

AUTOMATING REGULATORY- COMPLIANT DATA HANDLING IN FINANCE

A CASE STUDY

George MOLDOVAN
Chandrabhan SINGH
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Regulatory compliance as opportunity

Enhances the security and competitive posture of the company

Minimizes the risk of data-related incidents

- By adhering to data-related regulations set by governing bodies
- By driving process and **technical control mechanisms** across the entire Group

Starting with a story

The story of Team Compliance

Enabled by the regulated data model we created

January 2023. Team Compliance works on a report for CY 2022



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This presentation is on why this was possible

On Raiffeisen and how we operate

Who we are

More than 130 years of experience in CEE.

RBI's network size and reach are unique.

Universal bank with decades of retail, corporate and investment banking experience.

For geographical and historical reasons, Vienna is an important hub in eastern growth markets.

More than 200 international companies operate out of Vienna – many of them are advised by RBI on their way to CEE.

Leading international customers trust in our expertise.

With its headquarters located in Vienna, RBI acts as a bridge between East and West.

Raiffeisen is decentralized



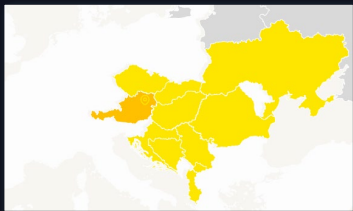
Operation performed by local subsidiaries

Subsidiaries have local steering

Central oversight setting the strategic direction and support

When introducing a group platform

Two different views on data compliance



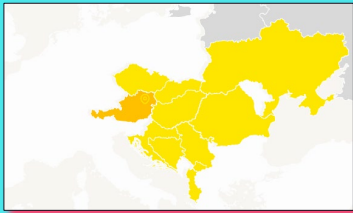
As the group platform provider



As a platform user in a subsidiary

When introducing a group platform

Two different views on data compliance



As the group platform provider

Diverse regulatory landscape

Harmonization vs. localization

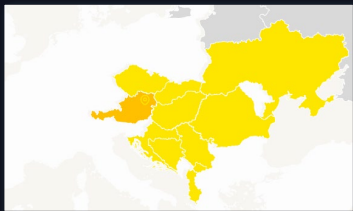
Cross-border transfer (of data)



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As a platform user in a subsidiary

Compliance and liability with local regulations

Ownership and control over data

Local-driven access to data

How do I handle data in the platform?

Data Storage and Retention



Data Access



Data Sharing



Data Audits



Breakdown of our Data Management Model

Starting from a high-level view, we dive into the conceptual design and technical implementation

APEX as the group's data platform



AWS cloud-based
Platform

powered by



databricks



Establish APEX platform
for unified Data and
Analytical services

Joint Data and AI in one platform to boost productivity and cooperation



Ease data access to
consumers on APEX
platform

Selected Group data sources and standard connectors to RBI service.



Enable Self-Service
through APEX as long-
term goal

Self-service environment removes the Head Office dependency



When introducing a group platform

Core strategy for achieving the group-level regulatory compliance

Decentralization

Tenancy

Scope-Based Model

When introducing a group platform

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Resilient, secure, and locally-governed platform, enhances regulatory compliance

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Customizable platform provides additional privacy and security through a logical isolating layer

