

# GDPR COMPLIANCE

“Seeing the Single Tree within the Jungle”

## 1. INTRODUCTION FINCOM.CO

FinCom.Co is a fully developed deployed, robust sophisticated technology platform that enables via “Phonetic Fingerprint” to combine databases and match their entries, even cross languages and transliterations spelling mistakes.

FinCom.Co’s technology using AI, fuzzy logic and machine learning, together with a proprietary phonetic fingerprinting that processes over 23 languages, transliteration and/or spelling mistakes, enabling to fix database corruption by achieving entry matching and thus database entry mapping.

## 2. BACKGROUND.

In May 2018 the EU law, General Data Protection Regulation (2016/679, known as “GDPR”) will come into effect. GDPR is the European Union framework for the protection of personal data and privacy of individuals, see <http://www.eugdpr.org/>.

The GDPR is directly applicable to any company doing business in EU member states, hence as well in USA. After May 2018, organization processing any kind of personal data will be held more accountable for their data collection and protection than before.

Enhanced individuals’ rights allow a data subject to view, correct and erase their data on request to any organization; globally. Personal data may not be kept for longer than is necessary for the purposes for which it was originally obtained.

GDPR is built out of 11 chapters, which the first 5 layout the requirements of a very systematic and comprehensive, management of IT security such as data protection management, reporting and accountability mechanism to notify data breaches, map data flows and conduct data protection impact assessments.

However, chapter 3 of GDPR specifically article 17 is all about privacy rights aka “right to be forgotten” (<https://www.privacy-regulation.eu/en/17.htm>), which requires the ability to provide a periodic comprehensive report on what information is in the database regarding every specific individual/client there is.

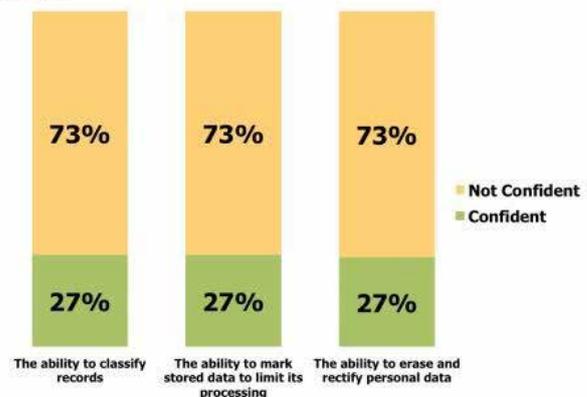
## 3. PAIN.

As mentioned in the above, article 17 “right to be forgotten” (<https://www.privacy-regulation.eu/en/17.htm>), entails to provide a periodic report specifying the information that a company has on a specific customer.

“Most EU companies are concerned, not GDPR ready and believe they will be fined”.

Based upon the survey which was conducted among SME companies, most businesses lack confidence to be GDPR ready while they’re already subject to privacy laws and dealing with processing and storing data for residents of the EU. The graph in the below displays 73% of the companies are not are not confident in in the ability to meet the key requirements of the GDPR.

Organizational Confidence in the Ability to Meet Key Requirements of the GDPR



Source: Osterman Research, Inc.

As a result of lack of confidence and needed preparations, Commvault concluded in their research of September 2017, 58% of US and 62% of German survey respondents believe that their companies will be fined. Most respondents claim that the biggest problem their companies are facing is “unstructured data” which forms 80% of all the companies’ data. As a consequence of this so called “unstructured data”, companies cannot trace data within their repositories on a specific entity/individual as written in section 3, article 17 and therefore will most likely be fined for non-compliance.

The amount of time to search, identify and process such a task of finding all associated information within the vastness of the databases is extremely time-consuming and very expensive. To illustrate, current estimations to comply as stated above, will take an engineer earning 50EUR per hour between 5 to 50 hours – **processing just 1 specific request.**

Hence, minimum costs could be calculated at 300EUR per request, and with a client base over 1 million the costs and times are extraordinary high. Any entity that stores or processes the personal data of EU residents will be obliged to conform to this new law, regardless of where that organization resides.

Non-compliance will be met with fines of up to 4% of global turnover or €20million, whichever is greater (<https://www.gdpr.associates/data-breach-penalties/>). These excruciating fines can bankrupt companies.

