

Streamlining GDPR Compliance with Cohesity

The General Data Protection Regulation (GDPR) harmonizes data privacy laws across the European Union (EU). In effect May 25, 2018, it has been called the “most important change in data privacy regulation in 20 years” because it gives EU citizens new rights over their personally identifiable information (PII)—from knowing how long companies retain it to demanding it be deleted. Organizations worldwide that have EU residents’ personal data are subject to the regulation, underscoring the importance of a modern framework for data processing. Cohesity’s unified, web-scale secondary data solution consolidates PII and streamlines compliance with the subset of GDPR requirements related to data protection and data management, helping to mitigate both technical measure and key provision non-compliance fines which can be up to 2% (or €10M) or 4% (or €20) of global annual revenue for each incident, respectively.

Enterprise data, including PII, is stored in silos both on-premises and in clouds where fragmentation, lack of visibility, and legacy products make it difficult to discover and search. Poor protection and limited data access and reporting is unacceptable under the GDPR. To comply with GDPR, companies must know exactly what PII they have, where it is stored, how long it has been stored, and whether it has been breached. Furthermore, they must be able to comply with individual citizen requests for modification and deletion.

“The GDPR will affect not only EU-based organizations, but many data controllers and processors outside the EU as well. Threats of hefty fines, as well as the increasingly empowered position of individual data subjects tilt the business case for compliance and should cause decision makers to re-evaluate measures to safely process personal data.

- Bart Willemsen, Research Director¹

Gartner

At a Glance: GDPR and Data Processing

- Strict new data protection rules put EU citizens in charge of their PII, requiring traditional data processing approaches to change.
- Enterprises worldwide must comply or pay hefty fines per incident (i.e., €10M-€20).
- Companies must now know exactly what PII they have; where it is stored (and moved); and for how it's been there.
- When asked by an EU citizen, a business must be able to quickly delete all of that user's PII from all systems and provide an audit log.
- If breached, companies must pay a significant penalty, report in 72 hours, and quickly remediate.

Cohesity Simplifies GDPR

Cohesity simplifies GDPR compliance by converging secondary data onto a software-defined, web-scale platform, reducing fragmentation. With Cohesity’s advanced protection capabilities, organizations streamline secondary data processing and management operations, such as backup on-premises and in leading public clouds, performed on personal data or sets of personal data, ensuring everyone remains aware of where PII is retained. With Cohesity consolidating and storing all secondary data in a single platform, enterprises with EU PII benefit even more. Greater visibility into all PII together with Cohesity Google-like global index and search enables enterprises to quickly find and delete EU PII, as requested. Always-available audit logs across all collected and stored data can also streamline breach reporting, and if needed, notification.

Data Processing Best Practice Considerations

GDPR goes well beyond information privacy and data protection laws of the 1970s, imposing a broad set of legal, governance, and technical requirements on companies processing PII of EU residents. Financial penalties for non-compliance with either GDPR technical measures or key provisions, or both, can be significant, which is why organizations must be vigilant, creating data protection best practices for

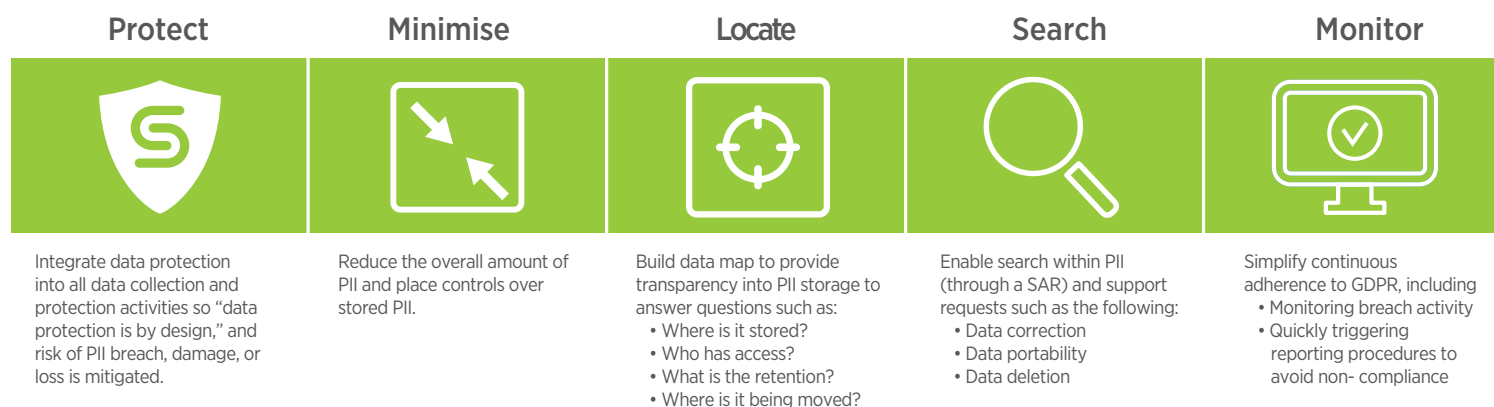
- Governance - Keeping auditable operations logs for data protection and processing that help demonstrate compliance
- Storage & Retention - Knowing what and where PII is stored at all times; keeping PII only for the purpose it was acquired and necessary time periods
- Response to Individual Rights - Complying with PII deletion and removal requests, as well as PII information access or change requests
- Breach Notification - Reporting within 72 hours of breach awareness


COHESITY

Cohesity provides the only hyperconverged, software-defined, scale-out solution to eliminate secondary data silos. By consolidating all secondary data and associated management functions, including backups, files, objects, text/dev copies, and analytics, Cohesity reduces GDPR PII management burdens and helps organizations establish data protection best practices. Cohesity's flexible platform is designed to give enterprises confidence that what they do today to streamline GDPR compliance can help them meet new industry and government requirements in the future.

