

## Kristina Podnar, Digital Governance

### Advisor

#### Cultivate Innovation within a Policy Safe Zone

Kristina discusses the evolution of GDPR and is surprised by the readiness ratio of global multinationals to small and medium enterprises. She draws a clever analogy of digital policies as a backyard boundary: a safe space to be creative in not a restrictive yoke. For women in cyber, she feels the landscape is changing and exhorts everyone, regardless of gender, nationality, or race to go for it and get things done.

03:49 GDPR isn't a doomsday, and the enforcement and evolution of the regulations are likely to be slow and steady.

05:40 Global multinationals haven't got their GDPR act together, despite a huge spend, but small to medium enterprises have.

10:32 Digital policies offer so many more opportunities than risks or compliance issues.

12:16 Digital policies as a backyard boundary. Boundaries create a safe space to be creative within. And in that creativity lies the competitive advantage and value to organizations.

13:30 Policy implementation should be the responsibility of just one person. Clear and delegated authority is essential, and there is value in an outsider's approach.

16:40 Policies protect against pain. They can shape best practice and keep enterprises within the law, but really it's about strategy.

19:03 Addressing the multigenerational aspect within enterprises

20:22 Younger generations are demanding more authenticity in their digital interactions. Bot or not.

24:31 On gender diversity in cyber, it's a changing landscape. Don't be afraid to own your space and learn because you can be the best.

26:01 Go for it and get things done

Ashwin Krishnan: [00:00:01] With me today on the UberKnowledge podcast is a good friend and digital policy expert, Kristina Podnar. Kristina, why don't you introduce yourself to the audience, and then let's dive right in.

Kristina Podnar: [00:00:14] Great. Thanks so much, first of all Ashwin, for having me here. I think I've said this to you several times, but I'd rather be right here than anywhere else in the world and I probably should be paying you for this time. It's just a lot of fun to be with you, so thanks for having me.

[00:00:29] In terms of my background, a little bit of a strange background I guess, in some ways. My journey in the digital space began back in the late 90s and I worked at a dot.com. And I think it was my first job that I had that was really seriously dotcom-ish, digital-centric. I came home after the first day of work, and I cried because I had come to work and I was told I would have to not do really cool management stuff — which was a shock to me because I was somebody with the title of a project manager — but I would actually have to code ColdFusion, and I'd have to write some HTML, I'd have to cut up PSD, and do all the things that we did to hand-code HTML pages back in the late 90s.

[00:01:17] But as luck would have it, I got good at that. And over time I got smarter, in the sense that I realized we were doing some crazy things in the web space at the time — it became digital space later on — and realized that we were doing really, really crazy stuff. Doing things like not having backups to client website files, critical files, sending credit card numbers through clear text FTP to banks for processing, just things that seem a little bit out there. And I really evolved. I evolved through watching and learning, and realizing there has to be a better way, and one better way is through digital policies. So, really early on, I started dabbling in the governance space, doing a lot of consulting and starting to develop ways for organizations to leverage policies, not just as a way to

comply with laws or regulations or keep themselves safe by not doing things like passing credit cards through clear text files, but really a way to harness digital policies for innovation, for digital competitive advantages to the organization and to the business. I really have enjoyed consulting with organizations over the last 20 years, helping them define their digital governance framework and what they're doing inside their organization to differentiate themselves from the competition. So that's what I do.

Ashwin Krishnan: [00:02:37] Awesome. We have fertile hunting ground here on a variety of different topics. But let's start with something that you and I collaborated on almost a year ago, which was an article for Entrepreneur Magazine on the topic of GDPR.

Kristina Podnar: [00:02:51] Oh, yeah!

Ashwin Krishnan: [00:02:53] So, it's been slightly shy of a year since the policy actually went into effect. Given your consultant's experience, let's fast forward to May 25, 2019. If you were to look back, what have you seen pan out which you knew would happen once GDPR went into effect? What were some of the surprises that either were unanticipated or definitely were not in the playbook? And what are some of the ramifications of GDPR that were not as defined, but they've actually had a positive effect. So, I'm just kind of looking back in the rearview mirror. What were some of the anticipated happenings, unanticipated negative consequences, and the unanticipated positive consequences?

