

The Four P's of Privacy

A culture of innovation and customer experience lifts Air New Zealand's data privacy program

Michelle Dennedy: In the airline business, pilots use a checklist for take-off and landing to make sure that important tasks have been completed and none skipped, even routine tasks. But, the challenge is different when you're an airline trying to embed data privacy principles into the fabric of your business. So, how do you build Privacy by Design, and a mentality and a checklist culture? We'll find out in a minute. But first, please fasten your seatbelts and put your cell phones in airplane mode. Because we're on the Sigma Riders.

Cybersecurity, data protection, privacy. You like to stay ahead of the curve, and listen to experts who lead by deriving greater value from data with an organized approach to data privacy. You're like us; just a few deviations past the norm. You are a Privacy Sigma Rider.

Hello again, Privacy Sigma Riders, Michelle Dennedy, chief privacy officer and chief privacy sigma rider over here. I am super, super excited to welcome—now, we're on a podcast, but you can't tell, but she's quite glamorous and fashionable—my dear friend, my mentor, my guru of flight, Ms. Jacqueline Peace who is the chief privacy officer for Air New Zealand. Jacqui leads the global privacy function for Air New Zealand out of the GCC's office and she is based in Auckland. Welcome to the show.

Jacqui Peace: Thank you, Michelle. How do I live up to that? My goodness, I was going to say the same about you.

Michelle Dennedy: Well, we can just do that for twenty minutes. I'm sure it'll fill up whatever one's drive time.

Jacqui Peace: Thank you. Yes, but how did I get to Air New Zealand and 15 years' worth of privacy and data protection roles. Well, I think I started this journey by getting it wrong.

Michelle Dennedy: As so many journeys start, right? So, how did you get it wrong? I don't see you ever getting anything wrong.

Jacqui Peace: Oh, I got it well and truly wrong in an early role where I was responsible for implementing unique IDs across hundreds of thousands of employees for an HR solution. And, realized very close to go-live that actually we needed to consider something called data privacy regulations globally in nearly 100 countries. Because patent unique IDs were something we needed to be a little more careful with. So, that threw me. And obviously, with sort of 72 hours to go-live, we had to put a stop and we had to put the brakes on basically and say, "Okay, what is this thing called privacy?" And, I think I spent 72 hours in a room catching up extremely quickly and identifying those jurisdictions we wouldn't go to globally that might have resulted in sanctions being imposed that we didn't want to experience. So, yeah I got it wrong. Those were in the days when I was implementing systems and as a result, that turned me into the privacy zealot I am nowadays. I want to always do the right thing or at least try to do the right thing.

Michelle Dennedy: Yeah, it's so easy isn't it? It's like that's when our growth moments happen. I sometimes think we should write a bartender's menu of here's the first thing I drank after I had one of those life-

changing failures that turned into a new path. So, maybe we'll call yours the unique ID drink. So...

Jacqui Peace: Yes, I've avoided pulling down that one before. Sorry.

Michelle Dennedy: That's good. So, tell us a little bit about—I mean your accent sounds like you might be a native Kiwi, but I know you've explored the globe a bit yourself. Can you talk a little bit about your background and travels and education? How did you find yourself suited for your own checklist for this job?

Jacqui Peace: Gosh, the travel starts from a very early age when my family emigrated from a little place called the Orkney Islands, which is full of history—steeped in history, in Viking history—in the top of Scotland. All the way over to New Zealand, just the other side of the planet. Couldn't have gone much farther if they tried, really.

Michelle Dennedy: Yeah, I think the next move is the moon.

Jacqui Peace: Well, I attempted. My daughter asked me about that the other day, how much does it cost. I said, "Out of my budget?" But, anyway. So, I spent quite a few of my formative growth years here in New Zealand. I studied at Victoria University in Wellington, which is our capital city. Which I did study industrial relations and psychology. I won't mention how many years ago that was. And, after a few years working with government environments here, I decided it was time to travel. So, off I did travel to London, and between London and New York then for the next sort of 20-something years, most of that time in London, and I picked up a Danish husband and family on the way.

