

# **ISACA Privacy Presentation A Corporate Challenge/Advantage**

*kpmg*

**Information Risk Management**

# Privacy Challenge - Advantage

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**Emerging Privacy Regulatory Regime & European Data Protection Directive**

**Leading Indicators, Events, Players & Coming Privacy Marketplace**

**Emerging Solutions for Privacy Compliance & Strategic New Services**

# US Privacy Initiatives

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- 105th Congress
  - ◆ 150 Bills Introduced
  - ◆ 9 Privacy Bills Enacted
  - ◆ 40 days of hearings
- Children's Privacy
  - ◆ Children's Online Privacy Protection Act
- Identity Theft
  - ◆ Criminalize Identification Fraud
- FCRA Amendments
- Social Security Numbers

# US Privacy Initiatives

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- FCRA Amendments
  - ◆ Relaxes Notification Requirements for non face-to-face transactions
  - ◆ Relaxes obsolescence standard for conviction data
- Social Security Numbers
  - ◆ **prohibit Dept Transportation from requiring SSN display in driver's licenses**

# US Privacy Initiatives

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- Unique Health Identifiers
  - ◆ H.R. 4328
  - ◆ prohibits HHS from assigning unique health identifiers
- Unfinished Business
  - ◆ Online Privacy
  - ◆ Financial Privacy “Financial Information Privacy Act”
  - ◆ FCRA amendment permitting affiliate sharing

# US Privacy Initiatives

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- Unfinished 105th Business
  - ◆ Public Records
  
- Trends for the 106th
  - ◆ Keen Administration Interest
  - ◆ View: Technology has Outpaced Traditional Controls
  - ◆ EU Directive will bring Pressures

# US Privacy Initiatives

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- Predictions for 1999
- Financial Services
  - ◆ Financial Information Privacy Act will pass
  - ◆ Affiliate sharing
  - ◆ Restrictions on 1st party financial data transfers
  - ◆ FCRA additional tinkering

# US Privacy Initiatives

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- Predictions for 1999
- Online Privacy
  - ◆ Regulation of Online Privacy
  - ◆ Subscriber info and notice/choice legislation
  - ◆ Safeguards/Restrictions on sale or disclosure of SSNs online

# US Privacy Initiatives

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- Predictions for 1999
- Digital Signatures
  - ◆ Financial Institutions Digital Signature Legislation
- Health & Genetic Privacy
- Public Records
- EU Directive
  - ◆ Safe Harbor Failure

# US Privacy Initiatives

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- Predictions for 1999
- US Privacy Office
  - ◆ Centralized Privacy Office
  - ◆ Non-regulatory Office?
  - ◆ OMB Position
- Encryption
  - ◆ Ongoing Debate

# US Privacy Initiatives

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- Predictions for 1999
- Employee Surveillance
- Governmental Surveillance
  - ◆ Broadened Scope of Wiretapping
  - ◆ National System to Identify “problem drivers”
  - ◆ SSNs required to confirm voter eligibility
  - ◆ FBI capture of Internet calls and e-mail
  - ◆ NSA’s ECHELON Program
  - ◆ HHS National Parent Locator Service

# US Privacy Initiatives

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- Predictions for 1999
- Governmental Surveillance
  - ◆ FBI National Instant Criminal Background Check System and DNA database go online
- Omnibus Privacy Legislation
  - ◆ remote possibility
  - ◆ Senate may be considering

# US Privacy Initiatives

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- Court Decisions - Adjudications
  - ◆ FTC v. GeoCities
  - ◆ TransUnion v. FTC

# US Privacy Initiatives

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- Consumer Privacy Activity in the States
  - ◆ 1998 - 2,367 bills introduced
  - ◆ 786 enactments (as of November 1)
  - ◆ 1997 - 2,370 bills introduced
  - ◆ 474 enacted
  - ◆ 1997 34 of 50 states passed one or more
  - ◆ 1998 42 of 50 states passed one or more

# US Privacy Initiatives

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- Consumer Privacy Activity in the States
  - ◆ Heath & Genetics
    - ◆ 10 bills limiting use
    - ◆ pharmacy records
  - ◆ Online/Internet
    - ◆ 20 states use of digital signatures
    - ◆ >12 anti-spam bills

# US Privacy Initiatives

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- Consumer Privacy Activity in the States
  - ◆ Financial Services
    - ◆ Access and Credit Protection
    - ◆ Identity Fraud
  - ◆ Direct & Telemarketing
    - ◆ “do not call”
    - ◆ “opt out”
    - ◆ caller ID
    - ◆ anti-slamming

