

GDPR and PDF : Are You Ready?

Neil Pitman

**Managing Director,
Aquaforest Ltd.**

www.aquaforest.com



GDPR – Google Trends



GDPR : There is no escape



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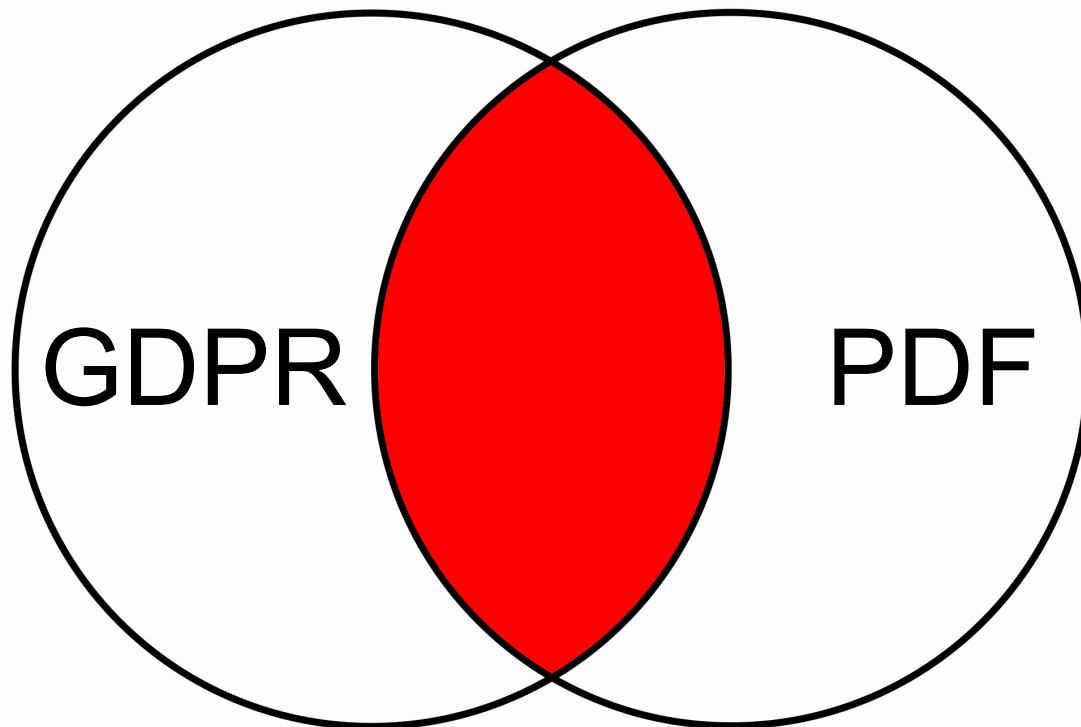


GDPR : There is no escape

www.pdfa.org



This Session



Background – Aquaforest Searchlight

SHAREPOINT AUDIT RESULTS

FILE SEARCHABILITY



- **UK Information Commissioner (ico.org.uk)**



ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/



Resources

- **Article 29 Data Protection Working Party**
 - **Will become The European Data Protection Board (EDPB)**



ec.europa.eu/newsroom/article29/news.cfm?item_type=1358
ec.europa.eu/info/law/law-topic/data-protection_en



Agenda

- **GDPR Overview**
- **GDPR in Practice**
- **PDF Issues and Opportunities**



REGULATIONS

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 27 April 2016

on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

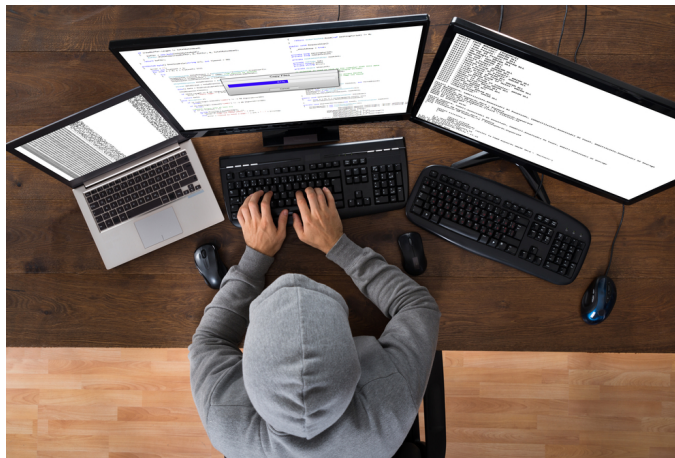


Is Your Personal Data Secure, Accurate & Properly Used?

facebook

EQUIFAX


myfitnesspal



FedEx

TESCO Bank

YAHOO!



GDPR Intent

- **Update outdated 1995 Data Protection Directive**
- **Regulation defines the rights of EU citizens (Data Subjects) around the privacy and protection of their personal data.**
- **Strengthen digital economy**
- **Regulations are binding**



GDPR – Who does it apply to?

- **Controllers**

A controller (eg an insurance company) determines the purposes and means of processing personal data.

- **Processors**

A processor (eg a service bureau) is responsible for processing or storing personal data on behalf of a controller.

