

Data Privacy -Protection from Trusted Users

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Compuware Field Technical Specialist September 19, 2007



Data Privacy Most Common Data Losses





Data Privacy Most Common Data Losses

"It is a serious mistake to think that mainframe applications are safe by default. They are not..... Enterprises should not experience a false sense of security simply because their mission-critical applications run on mainframes. Yet, they are often defenseless against insiders equipped with in - depth knowledge of the applications' logic and security policies — those using legitimate means to ill-exploit the system. **Most attacks on legacies come from inside the enterprises, committed by their own employees...** <u>Applications should be protected from the</u> <u>inside out</u>."

Joseph Feiman, Gartner Research, September 29 2006 Implementing Security for Mainframe Legacy Applications - Worth the Investment



Data Privacy

Environmental Differences for data use

Production Region	Test Region
Live customer/account information	Live customer/account information
Access through applications with role based information accesses	Direct access to the raw data
Trained access to employees through policies and agreements	Wider exposure to non-employees or employees across the world
Usage of data monitored and traced for compliance	Higher potential for unauthorized viewing and usage
Successful usage requires 'live' data	Successful testing does not require 'live' data
Region security mature and robust, through tools and processes	Region security not as robust as production



Test Data Privacy How we see it being addressed

- Signing non-disclosure agreements
- Restricting security access to sensitive/ confidential data
- Applying minimal "de-identifying" rules
- Implementing a complete data disguise solution with processes and procedures





Internal Challenges

Organizational	Political	Technical
 Defining ownership of the data Disguise enforcement Defining disguise standards Business process management Designing and implementing corporate disguise policies and procedures 	 Communication and agreement between different application groups Conflicts of interest External influences Interpretation of the compliance regulations 	 Variety of platforms Variety of data types Data complexity Maintain shared relationships between multiple environments Coordination of physical implementation



Test Data Privacy Requirements for Success

• Process

 A clear strategy backed up by a methodology that serves as a roadmap or blueprint for an enterprise-wide data privacy initiative

Technology

 Tools that can deliver quality data that meets the integrity, consistency and usability demands of your data privacy requirements

• Expertise

 The knowledge and experience to effectively manage the process and drive the technology to implement data privacy assurance in the application testing environment



Test Data Privacy Leadership

- Provide Products, Processes and People to disguise and generate data used for:
 - Application testing
 - Data exchange
 - Internal reporting
 - Offshore / outsourced development
 - Departmental data processing



Test Data Privacy Delivery



- Protect personal/sensitive data while maintaining:
 - Data Integrity across application(s)
 - Consistency, regardless of data source, and repeatability
 - Usability, test data should be valid and meaningful



Test Data Privacy Solution





Test Data Privacy Process: Methodology

Analyze – Understand each application's sensitive information

Design – Define strategies for disguising test data

Develop – Build the processes to disguise test data

Deliver – Deploy and maintain data protection processes



Process: Methodology

🔯 Microsoft Project - Compuware Data Privacy Project Plan ¥1.2.mpp								
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Compuware Data Privacy Project Plan. Copyright (2) 2007. Compuware Corporation. All rights reserved.								
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Process: Best Practices





Process: Best Practices

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Birta date Picote Number Em all addresses	1.2.2.1 Determine set	nsitive field/column disg	j uise techniq sitive field and the	ue air business	
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Test Data Privacy Analyze

• Gather and document information about:

- Applications to be treated
- Data structures involved
- Existing data relationships
- Data Classification Scheme to understand sensitive data elements
- Processes acting upon or impacting sensitive data



