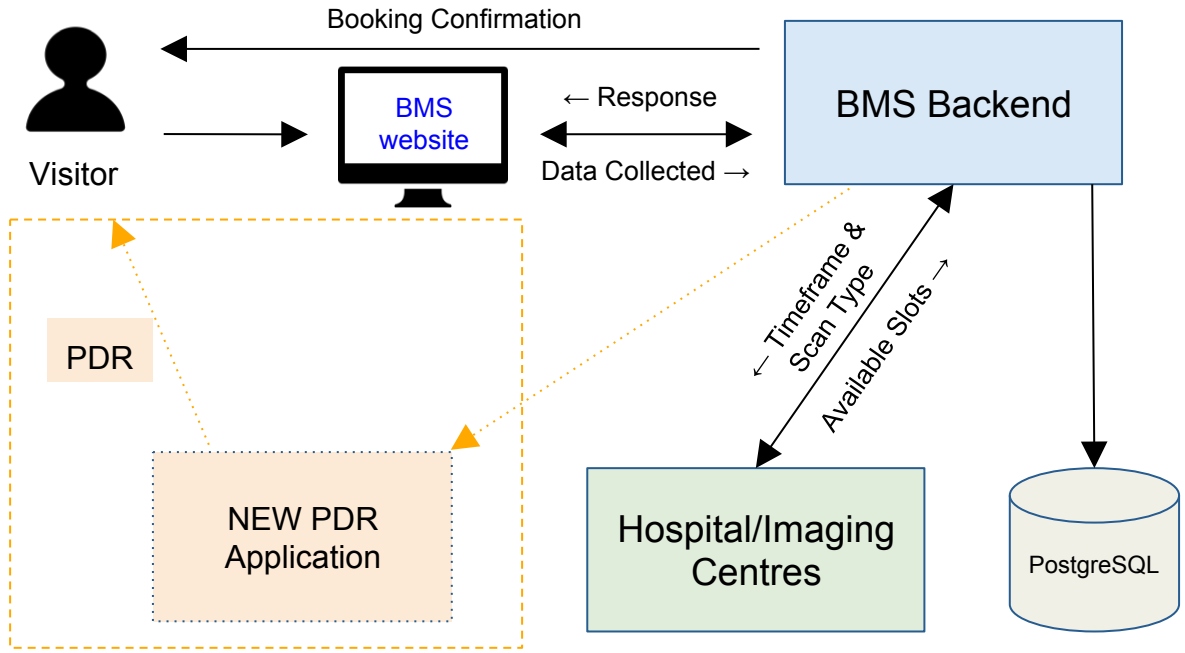
PDRs where are useful: Patient data collection

Data Points for PDR:

Email, Full Name, DoB, Phone Number, Address, Post Code

Added possibility to manage individual rights



IOTA

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Beyond transparency: Where else PDRs can be useful?

Barriers:
- Liability?
- Economic?

Barriers:
Access to computation resources
Transparent use of AI (GDPR req)
?

Digital Catapult can create this funnel

Data Aggregators/ MNOs

Data

Ad Network

SMEs

Skills

New Services

Does data portability only mean losing customers?

PDRs

PDRs as a tool to offer choice for data sharing

We need proper governance:
- Accountability of economic gain and distribution of liability
- Enable “Golden share“ organizations between data aggregators, consumers and SMEs

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Governance challenges: GDPR and AI Transparency

Article 4 (4) & 22 - *Automate decision making and profiling*

1. is either provided by the law, such as in the case of fraud prevention or money laundering checks,
2. or is necessary for the performance of or entering into a contract,
3. or is based on the individual's prior consent

This requires to explain:

1. the usage of such technologies;
2. the significance and envisaged consequences for the individual; and
3. "*meaningful information about the logic involved*"

PDRs can provide a user tool for that!