- **Data Subjects**

Natural Persons



What Does it Apply To?

- **Personal Data of EU Citizens**
- **Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.**
- **Can include**
 - Online Identifiers
 - Location Data
 - Name
 - Address
 - Credit Card Details
 - Birthdate
 - Photo
 - Email Address
 - Social Media Accounts and Posts
 - Metadata
 - Workplace
 - Phone Number
 - ID Cards and Passports
 - Workplace or School
 - Pseudonymous Data
 - Genetic Data
 - Biometric Data
 - Medical Data



Data Subject Rights

- **Access (Article 15)**
- **Rectification (Article 16)**
- **Erase (Article 17)**
- **Restriction of Processing (Article 18)**
- **Data Portability (Article 22)**



Data Subject Rights

- **Objection (Article 21)**
- **Right not to be subjected to automated individual decision-making (Article 22)**
- **Right to lodge a complaint with a supervisory authority (Article 77)**
- **Right to be represented by organisations and others (Article 80)**
- **Right to compensation (Article 82)**



Obligations - UK ICO 12 Steps



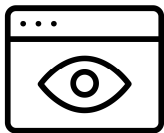
1. Awareness

You should make sure that decision makers and key people in your organisation are aware that the law is changing to the GDPR and appreciate the impact this is likely to have.



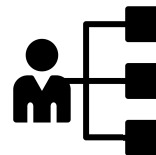
2. Information you hold

You should document what personal data you hold, where it came from and who you share it with. You may need to organise an information audit.



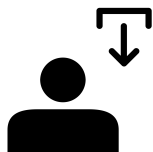
3. Privacy Notices

You should review your current privacy notices and put a plan in place for making any necessary changes in time for GDPR implementation.



4. Individuals' rights

You should check your procedures to ensure they cover all the rights individuals have, including how you would delete personal data or provide data electronically and in a commonly used format.



5. Subject access requests

You should update your procedures and plan how you will handle requests within the new timescales and provide any additional information.



6. Lawful basis for processing personal data

You should identify the lawful basis for your processing activity in the GDPR, document it and update your privacy notice to explain it.



UK ICO 12 Steps



7. Consent

You should review how you seek, record and manage consent and whether you need to make any changes. Refresh existing consents now if they don't meet the GDPR standard.



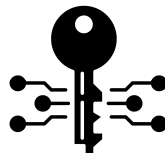
8. Children

You should start thinking now about whether you need to put systems in place to verify individuals' ages and to obtain parental or guardian consent for any data processing activity.



9. Data Breach

You should make sure you have the right procedures in place to detect, report and investigate a personal data breach.



7. COPs and Guidance

Review ICO's code of practice on Privacy Impact Assessments as well as the latest guidance from the Article 29 Working Party, and work out how and when to implement them in your organisation.



11. Data Protection Officer

You should designate someone to take responsibility for data protection compliance. You should consider whether you are required to formally designate a Data Protection Officer.



12. International

If you carry out cross-border processing, you should determine your lead data protection supervisory authority. Article 29 Working Party guidelines will help you do this.



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Use Case : Insurance Claims

- **Claim Forms**
- **Police Reports**
- **Medical Injury Data**
- **Medical Treatment Costs**
- **Driving and Criminal Offences**
- **Insurance Terms Compliance**
- **Loss Adjustment Report**
- **Vehicle Details**
- **Phone Call Recordings**
- **Premium Payment Methods**



Article 15 – Right of access by the data subject

(1) The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

...

...

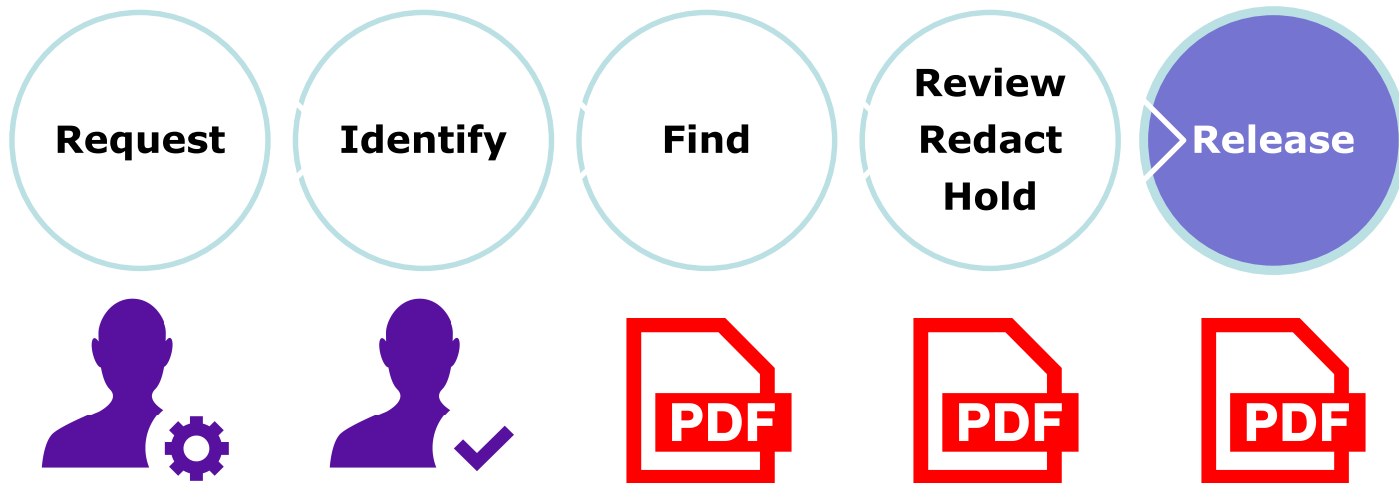
(2) Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

(3) The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. ³Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

(4) The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.



