



Managing data, privacy and security under the new credit reporting regime

Annelies Moens
Head of Sales and Operations, IIS
Dun & Bradstreet
Consumer Credit Conference
Melbourne, 11 September 2012
Sydney, 13 September 2012

About IIS

- Building trust and privacy through global thought leadership and consultancy work for a range of public and private organisations
- **Services:** privacy governance & strategy, privacy impact assessments and audits, regulator, customer & stakeholder engagement, identity management, privacy training.....



Australian Government



Commonwealth Bank



Overview

- Accelerating privacy regulation
- New credit reporting regime
- Impact of data breaches
- Pressing privacy issues: security, governance, data quality and transparency
- Trust and allocation of risk

Building trust and innovative privacy solutions

Changing Privacy Regulation

➤ In Australia:

- Privacy Amendment (Enhancing Privacy Protection) Bill tabled May 23, 2012
- House and Senate committees' inquiries due 11 and 21 September, 2012
- New law commences 9 months after royal assent

➤ Accelerating global regulatory developments:

- Asia-Pacific, United States and Europe

Building trust and innovative privacy solutions

Comprehensive credit reporting

- Introduction of 'comprehensive' information:

Consumer credit liability

Repayment history

- Key changes:

Individuals may request that their personal information not be used or disclosed in cases of suspected identity theft or fraud

Credit reporting bodies and credit providers must have clear and up-to-date information policies

Affected information recipients to take reasonable steps to implement practices, procedures and systems to comply with law and binding codes

Retention obligations

Pre-screening of credit offers

Credit reporting code

Fines of up to \$1,100,000

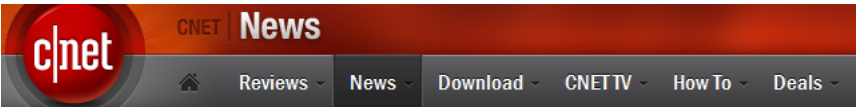
Why credit managers should care

- The finance sector continues to be the most frequently complained about industry in relation to privacy
- Together, the finance and debt collecting/credit reporting sectors comprise approximately a quarter of all complaints
- Managing data will become more complicated with the introduction of comprehensive credit reporting

(Statistics based on the 2010-2011 Annual Report of the Office of the Australian Information Commissioner)

Building trust and innovative privacy solutions

Reputation – Loss of trust



CNET > News > Privacy & data protection

June 16, 2005 4:44 PM PDT

Canadian credit agency reports data breach

By [Joris Evers](#)
Staff Writer, CNET News

The credit files of about 600 Canadian consumers were accessed without authorization, credit reporting agency [Equifax](#)

[Canada](#) said Thursday. The breach resulted from what appears to be improper use of the access codes and passwords of one of Equifax's customers, the company said in a statement. Most of the affected people are in British Columbia, and all have been contacted and offered a one-year subscription to a credit monitoring service, Equifax said.

This is not the first data security mishap at Equifax Canada. In March last year the company, a subsidiary of Atlanta-based [Equifax](#), warned that the credit reports of about 1,400 consumers had been accessed by criminals posing as legitimate credit grantors. Both cases have been reported to the Royal Canadian Mounted Police, according to Equifax.



RETAIL | 3/30/2012 @ 10:59AM | 22,219 views

Credit Card Processor Hit by Data Breach; Trading Halted

[+ Comment now](#)

A processor of credit and debit cards, Global Payments Inc., has reportedly been hit by a security breach, [The Wall Street](#)



VISA, MasterCard suffer 'massive' US data breach

March 31, 2012

[Comments 15](#) [Read later](#)

[Brian Krebs](#)

Up to 10 million credit cards could be affected.

