



# ZIMBRA FORUM FRANCE PARIS

UIC-P ESPACE CONGRÈS

20 MARS 2018

THE FUTURE'S SO BRIGHT  
**#ZFF2018**

La réunion annuelle de la  
communauté et  
des professionnels Zimbra  
est prévue le  
Mardi 20 Mars 2018

À l'IUC-P Espaces Congrès  
16 rue Jean Rey - F-75015 Paris

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GDPR

The General Data Protection Regulation

# ZIMBRA & THE IMPACT OF GDPR

# DISCLAIMER

I'm not a lawyer!



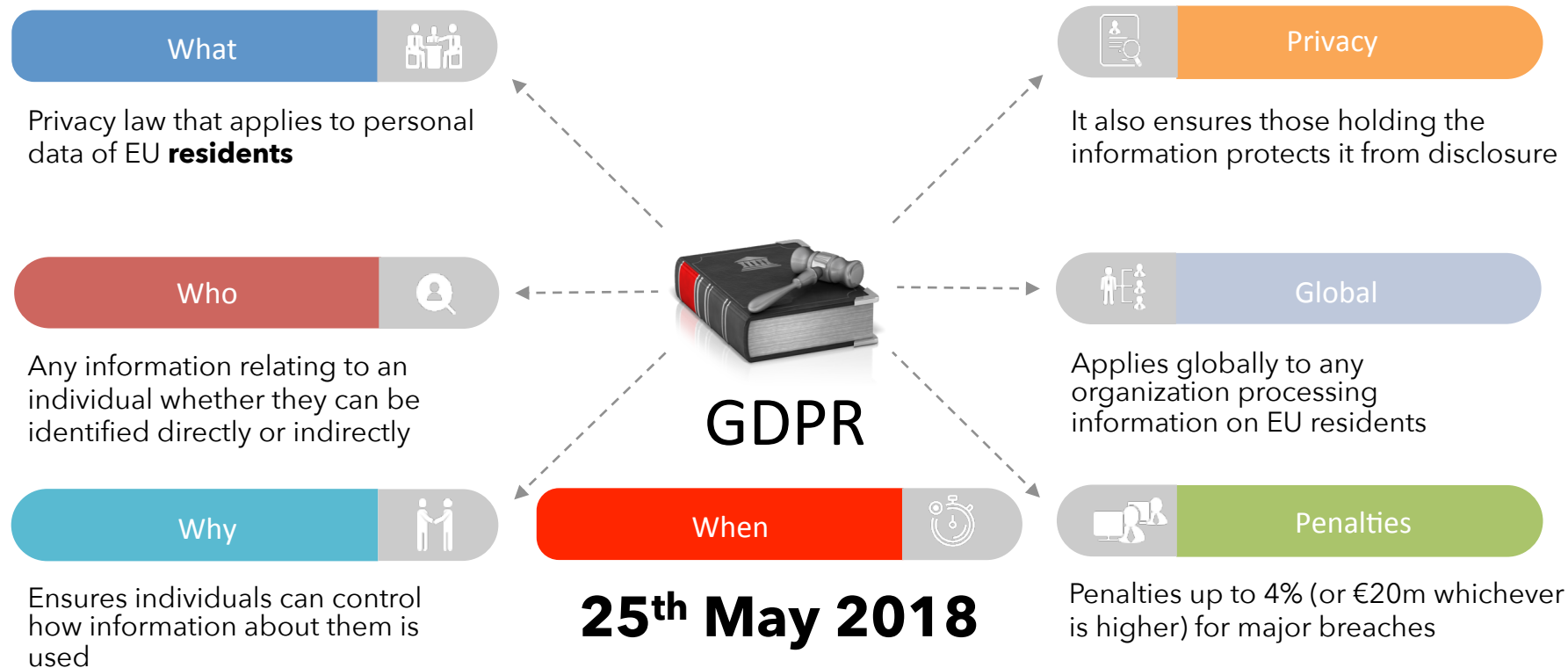
I've not read the GDPR Regulations from beginning to end!