Article 15 Workflow



Name
Policy Number
Claim ID
Police Incident Ref
Medical Claim #



PDF Issues and Opportunities

- **Findability**
- **Redaction**
- **Security**
- **Package**

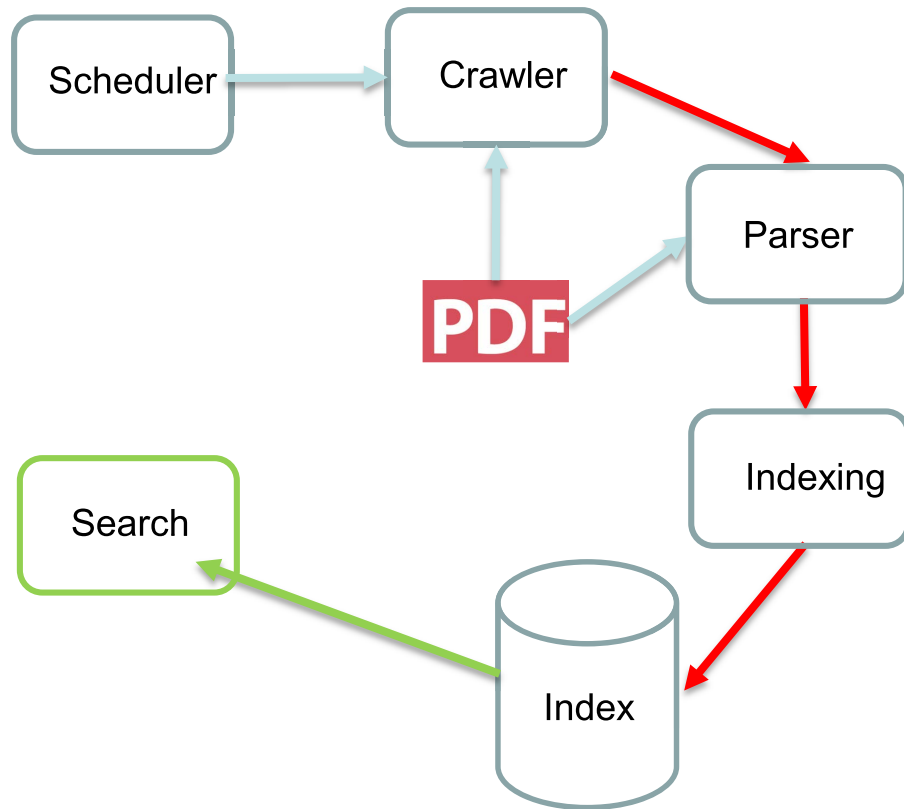
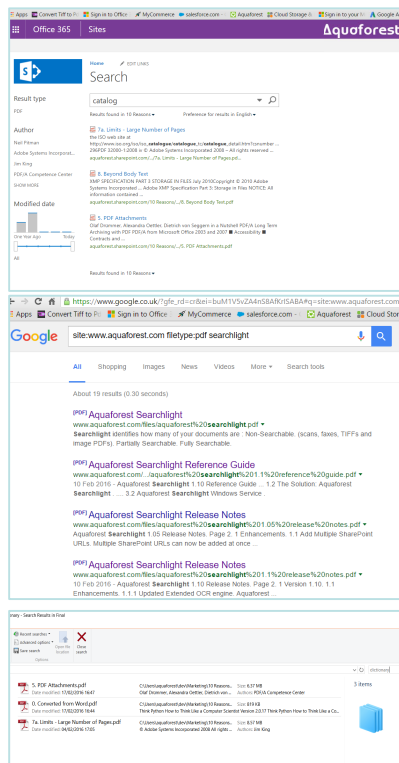


GDPR Requires PDF Findability ...

Top 13 Reasons why you might not be able to find that PDF



PDF Search and Index Process



1. Image PDF.pdf - Adobe Acrobat Pro

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Create [Icons]

1 / 8 [Icons] 212%

Tools Sign Co

Find
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Replace with

Buddy Systems with Selective Splitting

N. M. PITMAN*, F. W. BURTON† AND E. W. HADDON*†

* School of Computing Studies and Accountancy, University of
† Department of Electrical and Computer Engineering, University of

A new approach to the buddy system for dynamic storage allocation is presented. The size may be split in more than one way. It is demonstrated that this approach can be used to reduce the memory fragmentation of a buddy system.