Michelle Dennedy: That's a good acquisition. Yeah, and then back to Auckland? Okay, where she is now?

Jacqui Peace: Yeah, three years ago. So, it was somewhat of a cultural change coming home, but a good change.

Michelle Dennedy: Yeah, and it's cool. I mean we'll get to how we kind of started connecting and sigma-riding together in a little bit. But, I want to kind of like, how did these past roles, and all of this global experience and culture, how did that really prepare you for your current role in this airline industry? Was there a privacy officer before? Is this something new to them? How does that all fit together for you?

Jacqui Peace: Well, I felt that the opportunity arose because the airline industry was obviously becoming far more aware of the planet globally from a privacy perspective. And, Air New Zealand was at the forefront of identifying that actually we need a really good program here; we need to be on top of this. And so, I got the opportunity to come and build that program and lead the way, really. And then, what we did, because I've been working for so many years overseas and had been privy to that acronym, GDPR, which generally means to me "Getting Data Privacy Right." We won't go for the General Data Protection Regulation—but it meant that I was able to come in and actually sort of front-foot the program because we were aware of what was coming.

I didn't have to torment the executives too much with fears of sanctions or fines or reputation loss because they were already there. They wanted this. And so, they embraced that

opportunity to set the bar as high as we did from the other side of the world. And, everything I've done on the privacy program has been built around, okay, this practice pursued by designers just gotta happen. It doesn't matter that the GDPR tells us we have to do it. We were going to do it anyway, and we are doing it. So, I think what prepared me was having the exposure in Europe, and then having the opportunity to start off fresh, if you like, and build our program based on all of those best practices.

I've had some great experiences with people across the globe around the topic of privacy as well. So, I think I would just—good time, right time, right place. I think there is an element of luck, and the experience I had really sort of led the way.

Michelle Dennedy: Yeah, I will probably get my philosophers wrong—I think it was Aristotle who said that, "Luck is where our opportunity meets preparation." It's probably someone a lot more contemporary, but I think that's—you make your own luck and it sounds like there's a great deal of persevering. This is what I love about you, Jacqui, is you sound so chill about this whole thing. Like, "Of course we're doing privacy by design." That's not an "of course we're doing" statement from most organizations. In fact, you're one of the very early pioneers and certainly the first person to reach out to me and said, "Hey, we really are interested in doing this privacy engineering stuff" as part of your existing program getting ready for GDPR. Talk about what made you pick up the phone and call some crazy sigma-riding, Privacy Engineering Manifesto-writing wacko?

Jacqui Peace: Well, actually, I don't know if I picked up the phone. I think we stalked you quite a bit.

Michelle Dennedy: I like being stalked by you.

Jacqui Peace: To start with, I got the team reading your book and I had a dog-eared copy of the book, you know, Privacy Engineers Manifesto, which Jonathan Fox was involved in as well.

Michelle Dennedy: Indeed.

Jacqui Peace: And so, I exposed the team to that and made them read it. They read it with joy of course, but then they were all a bit buzzy about it as well. So, I sent them on a mission. I said, "We need to get ahold of Michelle. I've never met her. I have some ways into meeting her." So, I used my contacts as you know, to find you, and run you down basically, and just wear you out, and say, "Come and talk to us here..."

Michelle Dennedy: See my side of it is I'm just lonely sitting at home on a Friday hoping anyone will call me.

Jacqui Peace: Well, we convinced you and a few of your colleagues, which was fantastic.

Michelle Dennedy: Including the Silver Fox.

Jacqui Peace: Yeah, absolutely. And we ran some workshops. But not only did we run some workshops. We ran a fantastic breakfast event which meant that...You know, Air New Zealand is all about, as an airline here, we're iconic. We're one of the people's, a national favorite if you like. We have an obligation to help supercharge New Zealand's success, so when the thought of being able to convince you to come meant that I could actually open up what privacy by design is to more than those fortunate enough at Air New Zealand to hear you speak and Mr. Fox. But to other

organizations as well. So, a lot of our other corporates or government agencies, we invited along to a terrific breakfast. We got them to do a privacy by design, shall we say, a little workshop of their own basically, while they were eating delicious croissants and drinking great deserved coffee. And then, really, helped spread the word about what is privacy by design. We've gotten to build on that based on terrific information that you and Johnathan provided, and they were a buzz. I'm still being asked, "Hey how's your privacy by design program going? What more can you tell us?" So, yeah, that was a terrific event and all the better because you got the opportunity to sort of fly on Air New Zealand, I believe.