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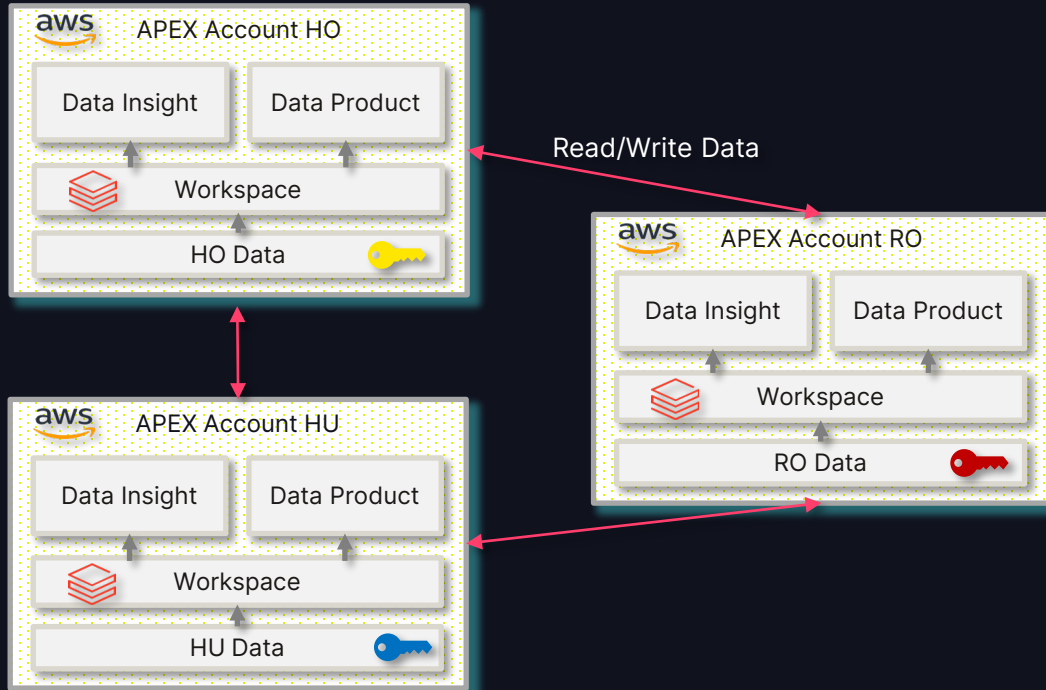
Customizable platform provides additional privacy and security through a logical isolating layer

Scope-Based Model

Scoped data usage ensures clear, boundaries for handling of data and mandates a purpose-specific usage

Decentralization of the APEX platform

Decentralization does not exclude collaboration



Provides ownership and control

Enables local governance

Enhanced security and privacy by localizing the data, its users and its lifecycle