Received April 1983

1. INTRODUCTION

In various computer applications there exists a need for dynamic storage allocation. Some sufficiently large contiguous memory pool is devoted to the transient storage of variable sized blocks of data. When the storage allocator receives a request to store a particular block it

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16 8 4 4 8 8 8 8

11 5 3 1 6 2 5 3

(64)



EP 0 632 365 A3



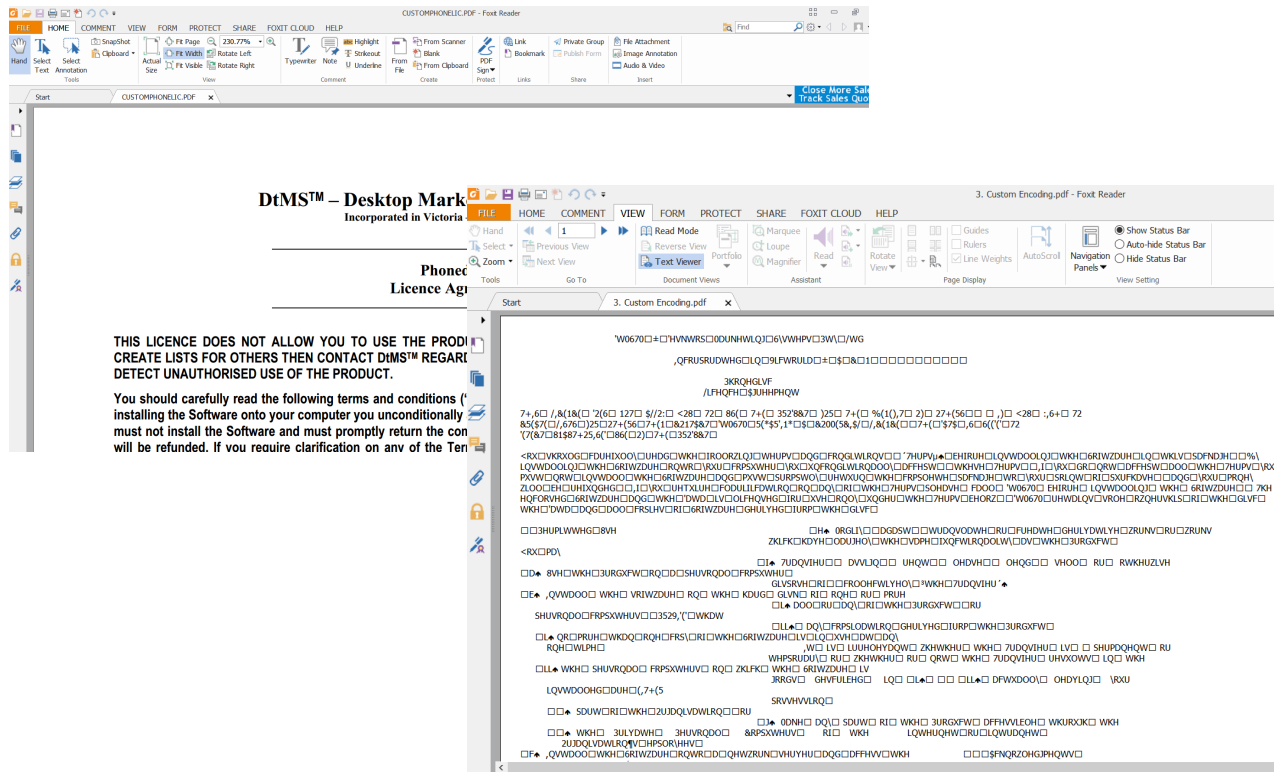
European Patent
Office

EUROPEAN SEARCH REPORT

Application Number
EP 94 11 0010

DOCUMENTS CONSIDERED TO BE RELEVANT			
Category	Citation of document with indication, where appropriate, of relevant passages	Relevant to claim	CLASSIFICATION OF THE APPLICATION (Int.Cl.6)
A	N. PITMAN ET AL :: "Buddy Systems with Selective Splitting" COMPUTER JOURNAL, vol. 29, no. 2, April 1986 (1986-04), pages 127-134, XP002126628 CAMBRIDGE GB * the whole document *	1,2,6,8, 12,13, 17,22,24	G06F12/02 G06F3/06
A	S. GONCHARSKY ET AL :: "Use of Binary Trees for Storage Allocation" IBM TECHNICAL DISCLOSURE BULLETIN., vol. 24, no. 6, 1981, pages 2710-2712, XP002126629 NEW YORK US * the whole document *	1,2,6,8, 12,13, 17,22,24	
A	EP 0 453 093 A (HEWLETT-PACKARD CO.) 23 October 1991 (1991-10-23) * column 5, line 37 - column 7, line 7 * * column 10, line 20 - column 13, line 2; figures 3-6,12-15 *	1,12,24	
			TECHNICAL FIELDS SEARCHED (Int.Cl.6)
			G06F







