

EDM Webinar

Google Cloud: Automating Cloud Data Governance

A conversation with



Mose Tronci
Industry Solution Architect
Google Cloud



Mark Tomlinson
Principal Architect
Google Cloud



Moderator



Jim Halcomb

Head of Product
Management
EDM Council



Mose Tronci

Industry Solution Architect
Google Cloud



Mark Tomlinson

Principal Architect
Google Cloud



What type of organisation do you work for?

- Enterprise
- Public sector
- Technology provider / Hyperscaler
- Consulting
- Other

Cloud Data Management Capabilities (CDMC)

CDMC Working Group



Cloud Challenges

- **Regulatory Mandate:** safeguard cloud computing services to protect customers' sensitive information
- **Inefficiency:** data, technology, regulatory and planning challenges on nearly every cloud implementation
- **Complexity:** 89% of firms use 2 or more cloud providers*



CDMC Group Objectives

1. **Best Practices** for a hybrid-cloud world
2. **Cloud Data Controls** to meet regulatory obligations for protecting Sensitive Data
3. **Accelerate Trusted Cloud Adoption** modeled after the DCAM data management industry framework



Cloud Data Management Capabilities (CDMC) Industry Engagement



100+ Organizations – 300+ SME participants – Cross Industry Leading Organizations

CDMC Working Group



Cloud & Technology Providers



Regulatory Engagement



- **US:** Federal Reserve, SEC, CFTC, FDIC
- **Canada:** OSFI
- **UK:** BoE, FCA, ICO
- **EU:** ECB, ESMA (pending)
- **Germany:** BaFin
- **Switzerland:** FinMA
- **Australia:** APRA
- **Singapore:** MAS
- **Israel:** Bank of Israel
- **India:** RBI, SEBI (pending)
- **Africa/Middle East:** 20+ Regulators
- Others in process...

CDMC Adoption Support



- Training Courses
- Cloud Service Certification
- Open Source Tools
- CDMC Authorized Partner Program

2022
CDMC Framework Validated
Cross Industry



- Life Sciences
- Telecommunications
- Manufacturing
- Retail / Services / CPG
- Consumer Tech
- Government / Defense

**CDMC Working Group Delivered release v1.1
28 September 2021**

Google Cloud becomes the next CDMC Cloud Certified Solution



Security & Identity

How to migrate sensitive data with confidence using Google Cloud's CDMC-certified architecture

June 26, 2023



ANNOUNCEMENTS



EDM Council Designates Google Cloud as a Certified Cloud Solution

Mon, Jun 26, 2023

Google Cloud clients migrating sensitive data to the cloud can do so with greater confidence now that Google Cloud has been certified against EDMC's CDMC control framework

New York, NY – June 26, 2023 – EDM Council, the leading global non-profit trade association for advocating data management and analytics, has today announced that Google Cloud's new solution architecture, which combines Google Cloud's BigQuery and Datanplex, has been independently

Recent Announcements [See all](#)