## 4. FINCOM.CO'S SOLUTION.

**FinCom.Co's** data mapping can help large companies facing consumers such as Banks (ING, BNP), Airlines (BA, KLM) Telecommunications (Vodafone, KPN), Commerce (Jumbo, Tesco) or any company with a loyalty plan, to efficiently within no-time find information on a specific client and match data entries between multiple databases regarding that individual.

This Auditing of Information enables database mapping shows the positioning of the data (including what information is in the data) for immediate access for either: comprehensive reporting or deleting/sandboxing the client

information from the company's database (or any other action as maybe needed such as data cleansing). Using this "Database Map" it becomes an effortless and immediate means to comply with GDPR Article 17, as understanding and showing every place exactly the information is hidden makes it easy to find!

The new GDPR regulation and specifically **Article 17, require that companies to Delete or Sandbox (save unaccessible due to laws till deletion is allowed)** any and all personal customer information: if the customer is no longer their customers or the venture for which personal information was given is over/done.

**FinCom.Co's** technology enables to...

- **Eliminate duplications within your databases, saving unnecessary and expensive GDPR reporting**
- **Know where each entry is and how many duplications – data cleansing**
- **Enable taking swift, immediate and effortless action as required – insuring compliance**

By analyzing and optimizing and sanitizing information using specifically its “**Phonetic Fingerprinting**” and then running that information through **FinCom.Co's AI suggestion engine** which uses a sophisticated ontology tree to statistically calculate the matching and linkage probabilities, with least possible false positives, delivering an unparallel result both on increase in scope of search and accuracy of results.

## 5. ENABLING FOR REAL-TIME TESTING & EVALUATION.

**FinCom.Co's** solution is fully developed and ready for implementation, easy and immediate integration for using **FinCom.Co** GDPR solution, need but parse the entire databases once using **FinCom.Co** semi-automatic parsing solution.

How? Set up a straight-forward PoC, data needs to be gathered of approximately 50-500 names, emails, phone numbers etc. The testing phase is explained in the below;

**GDPR REPORT**

**Results**

Query Details  
Search date and time: 12/8/2017, 6:19:48 PM

Query parameters  
• Name: Mattie Poquette  
• Date of Birth:  
• Country:

Client information in Database

Names	• Mattie Poquette • Mattie Poquette
Related Countries	• bahamas
Company	• Century Communications
Year of Birth	• 1971
Email	• mattie@aol.com
Address	• 73 State Road 434 E
Phone 1	• 602-277-4385
Phone 2	• 602-953-6360

Export

Name	Record Location	Record id
Mattie Poquette	Apricot source / 16	pilotA_16
Mattie Poquette	Banana source / 16	pilotB_16
Mattie Poquette	Coconut source / 16	pilotC_16
Mattie Poquette	Date source / 16	pilotD_16

Time stamp of query

Used parameters for query

Data structure on an entity

Results found on a specific query

Export data available in Json or TXT file

Duplications of name/entity + places within the different repositories

\*(image showing GDPR report)

- Use an Excel spread sheet and fill in a table, with structured information: Entry number, Name, Middle name, Last name, Birth date, Birth place.
- Copy this file 4 times – create disorder resulting in unstructured data as we would find in all databases, while keeping 1 record with all changes made as a baseline.
- Export all files into a CSV file and upload this to **FinCom.Co's** system which is installed on a blank laptop (on-premise) not connected to the internet.
- Run the report and generate the GDPR report.

The generated GDPR report consists out of 3 parts;

1. Top part: Used parameters + time stamp
2. Middle part: Results found on specific query
3. Lower part: Duplications of name/entity + places within the different repositories

## 6. BUSINESS MODEL.

cost without compromising the integrity of compliance policy. Per transaction fee 5- 25 cents

with yearly cap. A complete SaaS platform or on-premise installation as required. **FinCom.Co** will provide services integration and ongoing support our client's demands and billed on per case basis.

## 7.FINAL NOTE.

**FinCom.Co's** solution reduce significantly your costs, less time-consuming, increases efficiency - while insuring a full EU GDPR compliance, with other many advantages.

**CHALLENGE US TO ENSURE YOUR COMPLIANCE REGULATORY!**

**SET UP A PILOT TODAY!**

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