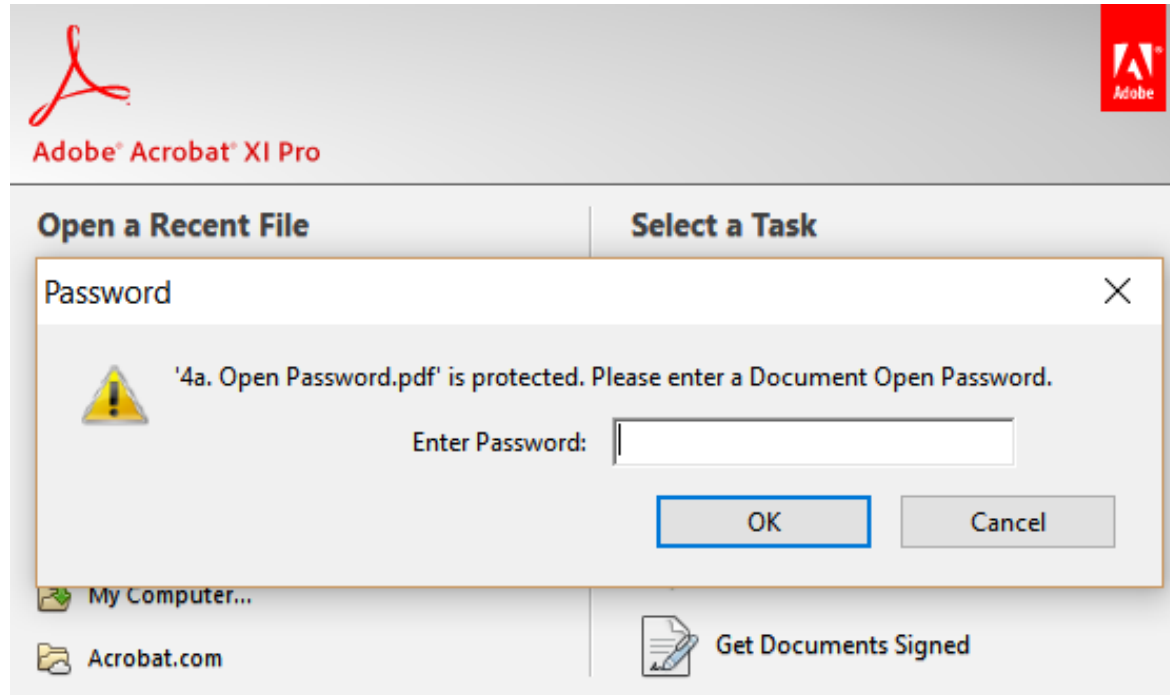
Dear President Trump

On 23 June last year, the people of the United Kingdom voted to leave the European Union. As I have said before, that decision was no rejection of the values we share as fellow Europeans. Nor was it an attempt to do harm to the European Union or any of the remaining member states. On the contrary, the United Kingdom wants the European Union to succeed and prosper. Instead, the referendum was a vote to restore, as we see it, our national self-determination. We are leaving the European Union, but we are not leaving Europe – and we want to remain committed partners and allies to our friends across the continent.

Earlier this month, the United Kingdom Parliament confirmed the result of the referendum by voting with clear and convincing majorities in both of its Houses for the European Union (Notification of Withdrawal) Bill. The Bill was passed by Parliament on 13 March and it received Royal Assent from Her Majesty



Password Security



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Document Properties

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Adobe Acrobat



All Adobe products enforce the restrictions set by the Permissions Password. However, not all third-party products fully support and respect these settings. Recipients using such third-party products might be able to bypass some of the restrictions you have set.



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Document Assembly: Not Allowed
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Page Extraction: Not Allowed
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Filling of form fields: Not Allowed
Signing: Not Allowed
Creation of Template Pages: Not Allowed