Test Data Privacy Managing the Analysis Tasks

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			Mew II		Name: Identify application data model Duration: 1d2 Estimated		
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	* *	+ -	± <u>s</u> ≦hov	v ▼ Arial ▼ 11 ▼ B I <u>U</u> ≣ ≣ All Tasks			
				Identify application data model	Most applications have documentation about the data elements		
		0	WBS	Task Name	structures, formats, relationships and dependencies. In many cases		
	1	<u> </u>	1	Computare Data Privacy Project Plan Convright	an application data model is already in electronic form via software		
	2	~	•	Compuware Data Privacy Project Plan. Copyrigh	engineering and data modeling tools.		
	3	6	1.1	□ Analysis	This task is about obtaining such information for subsequent analysis		
	4	ő.	1.1.1	Data Model Analysis	of what is considered sensitive data. A Subject Matter Expert,		
	5		1.1.1.1	Identify source data environment	Business Analyst, or Database Designer should be familiar with this		
	6		1.1.1.2	Identify target data environment and scope	information.		
	7	08	1.1.1.3	Identify application data model			
Ľ	8	08	1.1.1.4	Document data stores/entities and relations	Help OK Cancel		
Ë	9	68	1.1.1.5	Document data structures and layouts			
antt	10	0	1.1.1.6	Identify sensitive fields/columns			
l G	11	1	1.1.1.7	Cross reference sensitive fields/columns and	d data stores		
	12	1	1.1.2	Function Model Analysis			
	13	19 名	1.1.2.1	Identify application function model			
	14	1	1.1.2.2	Cross reference sensitive data stores and ap	oplication pro		
	15	1	1.1.2.3	Analyze application code over sensitive data elements			
	16	68	1.1.2.4	.1.2.4 Document business rules applied to sensitive fields/colun			
	17	0	1.1.2.5	Identify current application test plans			
	18	1	1.1.2.6	Document current test requirements over se	nsitive fields		
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Test Data Privacy Managing the Analysis Tasks



Test Data Privacy Managing the Analysis Tasks

Compuware Program Analyzer for Abend-AID, Xpediter and Strobe

Test Data Privacy Analysis Deliverables

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			First two digits are									
PROGRAM 001			validated for each credit card type									
PROGRAM_002	No validations exist											
PROGRAM_003					Stored encrypted							
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Test Data Privacy Design

- Define application disguise strategy and process
 - Source extract criteria for data (filters, naming conventions, etc.)
 - Security rules for supporting files
 - Structure, value domain (content), population strategy for translate table(s)
 - Target environment(s) and load method(s) to be used
 - Field-level obfuscation rules (encrypt, translate, age, generate)

Test Data Privacy Disguise Techniques

Test Data Privacy Managing the Design Tasks

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38	🍥 🍓 🔋 1.2.2.9	Design custom data generation rules		Once there is an understand	ling of the value domains for each field and
39	🧆 🍓 🛛 1.2.2.10) Specify aging rules		their business rules a fiction	alization strategy needs to be determined
40	🍥 🕵 🛛 1.2.2.11	Specify sensitive field/column masks		Ifor each sensitive data elem	ent according to the different techniques
41	🧆 🍓 🛛 1.2.2.12	2 Validate disguise rules vs. business/validation rules		available such as Encrypt 1	Translate, Generate or Age
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44	🤌 1.2.3	🗆 Data Load Design		 A combination or these tech 	miques anow to maintain uata integrity,
45	🍥 🍓 👘 1.2.3.1	Identify extracted data for load		consistency and usability. S	some techniques apply better to certain
46	🍥 🍓 👘 1.2.3.2	Identify target environment properties	i i i i i i i i i i i i i i i i i i i	types of fields. For instance), names and addresses are usually
47	🌾 🍓 🛛 1.2.3.3	Specify load mapping rules		translated, while phone num	bers and codes are normally encrypted.
48	🌾 🍓 👘 1.2.3.4	Specify load execution options		,	
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Ready					

Test Data Privacy Develop

Test Data Privacy Development tasks – z/OS Relationships

ATD DD

Production

z/0S

AR/RI

Command ===>	Relationship Detail -		SCROLL ===> CSR
Base object:	D701Cw01.PROD.CUSTOMER_TBL		
Line Commands:	<pre>S = Select Relationship to Modify A = Add Application Relationship</pre>	D = Delete I = Relatio	Relationship onship Informatior
CMD Parent/	'Dependent	Obj Rel Type Type	Status
_ D701CW01.PF D701CW01. D701CW01.PF	ROD.CUSTOMER_TBL PROD.CONTACT_TBL POD.CUSTOMER_TBL	DB2 RI DB2 DB2 AP	
D701CW01.	PROD.ORDER_TBL	DB2 AR	
_ 'SUSJDL0.FL D701CW01.	EX.KEYFILE.EXTRACT' PROD.CUSTOMER TBL	MVS AR DB2	
_ D701CW01.PF	ROD.ORDER_TBL	DB2 RI	ASSOCIATED REL.
_ D701Cw01.PF	ROD.PART_TBL	DB2 RI	ASSOCIATED REL.
D701CW01.	PROD.ORDER_LINE_TBL ************************************	DB2 ************	****