# US Privacy Initiatives

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- Consumer Privacy Activity in the States
  - ◆ Predictions
    - ◆ More State Restrictions on Genetic Information Use
    - ◆ Protect Patient-Pharmacist Confidentiality
    - ◆ Misuse of Biometric Identifiers
    - ◆ Increased support for Government intervention in cyberspace

# Citizen Concern

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- Consumers Want Choice & Control Over Personal Information
  - ◆ 82% feel consumers have lost all control over how companies collect and use their personal information
  - ◆ 78% believe that businesses tend to ask for too much personal information
  - ◆ 48 Million, 41% say they have personally been the victim of an improper privacy invasion by a business

# Citizen Concern

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- Rising privacy assertiveness by American consumer is a new trend recorded the survey
  - ◆ 78% say they have refused to give information
  - ◆ 43% have used an opt-out
  - ◆ however, very large majorities feel it is acceptable for businesses they patronize to look into their customer profiles to tailor offers

# Overview of EU Directive

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- Human rights view of privacy
- Catalyst for global change
  - ◆ 40 Nations & Growing
  - ◆ US Reaction (Internal Battle)
  - ◆ Domino Effect
- Limits on transfers abroad, to avoid “data havens” and creates necessary protections for fostering an information utility marketplace
- The Other Y2K Problem
- October 25th – Only the Beginning

# Broad Scope of Directive:

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- “processing of personal information”
- “processing” = almost any verb

# Personal Information

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- Personal information:
  - ◆ “any information relating to an identified or identifiable natural person (“data subject”)”
  
- Identifiable:
  - ◆ Any person who can be identified, directly or indirectly, such as by identification number

# EU Directive Position

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- Consent
  - ◆ Unambiguous
  - ◆ Informed
- Access
  - ◆ “Unfettered” vs. “Reasonable”
- Notice
  - ◆ Governing Agency
  - ◆ Data Controller ID
  - ◆ Purpose
- Security
  - ◆ “Appropriate”

# Exceptions to Scope:

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- Activities outside scope of Community law
  - ◆ public safety
  - ◆ national defence
  - ◆ State security
  - ◆ activities of the State in the area of criminal laws
- *Purely* personal or household activities

# Principal rights of data subjects:

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- Notice: identity of controller and purposes of processing
- Use limitation: processing only for announced uses

# Rights of Data Subjects (cont.)

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- Direct marketing: notice and opt-out for free prior to transfer
- Rights of access and correction
- “Sensitive” data: especially strict
  - ◆ racial or ethnic origin
  - ◆ political opinions
  - ◆ religious or philosophical beliefs
  - ◆ trade union membership
  - ◆ health or sex life

# Transfer out of E.U.

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- Article 25: OK if “adequate” protection
  
- Article 26: exceptions even if no “adequate” protection
  - ◆ unambiguous consent
  - ◆ necessary for performance of contract
  - ◆ controller legal obligation
  - ◆ protect vital interests of the data subject
  - ◆ overriding public interest

# Art. 25 -- “Adequacy”

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- Why it is strict:
  - ◆ transfer only if “adequate”
  - ◆ needed to prevent data havens
  
- Where no adequacy:
  - ◆ Countries must “take the measures necessary to prevent any transfer of data of the same type to the third country in question”

# Why Art. 25 may not be so strict:

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- “adequate” < “equivalent”
- “in light of all the circumstances”
- sectors may be adequate

# Art. 26 Exceptions

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- Unambiguous consent
  - ◆ may be broadly useful
  - ◆ in advance
  - ◆ consent for each type of use
  - ◆ consent for 3d countries

## Art. 26 Exceptions (cont.)

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- “Necessary for the performance of a contract”
  - ◆ only if *necessary*
  - ◆ related exception for payments systems
- Competing laws and policies
  - ◆ transfer if “necessary or legally required” use in legal claims
- Vital interests of data subject
  - ◆ Must be “vital”
  - ◆ Narrow exception

## Art. 26 Exceptions (cont.)

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- Transfers from public registers
  - ◆ Fewer public records in E.U.
  - ◆ Publicly known not enough

# Companies stuck in middle:

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- If strict, then expensive compliance
- But, limited enforcement staff
- Adopt policy of non-compliance?