Michelle Dennedy: I was just going to say, that was a huge highlight for me, although I still haven't got my pajamas. I need to see if I can get some Air New Zealand pajamas. But, maybe, I'm coming back in the Fall to see—your Spring, my Fall. So, Jacqui, let's just take a quick snapshot, for reasons of confidentiality obviously we won't talk about detail. But, let's talk a little bit about what we did in the privacy engineering scoping workshop and some of your thoughts about the outcomes and next steps.

Jacqui Peace: Yeah, sure Michelle. I mean those were three days that we conducted in November of last year where we had, what we identified was a couple of really key initiatives that were going on within the airline that had both customer and employee impacts around personal information. And, to some degree, doing new things with personal information. So, they were right initiatives, if you like, to actually get down and deep, if you like, in terms of what we were trying to do from a privacy by design perspective.

So, to get them off the ground, if you recall, we identified the two initiatives and we got them in a room. We got them talking to yourself and Jonathan Fox, just a little bit about helping them understand what we meant by privacy by design and giving it some context. So, they knew what they were coming to. And, before they even came into the workshops we got them to work really hard on some use cases so that we could understand what were the iterations of the application they were at, and what they wanted to achieve out of each of these cases so that we could break it down.

So, first things first, I think what we did was really just get them to talk us through in the room, what those use cases were. Help us to understand what they were trying to achieve with these new products or applications. And then, we threw up the checklist, the privacy by design checklist, which has become a talking point.

Michelle Dennedy: Oh good. I'm glad to hear that. So it still lives.

Jacqui Peace: And it does live, but what we've done is we have turned it into our version as well. So, obviously we give every due right to yours and Jonathan's, but we've turned it into what we call our four P's of privacy by design because that just sounded good. And it...

Michelle Dennedy: What are your four P's? I have to know. I love it.

Jacqui Peace: I thought you'd like to know. Okay.

Michelle Dennedy: Of course.

- Jacqui Peace: We'll take it to the next level with—the four P's for us: purpose, which I guess is self-explanatory. But, making sure that the teams really can articulate what purpose or problem they're solving for. We wanted to make it really clear up front that they understood that's what they needed to know. And, if they didn't know that, that's not a bad thing. Being in the workshop might actually help bring it out.
- Michelle Dennedy: Exactly.
- Jacqui Peace: But we would like them to have thought it through before they do come into the workshop. Making sure they understood who that key benefactor is as well. So, the personal data, note the second P, and silent D obviously in there. But, making sure they understood who's the benefactor of this. What's the data you're trying to use, the personal information? And making sure people understand where the nuances are with personal information. Because sometimes an identifiable item on its own doesn't have any significant impact, but mix it in with a number of other key items and people get a very different picture. So, we wanted them to understand that purpose and personal information obviously combine to give us a feel for what are you trying to achieve here. And then, thinking about people's rights, the next P. So, purpose, personal data, people's rights. Once you've got a feel for those three P's, you can start to figure out what are we going to do to protect the information.
- Michelle Dennedy: Oh, excellent.
- Jacqui Peace: That sort of P. So, I don't think there's any surprises in there, but it helps to give something as a little bit of a, hey four P's, we can remember those. Well, hopefully, they can. And then, we talk very much about it so that people understand “okay we've got to think about the four P's as a checklist.” But, the hard work I still feel is yet to come, and I still feel that once we've started the story and we've got people talking about privacy by design, I want it to be by default. I want those four P's to just be almost in their psyche and their subconscious that we think about it. But, that would take a while. I'm happy that we start with the four P's and we use that checklist.
- Michelle Dennedy: Yeah, I love it. It's like next to come. I'm trying to think for a good P, it's not really perception, but it's maybe planning. It'll be five P's.
- Jacqui Peace: Yeah, we can throw in a fifth P.
- Michelle Dennedy: I love how you guys have made this your own. I like that it fits into your context and it's how all of this is meant to be. It's a big ole globe, but it helps to have good friends wherever you go.
- So, let's talk a little bit more about privacy by design. You know, the airline industry, I put into not just travel and conveyances but also, really, hospitality. And there's a huge level of trust physically, of course, to be in the air and to be in a space confined with other human beings. But also just the experience and boarding your planes.
- Two questions before we kick off how you actually digitize some of that experience and how you think about privacy by design fitting in there. Tell a little bit about kia ora. What does that mean?