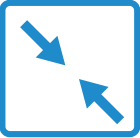



Cohesity Assists Enterprise Compliance with GDPR

The GDPR includes 99 articles. Cohesity helps organizations directly address 15 of them with a comprehensive solution that streamlines how enterprises protect, minimize, locate, search, and monitor secondary data.



Requirement	Mandate	Cohesity Capabilities
Protect 	<ul style="list-style-type: none"> • Ensure data protection by design and by default • Demonstrate transparency when validating compliance 	<ul style="list-style-type: none"> • Safeguard Data by Design and Default - To help organizations across industries achieve the requirements of a robust data protection strategy, Cohesity delivers web-scale simplicity for secondary data. Cohesity offers local data protection from accidentally deleted files, application crashes, data corruption, and viruses; supports fast recovery of individual files and applications; enables enterprises to retain data to satisfy compliance and regulatory requirements; and provides off-site data protection and reliable disaster recovery with Cohesity DataProtect, fully converged with Cohesity DataPlatform. • Secure Data Against Unauthorized Access - Cohesity's encryption architecture, based on the strong AES-256 Cipher Block Chaining standard with a FIPS-Certified mode, provides end-to-end security while optimizing the use of available resources. • Set Authorization Permissions - Cohesity supports granular authorization control through Role-Based Access Control (RBAC) and strong Active Directory (AD) integration. • Protect Against Data Loss and Breaches - Cohesity file- or view-level WORM (write one, read many) provides immutable locking and secure data retention capabilities to mitigate data loss and ransomware threats <p>GDPR-Relevant Articles: 5, 25, 32-34</p>

COHESITY

<p>Minimise</p> 	<ul style="list-style-type: none"> • Maintain less stored personal data • Only keep data for the period relating to the original intent of data capture 	<ul style="list-style-type: none"> • Centralize Management - The Cohesity architecture inherently minimises data copies, reduces attack footprint, and track copies, so enterprises can be more agile. • Automate Policies - Cohesity allows enterprises to set granular control over and automate retention policies to keep PII only for intended periods. • Relocate Data On Demand - With Cohesity, enterprises effectively relocate files to minimize the spread of PII data across the environment <p>GDPR-Relevant Articles: 5, 17</p>
<p>Locate</p> 	<ul style="list-style-type: none"> • Ensure a 360-degree view of what PII the organization has stored 	<ul style="list-style-type: none"> • Schedule Updates - Cohesity lets enterprises schedule updates to data maps that delineate the following: <ul style="list-style-type: none"> • Location of PII on Cohesity and parent details to track PII origin on the primary infrastructure • Movement tracking (source and destination) of PII • Retention periods of PII • Access rights to and actions performed on PII • Report Regularly - Cohesity reports help organizations complete Data Protection Impact Assessments (DPIAs), as needed, per GDPR requirements. <p>GDPR-Relevant Articles: 9, 30</p>
<p>Search</p> 	<ul style="list-style-type: none"> • Comply with EU resident requests for visibility, modification, movement, or deletion of PII 	<ul style="list-style-type: none"> • Use Google-Like Capabilities - Cohesity searches within unstructured data for multiple categories of PII. Enterprises can also input PII patterns and their variations as well as file types (txt, doc, pdf, xls, zip) to scan using templates. • Create Custom Apps - Enterprises can inject custom code to run data processing jobs on stored data using Cohesity's in-place analytics tool. • Leverage Analytics - Cohesity simplifies reporting by delivering search results in machine readable format or integrating with third-party data visualization or analytics tools <p>GDPR-Relevant Articles: 15-18, 20</p>
<p>Monitor</p> 	<ul style="list-style-type: none"> • Monitor for and report security breaches • Demonstrate appropriate reporting procedures post breach to avoid non-compliance 	<ul style="list-style-type: none"> • Prevent Unauthorized Data Movement - Cohesity prevents PII portability using white lists and through the granular control of policies that govern data movement. • Notify When Changes - Through Cohesity, enterprises receive notifications when data is tiered, archived, or replicated to a non-Cohesity target. Teams also receive notification when data leaves the EU while still on Cohesity. • Export for Reporting - Enterprises can export Cohesity generated product- and system-level audit logs for additional analytics and breach detection. <p>GDPR-Relevant Articles: 5, 9, 15-18, 20, 24, 34, 35, 42, 44</p>

Cohesity for GDPR

- Converge secondary data onto a single platform for complete PII visibility
- Automate protection, including backup on-premises and in leading public clouds
- Leverage global index and search to quickly find and delete EU PII, as requested
- Ensure continuous audit logs to streamline breach notification
- Discover how to help your enterprise streamline GDPR compliance. Visit www.cohesity.com.

About Cohesity

Cohesity makes your data work for you by consolidating secondary storage silos onto a hyperconverged, web-scale data platform that spans both private and public clouds. Enterprise customers begin by radically streamlining their backup and data protection, then converge file and object services, test/dev instances, and analytic functions to provide a global data store. Cohesity counts many Global 1000 companies and federal agencies among its rapidly growing customer base and was named to Forbes' "Next Billion-Dollar Startups 2017," LinkedIn's "Startups: The 50 Industry Disruptors You Need to Know Now," and CRN's "2017 Emerging Vendors in Storage" lists.