# Example Early Targets

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**AT&T**

**American Express**

**Andersen Consulting**

**Bayer**

**Cable & Wireless**

**Cap Gemini**

**Chase Manhattan**

**Citibank**

**Coca Cola**

**Disney**

**EDS**

**FBI**

**Ford Motor**

**Hilton**

**Marriott**

**Microsoft**

**Monsanto**

**Motorola**

**Procter & Gamble**

**Shell**

**United Airlines**

**VISA**

# International Privacy Standard

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## Prospects for an International Standard for the Protection of Personal Information

- The Globalization of International Data Transfers
- The European Union's Data Protection Directive: A De Facto International Standard
- The Implications for International Data Transfers

# International Privacy Standard

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What is needed:

- Universal Respect
- Reliable, Flexible and Harmonized Conformity Assessment
- Mutual Recognition of Conformity Assessment Procedures
- A System for International Auditor Accreditation

# International Privacy Standard

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- A Process for the Tailoring of Codes of Practice
- A Process for Publicizing Privacy-Friendly Practices
- A Clear Understanding of the Relationship between the Standard and Law
  
- Colin J. Bennett  
Associate Professor  
Department of Political Science  
University of Victoria

# International E-Commerce Standard

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VIENNA, July 14 (Reuters) - Europe's leading Internet service providers will meet in Brussels next week to launch a coalition that will promote industry codes of conduct, a senior executive at AOL Bertelsmann Online said on Tuesday.

# International Control of Internet Names

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"Brussels Welcomes US Plans for Control of Internet Names" Financial Times (11/06/98) P. 4; Buckley, Neil

The European Commission has approved U.S. reformation plans for the governance of the Internet address and naming system. The U.S. proposal suggests that the board of the Internet Corporation for Assigned Names and Numbers (ICANN) be made up of international directors, a concept that pleases the EU very much, wrote Bangemann.

# Leading Indicators, Events, Players & Market Potential

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- Corporate gathering of personal information
  - ◆ Out of Control
  - ◆ Under Investigation for Continued Abuses
  - ◆ Globally coming under new management
  
- Rising identity fraud, with little or no redress
  
- FTC finds corporate self regulation “lacking”
  
- OCC Official Warns Banks: Respond to Consumer Privacy Fears

# Leading Indicators, Events, Players & Market Potential

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- No uniform vehicle for trusted identity is available
  - ◆ People need some form of ID or controlled digital persona
  - ◆ Internet is ‘at your own risk’
- No readily available technology or comprehensive laws which give the consumer effective compulsory right of
  - ◆ “Informational Privacy”
  - ◆ “Informational Self-Determination”
- However! Events and change is coming

# Events

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## European Union Data Protection Directive

The European Union's comprehensive privacy legislation, the Directive on Data Protection, which became effective on **October 25, 1998**, prohibits the transfer of personally identifiable data to third countries that do not provide an "adequate" level of privacy protection.

# Events

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## International Safe Harbor Principles Published

11/04/98 . . . to minimize the uncertainty that has arisen about the Directive's effect on transborder data transfers from the European Community to the United States . . . discussed creating a safe harbor for U.S. companies that choose **voluntarily** to adhere to certain privacy principles.

# Events

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## International Safe Harbor Principles Published

- All fifteen Member States would be bound by the Commission's recognition of the safe harbor principles as adequate;
- The scope of any legal action by European citizens contesting data transfers under the Directive would be narrowed to alleged noncompliance with stated practices rather than addressing adequacy of the safe harbor privacy principles;

# Events

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## International Safe Harbor Principles Published

- In those EU Member States that require prior approval before data transfers can occur, organizations that belong in the safe harbor would either not have to seek such approval or would, as a general rule, have their applications automatically approved;
- The organization would have access to streamlined and expedited procedures in the event of a dispute; and

# Events

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## International Safe Harbor Principles Published

- A grace period for safe harbor participants to give them time to implement the principles.
- Principles
  - ◆ Notice
  - ◆ Choice
  - ◆ Onward Transfer
  - ◆ Security
  - ◆ Data Integrity

# Events

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## International Safe Harbor Principles Published

- Principles (cont.)
  - ◆ Access
    - ◆ access to information about them derived from non public records . . .
    - ◆ reasonableness of access depends . . .
    - ◆ used for substantive decision-making purposes that affect that individual

# Events

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## International Safe Harbor Principles Published

- Principles (cont.)
  - ◆ Enforcement
    - ◆ Effective privacy protection must include mechanisms for assuring compliance with the principles, recourse for individuals, and consequences for the organization when the principles are not followed.