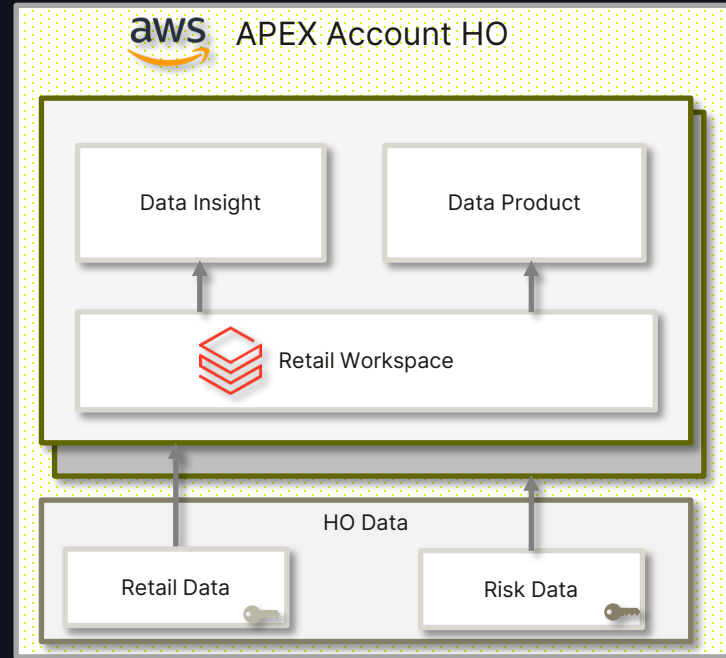
Tenancy support within a subsidiary

Ensure further data and process separation

Adapted data and data access privileges

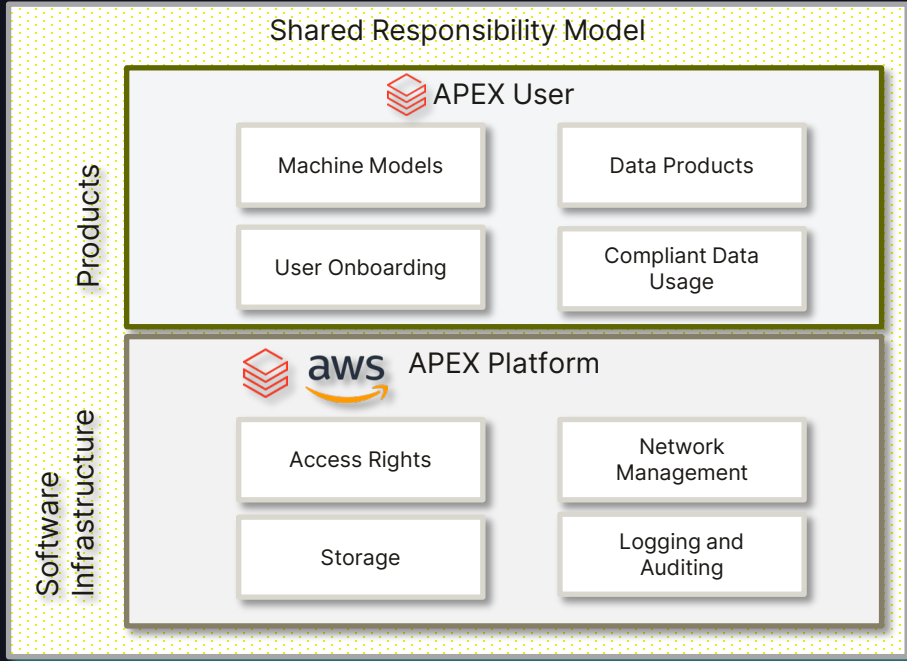
Additional layer of security and privacy within a subsidiary

Logical prevention of departments disrupting each other



Tenancy support within a subsidiary

Tenant introduces Compliance responsibilities



Shared Responsibility model agreement with each Tenant

Tenant is called a Workspace Owner

Responsible only for the compliant data usage

Decides what to consume and share



On how tenants work with data

Each use case of a
Tenant has a single,
clearly defined Scope
(Purpose)

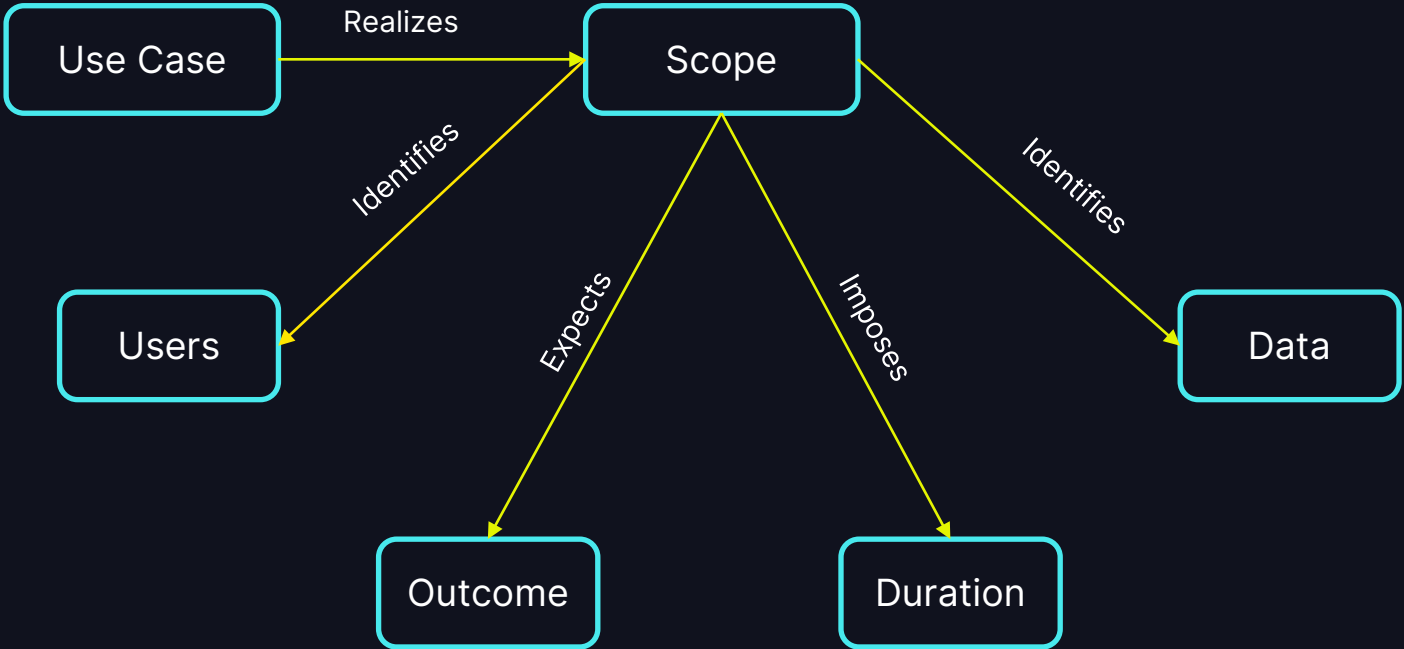
Legitimate reason for using specific data

