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| RESEARCH ARTICLE

Privacy and Cybersecurity Convergence: GRC Controls for Data Protection

Ramchandar Rao Thallada[1]✉ and Naresh Alapati [2]

[1] *GRC Executive, Manulife, Canada*
[2] *Principal Cloud Architect, Walmart, AR*
Corresponding Author: Ramchandar Rao Thallada; **E-mail**: thalladaca@gmail.com

| ABSTRACT

The accelerated pace of digitization of enterprises and their operations has significantly increased the amount of personal and organizational data that is being stored, processed, and transmitted across interconnected systems. This change has not only increased cybersecurity and privacy threats, but data protection has become an important issue for modern-day organizations. Data protection and cybersecurity have traditionally been treated as two separate entities, with cybersecurity focusing on protecting computer systems, networks, and infrastructure from unauthorized access and cyber threats, while privacy protection focuses on the ethical and lawful handling of personal data, adhering to data protection regulations such as GDPR, HIPAA, and other data protection laws and regulations. However, this disjointed approach to data protection and cybersecurity has not only led to ineffective control, reduced visibility of data protection threats, and an increased risk of data breaches and non-adherence to data protection regulations. The Governance, Risk, and Compliance (GRC) platforms are a well-structured approach to integrating the policies of governance, risk management, and compliance monitoring into a single platform. This study aims to develop a conceptual framework for the integration of privacy and cybersecurity controls within a GRC platform to improve the overall capabilities of an enterprise in protecting its data. The study aims to show how the mapping of unified controls, risk management, and governance can help an enterprise become more resilient against cyber threats while still complying with regulations related to privacy. The findings of the study are important in advancing the overall capabilities of an enterprise in protecting its data while providing guidance to organizations seeking to enhance their overall cybersecurity and privacy through the use of GRC platforms.

| KEYWORDS

Governance, Risk, and Compliance (GRC), Cybersecurity, Privacy, Data Protection, Risk Management, Compliance, Information Security

| ARTICLE INFORMATION

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1. Introduction

The rapid pace of development and integration of digital technologies, such as cloud computing and data-centric business strategies, has significantly amplified both the amount and monetary value of sensitive data being processed and managed by modern-day enterprises. Organizations increasingly accumulate, process, and store large volumes of personal data, financial data, healthcare data, and intellectual property to drive business efficiency and innovation. Although this digital revolution has opened up fresh avenues for business expansion and achieving competitive advantage, it has, at the same time, also raised critical cybersecurity and data privacy concerns. Cyber-attacks, such as ransomware, phishing, and data breaches, have increased in frequency and complexity, targeting sensitive data and information within and about individuals and enterprises. At the same time, governments and other relevant authorities worldwide have framed stringent data privacy regulations, such as the General Data Protection Regulation (GDPR), Health Insurance Portability and Accountability Act (HIPAA), and California Consumer Privacy Act (CCPA), to protect personal data and hold organizations accountable for data protection lapses [1][2].

Traditionally, cybersecurity and privacy have been two different organizational functions with different objectives, governance, and operational processes. In most cases, cybersecurity has been focused on protecting information systems, computer networks, and infrastructures from unapproved access, cyber threats, and system disturbances. The major objective of cybersecurity has been to ensure the confidentiality, integrity, and availability of information systems and information within an organization through the application of information technology and information security controls. In contrast, the major focus of the privacy function has been to ensure that there is compliance with laws and regulations regarding the collection, processing, and utilization of personal information within an organization. Although cybersecurity and privacy functions are two different functions with different objectives, their major aim has been to provide a protective mechanism for information within an organization [3].

This division poses several barriers to organizations aiming to protect sensitive information. Cybersecurity threats often trigger violations of privacy through the disclosure of personal information, leading to legal, financial, and reputational risks. On the other hand, the management of risks related to privacy is not fully addressed without adequate cybersecurity measures to prevent unauthorized access and disclosure of sensitive information. The independent management of these functions may result in duplication of measures, inconsistency in risk management, and gaps in the management of data protection. This may cause organizations to fail to have a holistic view of their overall risk management of data protection [4][5].