Test Data Privacy Development tasks – z/OS Extract Scope

Test Data Privacy Development tasks – Disguise z/OS Extract

File-AID/RDX ----

Option ===>

Extract Menu

Primary commands: menu-number, ALL, REFerence, REQuest, MODE

2007 Fall Conference

USER Profile: ENCRYPT1

SSID: D701

Test Data Privacy Development tasks – Disguise Set Up

Test Data Privacy Development tasks – z/OS Load

San Francisco Chapter

Test Data Privacy Development tasks – Distributed Extract

Test Data Privacy Development tasks – Distributed Disguise

Test Data Privacy Development tasks – Distributed Disguise

Test Data Privacy Delivery

Test Data Privacy Managing the Delivery Tasks

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				Audit extract and disguise process			
		0	WBS	Task Name	7, '07 Oct 14, '07 Oct 21, '07	Oct 28	
	89						
	90	ø	1.4	Delivery			
	91	é.	1.4.1	Extract and Disguise			
	92	6	1.4.1.1	Complete preparation of extract and disguise jobs	ել		
	93	ø	1.4.1.2	Develop site specific extract and disguise documentation			
	94	ø	1.4.1.3	Integrate extract and disguise into application test cycle			
	95	ø	1.4.1.4	Deploy extract and disguise processes			Fistionalized
Lar	96	ø	1.4.1.5	Review and adjust extract and disguise process			Fictionalized
Iĕ_	97	ø	1.4.1.6	Audit extract and disguise process			Data
<u> </u>	98	<u>ø</u>	1.4.2	🗆 Load			
	99	ø	1.4.2.1	Complete preparation of load jobs			
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Serving IT Governance Professionals San Francisco Chapter

Test Data Privacy Delivery – Output Results

Original Data	Disguised Data	Rule Applied
Mary Ward	Jill Jones	Translated
03-20-1962	04-18-1962	Aged
104 Main Street	111 State Avenue	Translated
Flint, MI 48025	Flint, MI 48025	Unchanged
370-55-2939	431-81-6492	Encrypted
4294 5730 5839 3037	42XX XXXX XXX9 3037	Masked
\$300,000	\$126,877	Encrypted
null	(810) 609-2873	Generated

Delivery – Audit Reports

Test Data Privacy Delivery - Disguise Rule Administration

Test Data Privacy Delivery - Disguise Rule Administration

Test Data Privacy Delivery - Validation of Results

- Verify Disguised Data is Properly Testing:
 - New or modified code
 - Critical business logic
- Online and Printed Reports
- Risk Metrics
- Change Management Signoff Requirements
- Auditing Documentation

Original Data	Disguised Data	Rule Applied
Mary Ward	Jill Jones	Translated
03-20-1962	04-18-1962	Aged
104 Main Street	111 State Avenue	Translated
Flint, MI 48025	Flint, MI 48025	Unchanged
370-55-2939	431-81-6492	Encrypted
4294 5730 5839 30	42XX XXXX XXX9 3037	Masked
\$300,000	\$126,877	Encrypted
null	(810) 609-2873	Generated

		•		
	Risk	Verbs Executed	Total Verbs	Branches Executed
🖃 🗍 System: PDASYSTEM	1007	3961(50%)	7816	867(49%)
🗄 📲 Load Module: PDA001	482	159(48%)	328	34(50%)
🗄 📲 Load Module: PDA002	478	135(55%)	243	36(66%)
🗄 📲 Load Module: PDA003	483	114(37%)	303	23(35%)
😑 🖧 Load Module: PDA004	918	157(48%)	326	36(51%)
PDA004 (11/04/04-06:24:59) Opt=N,Debug=N	918	157(48%)	326	36(51%)
🗄 📲 Load Module: PDA005	484	250(61%)	406	75(62%)
🗄 📲 Load Module: PDA006	491	227(39%)	572	61(39%)
🗄 📲 Load Module: PDA007	942	391(59%)	655	111(63%)
😑 📲 Load Module: PDA008	974	336(42%)	799	80(38%)
PDA008 (11/04/04-06:29:39) Opt=N,Debug=N	974	336(42%)	799	80(38%)
🗉 📲 Load Module: PDA009	939	451(58%)	777	92(51%)
🗄 📲 Load Module: PDA010	489	325(50%)	646	83(53%)
🗄 📲 Load Module: PDA011	485	156(38%)	410	27(35%)
🗄 📲 Load Module: PDA012	486	241(48%)	495	68(62%)
🗄 📲 Load Module: PDA014	480	190(61%)	310	29(48%)
🗄 📲 Load Module: PDA016	486	274(56%)	487	48(46%)
🗄 📲 Load Module: PDA017	488	367(50%)	720	43(39%)
🗄 📲 Load Module: PDA018	483	188(55%)	339	21(35%)