Defines limitations on persons using the data

Imposes (legal) boundaries on what the data can be used for, and for how long

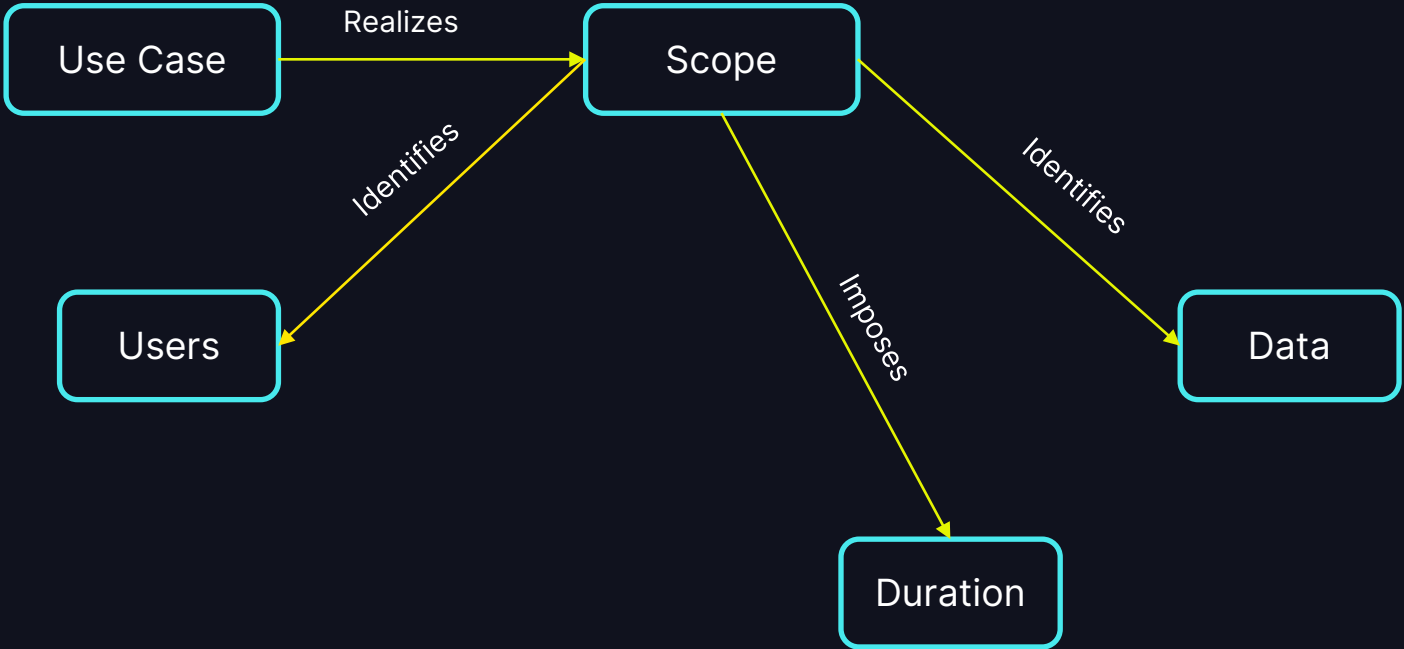
Scope-driven data access model

