





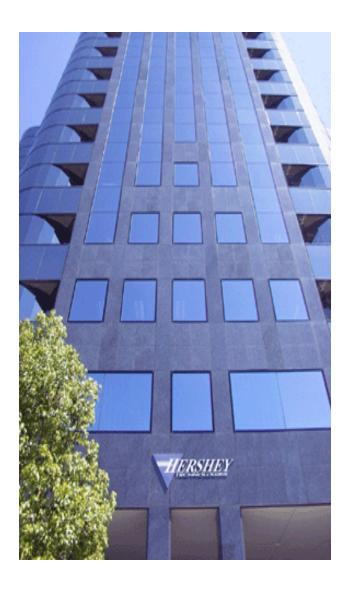
Understanding the need for information protection and the use of redaction technology types and best practices.

Neal Fischer
Principal and Founder Hershey Technologies



About Neal Fischer

- Founded Hershey Technologies in 1991
- Business Process Automation Products and services for...
 - Reduce Expenses
 - Improve Productivity
 - Automate Inefficient Processes
- Over 15 years of industry experience
- Developed Highly trained & certified technical staff













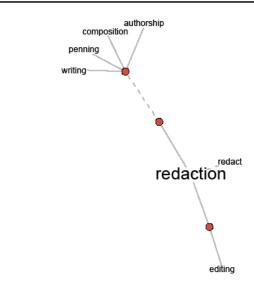


Redaction ... Defined

- re-dac-tion (rĭ-dāk'shən) _n.
- The act or process of editing or revising a piece of writing; preparation for publication.
- An edited work; a new <u>acceptable</u> edition or revision

Example: Redacted testimony suitable for public release.

redaction



NOUNS

?

editing, redaction

putting something (as a literary work or a legislative bill) into acceptable form



Use of Redaction Technology ..the collision course The Right to Know vs. Right to Privacy

- eGovt = Delivery of electronic information 7x24 ... often including public records that contain sensitive information
- The Public Call for Government Transparency and or Commercial Fair Practices vs. Responsibily to Protecting Sensitive Information through redacting or simply limiting access.









Balancing Act...Need to Know vs. Right to Know....

- Keeping Confidential Information —
- Public Access vs. Privacy Rights
- Key Business Drivers & Government Mandates
 - Compliance, Transparency
 - Industry Guidance Mandates via HIPPA, FOIA, Education, Government....
 - PCI ACT (Payment Card Information \$\$\$)



CALIFORNIA OFFICE OF PRIVACY PROTECTION





What Information is Protected?

Exemptions to FOIA

- National Defense
- Compromises Personnel & Operating Procedures
- Attorney Client Privilege
- Personal Identifiable Information

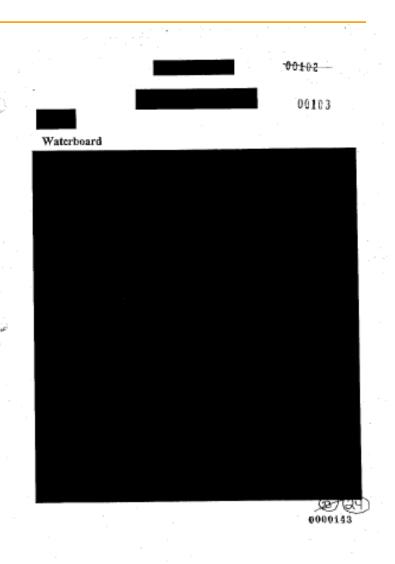
REDACTION CITATIONS

The red letters and numbers refer to specific exemptions of the Freedom of Information Act (Title 5 U.S.C § 552) that protect the redacted (blacked out) information.