This is primarily because governance, risk, and compliance (GRC) platforms provide an opportunity to address these challenges through the integration of governance policies, risk management processes, and compliance monitoring in a unified manner. This way, GRC platforms provide an opportunity to manage risks and controls in a centralized and structured manner. Thus, through the application of GRC platforms, it is possible to achieve the harmonization of privacy and cybersecurity controls in a unified governance framework. This way, it becomes possible to protect sensitive data in an effective manner.

This study proposes to provide a unified framework through the application of GRC to address the issue of integrating privacy and cybersecurity controls to improve the protection of enterprise data. This paper proposes to investigate the relationship between privacy and cybersecurity and identify the shortcomings of existing approaches to provide a conceptual framework for aligning controls, risks, and governance processes in a unified manner through the application of GRC. This way, it becomes possible to improve the effectiveness of controls and provide better visibility of risks and improve compliance while providing better resilience to cybersecurity and privacy threats.

2. Literature review

However, the growing dependence on digital systems has led to the creation of diverse cybersecurity frameworks that focus on protecting organizational assets from cyber-attacks. The most popular frameworks, such as the National Institute of Standards and Technology Cybersecurity Framework and the International Organization for Standardization's ISO/IEC 27001, offer detailed guidelines for protecting, detecting, responding to, and recovering from cyber-attacks. These frameworks highlight the significance of implementing technical and nontechnical measures, including access control, encryption, network monitoring, and incident response. The key focus of these frameworks is to ensure the confidentiality, integrity, and availability of information systems. Though these frameworks have been quite successful in dealing with system-specific security issues, they remain threat-centric and do not address privacy-specific issues.

Parallel to this, privacy frameworks and regulations have also been developed to specifically address the issue of personal data protection. Regulations such as the General Data Protection Regulation (GDPR) and privacy standards such as ISO/IEC 27701 are designed to ensure that personal information is processed in a manner that is transparent, lawful, and accountable. Unlike cybersecurity frameworks, privacy frameworks are primarily compliance-centric and focus more on the accountability of the regulation to the organization rather than the actual threats being mitigated. Though they provide comprehensive guidance on the protection of personal information, they are often considered to be premised on the presence of cybersecurity controls and are not integrated into the process of security operations [6][7].

Governance, Risk, and Compliance (GRC) platforms are a primary tool through which an institution can engage in the management of risks and compliance with regulations in a systematic and centralized manner. GRC platforms such as ServiceNow GRC, RSA Archer, and MetricStream help institutions document policies, manage risks, monitor the effectiveness of controls, and track compliance. GRC platforms are traditionally employed to address risks such as financial risks, operational risks, and regulatory risks. However, GRC platforms have expanded to include the management of cybersecurity risks and privacy risks. However, a significant number of institutions are still managing cybersecurity risks and privacy risks separately within a GRC platform, which is limiting the benefits of such an approach [8].

The existing literature emphasizes the need for the integration of cybersecurity and privacy in the context of data protection, but it is also recognized that these two areas are addressed as separate fields with separate governance, control, and compliance

infrastructures. This leads to gaps in risk awareness, which ultimately affects the effectiveness of data protection strategies adopted by organizations. The lack of a unified control model, which can bring these two areas together through a single governance, risk, and compliance infrastructure, is also recognized as a significant gap in the existing literature, which the current study attempts to bridge by proposing a combined approach to these two areas through GRC platforms [9].

3. Privacy and Cybersecurity Relationship

The two fields, privacy and cybersecurity, are related and share an overall objective, which is to protect an organization's data, but differ in emphasis, scope, and operational approach. Cybersecurity focuses on protecting an organization's information systems, networks, and infrastructure from unauthorized access, cyber-attacks, and disruptions to operations. The main objective of cybersecurity is to protect an organization's information assets from unauthorized access, cyber-attacks, and disruptions to operations, and to do this, cybersecurity uses technical and administrative approaches, such as access control, encryption, and intrusion detection systems, among others. Cybersecurity is, on most occasions, threat-driven and seeks to protect an organization from both internal and external threats that may compromise its operations. The success of cybersecurity is often measured by an organization's ability to prevent, identify, and respond to cyber threats.

