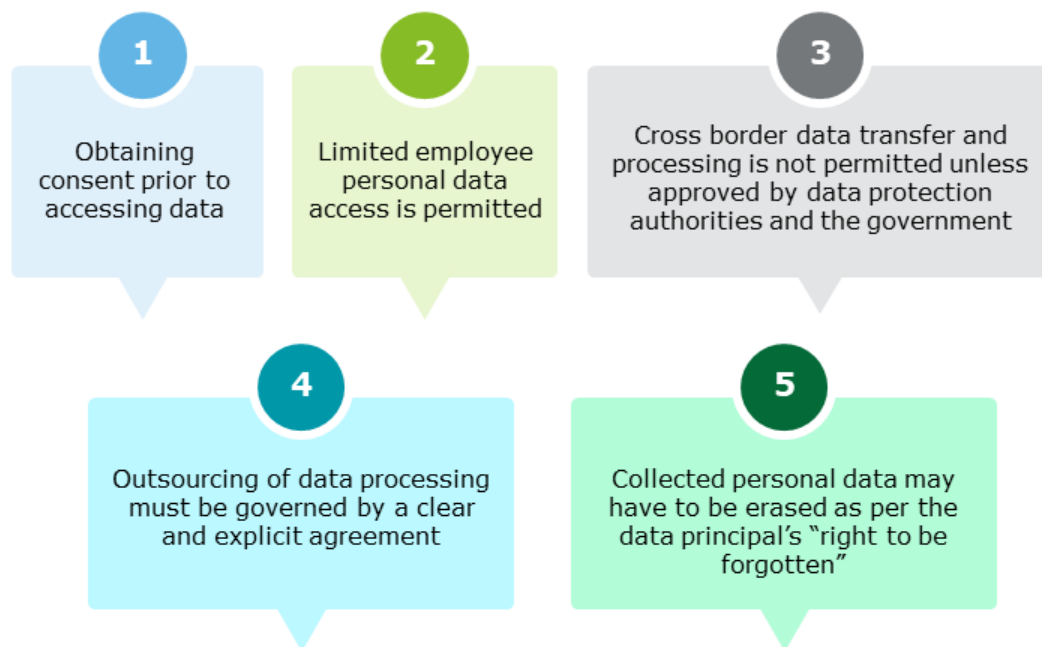


#7: Implications of the Personal Data Protection Bill, 2018 on fraud risk management

Some thoughts on the impact of the propositions made under the Bill in context of fraud risk management/ investigation



While this Bill may finally allow individuals the right to own and manage their data and its use, it is likely to pose a challenge for organisations attempting to manage the risk of fraud through risk assessments, investigations of noncompliance/ misconduct and on legal proceedings, whether criminal or civil where an individual's data may have been reviewed for the purpose of such initiatives.

Currently, many organisations are considering seeking a blanket consent from employees on access to data on company provided assets. While this may be suitable for some organisations, others may find it limiting, especially in cases where a Bring Your Own Device (BYOD) culture is encouraged and the lines between official work and personal work are blurred. Perhaps the Bill needs to address this. Until then organisations would need to find an approach that strikes a fine balance between seeking data and maintaining employee trust.