The following are suggestions and features that could help achieve compliance!



# WHAT IS THE GENERAL DATA PROTECTION REGULATION?





SO WHAT SHOULD YOU DO?

**DON'T**



## WHAT IS PERSONAL DATA?

As defined in "Article 4 GDPR Definitions":

Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## WHAT DOES THAT MEAN IN REALITY?

- Personal Email addresses
- Work Email addresses
- Physical addresses
- IP addresses
- Social media IDs
- Date of birth
- Place of birth
- Mobile, business and personal phone numbers
- Login names, Nicknames, Gaming IDs etc.
- And on and on and on....

It is an INEXHAUSTIVE list of what may be considered as personal data. The definition of personal data is deliberately wide. And it is contextual too; It is direct and indirect, identified and identifiable, given the context.

A close-up photograph of a person's hands holding a smartphone. The hands are positioned over a dark wooden surface, likely a table. The person is wearing a dark, textured sweater. The background is blurred, showing another person's arm and a warm, indoor lighting. The text "WHAT ZIMBRA FEATURES CAN HELP WITH GDPR COMPLIANCE" is overlaid in large, white, bold, sans-serif capital letters across the center of the image.

# WHAT ZIMBRA FEATURES CAN HELP WITH GDPR COMPLIANCE



## DATA DISCOVERY

- An essential step to meeting the GDPR obligations is discovering and controlling what personal data you hold and where it resides.
- Given the massive volume of data that exists in an unstructured form in a Zimbra platform a technological approach is needed to identify all such data and is an essential step to responding to SARs.

# Zimbra Archive & Discovery

# ZIMBRA ARCHIVE & DISCOVERY

**Zimbra Administration**

Home - Tools and Migration - Search Mail - New search task

**Search query**

Enter your search query here or click Advanced to build a query

from:(usera@zimbra-lab.local) (to:(userb@zimbra-lab.local) OR cc:(userb@zimbra-lab.local))

Advanced Clear

Basic Date Time Zmlets Status Attachment Domain Remove All

**Search results**

Cross mailbox search

Server name: zimbra-sn-u14-11.zimbra-lab.local

Target mailbox for search: admin@zimbra-lab.local

Mail folder for results: xmbx search results

Limit the number of messages returned by the search

**Accounts**

Search all accounts

Select accounts to search

**Scope**

Search mail archives (for accounts with enabled archiving)

Search live mail

Search in dumpster (for accounts with enabled dumpster retention)

# ENCRYPTION

Of the 261 pages of GDPR, the word 'Encryption' appears just 4 times;"

**"...implement measures to mitigate those risks, such as encryption.**

**"...appropriate safeguards, which may include encryption"**

**"...including inter alia as appropriate: the pseudonymisation and encryption of personal data**

**"... the existence of appropriate safeguards, which may include encryption or..."**

Do the terms 'may', 'such as' and 'as appropriate' indicate that Encryption is mandated by GDPR - I don't believe it does.