# Events

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## International Safe Harbor Principles Published

- Principles (cont.)
  - ◆ Enforcement
    - ◆ (b) systems for verifying that the attestations and assertions businesses make about their privacy practices are true and privacy practices have been implemented as presented; and

# Events

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## International Safe Harbor Principles Published

- Principles (cont.)
  - ◆ Enforcement
    - ◆ (c) obligations to remedy problems arising out of and consequences for organizations announcing adoption of these principles and failing to comply with the principles.
    - ◆ Sanctions must be sufficient to ensure compliance by organizations and must provide individuals the means for enforcement.

# Events

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**S. 2326. Children's Online Privacy Protection Act of 1998.** introduced by Senators Bryan and McCain to protect children's online privacy.

To require the Federal Trade Commission to prescribe regulations to protect the privacy of personal information collected from and about children on the Internet, to provide greater parental control over the collection and use of that information, and for other purposes.

# Events

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**HR 49. Postal Privacy Act of 1997.** To amend title 39, United States Code, to prevent the United States Postal Service from disclosing the names or addresses of any postal patrons or other persons. Introduced by Condit (D-CA) on 1/7/97. Condit **statement.** Referred to the Committee on Government Reform and Oversight. Referred to the Subcommittee on Postal Service.

# Events

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**HR 52. Fair Health Information Practices Act of 1997.** A bill to establish a code of fair information practices for health information, to amend section 552a of title 5, United States Code, and for other purposes. Introduced by Rep. Condit (D-CA) on 1/7/97. Condit [statement](#). Referred to the Committee on Commerce, and in addition to the Committees on Government Reform and Oversight, and the Judiciary. Referred to the Subcommittee on Human Resources. Referred to the Subcommittee on Health and the Environment. Referred to the Subcommittee on Crime.

# Events

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**HR 306. Genetic Information Nondiscrimination in Health Insurance Act of 1997.** A bill to prohibit discrimination against individuals and their family members on the basis of genetic information, or a request for genetic services. Introduced by Slaughter (D-NY). Slaughter [statement](#). Referred to the Committee on Commerce, and in addition to the Committees on Ways and Means, and Education and the Workforce. Referred to the Subcommittee on Health and the Environment. Referred to the Subcommittee on Health. Referred to the Subcommittee on Employer-Employee Relations.

# Events

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**HR 341. Genetic Privacy and Nondiscrimination Act of 1997.** A bill to establish limitations with respect to the disclosure and use of genetic information. Introduced by Stearnes (R-FL) on 1/7/97. Referred to the Committee on Commerce, and in addition to the Committees on Government Reform and Oversight, and Education and the Workforce. Referred to the Subcommittee on Health and the Environment. Referred to the Subcommittee on Human Resources. Referred to the Subcommittee on Employer-Employee Relations.

# Events

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Health Insurance Portability and Accountability Act (Public Law 104-91, 110 Statutes 1936 (1996)), known to its fans as “HIPAA”) has created an undercurrent of vague anxiety for many in the health care information technology (“IT”) community. We’ve all known that HIPAA requires the U.S. Department of Health and Human Services (“HHS”) to write IT security regulations, which HIPAA will give real teeth in the form of penalties per violation of up to \$250,000 and five days in jail. What hasn’t been clear is the kinds of measures HHS will require, and therefore what kinds of expenditures and activities affected organizations will be required to make to comply.

# Events

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## Health Insurance Portability and Accountability Act (Public Law 104-91, 110 Statutes 1936 (1996))

The other shoe has now dropped. On August 12, 1998, almost six months after they were due, HHS issued proposed rules implementing Security and Electronic Signature Standards for HIPAA. These draft regulations are part of HIPAA's comprehensive program requiring the use of electronic data interchange ("EDI") for the processing of health care financing transactions. . . . For this reason, HIPAA has been called "health care's other Y2K problem."

# Players

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- US Federal & State Entities
  - ◆ DOC
  - ◆ FTC
  - ◆ OCC
  - ◆ FCC, HHR
  - ◆ Administration
  - ◆ Congress, Senate
  - ◆ State Legislatures, County Agencies, . . .

# Players

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FTC

Children's On-line Privacy Protection Act (S.2326)

To require the Federal Trade Commission to prescribe regulations to protect the privacy of personal information collected from and about children on the Internet, to provide greater parental control over the collection and use of that information, and for other purposes.