Test Data Privacy Delivery – Improved Test Data

- Improve Test Coverage
 - Data flow analysis
 - Program level analysis
- Know What is Needed
- Remove Redundant Test Data for Efficiency

Compuware experience across various industries

Financial Services Companies

Large Australian Financial Institution
Leading US SE Financial Services Company
Global Financial Services Firm, Private Banking
Midsize US Investment and Financial Firm
US Life and Financial Services Co
Large US / NE Investment Company
Global Financial Services organization-Latin America,

Retail

Large Provider of PC Equipment

Manufacturing

Financial Arm of Automotive Company

Insurance Companies

- Global European Insurance Company
- Large US / NE Life Insurance Company
- **US Midwest Property & Casualty/Life/Auto Ins. Co.**
- •US Leading Health Insurance Company

Healthcare

Large US Midwest Health Insurance Provider
 Leading US Integrated Healthcare Organization

Test Data Privacy: Case Study Addressing HIPAA Compliance

- Large Health Management Organization
 - Public scrutiny and huge corporate liability due to data breach
 - Many of their applications were offshore
 - Complex environment containing a variety of data types
- Solution: Compuware's Data Privacy Solution
 - Promoted internal communication and provided strategic implementation consulting
 - Used multi phased project templates and Compuware Experts to conduct pilot

The end result: Successfully secured the test data for their initial 40 applications and continue to secure all 1500

Test Data Privacy: Case Study Reducing Risk of Exposure

- Largest US Consumer and Small Business Bank
 - Needed to transmit sensitive data to different locations around the company, as well as to an offshore partner
 - Complex, heterogeneous environment with many technologies and applications
 - Required a test bed with consistent data from all applications
- Solution: Compuware's Data Privacy Solution
 - Used a data model to simplify managing disguise data consistency across enterprise systems
 - Implemented top 8 high risk applications

The end result: Successfully de-identified data for high risk applications, maintaining usability and integrity for internal and offshore use

Test Data Privacy: Case Study SOX/GLB Compliance

- Property & Casualty / Life / Auto Insurance Co.
 - Executive Management saw internal risk
 - Wanted to disguise SSN, DL# and Last Name in Test & Dev.
 - Required disguising z/OS DB2, AS400/DB2 data
- Solution: Compuware's Data Privacy Solution
 - Defined disguise rules to sensitive field elements
 - Created extract disguise jobs to disguise sensitive data
 - Provide audit reports as needed to substantiate compliance

The end result: Successfully automated a repeatable process for protecting sensitive data

Test Data Privacy: Case Study SOX/GLB/SEC Compliance

- Financial Services Firm
 - Highly sensitive financial data
 - Millions of financial transactions containing sensitive customer data
 - Required disguising data enterprise wide
 - IT Risk and Security is top priority
- Solution: Compuware's Data Privacy Solution
 - Lower cost of regulatory compliance
 - Reduced risk and liability associated with data privacy
 - Deter misuse and exposure to unauthorized users

The end result: Provided an auditable disguise process to substantiate compliance

Test Data Privacy: Case Study Reducing Risk of Exposure

- Leading Direct Consumer Electronics Manufacturer
 - Discovered liability of using production data in test
 - Accidentally sent out bogus invoices and emails during a test cycle
 - Responding to enterprise-wide business process improvement initiatives such as:
 - Test driven development
 - Automated quality assurance
 - Global data management
- Solution: File-AID/CS
 - Increased the frequency of test cycles while improving data quality
 - Prevents database and application downtime during test data preparation

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The end result: Sanitize PII to protect from privacy abuse and meet audit requirements

Test Data Privacy: Case Study Reducing Risk of Exposure

- \$2B Securities Company
 - Dedicated to safe/secure test data for investment products
 - Passes client files to outside vendors and Off-shore exposure to critical data
 - Heavy IAM and Sybase usage requiring cross-platform consistency
 - Stringent Sr. Management security expectations
- Solution: Compuware's Data Privacy Solution
 - Analyzed critical fields for consistency/symmetry
 - Utilization of multiple disguise techniques
 - Provides test data cleansing, consistency and congruency across platforms, audit trails, and the ability to handle volume processing

The end result: Delivered Phase-1 of the disguise project within their timeframes, on-budget

Test Data Privacy: Case Study SOX/GLB/Insurance Compliance

- Large Mutual Life Insurance Company
 - Executive Management saw internal risk of exposing sensitive production data
 - Were impacted by various state insurance laws
 - Requirement to disguise the Consumer System application first which included z/OS and Oracle data
- Solution: Compuware Test Data Privacy Solution
 - Data Disguise routines needed to be reversible during early phases of implementation so downstream systems would not be impacted
 - Defined disguise rules for consistent results on z/OS and Oracle data
 - Translate tables were populated from data in the distributed environment and moved to the mainframe for consistent disguise

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The end result: Created a repeatable process to subset and disguise data which included audit reports for validation

Test Data PrivacyWhy Compuware?Our Solution is Comprehensive!