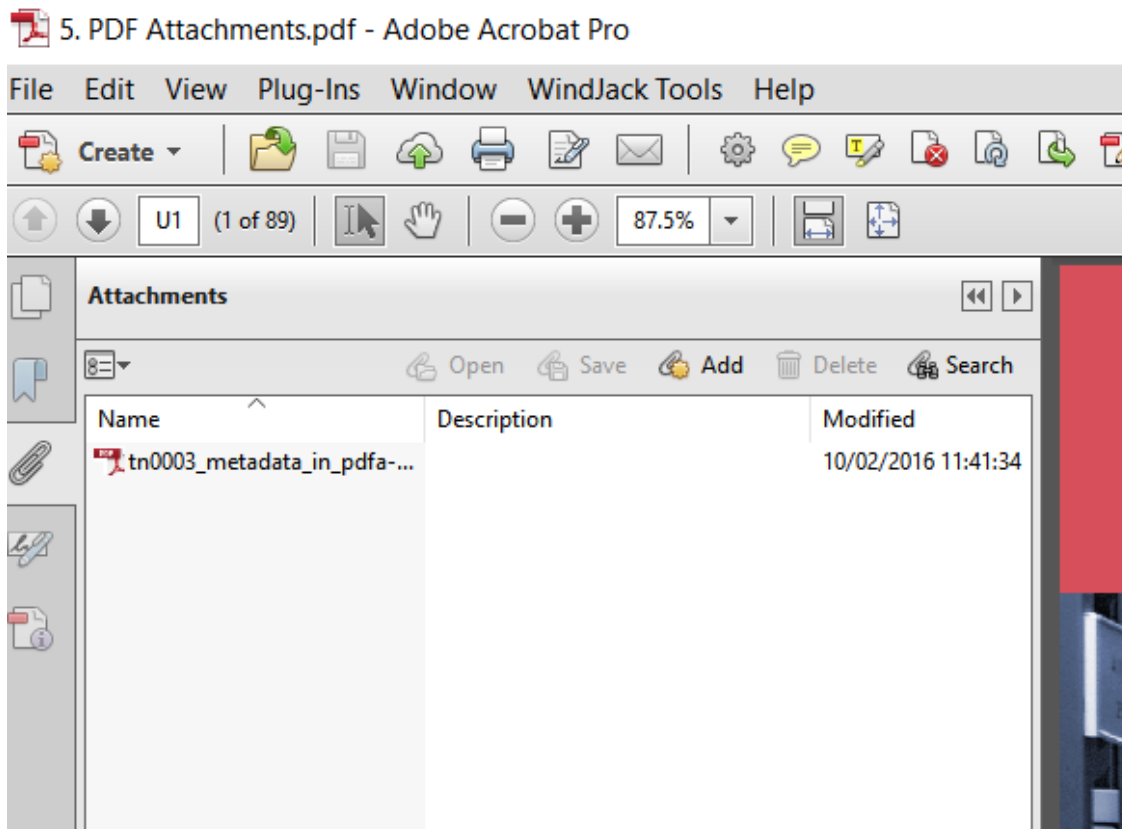


Email Attachments

 Send	From ▾	neil.pitman@aquaforest.com
	To...	<input type="checkbox"/> <u>Neil Pitman;</u>
	Cc...	
	Subject	PDF Claims Information
Attached	 <u>GDPR-Ebook-FINAL.PDF (3 MB)</u>	