On the contrary, the concept of privacy focuses on the protection of personal and sensitive information, ensuring that such information is collected, processed, stored, and shared in a way that complies with relevant legal, regulatory, and ethical requirements. The concept of privacy emphasizes individual rights, such as consent, access, correction, and deletion of personal information. The framework of privacy, such as the GDPR and ISO/IEC 27701, outlines requirements such as data minimization, limitation of purposes, lawful processing, and accountability. Unlike cybersecurity, which is primarily focused on protecting systems, the concept of privacy is primarily focused on protecting individuals and their personal information. As such, the concept of privacy is compliance-driven, ensuring that organizations are able to comply with relevant data protection laws and regulations, as well as ensuring transparency and accountability in their data handling practices.

Despite the apparent differences, it is clear that there is a significant overlap between the operational objectives and controls of both concepts, especially in the context of data protection. This is because both concepts rely on common security mechanisms such as restriction of access, encryption, and monitoring, among others, to ensure the security of sensitive information from unauthorized disclosure and use. For example, the application of encryption addresses cyber threats while also serving to enhance privacy by preventing unauthorized access to an individual's information. Similarly, mechanisms such as access control are employed to limit access to data and systems to only authorized personnel, serving both concepts of cybersecurity and privacy. This shows that there is a connection between cybersecurity and privacy, such that the former is a fundamental concept of the latter.

The distinction between the domains of privacy and cybersecurity has led to the development of operational silos that impede the effectiveness of data protection operations. The cybersecurity function has traditionally focused on the protection of infrastructure, as well as detecting and responding to cyber-related threats. On the other hand, the privacy function has emphasized compliance with relevant regulations and data governance. As cyber-attacks are now targeting personal information, the distinction between privacy and cybersecurity becomes less relevant with regard to risk management operations. In fact, there is often an overlap between the two domains in that a cybersecurity breach often leads to privacy violations, which in turn result in reputational damage to an organization.

The intersection of the two concepts of privacy and cybersecurity is fundamental for the development of a comprehensive data protection strategy. The unification of these two concepts within a single Governance, Risk, and Compliance (GRC) framework helps organizations to align these two concepts, thereby improving risk management processes and providing a clearer view of the overall enterprise-wide data protection risk profile. This helps in the effective management of both privacy and cybersecurity risks, which are generally considered two different concepts, thereby improving the overall effectiveness of risk management and mitigation for the organization.

4. Proposed Unified GRC Control Framework

In order to address the issue of fragmentation that has been noted in the handling of privacy and cybersecurity risks, the current study has proposed a Unified GRC Control Framework that integrates both privacy and cybersecurity controls within a single framework of governance and risk management. The Unified GRC Control Framework has been based on the understanding that both privacy and cybersecurity have the overarching aim of data protection, which can be better managed through the integration of both domains within a single platform of governance and risk management. The integration of both domains has been seen to eliminate issues of duplication of controls and improve the effectiveness of data protection.

The proposed framework has four different layers, namely the Data Layer, the Control Layer, the Risk Layer, and the Governance Layer. The Data Layer is the fundamental part of the framework and includes all sensitive organizational information. This includes personal information, financial information, intellectual property, and operational information. This layer is primarily concerned with the identification and classification of the organizational information based on the level of sensitivity and legal requirements. The classification of organizational information is a critical factor in determining the level of protection needed. With a clear idea of organizational information, appropriate measures can be taken to protect the most sensitive information.

The Control Layer includes the technical and administrative controls implemented to protect the data from unauthorized access, disclosure, and misuse. The controls include access management, encryption, data masking, monitoring, and incident response. In the unified framework, the controls are aligned with both cybersecurity and privacy requirements. This means a single control can be used to address multiple requirements. For example, the use of encryption addresses both cybersecurity risks such as interception and unauthorized access of data, as well as privacy requirements such as the unauthorized disclosure of information. Another example is the access management mechanisms, which ensure that only authorized individuals are able to access sensitive information. This addresses both cybersecurity risks and privacy requirements.