# Players

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## DOC

David L. Aaron, undersecretary of commerce for international trade argues that the U.S. does have effective privacy protections and has been negotiating with the European Commission to establish a safe haven for U.S. companies that adhere to a set of privacy principles and practices. Mr. Aaron said this week that an agreement may be reached by mid-December. October 26, 1998

# Players

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OCC

"The on-line environment gives rise to a new set of risks which banks must learn to manage effectively if they are to maintain customer confidence and assure the development of safe and sound electronic banking systems,"

said acting Comptroller of the Currency

Julie L. Williams

# Players

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OCC

"Privacy is clearly an issue that American consumers care about," she added. "Given what we know about the level of consumer anxiety about privacy, when this issue is handled well, it could become a powerful marketing tool and an important source of customer loyalty."

said acting Comptroller of the Currency

Julie L. Williams

# Players

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OCC

"Ms. Williams said too many banks have not complied with the letter or spirit of a provision in the Fair Credit Reporting Act that allows consumers to "opt out" of having their confidential information shared. "We can find too many disclosure statements that lack specificity, clarity, and simplicity," she said.

Comptroller of the Currency

Julie L. Williams

# Players

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- EU Entities
  - ◆ European Commission Delegation to U.S.
    - ◆ Ambassador Paeman
    - ◆ Gerard de Graaf
  - ◆ Article 31 Committee
  - ◆ Article 29 Working Party
    - ◆ Peter Hustinx, Chairman
  - ◆ National Data Protection Authorities
    - ◆ Peter Hustinx, John Borking (Netherlands)

# Players

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- Industry Associations & Privacy Advocates
  - ◆ Coalition of Service Industries
    - ◆ Citibank, Bank of America, Experian, . .
  - ◆ Direct Marketing Association
  - ◆ EPIC, Privacy International, . . .
  - ◆ Privacy & American Business
    - ◆ Insurance, Pharmaceutical, Financial Services, Computer Makers, Software
    - ◆ Model Contract Project

# Players

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- Seal Programs
  - ◆ TRUSTe
  - ◆ BBBOnline
  - ◆ WebTrust

# Emerging Privacy Market

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- Governments world-wide establishing rules of the road regarding trafficking of citizen data
- Products enter Internet market to prevent 'surveillance' i.e., unwanted data gathering, collection and trafficking
- Company online advertising is stymied by lack of effective means to reach targeted audience and are seeking to negotiate customer data for value in return, (free email, web, community, chat . . . )

# Emerging Privacy Market

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- Privacy Brokers (American Banker)

**What is a privacy broker?**

# Privacy Authority

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*from*

**Managing “Financial” Assets**

*to*

**Managing “Informational” Assets**

# Emerging Privacy Marketplace

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- Information Asset Management
  - ◆ Trusted Information Utility™
  - ◆ Trusted Network Community™
  - ◆ Personal Information Banking & Brokerage

# Trusted Information Utility™

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- Consumers directly contracted and provided protection and value in return for regulatory compliant use of personal information
- Personal Information Agents with embedded attribute certificates assert 'trusted' facts (Demographics, . . . ) with rule-based consumer command and control (informational self-determination)
- Bank is Trusted Intermediary

# Trusted Information Utility™

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- New Digital Identity Services and Agent-based Technologies Empower Trusted Consumer-to-Consumer, Consumer-to-Merchant Interaction satisfying multiple needs: accountability, controlled identity, controlled anonymity.
- New Online Advertising Services: Trusted Interaction Marketing™ for Individual and Aggregate Processing of Merchant-to-Consumer Interactions

# Trusted Information Utility™

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- Protect Personal Information as a Vital Economic and Social Resource
- E.U. Directive and Other International Privacy Standards Compliant
- Regulatory Compliance: Independent Audit and Strong Enforcement Mechanisms (strongly managed technology license with independent monitoring)

# Trusted Information Utility™

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- Next Generation Information Service Entities: Trusted Information Utilities™
- Trusted Information Service Entities (Credit Reporting Agencies, Banks, Manufacturers, others) source their customer data repositories with new Trusted Information Utilization contracts with regulatory compliant audit and enforcement methods
- Regulatory compliant use of consumer data in Online Environments: Trusted Network Communities™

# Trusted Information Utility™

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- Regulatory compliant use of consumer data in Online Environments: Trusted Network Communities™
  - ◆ Disney Online/Infoseek
  - ◆ Yahoo/GeoCities
  - ◆ Lycos/Tripod

# Trusted Network Community™

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- Personal Information Agent®
- Digital Identity Services & Products
- Strongly Authenticated Access & Control
- Consumer @Will Command & Control w/  
Negotiated Value in Return
- Security, Access, Notice, Enforcement, . . .