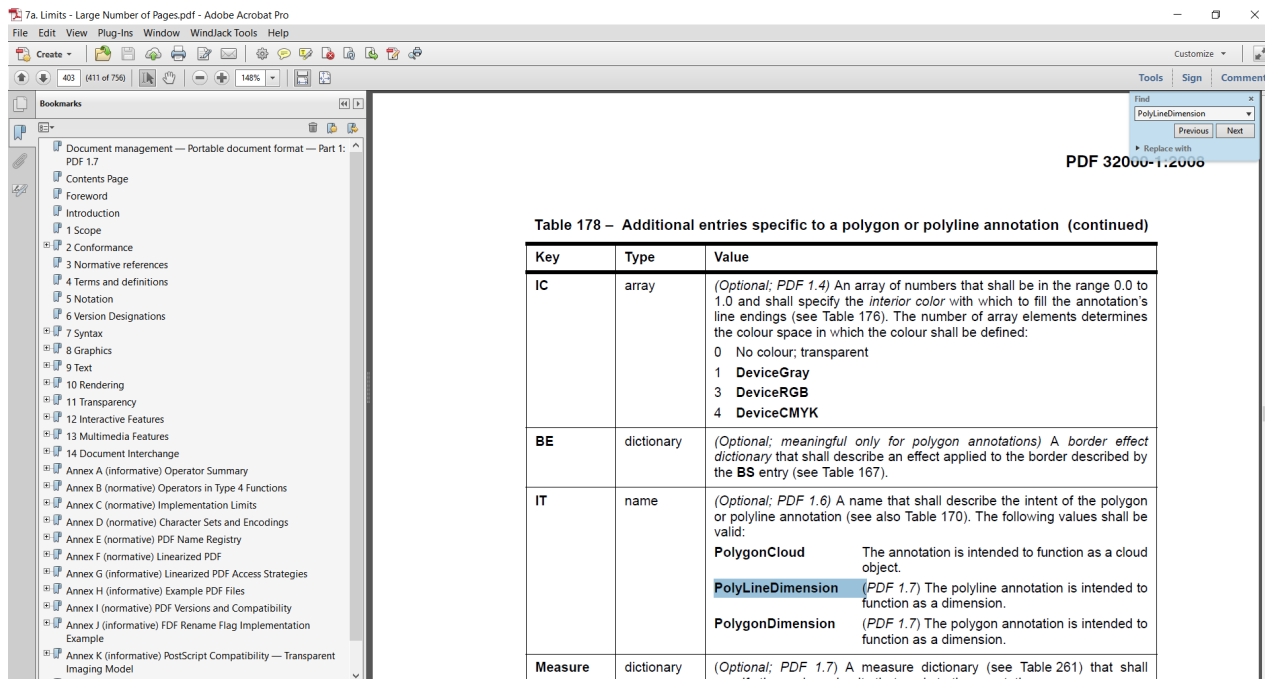


PDF File Attachments





Very Large PDFs



7a Limits - Large Number of Pages.pdf - Adobe Acrobat Pro

File Edit View Plug-Ins Window Window Tools Help

Create 403 (411 of 750) 148%

Tools Sign Comment

Bookmarks

- Document management — Portable document format — Part 1: PDF 1.7
 - Contents Page
 - Foreword
 - Introduction
 - 1 Scope
 - 2 Conformance
 - 3 Normative references
 - 4 Terms and definitions
 - 5 Notation
 - 6 Version Designations
 - 7 Syntax
 - 8 Graphics
 - 9 Text
 - 10 Rendering
 - 11 Transparency
 - 12 Interactive Features
 - 13 Multimedia Features
 - 14 Document Interchange
 - Annex A (informative) Operator Summary
 - Annex B (normative) Operators in Type 4 Functions
 - Annex C (normative) Implementation Limits
 - Annex D (normative) Character Sets and Encodings
 - Annex E (normative) PDF Name Registry
 - Annex F (normative) Linearized PDF
 - Annex G (informative) Linearized PDF Access Strategies
 - Annex H (informative) Example PDF Files
 - Annex I (normative) PDF Versions and Compatibility
 - Annex J (informative) PDF Rename Flag Implementation Example
 - Annex K (informative) PostScript Compatibility — Transparent Imaging Model

Find

PolyLineDimension

Replace with

Previous Next

PDF 32000-1:2006

Table 178 – Additional entries specific to a polygon or polyline annotation (continued)

Key	Type	Value
IC	array	<p>(Optional; PDF 1.4) An array of numbers that shall be in the range 0.0 to 1.0 and shall specify the <i>interior color</i> with which to fill the annotation's line endings (see Table 176). The number of array elements determines the colour space in which the colour shall be defined:</p> <ul style="list-style-type: none"> 0 No colour; transparent 1 DeviceGray 3 DeviceRGB 4 DeviceCMYK
BE	dictionary	<p>(Optional; meaningful only for polygon annotations) A <i>border effect dictionary</i> that shall describe an effect applied to the border described by the BS entry (see Table 167).</p>
IT	name	<p>(Optional; PDF 1.6) A name that shall describe the intent of the polygon or polyline annotation (see also Table 170). The following values shall be valid:</p> <ul style="list-style-type: none"> PolygonCloud The annotation is intended to function as a cloud object. PolyLineDimension (PDF 1.7) The polyline annotation is intended to function as a dimension. PolygonDimension (PDF 1.7) The polygon annotation is intended to function as a dimension.
Measure	dictionary	<p>(Optional; PDF 1.7) A <i>measure dictionary</i> (see Table 261) that shall</p>



Other PDF Text Objects

The screenshot displays the Adobe Acrobat Pro interface with several key features highlighted by green labels and arrows:

- Bookmark:** Points to the 'Bookmarks' panel on the left, which shows a 'Bookmark Reference B1234'.
- Text:** Points to a text object in the main content area, specifically the date 'BIT, 01.09.2012'.
- Image/OCR Text:** Points to a scanned image of a document page, which has been processed by OCR to make the text searchable.
- PDF Attachment:** Points to a small icon in the top right corner of the document, representing an embedded file.
- Annotation:** Points to a sticky note on the document page, which contains text and a reference to another document.
- XMP Metadata:** Points to the 'XMP Metadata' panel on the right, which shows metadata for the document, including 'Description', 'Keywords', and 'Creation Date'.
- Dictionary Metadata:** Points to the 'Dictionary Metadata' panel on the right, which shows metadata for the document, including 'Title', 'Author', and 'Subject'.



PDF Forms

9. PDF Forms.pdf - Adobe Acrobat Pro

File Edit View Plug-Ins Window WindJack Tools Help

Create [Icons]

1 / 18 [Navigation Icons] 203%

Please fill out the following form.

A1 **Company name**

To check if a company name is available use our WebCheck service and select the 'Company Name Availability Search' option:
www.companieshouse.gov.uk/info

Please show the proposed company name below.

Proposed company name in full ⓘ

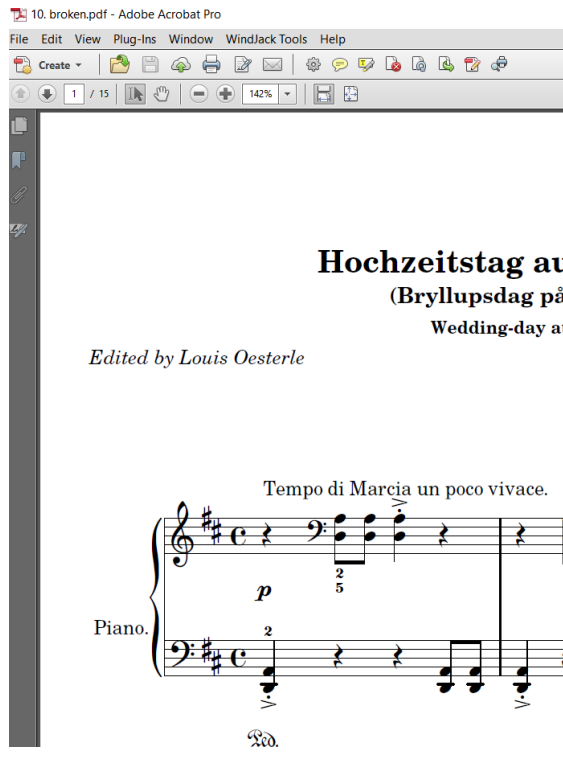
The SuperPDF Company

For official use

A2 **Company name restrictions**

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1 / 15 142%

Hochzeitstag au
(Bryllupsdag på)
Wedding-day at

Edited by Louis Oesterle

Tempo di Marcia un poco vivace.