Jacqui Peace: Kia ora, that's a Maori word. That's a greeting and that's really at the heart of Air New Zealand. When you get on our planes, you'll see the Kia Ora greeting that just says, "Welcome. Hello." Almost, you're home—and it just makes people feel, those returning, a little bit more shall we say, homesick, or glad to be returning home. And for visitors that come into country on our flights, it makes them appreciate and recognize that we're actually hugely a cultural organization and our Maori lineage and where we sit amongst the New Zealand psyche, if you like, is really important to us. And, we're very proud of it. And that's why we have the koru, which is the fern shape at the end of our tails on our planes as well.

So yeah, it's ingrained in us, which means it was easier for me to further ingrain more about the customer. It's fair to say that we are all about the customer and you're quite right. We obsess about the customer, and making sure that hospitality aspect is really sublime, and it's also got that local feel to it. But you know that you are getting into the top airline and one of the safest airlines. So, it meant that I was able to just tag on to this great feeling about the customer now that he's talked about the customer's data because it is still the customer's data. And, let's stop calling it data, let's talk about information that's personal to the individual, the person that we're talking to. So, it was a really easy win if that sort of answers your question there.

Michelle Denedy: Yeah, no, I think that's what I love about this stuff and this work is that privacy engineering, privacy by design, it's a very fundamental global type of a framework as is a pilot's checklist. You know, you check off the same things, there's mechanical things that have to go right regardless of where you touch down or take off from. And yet, you can still find a place for that local umami, that flavor, that culture, and really honoring in a global society, people want to be individuals. Entities want to have their cultures; you want to share that special value that's created through really curating your data in a very special way, in a very unique way, but inside a framework that can be turned into a checklist. So, you know that you're also having consistent experiences time and time again.

Jacqui Peace: Absolutely. Awe have a really strong experimentation culture as well, which I love, and we have a very strong digital mindset. So, by that I mean we think and work in that way. We're good at what we do. We're small enough to innovate, but when we do innovate, it has quite an impact.

I think we're being able to embrace privacy by design because we have that desire to do the right thing by the customer. But also because that's something new. We like to sort of enter an agile way of working. Me and my team, we'll go to stand-ups. We'll sit with the data scientists, which is something I would highly recommend anybody does is get off your backside, shall I say, get away from your desk, and immerse yourself completely amongst your CX people (your customer experience people), your UX people, your digital team in general. Get with the product leads and really help them to understand why we want to ask the questions. If you are looking at a new way of using personal data or sharing personal data differently, or you're using new data. We're not stopping you; we just want to work with you to embrace what we do here and let's do it to the benefit of everybody.

So, we've got sort of that risk analysis mindset as well. I don't often talk about the regulations and compliance. I try to talk very much about "this is at the heart of what we do, and people at the heart of what we do." So, why would we treat the experience on the plane any different than how we would treat the data that we handle that belongs to them.

