

ESSENTIAL FOR PRIVACY COMPLIANCE, DATA MAPPING HAS A TECH—AND EXPENSE—PROBLEM

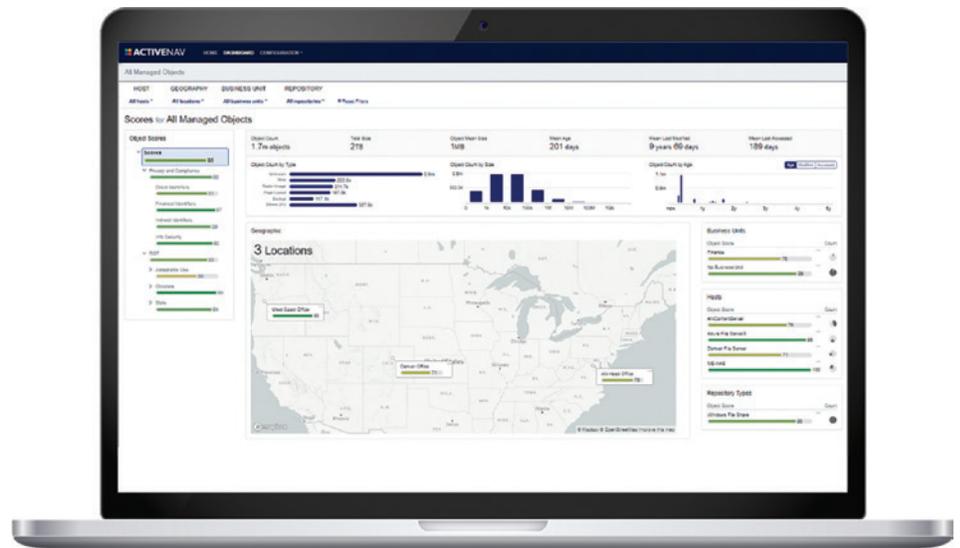
In the face of tech solutions that are either too expensive or “too not great,” many organizations may still be taking a manual—and somewhat flawed—approach to the challenge of data mapping.

BY FRANK READY

Data mapping may be the first step on the road to privacy compliance, but for some organizations it's a steep drop. The sheer volume of data being inventoried and the inherent limitations of technology solutions designed to help means that many companies or law firms are looking at maps with more than a few holes in them.

“It's not for lack of trying or for lack of willful intent to get to a good [outcome] here. It's that there are too many solutions that are too 'not great' or too expensive and this is a hard issue,” said Christopher Ballod, an associate managing director in the cyber risk practice at Kroll.

Unsurprisingly, he noted that data mapping is most common among organizations with roots in California



Inventory™, the new Data Mapping as a Service solution from ActiveNav.

or Europe, where regulations such as California Consumer Privacy Act (CCPA) and General Data Protection Regulation (GDPR) mandate the ability to comply with data subject access requests.

But data mapping is harder to come by in organizations that fall outside that purview—a reality that Ballod chalked up to the high degree

of difficulty that companies or law firms face in trying to successfully chart the flow of information throughout a large enterprise with multiple departments and swarms of personnel.

And data mapping tools can only do so much to help. “There just isn't a great piece of tech out there that is widely considered to be

affordable and that is very good at cataloguing data. ... And then there are extremely expensive suites of products that really do amazing things with inventorying what's on a network, but are really expensive," Ballod said.

Given the expense involved, many organizations may be trying to deploy a more analog strategy around data mapping. Dean Gonsowski, chief revenue officer at ActiveNav, noted that some enterprises trace data manually—basically going to an IT department or section manager and asking, "Where is your data stored?" But the potential for human error prevails.

"And it only really gets this really broad across-the-top layer of where information kind of should be in systems and silos. And for data privacy, the big challenge is you need to understand data at the file level or the element level, because that's where the Social Security number would be. That's where gender and race and religion and all the sensitive elements are," Gonsowski said.

To be sure, tech can help companies reach those levels—ActiveNav released its automated Data Mapping as a Service solution on Tuesday—but many tools are still limited in the types of data they can approach. For instance, Gonsowski noted that ActiveNav and other companies in the space typically focus on either structured or unstructured data, with few tools having successfully placed a foot in both camps.

Some of that divide simply comes down to heritage. Gonsowski pointed out that ActiveNav has been doing unstructured data for "a dozen years," so that's where the company's institutional knowledge is rooted. Other companies have more history or expertise established around structured data types.

This means that organizations who are serious about building a comprehensive data map typically have to invest in separate best-in-breed solutions for tracking both structured and unstructured data. "Our feedback

that we're hearing in the market is that any [provider] who tries to claim both, they fall over on one or the other," Gonsowski said.

Still, it's not like clients are making it any easier for tech providers. Jarno Vanto, a partner at Crowell & Moring, conceded that while there are a number of tech providers attempting to help companies address their data mapping needs, some clients—especially the older companies—have a tech stack that is built on layer upon layer of legacy systems.

"These data mapping exercises can get very complex quickly," Vanto said.

Nevertheless, as privacy regulations and the risks associated with lackluster data stewardship continue to grow more prominent, there's a chance that data mapping solutions could experience a boost in sophistication—and affordability. "You have more awareness around [data mapping], so you have more open-source solutions that are getting better and better," Ballod at Kroll said.