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Piano.

And.

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779 68 0 R
780 73 0 R
781 78 0 R
782 83 0 R
783 88 0 R
784 93 0 R
785 ] /Count 0
  
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Issue Summary – Findability

- **Review Requirements**
- **User Education**
- **Audit PDF**
- **Review Standards and Practices**
 - **Manual Tagging is an option**
- **Review Search Platform & Technologies**



Issue – PDF Redaction

- Right to be forgotten
- Provide information without disclosing that of third parties

DINNINGTON OPERATIC SOCIETY

Chairman
Secretary
Treasurer

Kevin Barron M.P.

November 27th 2005

Could you please forward the fee of £32.00 to our Treasurer at the above address.

Additional Costs Allowance

Member's claim form **ACA2**

About filling in this form

Your details

Name: Miss VIGGERS

Contributing: Gosport

Claim details

You can only claim for:

Please list:

Please attach:

Period of claim: 1.9.2006 - 31.3.2007

Total cost of claim: £31.30

Handwritten notes: Costs of maintaining, These costs for each month, including mortgage interest costs

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AUTOMATIC GATE SYSTEMS

Invoice

Date: 20/05/07

Order No. 200704

Account No. 200704

VAT Reg No. 200704

Net Amount: £301.74

Gross Amount: £343.56

PLEASE NOTE THAT:

Handwritten signature: Paul Viggers

Issue – PDF Security

Article 32 – Security of Processing

“...the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk....”



A role for PDF Security?



Issue – PDF Export and Transfer

- **Article 20 – The Right to Data Portability**
- **“The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller”**
- **CSV, XML, HTML and Images .. or PDF??**

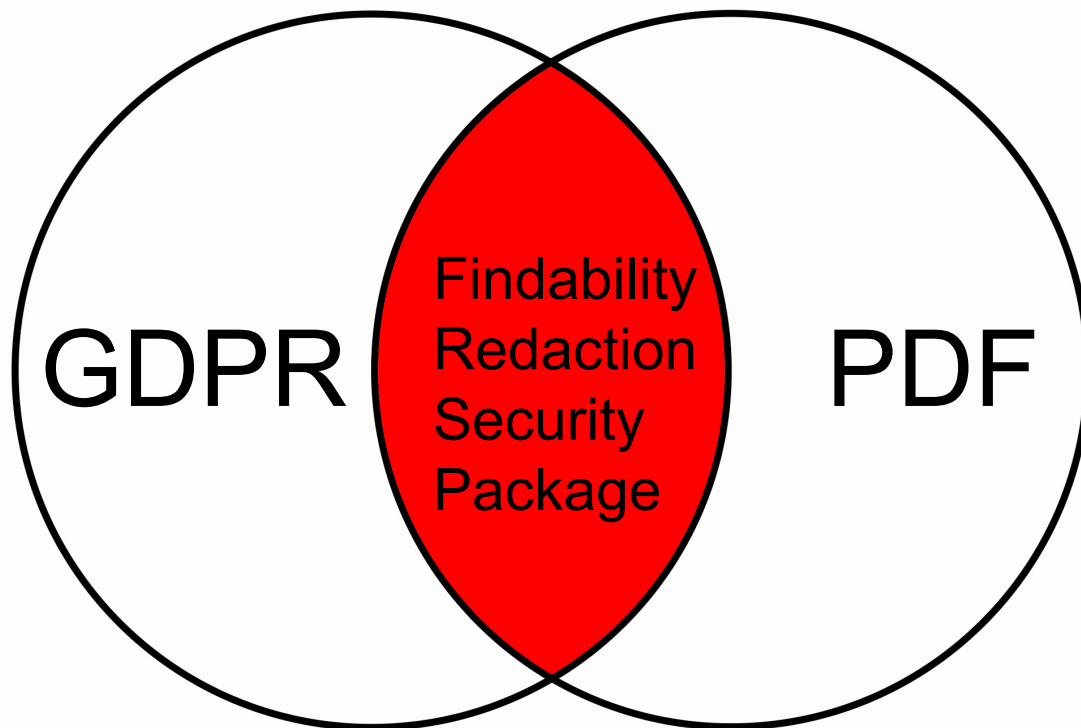


Issue – PDF Export and Transfer

- **Key PDF Capabilities**
 - XMP Metadata
 - Associated Files
 - Navigation & Accessibility
 - Redaction
 - Mixed & Analog Content
 - Security
- **PDFpackage**
 - <https://www.pdfa.org/pdfpackage-a-lightweight-content-management-platform/>



Summary



Thank you!

Any questions?

Get in touch:

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www.linkedin.com/in/neilpitman

www.aquaforest.com