- (b) (1) denotes a redaction to protect information that is properly and currently classified in the interest of national defense, as specifically authorized under the criteria established by Executive Order and implemented by regulations, such as DOD 5200.1-R (Reference (G)). Information is withheld because it contains information concerning military operations and vulnerabilities or capabilities of plans and release of this information would impede the defense of national security.
- (b) (2) (High) denotes a redaction to protect personnel, operating procedures, and national security. Information is withheld because release of this information would clearly or could be expected to impede the conduct of the mission, allow circumvention of previously unknown tactics, and place personnel at increased risk for injury or death.
- (b) (3) specifically 10 USC §130b denotes a redaction to protect personnel. Information is withheld because release of this information would clearly constitute or could be expected to constitute placing personnel in overseas, sensitive, or routinely deployable units and their family members at increased risk for injury, harm, or death.
- (b) (5) denotes a redaction to protect attorney work product or attorney client privilege. Information is withheld because release of this information would constitute or could be expected to be a violation of attorney client privilege and a failure to protect attorney work product.
- (b) (6) denotes a redaction to protect personal privacy. Names and identities of personnel as well as other personal identifying information are withheld because release of this information would clearly constitute or could be expected to constitute an unwarranted invasion of the personal privacy of the individuals.

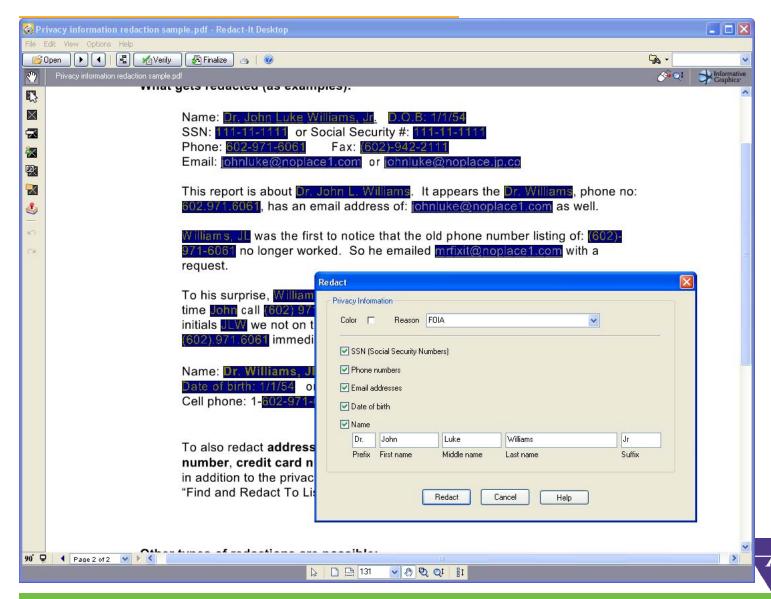


Examples of Redaction ..National Defense Policy





Examples of Redaction Privacy Protection (PII)



Examples of Redaction ...Public Testimony

REDACTED PREPARED SUPPLEMENTAL TESTIMONY OF

DEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Table 1 Projected in-service schedule for New PPAs

(MW- nameplate capacity)	2007	2008	2009	2010	2011	2012	Total
Renewable Resources PPAs	2	5	7	275			288
Peaker PPAs for CDWR Replacement /Resource Requirements				450	150	200	930



Fastest growing crime ..ldentity Theft





Legislation protecting personal data and consumer rights to privacy, emphasizing the importance of achieving a balance between business information benefits and consumer rights.

data protection • credit information • developing countries • emerging economies • legislation • personal data • privacy • cyber threats • regulation • security • standards • credit reporting service

Why best practices and selection of the proper redaction methods matter

Balancing process with efficiency

- Develop best practice to ensure content protection regardless of format (Paper, Electronic)
- Properly identify content at risk and completely remove affected content
- Protect integrity of original document
- Streamlined & cost-effective redaction process
- Reduces mistakes
- Easy to comply with electronic filing rules



Examples of Redaction ... Poor execution of business practice

WASHINGTON, Dec. 8, 2009

Unredacted TSA Manual Leaked Online An embarrassing security breach concerning the TSA's manual for screening air travelers

•129 Comments By Bob Orr

(CBS News) It was a security breach and a big embarrassment for the Transportation Security Administration. A secret manual that tells airport screeners around the country how to do their jobs somehow wound up on line for all the world to see.