[Tweet](#) 76 [Recommend](#) 125 [+1](#) 1 [Share](#) [Pin it](#)
[Email article](#) [Print](#)



Under attack ... Visa and MasterCard. Photo: AFP

Reputation – Loss of trust

BBC News Sport Weather Travel Future
NEWS TECHNOLOGY
Home UK Africa Asia Europe Latin America Mid-East US & Canada Business Health Sci/Environm

30 August 2012 Last updated at 15:35 GMT



Data breaches 10 times worse, say ICO figures

Data breaches in the UK have increased tenfold in the past five years, figures from the Information Commissioner's Office (ICO) reveal.



In local government the increase was 1,609% and

The Info Ima

AUSTRALIANIT

Gartner. SYMPOSIUM ITXPO® 2012 The World's of CIOs and data
12-15 November • Gold Coast, Australia Focus. Conne

NEWS OPINION NATIONAL AFFAIRS BUSINESS AUS IT HIGHERED MEDIA SPORT ARTS LIFE

NEWS IT BUSINESS EXECUTECH OPINION GOVERNMENT TELECOMMUNICATIONS IT JOBS CLOUD COMPU

AUSTRALIAN IT retweet Recommend 0 A+ A

Epsilon email security breach widens

KAREN DEARNE Australian IT April 07, 2011 12:02PM

MILLIONS of customers around the world may be affected by the Epsilon data breach as the fallout from an attack on the giant US marketing and email service firm continues to spread.

Retailer Marks & Spencer has become the first British company to warn its customers their names and email addresses have been exposed, while in Canada the Best Buy chain, Air Miles and AbeBooks are contacting loyalty program members.

Sony PlayStation suffers massive data breach

Recommend 3,166 people recommend this. Sign Up to see what your friends recommend.



Tweet

Share

Share th

+1 0

Email

You are here: Home • IT Pro • Security • Article

One data breach a week: Australia

April 30, 2012

Comments



Lia Timson

IT Pro Editor

Follow Lia on Twitter Email Lia

Business told to prepare for more data breaches.

Tweet 38 Recommend 3 +1 0 Share Pin it

Email article Print

Impact of a data breach

- The total cost per data breach in Australian organisations surveyed averaged \$2.16 million (highest \$4.68M) in 2011
- Companies in the finance sector have the highest per capita cost of \$201 per record (average is \$138 per record)
- Organisations with external consulting support reduced cost of data breach by up to \$45 per record
- Organisations with a CISO responsible for overall data protection strategy reduced cost of data breach by up to \$35 per record

Based on data breaches experienced by 22 Australian companies within 10 industry sectors in 2011 – Finance sector represented largest portion of sample-Cost of Data Breach Study: Australia, Ponemon Institute LLC (sponsor Symantec), March 2012

Building trust and innovative privacy solutions

Security

How will you know if the data has been accessed or used inappropriately?

What happens when there is a breach of privacy and data has been accessed, used or disclosed?

Do you have sufficient resources or insurance to cover the cost of data breaches?

What data breach response plans are in place to deal with the breach?

Building trust and innovative privacy solutions

Security



➤ Causes of data breach:

Malicious or criminal attack (36%)

- Hackers or criminal insiders (employees, contractors, cloud providers, business partners) typically cause the data breach
- Viruses, malware, worms, trojans
- SQL injection
- Theft of data-bearing devices
- Social engineering

Negligence (32%)

- Negligent employee or contractor
- IT and business process failures

System glitch (32%)

(Based on data breaches experienced by 22 Australian companies within 10 industry sectors in 2011 – Finance sector represented largest portion of sample- 'Cost of Data Breach Study: Australia', Ponemon Institute LLC (sponsor Symantec), March 2012)

Security - Safeguards

- Independent audits by trusted third parties required by new Bill
- Ensure the security of credit information in transit (encryption)
- Run tests on systems and ensure that vulnerabilities are identified and remedied
- Implement adequate controls in the preservation of audit trails
- Screen and monitor data handling employees
- Inform staff of policy/practice changes, outages, access etc
- Develop a data breach response plan

Building trust and innovative privacy solutions

Governance

- Does your organisation have someone in a senior position who is responsible for privacy?
- Is the data in your organisation protected by thorough and effective risk management strategies to the same (or higher) levels as other vital assets?
- Is there a culture of respect for privacy?
- What is the policy regarding collection and use of information, and how is it determined?
- What accountability mechanisms are in place for when things go wrong?