What the Scope defines within a Tenant's Use Case



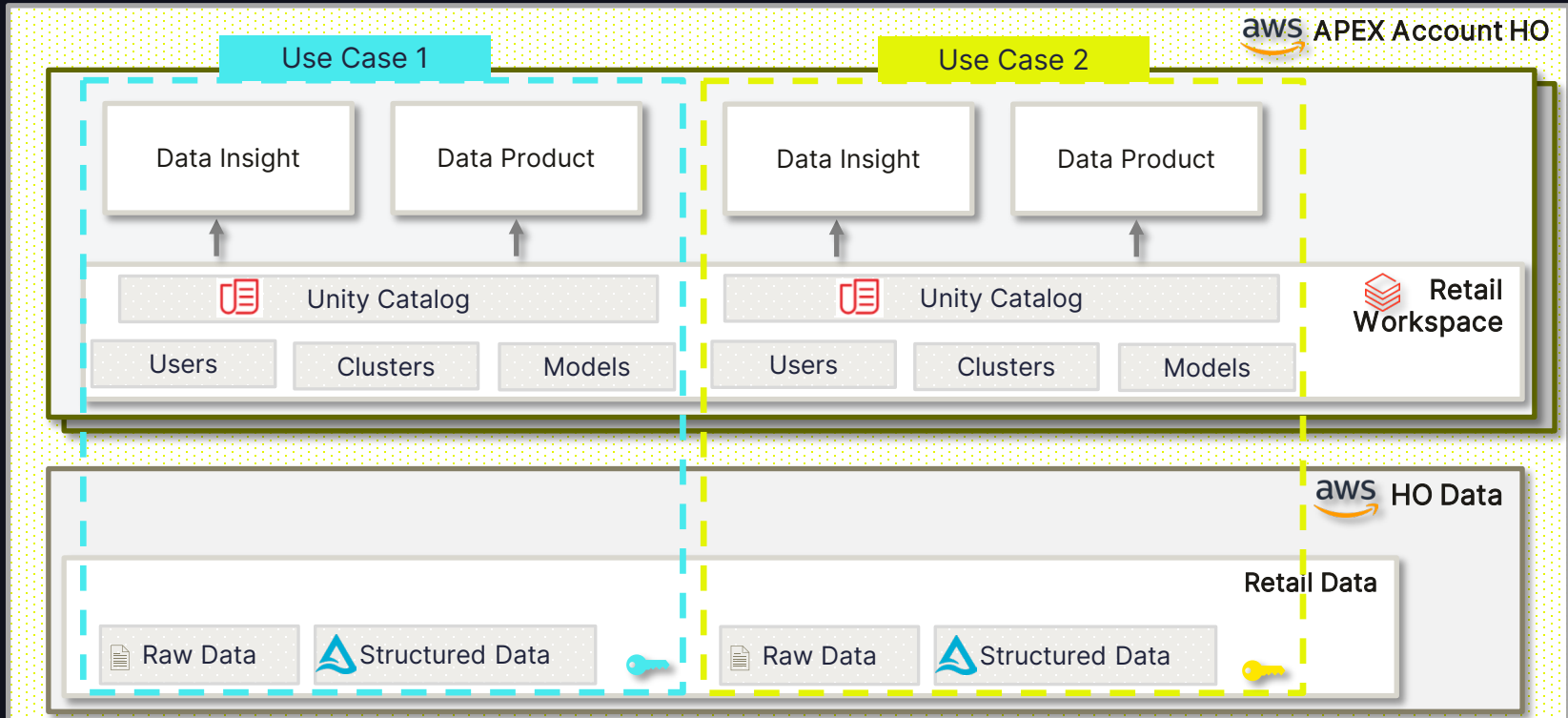
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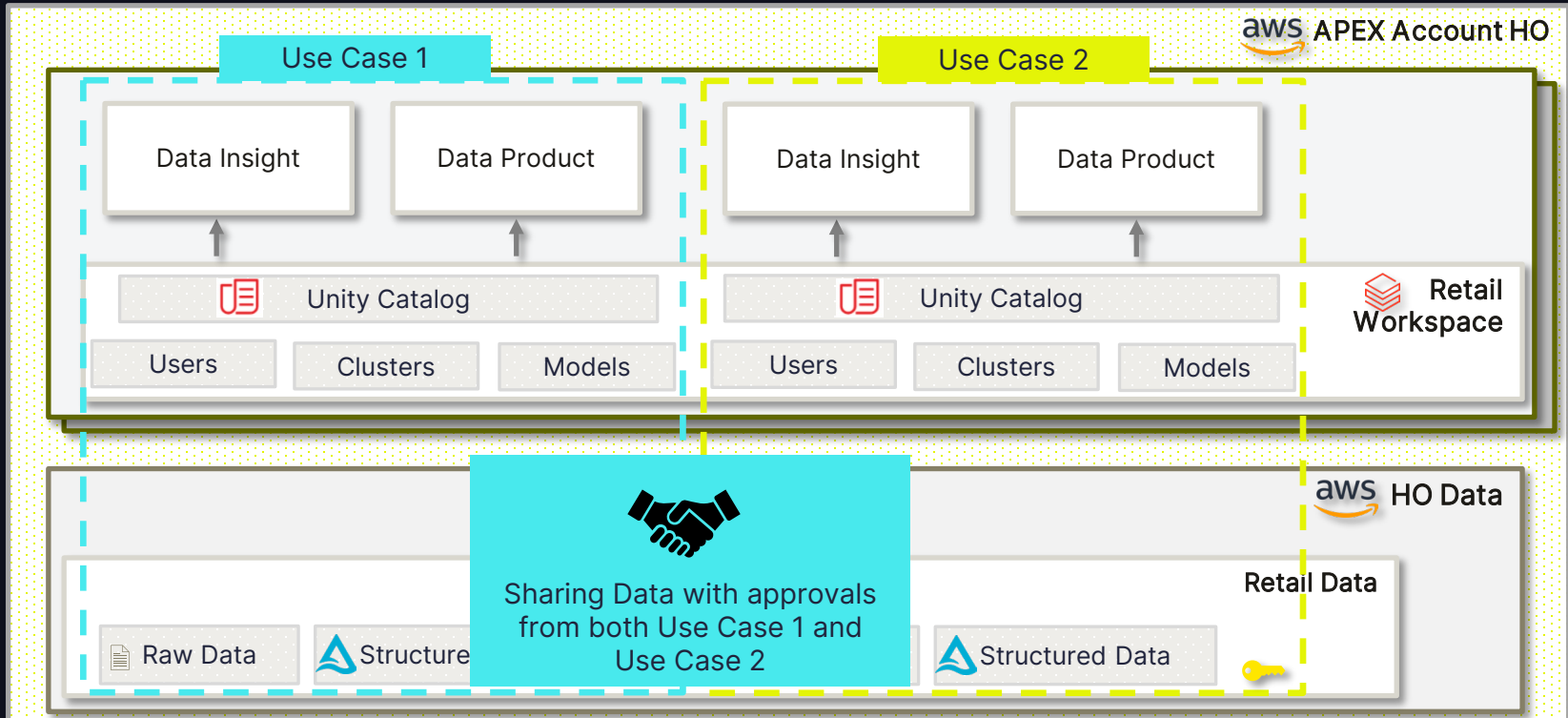
Scope-driven data access model