Kristina Podnar: [00:03:49] Right. I think that just in general at a macro level we've seen what we thought we would see. There was a lot of panic, as you remember, leading up to May 25th. And one of the reasons that we co-wrote the article was to really say, "Look, May 25th isn't doomsday. Nothing crazy is going to happen. The sky's not going to fall down on us, but it is a change going forward in terms of how we're going to operate in the digital space." And I think we've started to see that. It hasn't been an overnight shift, and it won't be an overnight shift, but what we have seen is movement. I equate it a lot to digital

accessibility, online accessibility; accessibility is a regulatory requirement in many countries, including the United States. But it's taken years and years, we're talking decades, the bill was, I think, signed in 19... I'm not going to try and remember the exact date, but at least two decades ago. You know, more than that actually since it's gone into law, and so it's really taking us at least that long to understand what accessibility means in the digital space. I think that privacy and protection and GDPR and variations of GDPR around the world are going to be much the same way.

[00:05:02] We've certainly seen the first fines and the first letter threatened. The first fine being, of course, the Google \$57 million fine that came out recently. We saw the first letter come out to a non-EU company. We saw a letter go out to AggregatIQ, which is a Canadian company, from the ICO in the U.K. So, we're starting to see some enforcement, not a ton but some, and I think that this is how we're probably going to see things evolving over time. We're going to see slow and steady rather than really the big bang effect. So that's, I guess, what was anticipated, or what we thought was going to happen that has come true.

[00:05:40] I think along the lines of the surprising pieces, there's also the unsurprising parts. A lot of the global multinationals that I've worked with around digital policy haven't been able to get their act together enough to get GDPR done, which is surprising because I've seen price tags of three to five million dollars being spent on GDPR compliance, and they have nothing to show for it yet. That's not a good ROI, and I tend to question not just where the compliance people are but really where are the CEOs because it's such a fiscal investment. I know for some multinationals it's not a ton of money but it's significant. Who's asking where are we in the evolution of this process and where are we in terms of adoption?

[00:06:22] So that's a little bit of a surprise to me that those large organizations haven't necessarily gotten as far as I thought they would. Some haven't really snapped to grid, but I guess that's a bit of a mixed bag. The thing that's really surprising to me perhaps, and I don't think you and I have talked about this, is in

the US I've started to see a lot of adoption of GDPR especially with small to medium organizations.

Ashwin Krishnan: [00:06:45] Wow. OK.

Kristina Podnar: [00:06:46] Yeah, right! That's exactly kind of the reaction I had. I started getting calls to do my GDPR workshop and I've been working with a really good number of small and medium organizations. The smallest of which is five employees, all five employees are based in the United States or one in Canada. Not only are they going for GDPR, Ashwin, but they are looking to adopt GDPR principles for every user that they interact with whether inside or outside of the organization, regardless of where they are in the world.

Ashwin Krishnan: [00:07:22] Interesting. Now that resonates with me because there's another similar organization and I was surprised that they were saying they had looked at the implications of distinguishing between an EU and a non-EU person, but it was not worth it. So, they said let's treat everybody like an EU person and go full-fledged with GDPR. I'm not surprised by that reaction, but that's really interesting to note that the smaller organizations have gone the whole hog.

Kristina Podnar: [00:07:51] That's right. And you know in this specific case, I can't speak to all the small organizations out there, but this particular one that I'm thinking about, it's a fascinating landscape for them. I would have thought that they would have decided to do this because it was a technically easier solution for them. But it has nothing to do with technology. When I spoke to their CEO and I asked, "Why do you want to do this?" His answer was, "Why would we not." And I was like, "OK, you've got this dialed in." It's been quite an experience for me to be able to interact with them and to see how they're going about GDPR compliance. Obviously, they have this in their DNA; it's part of their organizational culture. They weren't doing anything super crazy around privacy before because people who have that kind of intent don't do super crazy things. So for them, it's been more of a clean-up job and getting into some of

the details and making sure that they close the gaps. But it's been a really rewarding experience because I keep thinking to myself, look if a company that has five employees can get this done and it can be a focus for them, then it certainly ought to be doable by large-scale enterprises that have so many more resources they can tap into.

Ashwin Krishnan: [00:09:03] Yeah, absolutely. That's actually a good segue into one of the questions I want to ask you. Have you also seen — again this is a broad-based question, so clearly, I think the answer is going to be different based on the location and the demographics as well as the size of the company, but I'm going to ask it anyway: Are you seeing policy, digital policy in particular, being viewed as a competitive advantage? And if so, what in your opinion has shifted the mindset towards, "OK. This is not just a regulatory hassle that I have to do so that I am staying compliant and I don't get into Legal's bad books," but truly look at it and say, "OK, we can actually market this. We can actually talk to how I'm going to keep my customers' data secure and give the end customer control above and beyond what the policy states"? Or is that a pipe dream?