Building trust and innovative privacy solutions

Data quality



- New Bill obligates credit reporting bodies and credit providers to take reasonable steps to ensure information is accurate, up-to-date and complete
- Common data quality issues:
 - Mistaken identity, incorrect information about the individual
 - Information objectively accurate but does not comply with regulatory standards relating to permitted content
 - Inconsistent reporting of information
 - Updates to overdue payment information

Building trust and innovative privacy solutions

Data quality - Safeguards

- Regular audits by independent entity required by new Bill
- Provide adequate training to staff on information handling practices
- Data quality managers to validate new files
- Implement input validation checking to ensure that information is correctly formatted
- Identify information entry points to track the origin
- Schedule routine information cleansing and checking

Building trust and innovative privacy solutions

Transparency

- Transparency about information collected is doubly important:
 - For consumers – impact on livelihood, identity and reputation
 - For credit providers and credit reporting bodies – impact on levels of trust, compliance and business practices
- New Bill mandates the open and transparent management of credit reporting information
 - Consumer education is vital to realise benefits of comprehensive credit reporting regime (See 'Credit impacts of more comprehensive credit reporting in Australia and New Zealand' PERC Results and Solutions 2012, sponsor Dun & Bradstreet)
 - How many consumers only find out about the existence of their credit information file after damage has already been done?

Transparency

- In a Newspoll survey conducted on behalf of Dun & Bradstreet in 2009, 86% of Australians had never seen their credit information file

Benefits of Consumer Awareness:

- **For consumers** – knowing about their credit information file provides incentive to take care of their record, so when the time comes to obtain credit, issues are minimised
- **For credit providers** - reduce percentage of declined credit applications, reduce processing time, increase business.
- Transparency also builds reputation of openness and trust

Problems with consent ‘front end loading’

Terms and Conditions

PLEASE READ THESE TERMS AND CONDITIONS OF USE CAREFULLY. BY ACCESSING OR USING THIS WEBSITE, YOU AGREE TO BE BOUND BY THE TERMS AND CONDITIONS DESCRIBED HEREIN AND BY ALL TERMS, POLICIES AND GUIDELINES INCORPORATED BY REFERENCE. IF YOU DO NOT AGREE TO ALL OF THESE TERMS, DO NOT USE THIS WEBSITE.

These terms and conditions of use (“Site Terms”) apply to your use of this website (the “Site”), and do not alter in any way the terms or conditions of any other agreement you may have with Pure Country, Inc, its subsidiaries or affiliates. By using this Site, you represent and warrant that you are over the age of 18 and are lawfully able to accept these Site Terms. If you are using the Site on behalf of any entity, you further represent and warrant that you are authorized to accept these Site Terms on such entity’s behalf, and that such entity agrees to indemnify Pure Country, Inc for violations of these Site Terms.

Ownership of the Site and its Contents

This Site is owned by Pure Country, Inc. Unless otherwise indicated, all of the content featured or displayed on this Site, including, but not limited to, text, graphics, data, photographic images, moving images, sound, illustrations, software, and the selection and arrangement thereof (“Pure Country, Inc Content”), is owned Pure Country, Inc, its licensors, or its third-party image partners.

All elements of the Site, including the Pure Country, Inc Content, are protected by copyright, trade dress, moral rights, trademark and other laws relating to the protection of intellectual property.