Capturing the scope-model using Databricks and the underlying cloud



Scope-driven data access model

Capturing the scope-model using Databricks and the underlying cloud



From the user's perspective

Compliance- and data control-drift need to be enforced

All permissions are deployed by an automated process

Administrator roles (AWS, Databricks) are not allowed

Internal APEX page provisions all required resource and restrictions

All keys (AWS, Workspace) are externally generated and can be revoked by each Tenant separately

From the users perspective

APEX SSP Admin Dashboard

DATA MANAGEMENT		
Access points		View
Actions and Extra Migrations Results		View
Network Unit Prefixes	+ Add Change	
Shares		View
Source systems		View
Units		View
Use Cases		View
Workspaces		View

SERVICE MANAGEMENT		
Chains histories		View
Consumer Create requests	+ Add	View
Consumer Delete requests	+ Add	View
Share Create requests	+ Add	View
Share Delete requests	+ Add	View
Share Update requests	+ Add	View
Unit Create requests	+ Add	View
Unit Delete requests	+ Add	View

Recent actions

My actions

- [ID=265 | PATH=bi-apex-at02-ho-dsa-apex-data-training-test/apex-data-training-test | GLUE-DB=edyo64wt7-apex-data-training-test](#)
Share
- [+ ShareRequestID=3503](#)
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Unit Create requests
- [+ ShareUpdateRequestID=604](#)
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Listing and creating locations for data ingestion