Aldefi becomes the newest member to join the EDM Council

Automating Cloud Data Governance

Mose Tronci, Industry Solution Architect

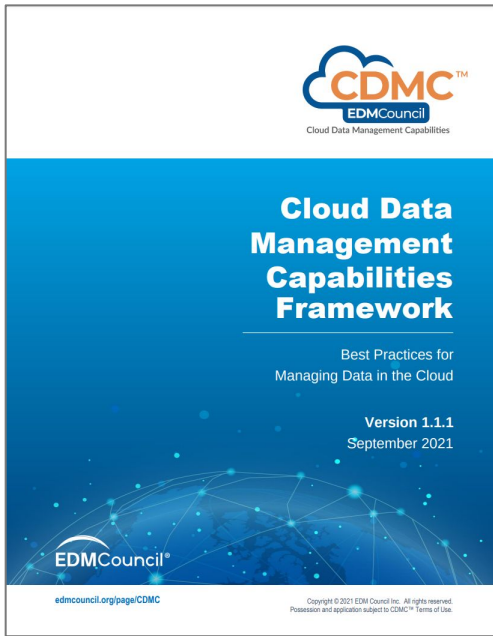
Mark Tomlinson, Principal Architect



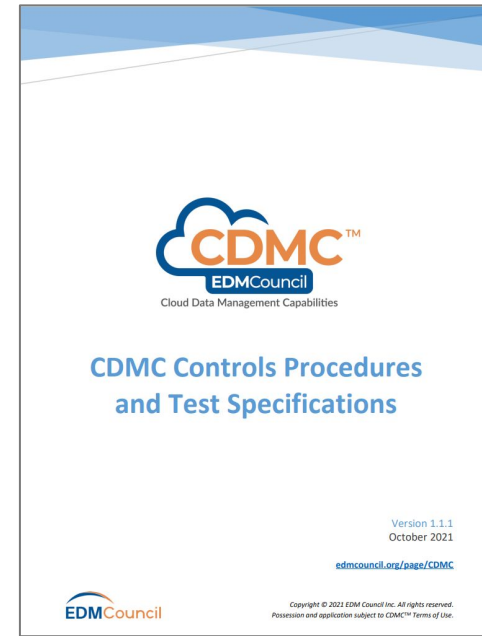
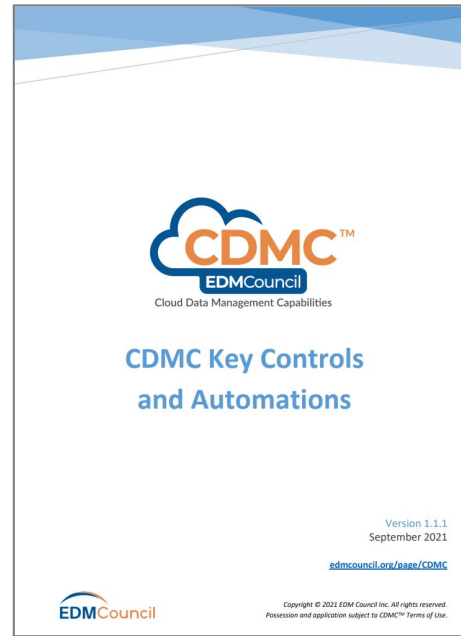
What is your role?

- Data Management professional
- CDO
- Data Engineer
- Cloud Architect
- Project Manager
- Consultant
- Sales
- Other

CDMC Main Elements Recap



CDMC ASSESSMENT Sub-Capability Survey					
1.0.0 Governance & Accountability					
The Governance & Accountability component is a set of capabilities that ensure an organization has clear accountability, controls and governance for data migrated to or created in cloud environments. These capabilities provide the foundation of well-governed business cases, effective data ownership, governance of data sourcing and consumption and management of data sovereignty and cross-border data movement risks.					
Component Score:					#ERROR!
1.1.0 Cloud Data Management Business Cases Are Defined And Governed					
The organization must have clearly defined business cases for the management of data in cloud environments. These must include a framework of measures of the value to be realized. Each business case must be approved by an appropriate authority and sponsored by accountable stakeholders.					
Capability Score:					
1.1.1 Cloud Data Management Business Cases Are Syndicated and Governed					
As an organization moves its data and operations to cloud environments, it is important to develop, communicate, cultivate, and support business cases for cloud data management. An effective cloud data management business case defines the objectives and expected outcomes of the implementation. It is vital to develop an entire cloud business case framework of metrics, measures and key performance indicators to articulate the value of cloud data management.					
Sub-Capability					
1 Not Initiated	2 Conceptual	3 Developmental	4 Defined	5 Achieved	6 Enhanced
No formal standard cloud data management business cases exist.	No formal standard cloud data management business cases exist, but the need is recognized, and the development is being discussed	Formal standard cloud data management business cases are being developed.	Formal standard cloud data management business cases are defined and validated by stakeholders.	Formal standard cloud data management business cases are defined and adopted by the organization.	The formal standard cloud data management business cases are established as part of business-as-usual practice with continuous improvement.
1.1.2 Cloud Data Management Business Cases Are Syndicated and Governed					
Each cloud data management business case must be approved by an appropriate authority and sponsored by accountable stakeholders. Successfully managing data in cloud environments requires substantial support from both business and technology stakeholders within an organization. The interests of these groups must be aligned early and consistently represented through deployment.					
Each cloud data management business case must be enforceable and periodically reviewed by sponsors throughout deployment and the cloud data management lifecycle. Reviews will ensure that the business cases meet requirements as the organization's objectives evolve and the stakeholders change.					