Use of the Site

This Site and the Pure Country, Inc Content are intended for customers of Pure Country, Inc. You may not use this Site or the Pure Country, Inc Content for any purpose not related to your business with Pure Country, Inc. You are specifically prohibited from: (a) downloading, copying, or re-transmitting any or all of the Site or the Pure Country, Inc Content without, or in violation of, a written license or agreement with Pure Country, Inc; (b) using any data mining, robots or similar data gathering or extraction methods; (c) manipulating or otherwise displaying the Site or the Pure Country, Inc Content by using framing or similar navigational technology; (d) registering, subscribing, unsubscribing, or attempting to register, subscribe, or unsubscribe any party for any Pure Country, Inc product or service if you are not expressly authorized by such party to do so; and (e) using the Site or the Pure Country, Inc Content other than for its intended purpose. Such unauthorized use may also violate applicable laws including without limitation copyright and trademark laws, the laws of privacy and publicity, and applicable communications regulations and statutes.

You represent and warrant that you will comply with all applicable laws and regulations, including, without limitation, those relating to the Internet, data, e-mail, privacy, and the transmission of technical data exported from the United States or the country in which you reside.

Copyright Infringement Policy

In accordance with the Digital Millennium Copyright Act (“DMCA”) and other applicable laws, Pure Country, Inc has adopted a policy of terminating, in appropriate circumstances and at Pure Country, Inc’s sole discretion, account holders who infringe the intellectual property rights of Pure Country, Inc or any third party.

Trademarks

Pure Country, Inc’s trademarks, the Pure Country, Inc logo, and any other product or service name or slogan contained in the Site are trademarks of Pure Country, Inc and its suppliers or licensors, and may not be copied, imitated or used, in whole or in part, without the prior written permission of Pure Country, Inc or the applicable trademark holder. You may not use metatags or any other “hidden text” utilizing “Pure Country, Inc” or any other name, trademark or product or service name of Pure Country, Inc without our prior written permission. In addition, the look and feel of the Site, including all page headers, custom graphics, button icons and scripts, is the service mark, trademark and/or trade dress of Pure Country, Inc and may not be copied, imitated or used, in whole or in part, without our prior written permission. All other trademarks, registered trademarks, product names and company names or logos mentioned in the Site are the property of their respective owners. Reference to any products, services, processes or other information, by trade name, trademark, manufacturer, supplier or otherwise does not constitute or imply endorsement, sponsorship or recommendation thereof by us.

Disclaimer

THIS SITE AND THE PURE COUNTRY INC CONTENT ARE PROVIDED “AS IS” AND PURE COUNTRY INC AND ITS DIRECTORS, EMPLOYEES, CONTENT PROVIDERS, AGENTS AND AFFILIATES EXCLUDE, TO THE FULLEST EXTENT PERMITTED BY APPLICABLE LAW, ANY WARRANTY, EXPRESS OR IMPLIED, INCLUDING, WITHOUT LIMITATION, ANY IMPLIED WARRANTIES OF MERCHANTABILITY, SATISFACTORY QUALITY OR FITNESS FOR A PARTICULAR PURPOSE. PURE COUNTRY INC WILL NOT BE LIABLE FOR ANY DAMAGES OF ANY KIND ARISING FROM THE USE OF THIS SITE OR THE PURE COUNTRY INC CONTENT, OR THE UNAVAILABILITY OF THE SAME, INCLUDING, BUT NOT LIMITED TO LOST PROFITS, AND DIRECT, INDIRECT, INCIDENTAL, PUNITIVE AND CONSEQUENTIAL DAMAGES. THE FUNCTIONS EMBODIED ON OR IN THE MATERIALS OF THIS SITE ARE NOT WARRANTED TO BE UNINTERRUPTED OR WITHOUT ERROR. YOU, NOT PURE COUNTRY INC, ASSUME THE ENTIRE COST OF ALL NECESSARY SERVICING, REPAIR OR CORRECTION DUE TO YOUR USE OF THIS SITE OR THE PURE COUNTRY INC CONTENT. WE MAKE NO WARRANTY THAT THE SITE OR THE PURE COUNTRY INC CONTENT IS FREE FROM INFECTION BY VIRUSES OR ANYTHING ELSE THAT HAS CONTAMINATING OR DESTRUCTIVE PROPERTIES.