The Risk Layer enables the identification, evaluation, and management of risks, which encompass threats to cybersecurity and violations of privacy. In a conventional environment, the risks of privacy violations and cybersecurity threats are normally evaluated independently, which leads to fragmented risk awareness. The proposed framework aggregates these two risk types into a single risk register, which is hosted by the GRC platform. Each risk is mapped to relevant data assets and controls, which enables more accurate evaluation of the risk. The evaluation of these risks will help the organization better prioritize the mitigation of these risks, thus ensuring that controls are aligned with the organization's overall risk management strategy. Moreover, it will help the organization better comprehend how cybersecurity threats can lead to violations of privacy, which can result in regulatory consequences.

The Governance Layer provides oversight and coordination of all the various constituent layers of the framework. This includes the development of policies, procedures, roles, responsibilities, and decision-making processes relevant to data protection. The Governance Layer ensures that there is an articulation of policies related to cybersecurity and privacy requirements, as well as the implementation of these policies to meet the relevant requirements. Furthermore, there is accountability through the identification of risk management and compliance responsibilities to various roles or entities, such as the Chief Information Security Officer, Data Protection Officer, and risk owners. The Governance Layer also allows for the monitoring of controls and risks to enable an organization to take corrective actions where there are deficiencies identified in the various processes of the framework. The centralization of the framework allows for an organization to keep its initiatives aligned with its objectives.

Furthermore, the framework also defines the integrated workflow model within the GRC system, which includes data, controls, risks, and governance. Once the identified risk is associated with the respective data assets and the corresponding controls, the effectiveness of the controls is continuously monitored. In the event that the control fails, the issue is communicated to the respective governance stakeholders. This allows for continuous risk surveillance, which enables the organization to quickly address the identified risks and threats that may arise. The relationship between data assets, controls, and risks is also defined, which increases transparency and enables the organization to make informed decisions. In conclusion, the proposed Unified GRC Control Framework provides an all-encompassing and structured approach to integrating the concepts of privacy and cybersecurity within a single framework. The integration of data classification, control implementation, and risk management enables the organization to strengthen data protection and compliance, which enables the transition from traditional and ineffective methods to a proactive approach to protecting sensitive data within the organization.

