

**Pension Lawyers Association Conference 2013**  
*Moving from Light Touch to Outcomes based Supervision*

Data Protection Breakaway Session  
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**PoPI Principles**

- 1 Accountability
- 2 Processing limitation
- 3 Purpose specification
- 4 Further processing limitation
- 5 Information quality
- 6 Openness
- 7 Security safeguards
- 8 Data subject participation

**1. Processing personal information - broad definitions**

Term	Definition
<b>Processing</b>	To receive, store and transmit
<b>Personal</b>	Private to an entity or individual
<b>Information</b>	Data used to identify an individual

**2. Compliance with PoPI – benefits and risks**

Area	Benefits	Risks
<b>Sound processing processes</b>	Reliable data, increased automation	Bad data, increased costs
<b>Robust technology</b>	Automation, security, accessibility, cost efficiency	Expensive, manual
<b>Data quality</b>	Reflection of good processes and effectiveness of administrator, internal and external reporting	Manual processing, increased costs
<b>Data security</b>	Compliance, reduced risks	Fraud and reputation risks
<b>Industry perception</b>	Safety, trust	Lack of trust
<b>Communication</b>	Better, building trust, education	Haphazard, unclaimed

**3. Cross border transfer of data**

Action	Compliance
<b>Why should we do this?</b>	Product / service enhances governance, service and / or reduce costs – this is why PoPI is here
<b>PoPI compliance</b>	Authority built into individual data authority processes
<b>Compliance with data laws</b>	Of receiving country (UK, USA and Europe)
<b>Viewing data stored overseas</b>	PoPI gives 3 <sup>rd</sup> country equivalence
<b>Where it is stored</b>	Understand location (Cloud or hosted)
<b>Processing limitations</b>	Understand what is being transferred and what for
<b>Access to data</b>	Before, during and after – Terms & Conditions
<b>Risk management</b>	Stability& accessibility

**4. Outcomes and measures**

Outcome	Measure	Action
<b>Sound processes</b>	Efficient administration	Map data flows
<b>Robust technology</b>	Uptime, automation, accessibility	IT governance
<b>Efficient administration</b>	Data quality	Measure data quality
<b>Good communication</b>	Time to access information	Driven by data quality and technology
<b>Company governance</b>	Board and Exco responsibility, liquidity	Company structure, reporting
<b>Scheme governance</b>	Reporting processes	SLA's, process and risk management