Kristina Podnar: [00:09:57] No, I don't think it's a pipe dream at all? But to answer your question, are people doing this? My answer is, yes, they are doing it, but not enough people are doing it. And I think what people are still stuck in is this really crazy whirlwind cycle thinking about policies as something that's restrictive and thinking about something that is almost a negative thing. My premise to most organizations is, yes, it's easy to look at it that way, but if we actually shift that paradigm and if we think about the opportunities that digital policies bring in, whether they are GDPR related or different aspects, there's so many more opportunities than there are risks or compliance issues. In the work that I do with organizations for example, we talk about things like creating policies that tell us exactly what the boundaries are for digital marketing content, and it doesn't have to do with privacy at all. It can deal with things like: what can we do creatively around our brand, what can we do in terms of platforms. You know it can really be any aspect of marketing communications or digital product or

service delivery. And the benefit from having policies comes from having a very clear idea of and a clear understanding of what's OK and what's not OK.

[00:11:13] I think I've told you this before, I always equate digital policies to my backyard and that's how I explained them to my 11-year-old son when he was little. I would say things like, "We have a big backyard and we have a fence. As long as you're in the backyard and you don't leave the area that's been outlined by the fence, you can do whatever you want within the backyard." So, he would do crazy things. He would grab worms and parade them around and pet them. He would actually pretend that the rake was a horse. He would play in the sandbox and throw sand all over the place, including onto my grass. He would pick the carrots out of the garden ahead of schedule. But here's the thing, he was always safe, right. Always. That's the fundamental concept of policies: it's about being safe. It's about knowing the boundaries and then being able to be really creative and have fun and do great things because the imagination and the limits of your imagination are really boundless. As long as you know what that ultimate boundary is, there's a lot of room to do a lot of creative things.

[00:12:16] That's where the competitive advantage to organizations comes from. Policies do a lot of things. They free up employees to have more time to work on projects because they don't continually have to ask things like, "Hey, is this all right? If I'm going to collect this type of data, how do I have to treat it?" It's very clearly defined. We already know what we can and can't do. It's time to get creative and really push against those boundaries and do really fun stuff. And so, I think there's a really great opportunity there. And no, we're not seeing enough organizations do that. And I think that's a failure of sorts. For organizations that are ready to do that, we're seeing incredible opportunities, but also incredible sales, incredible growth, and just really boundless opportunities out there.

Ashwin Krishnan: [00:13:02] Yeah, that's a really interesting way that you put it. It's almost like it reminds me of the phrase, "Slow down to speed up." So, within the

concept of the framework that you defined like your backyard and having clear boundaries and go crazy within those bounds, and I think that that's a great way of looking at innovation defined by policy. So, one of the quotes that I saw that was attributed to you is, and I quote you, "If policies are everyone's job, then they are no one's job."

Kristina Podnar: [00:13:31] Ah! Yes.

Ashwin Krishnan: [00:13:34] Why don't we dig a little bit deeper into that. What do you mean by that, and where have you seen this fail where there isn't an accountable person, and what is the implication of that?

Kristina Podnar: [00:13:47] Right. This is actually a symptom that happens a lot, especially in larger enterprises, although I see it a lot in a medium-sized organizations as well. What we really have is everybody thinks they're working towards the same common goal. Everybody thinks they're doing the right thing. But because there's not a single person who has visibility across all of those things, we have the opportunity for gaps. And so usually people defer to the fact, "Oh well, we have a PMO. We have a project management or program management office. They know everything that's going on." Not really. Unless you have somebody who's really paying attention to the digital landscape and really thinking, not just about those regulations or those laws and the risks that are out there, but also about the opportunities, you don't have a coordinated team underneath that because people don't actually have the end-to-end view into what is and isn't allowed in the digital space. So, a lot of times if people are paying attention to their thing, they're not necessarily asking the right questions. And I think that's where the benefit of having clear, delegated authority comes in because the person who has to ask the question is asking the question.

Ashwin Krishnan: [00:14:53] Right.

Kristina Podnar: [00:14:54] And oftentimes interesting questions, right, because they might not be a subject matter expert but they're somebody from the outside, in that they're outside of marketing or outside of legal or outside of a specific job function. So, they're asking the right questions. They're asking things like, "Oh, we're going to go into the cloud. That's interesting. I think I saw on CNN the other day when I was watching that somebody got in trouble in Europe for not doing that or not doing that correctly. Something about this thing we call GDPR. Should we be worried about that?" And so, they probably will pull in the lawyer, and they'll pull in somebody in marketing, and they'll pull in somebody from IT, and they'll pull in somebody from procurement. They might even pull in somebody from HR, if it is employee-data related. And they will get them around a table and say, "Look folks, do need to be worried about any of this stuff?" What a great opportunity to bring it all together and have a cohesive strategy, a cohesive story, and a cohesive view into what's going on. So, it can't be everybody's job, but it has to be somebody's job, and every enterprise out there needs to understand whose job it really is.