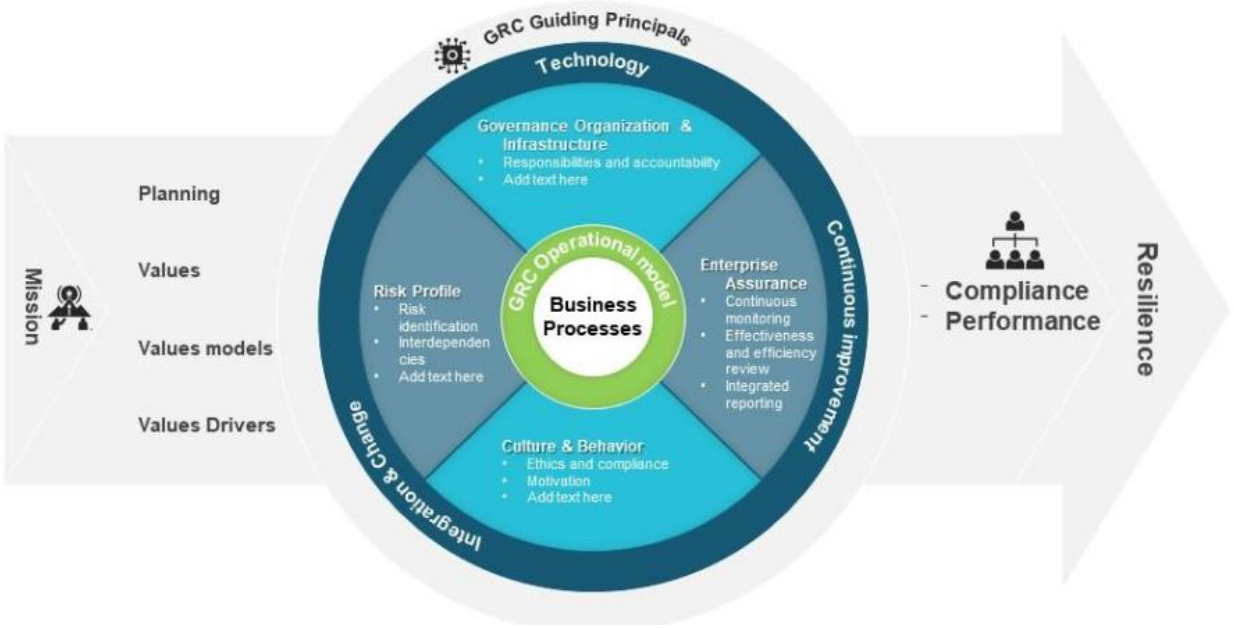

Fig 1. GRC Control Framework

The above illustration represents the operational model of Governance, Risk, and Compliance (GRC) and its role in improving enterprise resilience and compliance performance. At its core, the model highlights business processes, thus emphasizing that GRC is integrated into business operations rather than being an additional overlay. The four major components that surround the core, or center, of this model are, from the inside, governance organization and infrastructure, which defines and outlines responsibility and accountability; risk profile, which includes risk identification and risk management; culture and behavior, which focuses on ethics, compliance, and values; and finally, enterprise assurance, which focuses on continuous monitoring and measurement of control effectiveness and reporting. This is enabled by technology and guided by GRC principles, thus integrating and improving these components. This model is closely related to and supports the organization's mission, planning, and values on one side and ultimately compliance performance and enterprise resilience on the other, thus highlighting the importance of effective GRC implementation to an organization's stability, accountability, and risk management.

5. Implementation in GRC Platforms

The implementation of the proposed Unified GRC Control Framework can be realized through the implementation of modern GRC solutions such as ServiceNow GRC, RSA Archer, and MetricStream, which offer integrated capabilities to govern governance, risk, and compliance processes within organizations. The first phase of implementation involves the development and standardization of cybersecurity and privacy controls within the GRC platform. The process of developing the Unified GRC Control Framework within the GRC platform involves the development of a unified control library that integrates technical controls such as access control, encryption, and monitoring, as well as privacy controls such as data handling, consent management, and compliance. By consolidating these controls within the GRC platform, organizations are able to ensure the implementation of these controls without duplication of efforts within departments within the organization.

The next step involves the alignment of the controls with the appropriate data assets, risks, and regulatory needs. GRC platforms help to associate each control with corresponding categories of risk, such as unauthorized access and personal data exposure, and also map the controls to different regulatory needs, such as GDPR and HIPAA. This way, the role of each control in providing support for both cybersecurity and data privacy is understood. In addition, the platforms help the owners of the risks and the compliance team assess the effectiveness of the controls and identify the gaps, which might lead to an increase in the level of organizational risk.

Another significant aspect of implementation is continuous monitoring and workflow automation. The modern GRC systems are able to integrate with various security systems like Security Information and Event Management systems, vulnerability scanners, access control systems, etc., to collect security-related information in real time. This helps to automate the monitoring of control effectiveness and to detect any control deficiencies or compliance failures. Once the deficiencies are identified, workflow automation helps to assign the necessary actions to the concerned people to resolve the identified problems quickly, thus making the organization more agile to address any potential risks or cybersecurity/privacy-related risks.

Lastly, GRC platforms provide reporting and dashboard features that improve governance and decision-making. Executives, risk managers, and compliance officers can use these features to evaluate risk exposure, control effectiveness, and compliance status for an organization. This will improve decision-making for an organization, and its executives can use this to identify areas to improve risk mitigation based on data analysis. Therefore, an organization can realize an effective and efficient approach to managing privacy and cybersecurity risks by implementing the proposed framework within GRC platforms.

6. Benefits of Privacy–Cybersecurity Convergence

The integration of privacy and cybersecurity into a single Governance, Risk, and Compliance (GRC) framework offers significant benefits to organizations seeking to improve their data protection capabilities. The first advantage is the protection of sensitive data through the implementation of integrated controls. When dealing with the implementation of separate controls for privacy and cybersecurity, there is a high probability of gaps, inconsistencies, and redundant efforts, which can compromise the effectiveness of data protection. However, the integration of these controls into a single framework ensures that sensitive data is provided with consistent protection across systems, processes, and departments. Integrated controls, such as encryption, access control, and monitoring, address data security and privacy risks simultaneously, thereby minimizing the probability of data breach or unauthorized data disclosure.