Pure Country, Inc uses reasonable efforts to ensure the accuracy, correctness and reliability of the Pure Country, Inc Content, but we make no representations or warranties as to the Pure Country, Inc Content’s accuracy, correctness or reliability.

© 2000-2008 Pure Country, Inc, Inc. All rights reserved. Terms and Conditions of Use.

- Avalanche of notices ≠ more privacy
- ‘Take it or leave it’ approach at odds with real consent
- Risk shifted to consumers, who may not have the time/patience/ability to comprehend the terms

Building trust and innovative privacy solutions

Transparency

Standard Information Sharing Label

The recipient requests access to certain information for the purpose and duration below.

Who	Facebook, Inc. (http://www.facebook.com)
What	Status Update [Show Me]
From	Status update form on this web page [Highlight]
When	On clicking "Post"
Why	1. Share status with selected audience (Friends) 2. Personalize advertising on Facebook
For How Long	Indefinitely, until deleted
Output To	Personal and audience timelines. Also available through Facebook's OpenGraph API to applications with <code>read_stream</code> permission from any permissioned audience member.
Additional Terms	
Master Agreement	This agreement is governed by the April 26, 2011 Facebook Statement of Rights and Responsibilities. https://www.facebook.com/legal/terms
3rd Party Ratings	Trust Rating 4.3/5 [X X X >] Example, Inc. (http://example.com) 2011-11-04
Storage	A record of this agreement will be stored at PortableContext.org.

- Today, many ways to improve notice and transparency
- Use of plain English
- Layered privacy notices
- Standard information sharing label

(Kantara Initiative – Standard Information Sharing Label, released August 2012)

Transparency



Date of Birth

Occupation

Address

Post Code

Date of Birth

Occupation

Address

Post Code

How information about you will be used

We may share your information with credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors.

We would like to send you information about our own products and services, as well as those of selected third parties, by post, telephone, email and SMS. If you agree to being contacted in this way, please tick the relevant boxes.

Post Phone email SMS

We would also like to share your information with other companies so that they may send you information about their products and services, by post, telephone, email and SMS. If you agree to your information being shared in this way, please tick the box.

If you need any further information please write to us at 10 Street Name, Town Name, County Name AB12 3CD.

Customer Signature

Date

Simple language, clear font and style.

Clear opportunity to agree to marketing.

Prior consent sought.

LEGAL DECLARATION

X Limited is a company incorporated in England and is a member of the X Retail Group ('the Group'). The Group ('we/us') also includes Y Limited and Z Limited and their associated companies from time to time. The personally identifiable information you provide will be processed in accordance with the Data Protection Acts 1984 and 1998 and other applicable laws. We will use your information so that we can process your order. This includes administering any accounts, processing your bank/credit card details in order to obtain payment, arranging delivery of any goods purchased, and the prevention and detection of fraud. We can hand over your information to anyone to whom we transfer our rights and duties under our agreement with you or if we have a duty to do so and the law allows us to do it. We will use your information for market research and the marketing of our own and third parties' products and services. This may include contacting you by post, telephone, email or SMS unless you indicate you do not want to be contacted in any of these ways by calling us on 0870 23 45 67. We will use your information to search the files of credit reference agencies who will record that search. This information may be used by other lenders in making credit decisions about you, members of your household and those with whom you may be financially linked. Information held about you by the credit reference agencies may already be linked to records relating to people with whom you are financially linked. For the purposes of credit searching, you may be treated as financially linked and you will be assessed with reference to any associated records. We will share your information with other companies, for the purposes of market research and the marketing of their products and services, unless you indicate that you wish to be excluded from such uses by contacting us on 08701 23 45 67. By signing this form, you consent to the information you provide being processed for the above purposes.

Customer Signature

Date

Confusing and legalistic language. Closely spaced text, small italic font in light grey.

Unnecessary – means little to public.

Raises Privacy and Electronic Communications Regulations problems and 0870 number does not provide easy means to opt-out consistent with the medium (script).

Confusing language.

Unexpected use. Good practice would be to obtain consent.