Ashwin Krishnan: [00:16:00] Yeah. And I think by doing that you're also making this particular individual out of his own organization constantly keep up with the changing laws and be able to interpret that properly for the different functions. Otherwise, imagine you're a CMO and you're trying to keep up with what the California consumer privacy act really means. You're probably not going to be spending as much time as you should. So, have you seen that also be successful, especially as you have these new laws and new regulations unfolding, having a central organization which is able to decipher the meaning of those new laws and be able to translate that in the business functions?

Kristina Podnar: [00:16:40] Yes absolutely, and where I see it working best is when they're just not focused on the laws and the regulations, but they're also tasked with considering the triggers for policies or considering the triggers for the bigger picture, if you will. And so, it's laws. It's the regulations. It's the best practices that we've learned because we've done something. Like if we took an operation to the cloud, for example, there's probably a ton of lessons learned and there's

certain things that we can actually leverage over and over again as best practice, so we don't have to feel the same pain or take the same risk over and over again. So maybe that ought to be a policy. That's just how we do things when we migrate to the cloud, for example. It's really about the laws, it's about the regulations, it's about best practices, but it's also about the strategy.

[00:17:28] So, you know, we always talk about the fact that digital is there to support the business which is really great. But whoever is looking at the policies really needs to understand where the business is going and the business objectives and how that's going to translate into the digital space, or at least understand the digital strategy so they can actually update those policies to reflect that strategy. If we decide that we're going to accept bitcoin tomorrow, we probably need to create some policies for that today or at least have some conversations. It is a lot about the laws and regulations, but it's a lot about other things as well. And I think having that one central body really creates that competitive advantage to organizations. And I've seen it work really, really well in enterprises when that happens.

Ashwin Krishnan: [00:18:13] Got it. So shifting gears a little bit, talking about demographics, especially within mid-sized to large organizations. When you have everybody represented from Gen Xs, Gen Ys, Gen Zs to millennials and baby boomers, have you seen examples of successful policy implementation, knowing for instance that maybe the younger generation doesn't really care much about email but they're into social chat big time? Do you see a relevance of policies in terms of adaptability to different demographics or is it the one size fits all? And then do you have all of these shadow digital functions that crop up because the current policies don't have any teeth?

Kristina Podnar: [00:19:03] Yes, you know it's interesting. I definitely do see the generational aspect playing into the digital policy space. I actually find this really interesting right now just because I'm working with a number of organizations that not only have employees who are multigenerational but their clients are multigenerational.

Ashwin Krishnan: [00:19:21] Interesting.

Kristina Podnar: [00:19:24] Yeah, it really is. I mean one client that I'm working with right now has stood up a chat bot just because the chat bot function really addresses the needs of the millennials in their audience. Whereas, they found that people over 37 will never interact with a chat bot, and I don't know if that's just for their specific line of business or not. I can't speak to that specific aspect, but I think it's really interesting that they've been able to dial it to that level.

[00:19:51] If we look at other public digital efforts out there, one of the organizations that jumps to mind when we're talking about something like this is H&M. H&M really started the trend of leveraging micro- and even nano-influencers in their social media campaigns, which is something that's changed. Before it used to be going for the influencers who are really well known, the stars, the football players, the soccer players, etc. What we've seen is a shift and that's a shift because organizations are looking not just for a shallow penetration and going broad, they're looking for deep penetration and almost one-on-one experiences with users. And that, I think, is being driven a lot by the newer generations rather than the older ones.

[00:20:42] The H&M example is a really good one to bring up because they've been driving the engaged consumers in their target audience. It's not only that they're saying we're doing micro- and nano-influencers and people are engaging in this small but highly engaged and active audience way, but they're doing it in a way that they can measure. H&M has developed a strategy over years, it's not something they did overnight, but they've managed to gain close to 300 — I think it's around 295 or so — engagements per mention in social media. That's a really phenomenal result not just for anybody that's in this Head of Channel, digital channel space but I think it's even a more phenomenal consideration when you're talking about a very highly competitive industry, and that's really what the clothing industry is. Things are very much changing based on the generational aspect both in terms of the audiences that we're engaging

and how we're engaging them. At least, I'm seeing a lot of organizations put a stronger foot forward in starting to take a stance in certain areas because it's something that we're getting used to with the younger generations really being more in the social space.