Yet another significant benefit of adopting an integrated approach to GRC lies in the minimization of regulatory and compliance-related risks. Organizations of today are required to comply with an array of data protection laws and regulations, which include the GDPR, HIPAA, and other industry-specific laws and regulations in different regions of the world. An isolated approach to data privacy and cybersecurity makes it difficult to comply with different laws and regulations, thus increasing the possibility of regulatory violations. An integrated GRC approach helps an organization align its GRC framework with regulatory requirements, thus enhancing its ability to comply with laws and regulations while minimizing the possibility of any legal consequences or regulatory violations.

The convergence of privacy and cybersecurity can improve the organization's risk visibility and decision-making. When risk management is done through disparate systems, it becomes challenging for the organization's leadership to grasp the overall risk situation of the organization. A unified governance, risk, and compliance platform can provide a centralized risk register, which can combine the organization's cybersecurity and privacy risks, thereby providing stakeholders with the capability to assess the organization's risk exposure from a holistic point of view. This can improve the organization's capacity to detect emerging risks and respond appropriately, thereby reducing the probability of significant risk events occurring within the organization.

Besides the improvement of risk management, the elimination of operational inefficiencies and costs associated with the management of duplicate controls and processes is also achieved. In traditional systems, the management of privacy and cybersecurity may be characterized by the implementation of separate controls with similar objectives. This may result in complexity and wastage of resources. However, through the integration of these controls, it is possible to eliminate duplication and enhance operational efficiency. This will enable the allocation of resources in a more efficient manner, with a focus on critical risk mitigation activities. Additionally, the management of controls will be simplified through central management, reducing administration costs.

The convergence of both concepts will, therefore, enhance organizational resilience while promoting stakeholder trust. The breach of sensitive data and privacy has serious implications, including financial, legal, and reputational risks. The application of a unified approach to governance, risk, and compliance will enable an organization to enhance its ability to prevent, detect, and respond to security incidents involving sensitive data. This will be a proactive approach to addressing security threats, enhancing the overall security of the organization while promoting trust and confidence among customers and other stakeholders. The benefits of improved trust and confidence will be a source of competitive advantage to an organization, enabling it to thrive in a highly regulated and data-intensive business environment.

7. Conclusion

The rapid expansion of digital technologies and the associated rise of the volume of personal information have elevated the importance of data protection to an unprecedented level of significance for modern enterprises. Conventionally, the domains of privacy and cybersecurity have been treated as separate entities, where cybersecurity focuses on the protection of systems from cyber attacks, while the focus of privacy is on the ethical handling of personal information. However, with the rise of cyber attacks that often result in the disclosure of personal information, the distinction between privacy and cybersecurity has become less effective in handling the challenges to enterprise data protection.

This study emphasizes the need to realize the convergence of the concepts of privacy and cybersecurity and shows how Governance, Risk, and Compliance (GRC) platforms can play a vital role as a foundational mechanism to realize the integration of

these domains. The proposed Unified GRC Control Framework is a structured, centralized approach to the alignment of data classification, control implementation, risk management, and governance. This will enable organizations to realize the benefits of integrating the domains of privacy and cybersecurity controls through a single framework. The framework will also enable organizations to break away from operational silos and avoid duplication of controls.

The application of a unified framework in modern systems of governance, risk, and compliance (GRC) allows for continuous monitoring, automated work processes, and reporting. This will help improve the identification of risks, efficient responses to incidents, and ongoing compliance with privacy and cybersecurity regulations. The strategy of convergence will also improve organizational resilience as it ensures that the approach to addressing data protection considers both threat-based cybersecurity risks and compliance-based privacy risks.

The convergence of both concepts will also improve organizational trust and the overall sustainability of an enterprise. This is because, as customers, regulators, and other stakeholders demand robust approaches to data protection, an enterprise will be able to attain a competitive advantage through the application of a unified GRC approach. This will help an enterprise protect sensitive information, comply with regulations, and respond to new risks in an ever-changing digital world.

In summary, the integration of privacy and cybersecurity into a single framework for Governance, Risk, and Compliance represents an important step forward for data protection strategies within enterprises. The proposed framework represents an important step forward for data protection strategies within enterprises, and its adoption is likely to be an important step towards improving data protection within enterprises, especially considering that data protection strategies will be evolving to accommodate changing cybersecurity and privacy concerns.

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