CDMC 1.1.1 Framework
Defines the 14 capabilities and 37 sub-capabilities across 6 domains.

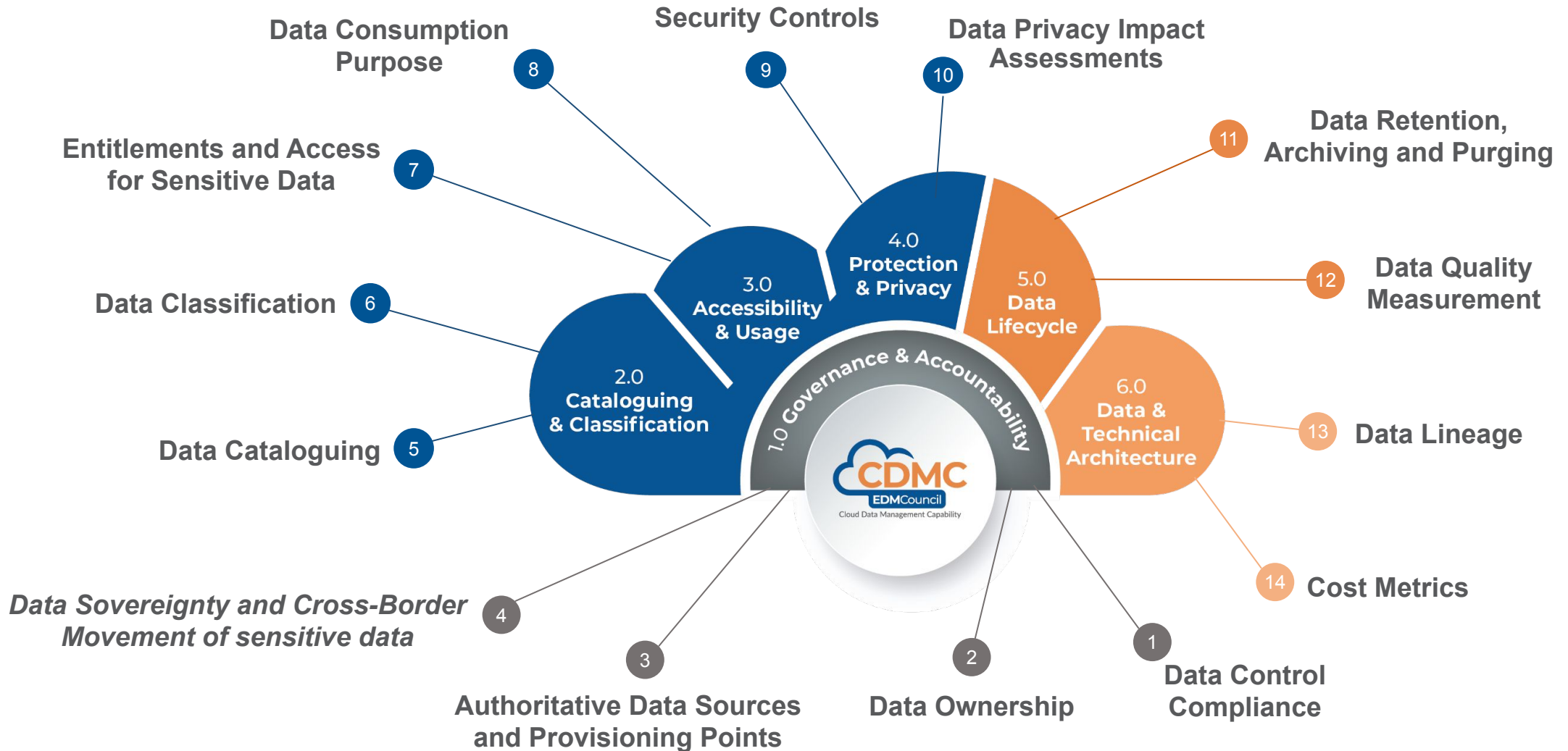
CDMC 1.1.1 Assessment Template
Spreadsheet to facilitate sub-capability assessments using scoring guide of 1 to 6.