[00:22:00] It's sort of expected, right. I don't know if you've seen the HSBC Bank advertisements in the UK. I don't know that a lot of people have been paying attention to them, but they have these really great campaigns called, We're Not an Island. And it's interesting because these campaigns talk about really how diverse the UK is, and it's anything from a Tikka Masala to people watching American films. What's interesting is they've put together a really strong social media campaign that isn't as conservative as historically we've seen organizations be. It works really well because they're maximizing their digital investment, really using it for all it's worth, getting dialogue going. Appealing to younger people really cutting both ways with the pro-Brexit and anti-Brexit folks at the same time.

Ashwin Krishnan: [00:22:51] [Chuckles]

Kristina Podnar: [00:22:51] Yeah, they're doing it and it's great. If you look at these campaigns regardless of where you are pro- or anti-Brexit, they're kind of delivering these other nestled nuggets of good experience. Is it really about banking or is it about positive messaging and awareness and doing the right thing? I think that we're starting to see shifts in those ways, engagements that matter on a much more personal and emotional level rather than just having reach or having something that's not necessarily a bad thing, but that we can't quantify and really bring back to the business and sell it to them as a success.

[00:23:33] Very, very interesting. So, final topic, and I know this is a big thing especially in cybersecurity, but I'm sure it's there in other spheres as well, which is the diversity or the gender gap that exists. So, if you were to look back on and clearly you have two decades of experience under your belt and you've been through a lot. But if you were to be addressing the next generation, let's talk

about high schoolers or undergrads, what advice do you have for them in terms of why they should be choosing the space of policy, governance, security, privacy? Why, from a career choice, that matters, but also some learnings that you've gained working through a male-dominated industry and what are some of those key tips that you would want to share with the next generation?

Kristina Podnar: [00:24:31] Ashwin, this is where I'm going to actually quote somebody who is on this podcast with me and is very smart in terms of saying, "My single best advice is just go for it. Take the risks and just go for it." I've been very fortunate in my career that I've been given great opportunities, and honestly, I remember the first 10 years or so of my career working in very heavily male-dominated environments. It's interesting to me because I actually don't have negative stories to tell. I ended up working in this male-dominated environment, I learned a lot. I learned to carry myself in that environment, definitely to a point where I could do things just as well if not better than some of my male colleagues. I could actually lock down a server to NIST standards. I could develop Java beans when I had to do that for a commercial platform. There's a lot of things that I learned to do. And I think when I say, go for it, I mean, go for it, as in don't be afraid to be in the environment. Don't be afraid to own your space and learn because you can be the best. The dynamics are shifting. I'm seeing that every day. We're not there yet. We're not there yet because about two months ago, I was with a colleague in a room with three IT folks and when I said something like, "Hey, can we see the standards that you're actually locking down your servers to?" they looked at me like I had three heads because they couldn't understand that somebody who is wearing a dress could ask that question. Which is weird, right? It's 2019.

[00:26:01] There's still some holdouts, but it is a changing landscape. I think that's a great thing. I think that women bring a very different perspective into the privacy, into the digital space. I don't think it's good or bad I think it's just different. My thought is get in there, learn, contribute, do your thing, and show those differences because you don't have to be the same, you don't have to fit in. But what you do have to do is have a good experience, good background,

and good knowledge so that when you have those right opportunities you can step up and shine. I think that that would be the first piece of advice, and if there's a second piece that I can toss in there I would say, make sure that you're always busy learning and doing because that's what I've done. People often say things like, "If you want to get something done, give it to a busy person." I've been given a lot of things over my career, and I'm grateful for each and every one of them. But I think it's because I was always doing something, I was always demonstrating, and I think that's true whether you're male, female, or whichever country you're in. At the end of the day people like people who get things done and who get them done well. And so just go for it and be one of those people that can get it done.

Ashwin Krishnan: [00:27:17] That's a super advice. Go for it and get things done.

Kristina Podnar: [00:27:20] Exactly. That's what you tell me, right!

Ashwin Krishnan: [00:27:25] That's something that we kind of lose sight of then start second guessing ourselves. So, I think that that's really, really good advice. Thanks for your time Kristina. I know this has been a really fascinating conversation, hopefully the listeners come up with a few things that they could go and put into practice right away. I appreciate your time and look forward to future conversations. Thank you.

Kristina Podnar: [00:27:45] Thanks so much for having me. Take care.