CASE STUDY

PRUDENCE CRÉOLE COMPLIED WITH GDPR IN LINE WITH INSURANCE INDUSTRY SPECIFICS

To comply with the various regulations impacting its business the GDPR in particular—Prudence Créole was seeking to anonymize data for all its non-production environments while also complying with specific requirements of the insurance industry and system integrity constraints. ◆

The Customer

Founded in 1863, Prudence Créole is a P&C insurance company and an industry leader in La Réunion, holding 40% of the region's market share.

Prudence Créole is today a subsidiary of Generali Group, a leading worldwide insurance and financial services company that assists 61 million customers in 50 countries around the world. ◆

Background

With its 200 employees, Prudence Créole has a strong IT focus. The IT department has two main functions: **Engineering and Development, responsible for updating the management system,** and **Infrastructure/ Operations ensuring continuous availability of the information system.**

Prudence Créole's technical environment based on IBM i (aka iSeries, AS/400). The core system uses a DB2 database containing approximately 1,200 tables, for managing activities from underwriting to claims payment.
The teams utilize five environments (preproduction, production, test, training, and development).

Challenges

To complete this project, Prudence Créole needed to meet the following functional requirements:

- **Identify personal data:** Ascertain the scope of data that are likely to be personal and which would need anonymization.

- **Maintain the pricing management rules:** Ensure that the anonymization technique is consistent with Prudence Créole's pricing rules. In the insurance industry, these rules are based on a multitude of criteria, such as age, risk area, etc.

- **Maintain consistency for telephone numbers** and social security numbers which could have caused tests to fail if they were incorrectly anonymized.

- **Integrate anonymization results in a dashboard:** Improve anonymization management and demonstrate to auditors that anonymization was performed correctly.

- **Anonymize a PDF or Excel spreadsheet:** Anonymization of unstructured files was needed for additional items considered as complementary.
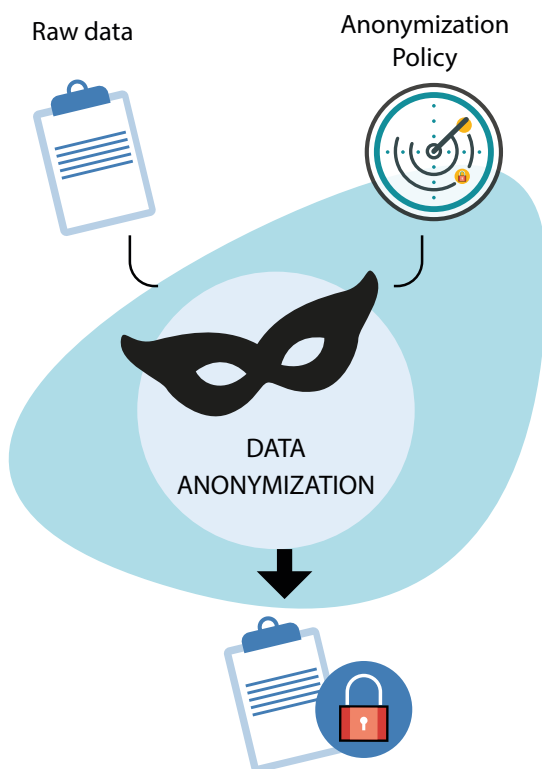
- **Maintain anonymization consistency between PDFs, Excel spreadsheet files and the structured database:** A person anonymized in the database must be anonymized the same way, whatever the environment, in order to ensure consistency.

- **Remain on premise:** Generali Group required that data be managed and maintained on site. ◆

DOT Anonymizer solution

To ensure that all requirements were met, Prudence Créole chose to implement DOT Anonymizer, including:

- *Masking of sensitive data originating* from the production environment for users lacking the authorization needed to view them (testing, training, etc.)

- *Agnostic to all data sources and DBMS*

- Automatic detection and localization *of personal and identifying data*

- Usability of anonymized data *(consistency, readability, referential integrity, etc.)*

- *Extensible* algorithm library ◆

Raw data

Anonymization Policy

DATA ANONYMIZATION

Guidelines

- Prepare well in advance: constitute the data registry

- Split the project into several sub-projects

- Ensure smooth collaboration between teams: systems/business/technical ◆

"DOT-Anonymizer is simple and intuitive to use, which enabled us to implement the solution very quickly."

Guillaume VAN DE WALLE,
Business Process Manager, Prudence Créole