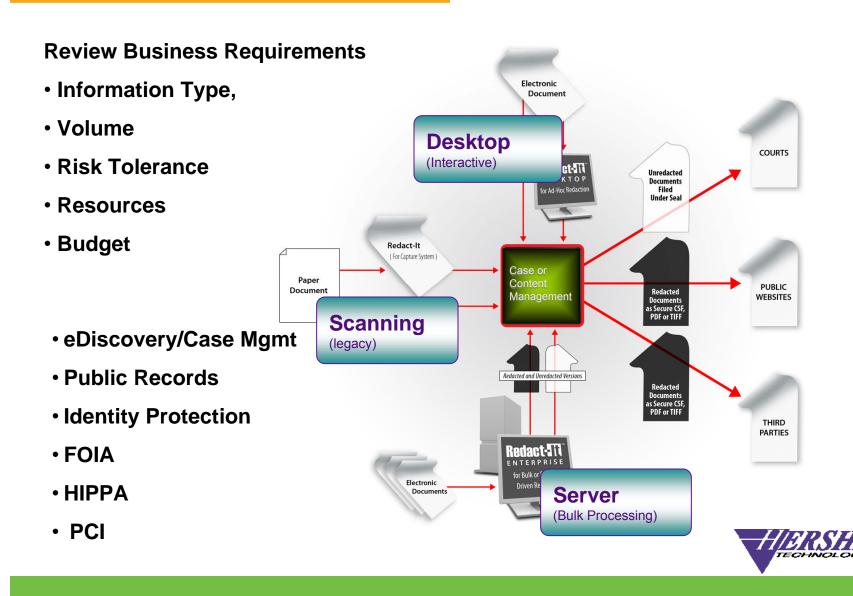
Play CBS Video TSA Security Breach



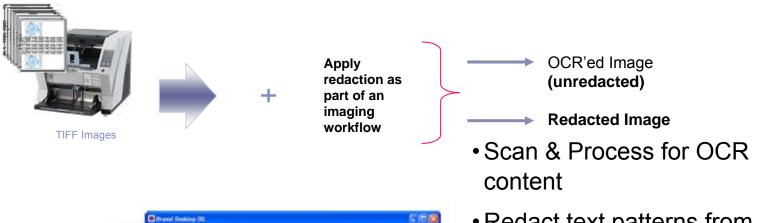
Like this Story? **Share On Facebook**

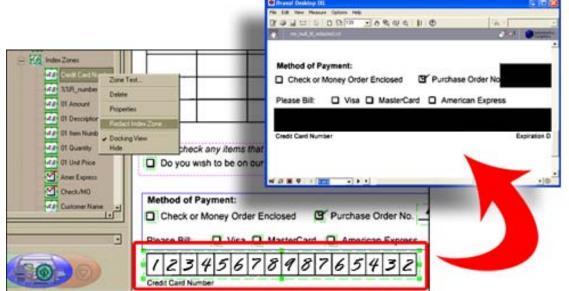


Types of Redaction Technology Offerings & Use Cases



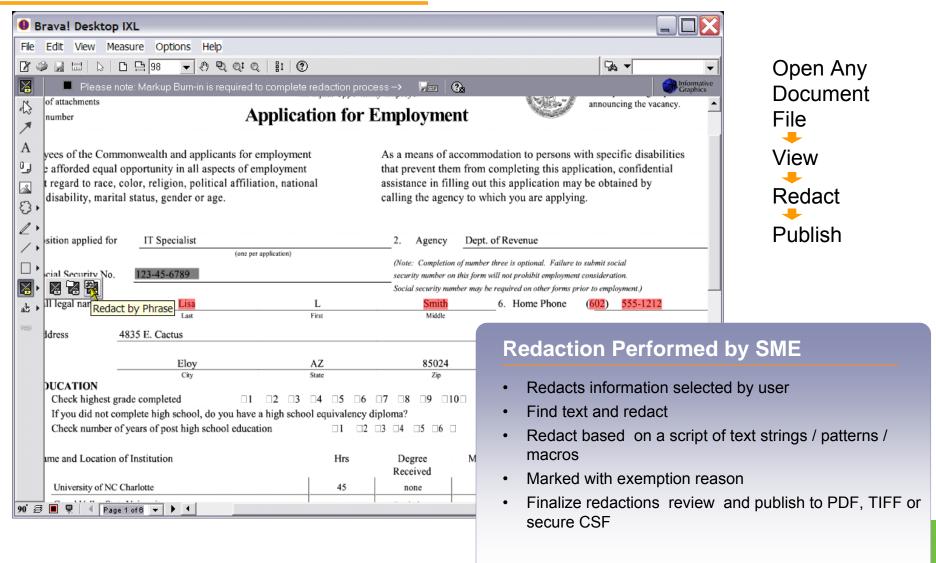
Redaction Use Cases: #1 Protecting privacy with paper documents & forms