CDMC 1.1.1 Key Controls
Specifies 14 key controls across the 6 framework domains.



CDMC 1.1.1 Controls Procedures and Test Specifications
Outlines tests and evidence required for third-party CDMC platform/solution certification

Cloud Data Management Capabilities

14 Key Controls for Managing Data Risk



CDMC Assessment types

Assessment Type	Target	Use For	Basis	Uses CDMC Capability Framework?	Uses CDMC Key Controls Framework?	Uses CDMC Key Controls Test Procedures?	Assessed By
CDMC Certification 	Individual	Personal skills, Planning	Training Attendance	Yes	No	No	Online Exam
CDMC Readiness Assessment	Consumer	Planning and Progress Tracking	Sentiment or Evidence-based	Yes	Optional	Optional	Self- or CDMC Authorized partner
CDMC Certification Assessment	Consumer	Formal Audit, Regulatory Preparation	Evidence-based	Yes	Yes	Yes	CDMC Authorized partner
CDMC Certification Assessment 	Cloud Providers	Planning and Independent Evidence	Evidence-based	No	Yes	Yes	Independent CDMC Authorized partner

Focus today

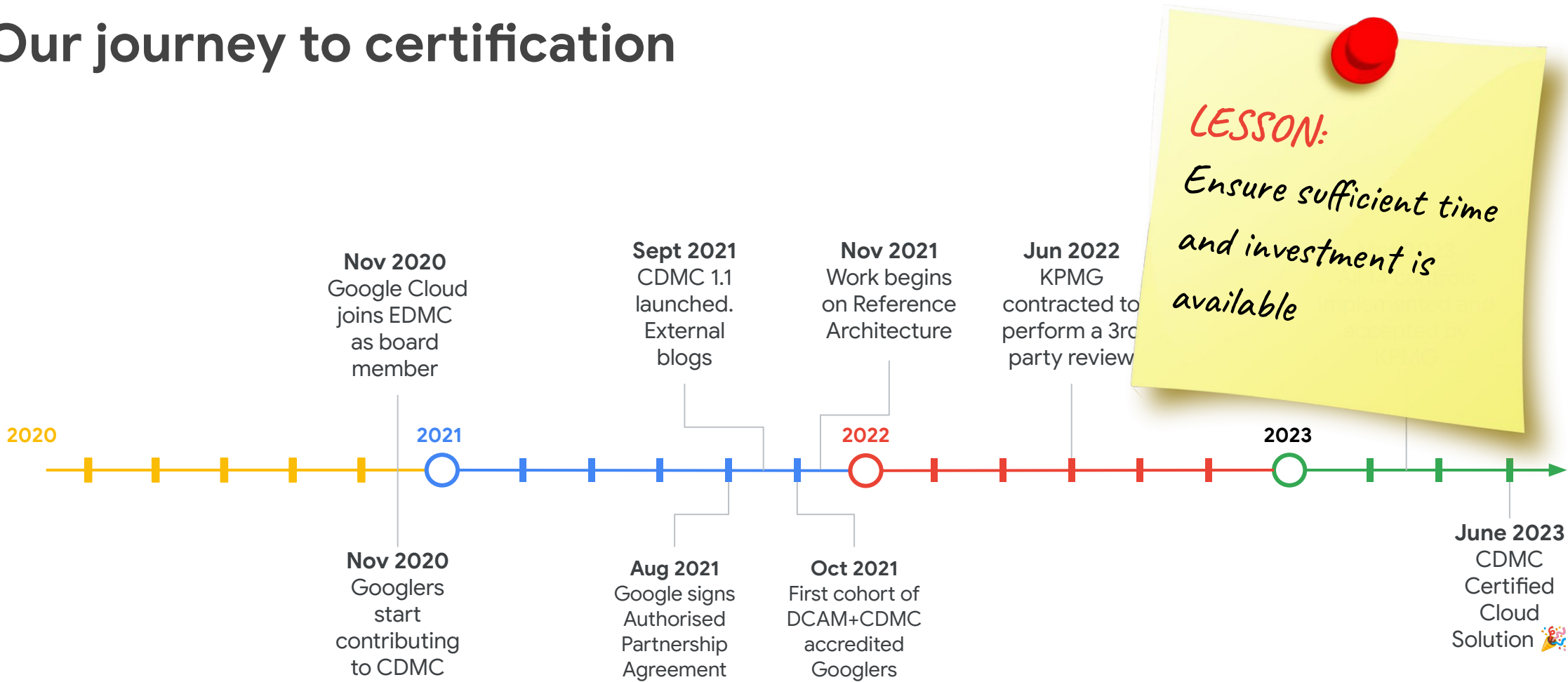


Relevant Lessons



Key Differences

Our journey to certification



Introducing the Google CDMC Team

Executive Sponsors



Prajakta Damle
Director, Prod Mgmt
(Data Gov)
EDMC Board



Andy Chang
Group Prod Mgr
(Security)
Blueprint Sponsor

CDMC GCP Reference Architecture Team



Mose Tronci
Industry Solns
Architect
EDMC Lead



Mark Tomlinson
Principal Architect
Project Lead



Eduardo Marreto
Cloud Data
Engineer



Erlander Lo
Senior Product
Manager, Security
Blueprint Lead



John Swain
Customer
Engineer, Smart
Analytics



Shirley Cohen
Solutions Architect
Tag Engine Lead



Svitlana Gavrylova
Data Management
Practice Lead UK

CDMC 1.1 Specification Working Group Contributors



Mose Tronci
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Manager, Data
Governance



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Customer
Engineer, ML



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Innovation Lead,
Financial Services,
PSO