Alternative 'opt out' version:

Clear opportunity to opt out of marketing.

We would like to send you information about our own products and services, as well as those of selected third parties, by post. If you **do not** agree to being contacted in this way, please tick the box.

Specific rules for marketing by email, telephone and SMS apply. Please see our guidance on the Privacy and Electronic Communications Regulations 2003.

Transparency



(iv) ...
costs ...
agreement ...
become due and payable immediately and will not be ...
to the terms of any default notice issued by you.

Using your personal information

6. Personal information which you supply to us may be used in a number of ways, for example:
- To make lending decisions
 - For fraud prevention
 - For audit and debt collection
 - For statistical analysis
- (i) We may share your information with, and obtain information about you from, credit reference agencies or fraud prevention agencies. If you apply to us for insurance we will pass your details to the insurer. Information provided by you may be put onto a register of claims and shared with other insurers to prevent fraudulent claims.
- (ii) We will not disclose any information to any company outside the XXXX Bank Group except to help prevent fraud, or if required to do so by law.
- (iii) For further information on how your information is used, how we maintain the security of your information, and your rights to access information we hold on you, please contact: (clear web link/freephone etc..)

Title that people will understand.

Clarity about who personal information is shared with and why.

Clear info about how to find out more. Easy, free access.



(iv) ...
costs ...
agreement ...
become due and payable immediately and will not be ...
to the terms of any default notice issued by you.

DPA Statement

6. I/we agree that You and any lender resulting from this application (the "Lender"), shall be entitled to use and process, by any medium, the information given by me/us which may be acquired during the lifetime of any loan for the following purposes:
- (i) to provide data and search the files of credit reference agencies or fraud prevention agencies whether before or during the lifetime of any loan granted me/us by the Lender
- (ii) to disclose the data to credit reference agencies when required by them for future applications for finance by me/us or my/our financial associates unless I/we successfully file a disassociation with the credit reference agencies
- (iii) to disclose the data to any other company within the XXXX Bank Group or to any third party at any time for the purpose of assessing my/our application and administering and enforcing any subsequent loan
- (iv) to disclose the data to any third party who replaces my/our Lender
- By submitting your personal data you CONSENT to it being processed.
- We will share information about you within the XXXX Bank Group and also with other selected companies to provide you with information about products/services which we believe may be of interest to you.
- Under the terms of the Data Protection Act 1998 you have the right to make a subject access request. All requests must be made in writing to our head office. There is a charge for this service.
- If you do not wish to receive marketing information from XXXX Bank Group or other companies please inform your branch.

Title doesn't mean much to the public.

Unnecessarily complicated language. Use of I or me, we or us etc adds to confusion.

Unclear, 'offputting' notice – seems like a difficult or expensive process. People may not know what a subject access request is.

Small print, not easy to do (i.e. contact branch). Opt out statement not next to statement about marketing information.

Key privacy **traps** to avoid

- X Privacy is about compliance with law so privacy governance = lawyers
- X Bundled consent will do the trick
- X Privacy is just about managing our risk
- X Collect now, think of how to use later
- X We will try to get away with what we can and pull back later if necessary
- X We will avoid talking to privacy advocates because we won't like what they say



Building trust and innovative privacy solutions

Respect and trust essential



- ✓ Customer-centric approach
- ✓ Customer control or assurance that organisation has things under control
- ✓ Not relying always on consent for control
- ✓ Fair allocation of risk – fair approach when things go wrong, especially when more than one organisation involved
- ✓ Go beyond mere compliance with law

Building trust and innovative privacy solutions



Key question

- Privacy law is just one dimension
 - Ticking boxes against privacy principles can miss key issues
 - Compliance does not mitigate all privacy risks

- KEY QUESTION IS: **what harms could arise?**

- Consumer livelihood impacted – can't buy house, can't open bank account, reputation destroyed



Trust is reduced when:

- Risk is shifted from organisation to consumer
- No recourse for consumers when things go wrong
- Scope for function creep exists