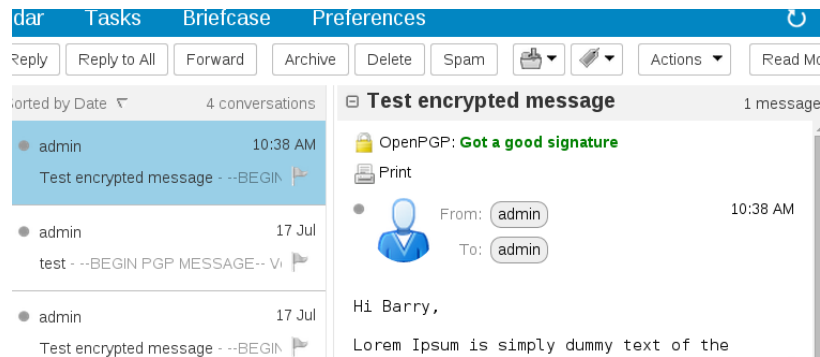
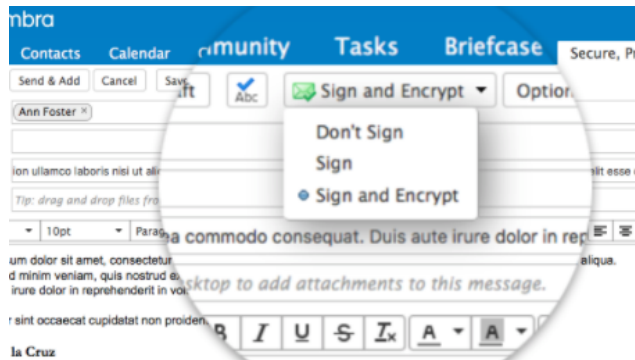
Do these terms suggest that Encryption is an OPTION and a good idea? - Yes, it does.

**S/MIME**  
**PGP**

# ENCRYPTION

- Consider enabling S/MIME encryption
- Open Source PGP options available
- But consider the Pros and Cons
- Encrypt archived backups
- Encryption of end point devices
- What about encryption at rest
- Mobile device encryption

Device Settings	
Require device encryption	<input type="checkbox"/>
Allow removable storage	<input checked="" type="checkbox"/>
Allow camera	<input checked="" type="checkbox"/>
Allow Wi-Fi	<input checked="" type="checkbox"/>
Allow Infrared	<input checked="" type="checkbox"/>
Allow sharing	<input checked="" type="checkbox"/>
Allow remote desktop	<input checked="" type="checkbox"/>
Allow desktop sync	<input checked="" type="checkbox"/>
Allow bluetooth	Allow





## PERIMETER SECURITY

- Review wiki for best practices
  - Enable DKIM and SPF
  - Make sure AV signatures are kept up to date
  - Should you consider 3<sup>rd</sup> party solutions?
  - Firewall rules
  - Tiered architecture - leverage multi-server
- 

**DKIM**  
**ClamAV**  
**SPF**  
**Postscreen**

## DATA RETENTION

- The emphasis under the GDPR is data minimization both in terms of the volume of data stored on individuals and how long it is retained for.
- GDPR states that personal data shall be kept for no longer than is necessary. (Though regulatory compliance requirements can still prevail)
- Organizations must ensure personal data is securely disposed of when no longer needed.

# Retention Policies MDM

# DATA RETENTION

- Leverage the retention policies available in Zimbra. The Admin can enforce retention policies at a CoS and per user level
- Don't forget backups - only keep backup archives needed for DR and compliance
- Zimbra Mobile policies can apply limits to the amount of data synchronized on mobile devices as well as remote wipe and policy enforcement.

The screenshot displays the Zimbra Admin Console interface for configuring data retention. At the top, there is a checkbox labeled "Enable COS-level policies instead of inheriting from the policy defined in Global Settings." Below this, the "Retention Policies" section is visible, featuring a table with columns for "Policy Name" and "Retention Range". An "Add Retention Policy" dialog box is open, showing a "Policy Name" of "Sent" and a "Retention Range" of "365" days. Below the dialog, there are "Delete", "Edit", and "Add" buttons. The "Disposal Policies" section is also visible, with a table for "Policy Name" and "Disposal Threshold". Below this, the "Email Retention Policy" section is expanded, showing a note: "Note: These settings will not have effect if zimbraMailPurgeSleepInterval is". Below the note, there are three rows for "E-mail message lifetime", "Trashed message lifetime", and "Spam message lifetime", each with a numeric input field and a "days" dropdown menu. The "Sync Setting" section is also expanded, showing settings for "Past calendar items synchronized", "Past email items synchronized", "Limit plain text message size (KB)", "Allow direct push while roaming", "Allow HTML messages", and "Limit HTML message size (KB)".