Svitlana Gavrylova
Data Management
Practice Lead UK



Tinh Ha
Cloud Data
Engineer, PSO



Google Cloud CDMC Reference Architecture

core principles

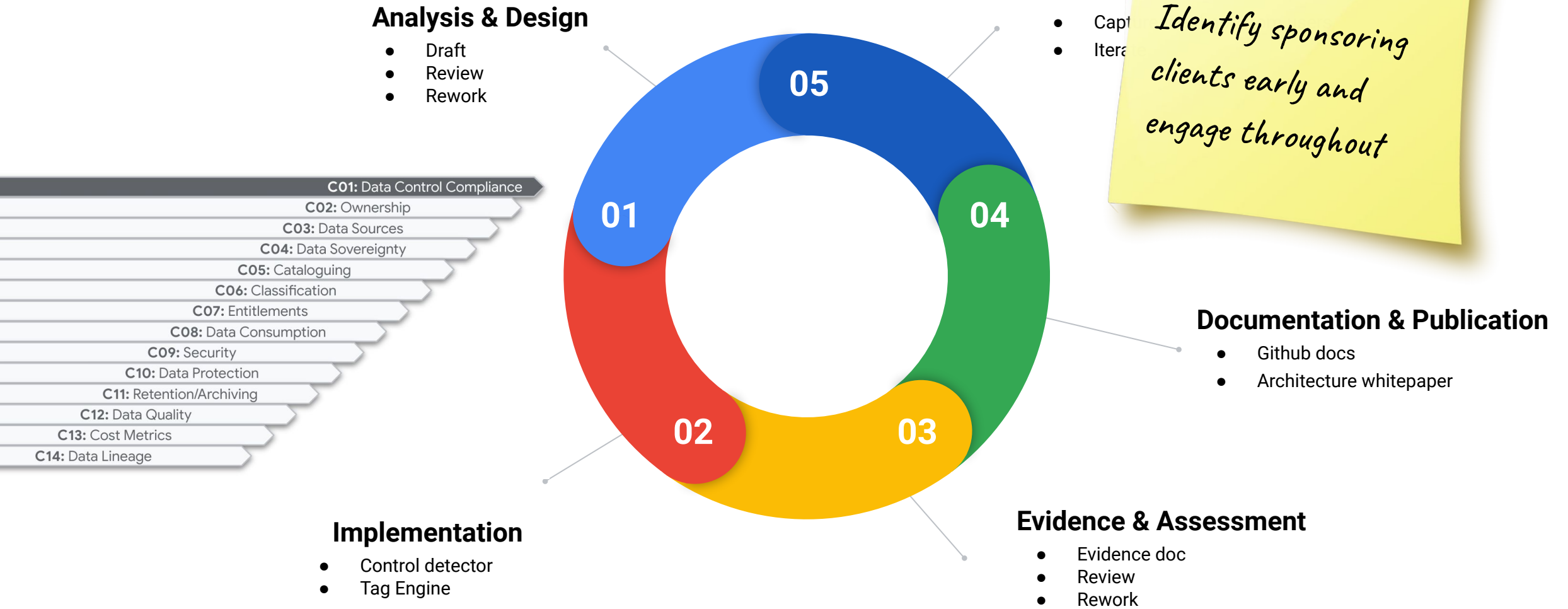


#	Principle
1	Build on prior work and maximize reuse
2	Implement all 14 CDMC controls
3	Align to product roadmap, but minimize dependencies on future i
4	Prefer native Google Cloud features over third party services
5	Strong preference for full automation, but pragmatic, iterative ap
6	Author with intent to publish externally for customers and partn
7	Provide value-add for both new and established Google Cloud

LESSON:
Consider bespoke vs.
reusable
implementation

LESSON:
Consider starting
with limited
automation and
iterate

Delivery process overview



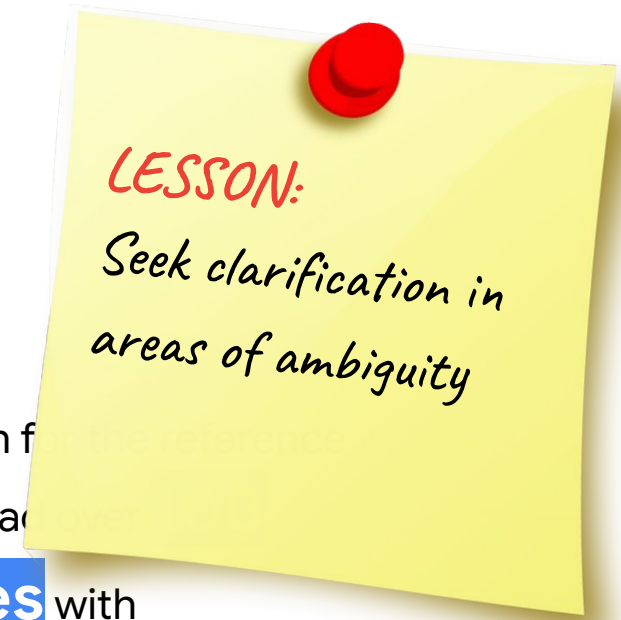
Where are you on your CDMC journey?