Building trust and innovative privacy solutions

End result: A deficit of trust

- Consumers avoid engagement or switch to competitors
- Consumers become defensive – minimise or falsify responses
- Missed opportunities to develop relationships
- Innovative products and services unused
- New security vulnerabilities



Building trust and innovative privacy solutions

Examples



➤ [Thodey thumps Telstra team over trust breach](#)

Telstra's CEO, David Thodey, has told his team that the customer privacy breach that occurred over the Smart Controls scandal "must not happen again", with privacy "an essential requirement and our license to operate"... "customer trust is both precious and fragile, taking months and years to build, but can be broken in one day". July 2012

➤ [Privacy advocates raise concerns over Facebook's facial recognition technology](#)

Privacy advocates warn that Facebook's facial recognition technology could be used to track people down, and access their personal details without their permission. June 2011

➤ [Victorian Privacy Commissioner - Access Card / National ID Card](#)

'Nothing to hide, nothing to fear', directed at each member of the public, should be turned around and directed at government as: 'No legitimate reason to know, no legitimate reason to ask'." – Paul Chadwick, Victorian Privacy Commissioner. May 2006

Building trust and innovative privacy solutions

A PIA can help

- **Privacy strategy for early stage of the project**
 - ✓ Identify key privacy issues, stakeholders, principles
- **PIA on high level design**
 - ✓ Are the fundamentals right?
 - ✓ Is it a good idea?
- **PIA on detailed design / build**
 - ✓ Have recommendations been implemented?
 - ✓ Have further issues emerged?
- **PIA on implementation**
 - ✓ Have recommendations been implemented
 - ✓ Are privacy policies easy to read and transparent?
 - ✓ Is there good governance and complaints mechanisms

Building trust and innovative privacy solutions

Conclusion

- Global privacy regulatory developments increasing
- Data breaches are costly, especially in the finance sector
- Comprehensive credit reporting brings to focus the importance of security, governance, data quality and transparency
- Privacy is more than mere compliance – build trust, avoid shifting the burden of risk

Building trust and innovative privacy solutions

Further Information

- 'Credit impacts of more comprehensive credit reporting in Australia and New Zealand' PERC Results and Solutions 2012, (sponsor Dun & Bradstreet) perc.net/files/PERC%20Report%20-%20Final.pdf
- '2011 Cost of Data Breach Study: Australia', Ponemon Institute LLC (sponsor Symantec), March 2012 www.symantec.com/content/en/us/about/media/pdfs/b-ponemon-2011-cost-of-data-breach-australia-us.pdf?om_ext_cid=biz_socmed_twitter_facebook_marketwire_linkedin_2012Mar_worldwide__CODB_Australia
- '2012 Data Breach Investigations Report', Verizon, 2012 www.verizonbusiness.com/resources/reports/rp_data-breach-investigations-report-2012_en_xg.pdf
- 'Privacy Notices Code of Practice', Information Commissioner's Office (UK), June 2009 www.ico.gov.uk/upload/documents/library/data_protection/detailed_specialist_guides/privacy_notices_cop_final.pdf
- 'Ten Steps to Develop a Multilayered Privacy Notice', The Centre for Information Policy Leadership, 2007 www.hunton.com/files/Publication/37a71d77-14c4-4361-a62b-89f67feb544f/Presentation/PublicationAttachment/e7ffca9d-da66-4ed6-a445-f8fdc0b97e22/Ten_Steps_whitepaper.pdf
- 'Credit Reporting Literacy', United States Government Accountability Office, May 2005 www.gao.gov/new.items/d05223.pdf

Questions?

**INFORMATION
INTEGRITY
SOLUTIONS**

Annelies Moens

Head of Sales and Operations
BSc, LLB (Hons), MBA

53 Balfour Street
Chippendale NSW 2008

Ph: +61 2 8303 2417
Au. M: +61 413 969 753
Int. M: +372 5437 1881
Fax: +61 2 9319 5754

amoens@iispartners.com
www.iispartners.com