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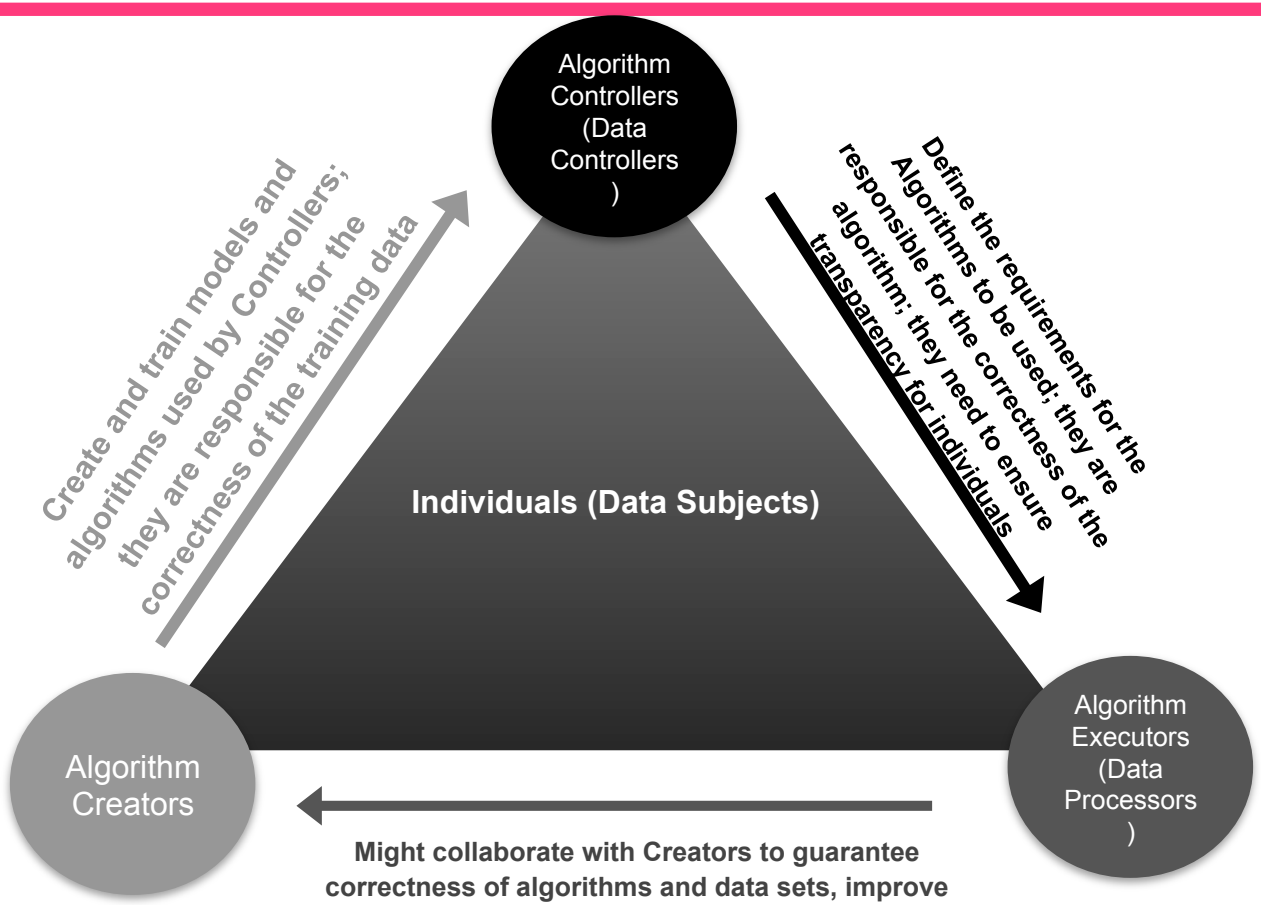
The complexity of AI ecosystem



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The role of AI Governance

Information and AI challenges

- **Capture** — Capture and provide information on heritage of algorithms and training data
- **Use** — Who's responsible and accountable for distributed AI-derived information?
- **Explain** — Explain findings and conclusions; communication with users and ensuring trust
- **Retain** — 'Fair' retention and appropriate availability
- **Dispose** — Removing the effect of historical training data from future outcomes

Stewardship Governance responsibilities

- Require trustworthy provenance, transparency and 'fair use'
- Encourage trustworthy behaviour of services and algorithms
- Enable ongoing communication, transparency
- Governing accumulation and linkage of historical data
- Assuring trustworthy disposal of information and data

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THANK YOU!

Questions?

@DigitalCatapult
/DigitalCatapult
digicatapult.org.uk
Digital Catapult
0300 1233 101
info@digicatapult.org.uk

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