The Exchange Mechanics of the Privacy Obligation Document (POD)
Where PODs Come From

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Demo by Lisa
SDPC Resource Registry

STEP 1: Is this a new request with a signed contract in place?

No, we have no agreement. Yes, we have a signed agreement.

STEP 2: SELECT the Agreement Type

Originating Agreement Type Finder:
Enter a Resource Name (As you type, suggested resources from the database will be displayed. Click on the desired suggested resource once it appears.):

Search

- National Agreement (NDPA)
  - This is the adopted National Standard Agreement with no modifications.
  - What is an originator? What is a subscriber?

- National: Vendor-Specific Agreement
  - This is a NDPA that has been modified and adopted by a vendor.

- MSPA Standard Agreement
  - This is the adopted Alliance Standard Agreement with no modifications.

- Vendor-Specific Agreement
  - This is the standard alliance agreement that has been modified and adopted by a vendor.

- Other Agreement Types
SDPC Resource Registry

Internal Fields
- Requestor
- Requestor's Email
- Paid By
- Cost
- Requires Media Release? (Yes)

Other Information
- Notes:

Continue
Auto Exhibit E Creator

Below is a listing of all statewide Exhibit Es for the state of Massachusetts. Note: Do not create an Exhibit E unless your district is currently using the resource.
Privacy APIs

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Original Mandate

- Just Move all the Data
  - Small database at the time
  - Didn’t have many users
  - Was seized on as a learning opportunity
- Result:
  - Only does one thing
  - Web page like
  - Awkward authentication
  - Became popular
  - Did Not Scale
Example
In Progress

• Filter by State
• Filter by District
• Changes Since Functionality
  1. Get the current timestamp at login
  2. Get all the desired data
  3. Get the next timestamp at login
  4. Use the current timestamp to get all the new and updated data
  5. Make the current = next
  6. Repeat starting with step 3

• Updated Documentation
Future

• Non-Production Pilot Project with McGraw Hill & CedarLabs
• Already Tackling
  • Issues with the documentation
  • Non-member access to a POD
  • Awkward authentication
Performance

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Performance issues at scale

- Adding resources did not help
- Initial work focused on decreasing DB load:
  - Query optimization
  - Fixing and adding indexes
  - Converting to more performant data types
  - Implementing database side pagination
- In test environment, this fixed the issue.
- Production… disagreed.
Performance issues at scale

- The API was to blame
- Hourly pulls were overlapping
- 500x increase with caching and indexing

Improvements still to be made but it can scale
Through the Global SIF Infrastructure

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The journey of a thousand miles begins with a single step...

- SIF Infrastructure support for Data Protection Services is vast
- Hundreds of person-hours spent across continents
- Lots of use cases with lots of implementation details
- But…let’s just start with:

  “Does this app agree to their obligations?”
Hand-waving Commences

• The contract version *is known* by both parties

• Data Privacy Marker asserts what the consumer agrees to
  • *http header: dataprivacymarker*

• Must be present and match expectations in every request
How the pieces fit

1. Request data
2. Lookup service validates PODs
3. Data requested from source
4. Raw data returned
5. Filter data using POD
6. Filtered data returned

POD Pilot

Data Processor (Consumer) e.g. State of MA

Data Controller (Provider) e.g. school or district

POD Enabled Data Hub

POD Privacy Services

POD Enforcer

POD lookup

POD object 1

POD object 2..
For (much) more information…

- Exhaustive infrastructure support:

- Takes away the “hand-waving” configuration

- Support for events

- Field-level redaction

- POD Structure