We deliver a comprehensive solution that includes:

- Integrated and proven technology
 - File-AID/Data Solutions, File-AID/RDX, and File-AID/CS
- Defined, repeatable processes for automated product execution
- Project templates that fully document the tasks for each step in the process
- Documentation to substantiate compliance
- Product-generated, standardized reports for ongoing auditability
- People with project management and data privacy implementation experience

Why Compuware? We are Experienced!

- We have assisted with implementation of nearly 40 Data Privacy Projects in the US and Canada over the past 3 years
 - Several Test Data Privacy customers also in Europe, Australia, Latin American, Brazil and South Africa
 - Companies are mostly Insurance, Financial Services, Retail and Health Care organizations
- We can assist with any stage of the project; analysis, design, development or delivery
- We have the ability to adapt to out of the box scenarios and situations

Test Data Privacy The Value Proposition

- Lowers cost of regulatory compliance
- Reduces risk and liability associated with data privacy
- Improves test data quality while maximizing testing efficiency
- Provides an end-to-end solution from a single company

How do you protect against sensitive data breaches where users are authorized to access the data?

Application Auditing Where's Your Risk?

"Contrary to what most people believe, the majority of identity thefts are inside jobs."

> Judith Collins Michigan State University Identity Theft Survey

"Gartner estimates that more than 70% of unauthorized access to information systems is committed by employees, as are more than 95% of intrusions that result in significant financial losses."

> **Richard Mogull** Gartner Senior Analyst

Application Auditing Defined

Compuware's solution for Application Auditing acts like a surveillance camera for your applications by efficiently recording internal activity between users and their applications. Not only does this deter inappropriate activities, but it also provides an audit trail that can be retrieved to investigate details of a data breach—and limit its impact.

Application Auditing

Methods currently used to prevent unauthorized access

RACF, ACF2 or Top Secret authenticate the user at login.

If this is done properly, you will lock out external users, but trusted internal users still have access to the application and a breach could still occur.

RACF, ACF2 or Top Secret secure access to the application and data.

Application Auditing What we do: Record End-User Activity

- End-users are notified that all their application activity is being recorded
- Key application communication is recorded
- Repository of Audit Trail information is saved, protected and ready for use

Application Auditing

Example of Investigating Suspicious Activity

- An end-user is suspected of misusing client data
- Reports are created to pull up that user's activity from the repository
- Results are shown in a web browser
- Can focus within a date range or other criteria

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	JIM	2006/10/04-10:25:07	N/A	N/A	18	0	0	E ^Q				
	DEAN3	2006/10/04-10:28:30	N/A	N/A	18	3	30	<u> </u>				

Application Auditing

The Global Record Repository: Valuable, Reusable Assets

Application Auditing An IT Auditor's Perspective

"As an IT Auditor, I see Compuware Hiperstation for Application Auditing as a 'proactive defense' tool. By recording end-user application activity, a company can prevent and investigate fraud and data security breaches helping to reduce the potential for significant damage. Hiperstation's detailed forensic information and audit reports are indispensable tools that provide indisputable proof that can be used to detect problems or policy violations; prevent incidents from becoming larger; and reduce the scope of an incident response."

> Paul L. Haley IT Auditor, CISA

Application Auditing

Case Study Example: An Audit Trail of Evidence

Large Federal Government Agency

- Highly sensitive online transactions
- Hundreds of end users all over the world producing 8+ million daily transactions
- IT security is top priority

Solution: Hiperstation •

- Record and save all application traffic
- Search repository for suspected misuse
- Use information for legal proceedings

Application Auditing:

Savings With a Targeted Notification

Example: You have 100 CSR's supporting 100,000 customers; avg. customer acquisition cost is \$200; expected lifetime revenue is \$1,000 per customer

Notify All Customers

- 100,000 Customers X
- 1% Lost Customer Rate =
- 1,000 Lost Customers

Limit Notification

1,000 Customers X 1% Lost Customer Rate = 10 Lost Customers

\$1,200,000 v

VS.

\$12,000

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