- Michelle Dennedy: I think that's, it's such a powerful connection and I think for the people who work in data, and the people who work in the air and consume that data. Even critical data like health concerns, and allergies, and destinations, and that sort of stuff. It's really important that they own this for themselves—so each person working with this machine--so, you're basically horizontal across a business, and vertical at least thirty thousand feet in the sky.
- Jacqui Peace: Oh completely, and you know one of the things I absolutely have loved about this airline industry experience is the breadth of privacy opportunities we get because we are innovative, we are creative. The organization does have a customer ambition mindset, but I can look at applications for helping unaccompanied minors. So, children traveling on their own. We've got these fantastic wristbands where we've worked very closely with our digital function to make sure that your precious cargo, your child, your grandchild, as your popping them on the plane, as they're about to go to the other end of the island or even outside of the country. They are being tracked and people think, "Oh my God, that shouldn't happen," I mean absolutely it should. But, it needs to happen in the right way.
- Michelle Dennedy: That's right.
- Jacqui Peace: And, it needs to give confidence to the people who are giving us their precious cargo and to the ones who are collecting it that if there's a disrupt along the way, a disruption to the flight for example, that we've got it, we'll handle it, we'll take care. So, we get applications like that to work on.
- More recently, I've been looking at the transportation security requirements, back and forth into the U.S., and prescreening questions. So, I get to look at, okay what's the physical privacy implications I need to consider there from privacy by design. But, the business comes and ask me, they want to do the right thing. So, I think I mentioned this to you, I've needed to get out there and I get out there a lot and talk to the business. I just can't leave it to chance. And once you have told them once you can't expect that's sufficient. You've got to go back again, you've got to be resilient, keep smiling, and keep reminding them, "Hey I'm here."
- Michelle Dennedy: Back again.
- Jacqui Peace: Yeah, back again and somebody will come to me and say, "Hey we need to share some biometric data with one of the airports. It's a facial image. Should we be worried about that?" And I think okay let's step through this. So, the breadth of opportunities and I get an exposure to the personal information that we're sharing across an airline or with other airlines is just phenomenal. And so, I feel really quite privileged to be a little part of that.
- Michelle Dennedy: Really for you, Jacqui, and this role is so exciting. You're dipping in all across the business, and all around, and in different fields. How do you roll this up? What's next if you look in the future for, where do you want to take your organization?
- Jacqui Peace: Well, that's a great question and I am thrilled to say that earlier this year we were the first airline out of 90 airlines I think that were surveyed for a digital airline progress award and we got first in that from a digital privacy perspective. So, that's great recognition, but with that great recognition, which--comes a fear that someone's going to try and find a loophole, and you know we haven't got it all sewn up. We've got plenty yet to do and I—a long way to continue

that way because as we continue to be creative with people in our offerings, our products, and our services. It creates more opportunity for us to look at how we use information. So, where is next? I desperately want more privacy champions across New Zealand. I've seen a huge change in the two or three years that I've been back. Within the airline as well, I've seen a massive—embraced what we're doing. I work quite closely with our CISO. We have a very creative and forward-thinking information analytics and data scientist group. I work very closely with them.

We've talked in the past about you must engage all of these different parts, all of these different business partners. But now I actually see it happening. You don't just talk about it. It takes a while to get people in the right space, but you've got to talk to people on a regular basis about what are you looking at, how are you doing it, what relationship does it take, what should we be looking out for? It's really recognizing that we are a collaborative force. Me, on my own, I'm not going anywhere without some kind of data office or data governance, or without the security and the DP-controlled if you like from the CISO's area. We are truly cross-functional and I think that's where it's going. I think there's room for more growth here. I think we're leading the way and I hope that we can expand and Air New Zealand continues to help the good message, spreading the privacy advocates across the business.

Michelle Dennedy: I love it and spreading it really across the island and across the region. And as you say, you know you guys have been very generous hosting breakfast and meeting lots of people in the community down there. It's a small island, but what an impact you've had and I honor our friendship. I'm excited to see you in person again, and really thank you for welcoming us. And I will get *kia ora* worked out in my vocabulary one of these days soon.

Jacqui Peace: Oh, I think you're saying it quite well. Don't you worry.

Michelle Dennedy: Alright, good. Well, thank you, Jacqui Peace, the chief privacy officer from Air New Zealand. It's a wrap, kids.

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