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Listing and creating a 'Scope'-based Use Case

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Linking data to Use Cases

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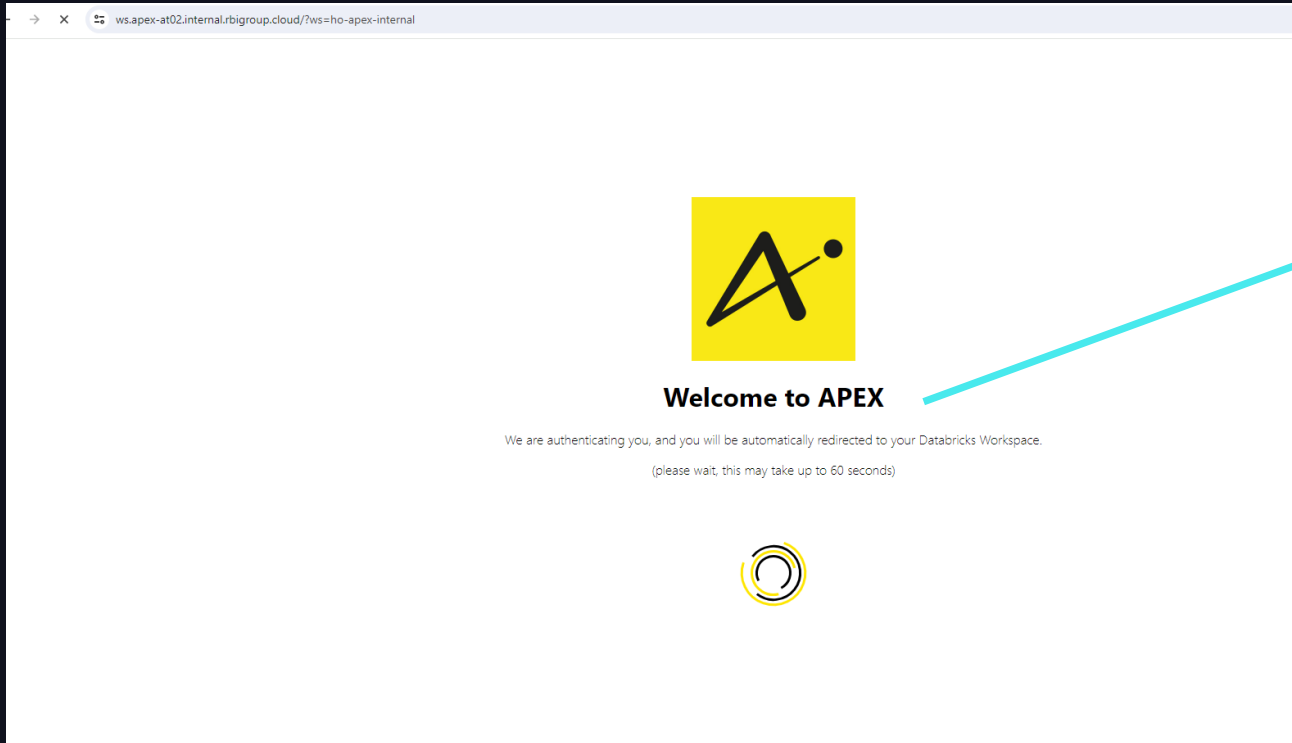
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Listing and logging in into a Workspace

From the users perspective



Custom page sets up the Workspace-level permissions dynamically

Assigns correct use case access

Time-of-day access restrictions

Geographical access restrictions

Facts on our journey

Data access model and the system enforcing it

Building it

Using it

Adoption

Facts on our journey

Data access model and the system enforcing it

Building it

- Development Team of 15
- First release after 6 month
- Continuous improvements since January 2022

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Using it

- Retail, Compliance, Finance, Corporate, Investment, Retail, Marketing, ...
- 1.2 PB of data currently stored
- 3000 avg daily workflows

Adoption

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- 3000 avg daily workflows

Adoption

- 450 monthly users
- 1800 total users
- 12 APEX Instances deployed
- 120 Workspaces with 40 Owners

Thank you