# Trusted Network Community™

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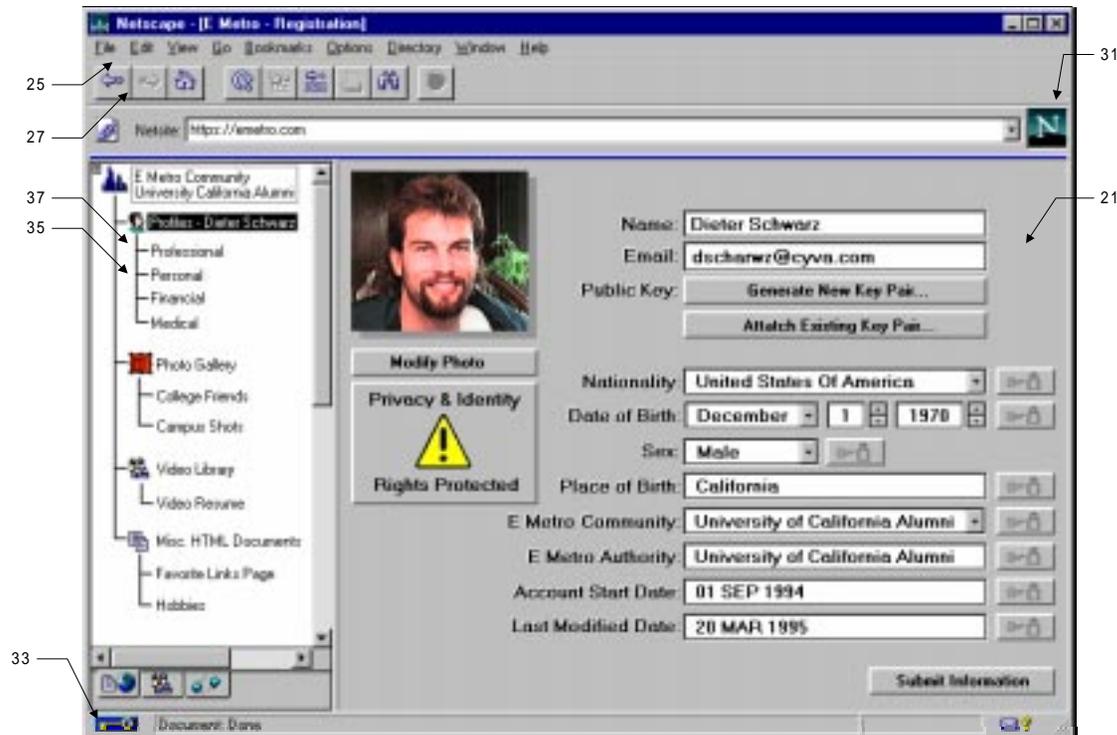
- Trusted Information Utility™ Technology & Security Infrastructure
- Trusted Interaction Marketing™ for Electronic Commerce
- E.U. Directive and Other Privacy (OPA, BBN, TRUSTe, WebTrust) Policy Compliant
- Regulatory Compliance: Independent Audit and Strong Enforcement Mechanisms