- Redact text patterns from OCR locations or <u>structured</u> <u>zones</u>
- Support for remote "<u>ad-hoc"</u> visual review
- Uploads redacted and nonredacted original records files to content, case or records management system

Use Cases # 2 Support for Ad-Hoc Redaction — Key words & text strings



Use Case # 3

High Volume - Rules Based Redaction Monitor 🚷 Privacy information redaction sample.pdf - Redact-It Desktop **Files** Open
▶ ◀ | □
Was Verify
Finalize
⑤ | ② Graphics vviiai yetə reuduleu (də examples). Open X Name: Dr. John Luke Williams, J. Document 只 SSN: 111-11-1111 or Social Security #: 1 Phone: 602-971-6061 Fax: (602)-942-211 X Email: johnluke@noplace1.com or johnluke@noplace.jp.co _File This report is about Dr. John L. Williams. It appears the Dr. Williams, phone no: View 602.971.6061, has an email address of: ohnluke@noplace1.com as well. Williams, JL was the first to notice that the old phone number listing of: (602)-Redact 971-6061 no longer worked. So he emailed mrfixit@noplace1.com with a request. Redact Review To his surprise, William Privacy Information time John call (602) 97 Color Reason FOIA initials JLW we not on t **Finalize** 602).971.6061 immedi SSN (Social Security Numbers) Phone numbers Name: Dr. Williams, J Date of birth: 1/1/54 or **Automated Redaction System** Cell phone: 1-602-971 ✓ Date of birth ✓ Name Dr. John Redact event handling preset information selected by user To also redact address Prefix First n number, credit card n Find text and redact in addition to the privac "Find and Redact To Lis Redact to a script of text strings / patterns / macros Marked with exemption reason Redaction authoring saved as XML "RedactUps" – recall later 90 Page 2 of 2 and change required D 🖺 131 Add Bates numbers, Identify SS #, Credit Cards #, ID # Finalize redactions and publish to PDF, TIFF or secure CSF

Technology Demonstration

Automated Redaction & Image Annotation Services

In Action



Best Practices

- Keep in the mind the following when taking on projects that require redaction:
- Understand the use cases, volumes, schedules, resources and specific features of the tools you will need.
- Consequences and Risks of accidental information disclosure.
- Is all the information removed?
 - Is there additional hidden text, abbreviations metadata, etc.



Best Practice and Common Sense Matter

- CALIFORNIA CRIMINAL EVIDENCE: AND REDACTION
- A common privacy protection solution is often to redact the statement to delete your client's name and insert a pronoun. Often, this isn't enough.
- The California Supreme Court, noting that where, as here, the reference to "the other" led to the <u>obvious</u> inference that it was the defendant, the redaction doesn't cure the error.



Best Practics – continued

- Understand the software tool sets and labor dependencies.
 - Redaction typically creates two (2) files ...
 - Example: Acrobat <u>does not rename</u> the document for you, so exercise care.
 - Redactions must be <u>applied individually</u>, to each document.
- Examine the feature set...
 - Search and Redact features will only find text in searchable documents
 - What about <u>pattern matching</u>. e.g. number strings, <u>fault tolerance</u> etc. (Fischer, Fisher)?

Best Practices (cont)

- Carefully review all documents prior to submission in discovery. Setup a redaction workflow team, a twoperson review team will catch many more errors than a single person.
- Know your local court rules and judges orders regarding redaction.
- Commercial clients ...ask the company assigned legal council or clerk of the court for clarification if you need more information.



Questions & Answers