Enable COS-level policies instead of inheriting from the policy defined in Global Settings.

Retention Policies

Policy Name	Retention Range
-------------	-----------------

Add Retention Policy

Policy Name: Sent

Retention Range: 365 days

Help Cancel OK

Delete Edit Add

Disposal Policies

Policy Name	Disposal Threshold
-------------	--------------------

Email Retention Policy

Note: These settings will not have effect if zimbraMailPurgeSleepInterval is

E-mail message lifetime: 0 days

Trashed message lifetime: 30 days

Spam message lifetime: 30 days

Sync Setting

Past calendar items synchronized: One Month

Past email items synchronized: One Month

Limit plain text message size (KB):

Allow direct push while roaming: ☐

Allow HTML messages: ☒

Limit HTML message size (KB):

## IDENTITY AND ACCESS MANAGEMENT

Whether it's critical data or systems, GDPR will require organizations to have the appropriate access policies in place. Your organization should review:

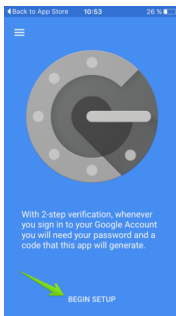
- Administrator privileges
- Ensuring only the right people have access to personal data
- Off-boarding and de-provisioning
- Strengthening authentication

**Password  
Aging &  
Complexity  
2FA**



# IDENTITY AND ACCESS MANAGEMENT

- Setup password policies in CoS
- Enable 2 Factor Authentication
- Fail2ban intrusion prevention
- Monitor audit logs for suspicious activity



Two Factor Authentication	
Enable two-factor authentication	<input type="checkbox"/>
Require two-step authentication	<input type="checkbox"/>
Number of one-time codes to generate:	<input type="text" value="10"/>
Enable application passcodes	<input checked="" type="checkbox"/>

Password	
<b>Note:</b> These settings do not affect the passwords set by users in v	
Prevent user from changing password	<input type="checkbox"/>
Minimum password length:	<input type="text" value="6"/>
Maximum password length:	<input type="text" value="64"/>
Minimum upper case characters:	<input type="text" value="0"/>
Minimum lower case characters:	<input type="text" value="0"/>
Minimum punctuation symbols:	<input type="text" value="0"/>
Minimum numeric characters:	<input type="text" value="0"/>
Minimum numeric characters or punctuation symbols:	<input type="text" value="0"/>
Minimum password age (Days):	<input type="text" value="0"/>
Maximum password age (Days):	<input type="text" value="0"/>
Minimum number of unique passwords history:	<input type="text" value="0"/>

## DATA PORTABILITY

Data subjects have the right to request an export of their data in a usable format that can be given to another vendor or service provider to import into its service.

Enabling customers to perform their own export of personal data through a secure, self-service web interface is a good way of balancing access and economics.

# Import Export

# DATA PORTABILITY

Undo Changes

## Import

File:  No file chosen

Destination:

## Export

Type: ☒ Account ☐ Calendar ☐ Contacts

All account data can be exported to a "Tar-GZipped" (.tgz) format which can be imported back into the system.

Source:

☒ Advanced settings

Data types: Include all folders from the following applications:

☒  Mail ☒  Contacts ☒  Calendar

☒  Tasks ☒  Briefcase

Date: Start On:   End On:

Search filter:

Other: ☐ Only export content files, exclude meta data

## OTHER CONSIDERATIONS

- Right to be forgotten (Compliance?, Backups?)
- Intrusion detection & audit logs
- Certification
- Consent (Legitimate interest or positive consent)
- Data sovereignty
- DLP (MyDLP?)





A close-up photograph of a person's hands holding a smartphone. The phone is held in the right hand, with the left hand resting on the wooden table surface. The phone's screen displays a colorful interface with various app icons. The background is a dark, textured wooden table. The text 'THANK YOU!' is overlaid in large, white, bold, sans-serif capital letters on the left side of the image.

**THANK YOU!**