# New & Coming Infrastructure

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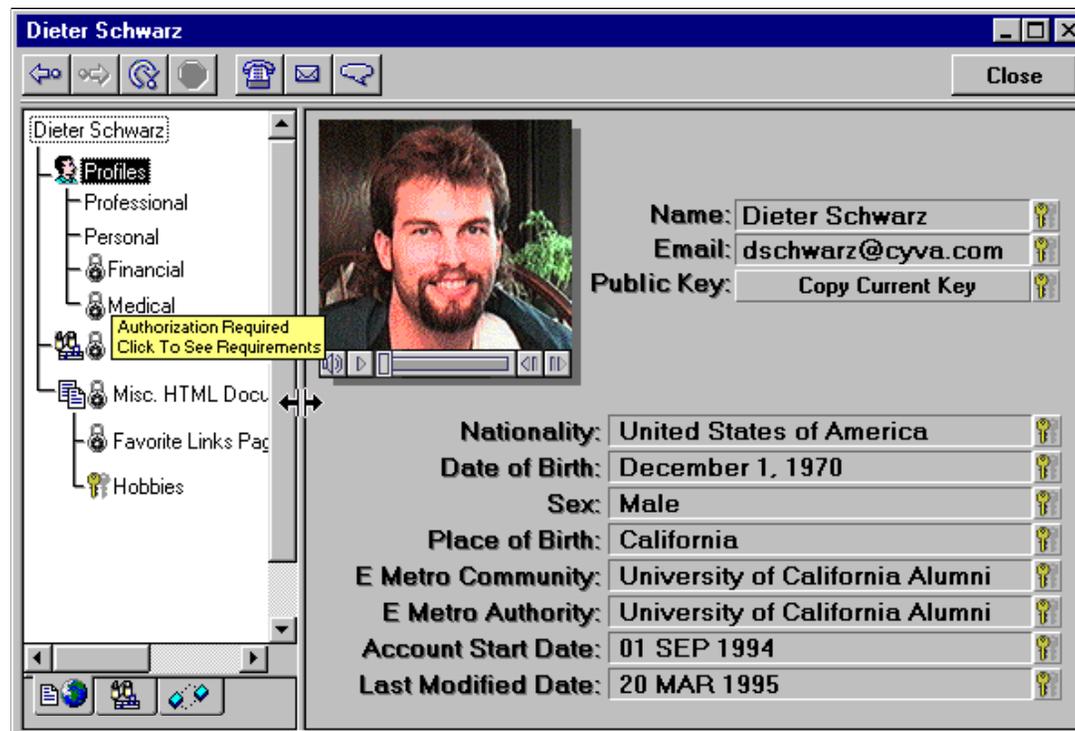
- Leverage emerging issuance of digital IDs
- Emerging technologies
  - ◆ Personal Information Agents®
  - ◆ Digital IDs
  - ◆ Smart Cards
  - ◆ Wireless Internet Devices
  - ◆ Internet Appliances

# Personal Information Agent®

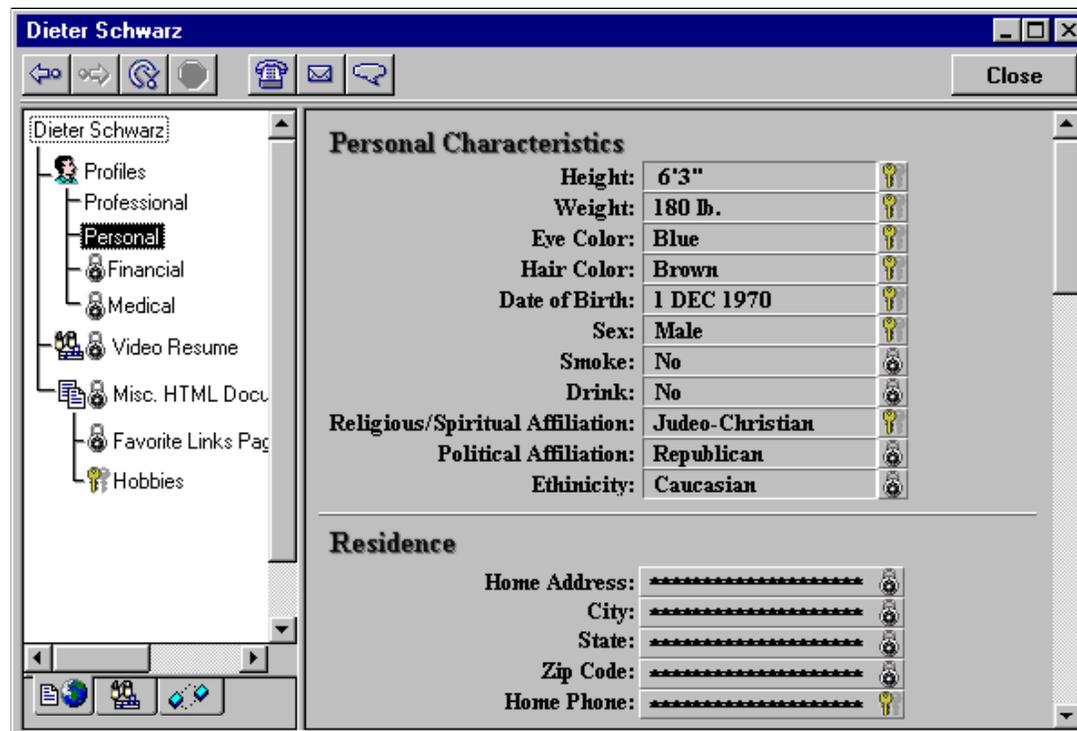


# Personal Information Agent® @ Work

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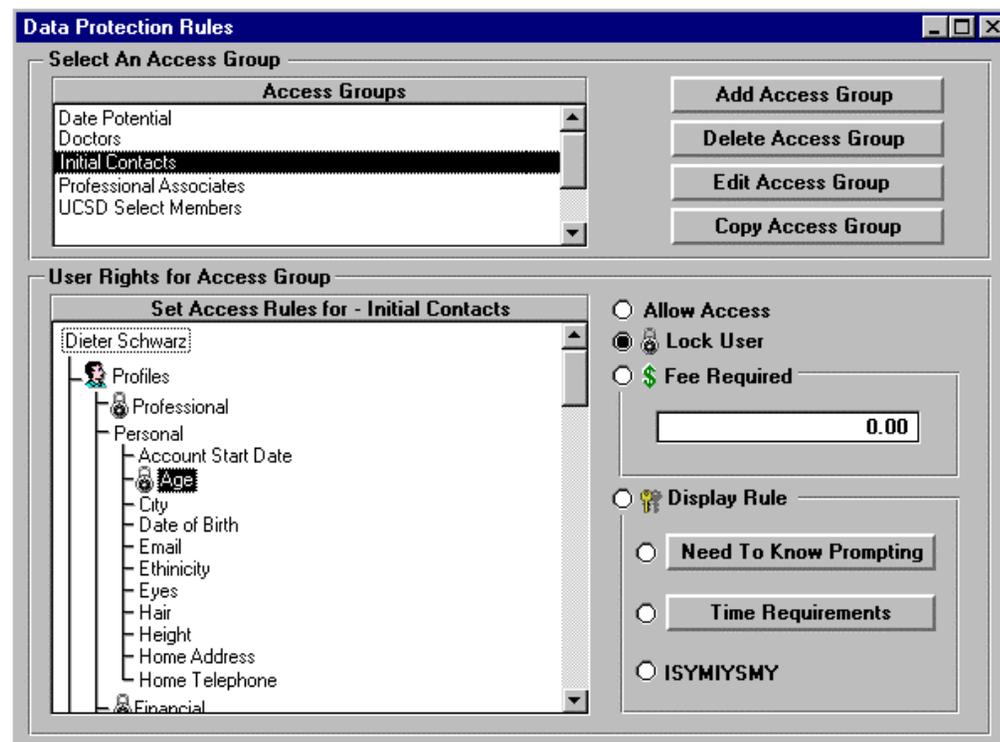


# Personal Information Agent® @ Work



# Personal Information Agent® Rule-based Access-Control

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# Strategic Services & Proactive Business Development

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- Proactive Development of a Privacy Marketplace
- Create Newly Empowered Industry w/ Appropriate Government Oversight
- Information Utility Consortium (Partnership of Industry & Government)

# Strategic Services & Proactive Business Development

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- Information Utility Act of 1999
- Information Utility State, Federal, and International Regulatory Standards

# Strategic Services & Proactive Business Development

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- Challenge: Innovate and join the market makers or play the agonizing game of catch up
  - ◆ Amazon vs. Barnes & Noble/ Wal-Mart
  - ◆ "Clearly, Amazon.com has targeted a specific combination of individuals for their expertise and inside knowledge of Wal-Mart's distribution, data warehousing, and merchandise management systems."
  
- Online Medical Repository (50,000 members)

# Strategic Services & Proactive Business Development

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"Storing Medical Records a Healthy Web Use"

Investor's Business Daily (11/03/98) P. A1;

Newsome, Melba

A free filing service found on the World Wide Web allows people to consolidate their personal and family medical data in one central location. Medical-Record.com, which has been online since June and has a membership of 50,000, claims to be the first online business to offer such a service.

# Strategic Services & Proactive Business Development

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"Storing Medical Records a Healthy Web Use"

Investor's Business Daily (11/03/98) P. A1;

Newsome, Melba

Women, families, seniors, and travelers have found the service especially popular, says founder Edward Kriese. Kriese says the service is particularly helpful for keeping records available in the event of a medical emergency.

# KPMG Information Privacy Services

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- Information Privacy Risk Analysis Services
- Information Privacy Assurance Services
- Information Privacy Solution Services
- EU - US Data Protection and Privacy Symposium

# CYVA Research Corporation Technology & Service Models

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- CYVA Research Corporation
  - ◆ Personal Information Agent®
  - ◆ E-Metro® “the Electronic Metropolis”
  - ◆ Trusted Information Utility™
  - ◆ Trusted Network Community™
- Patent pending
- Trademarks
- License

# Primary KPMG Contacts

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