- Not started
- Currently investigating
- Project in progress
- Already assessed
- Already certified

Analysis & Design - key stats

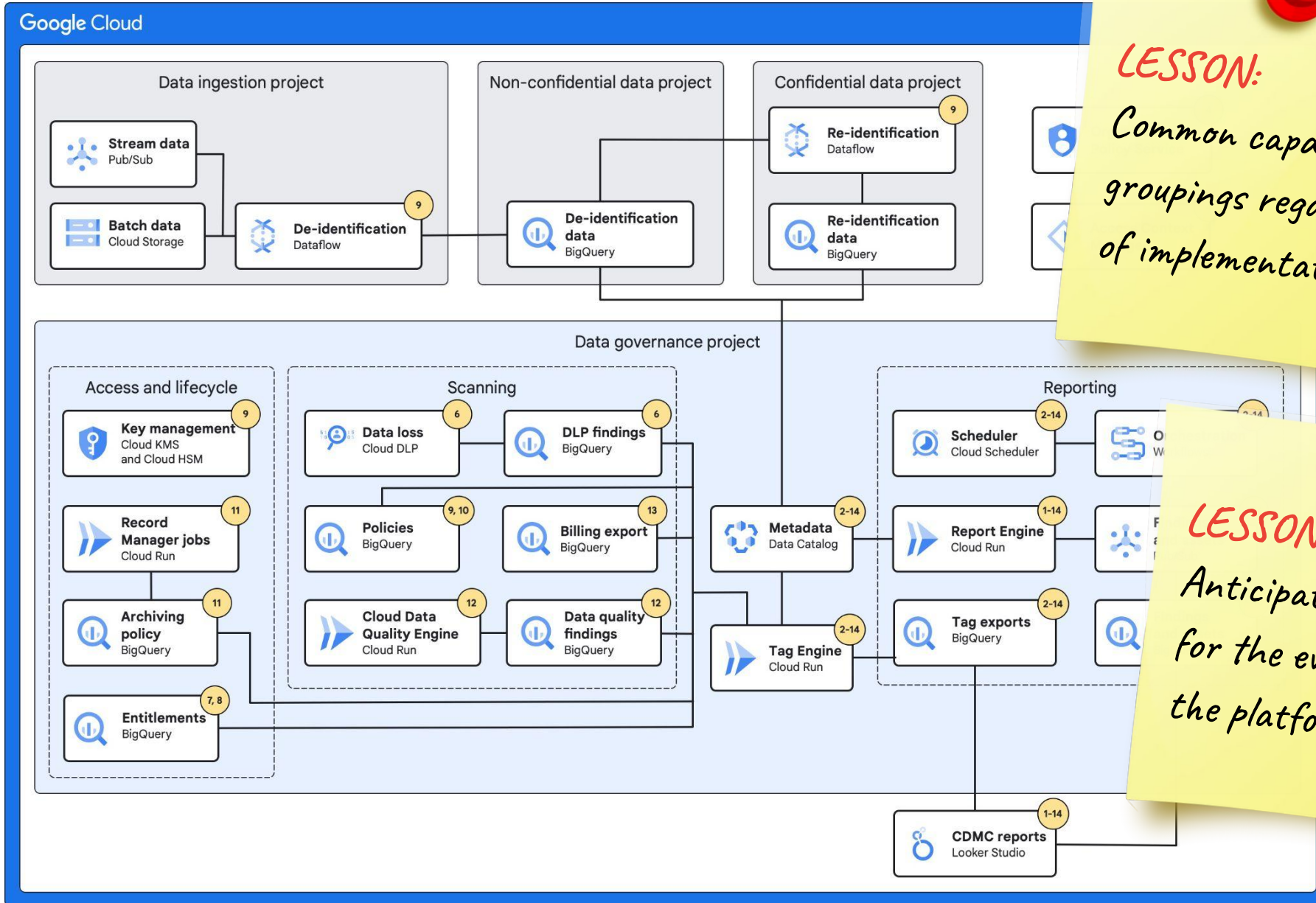
The CDMC framework specification extends to **165 pages** and details **37 sub-capabilities** of data management and governance

The internal design for architecture has **pages** with **60 figures**, and **136 design decisions**



No perfect answer - need to put a stake in the ground

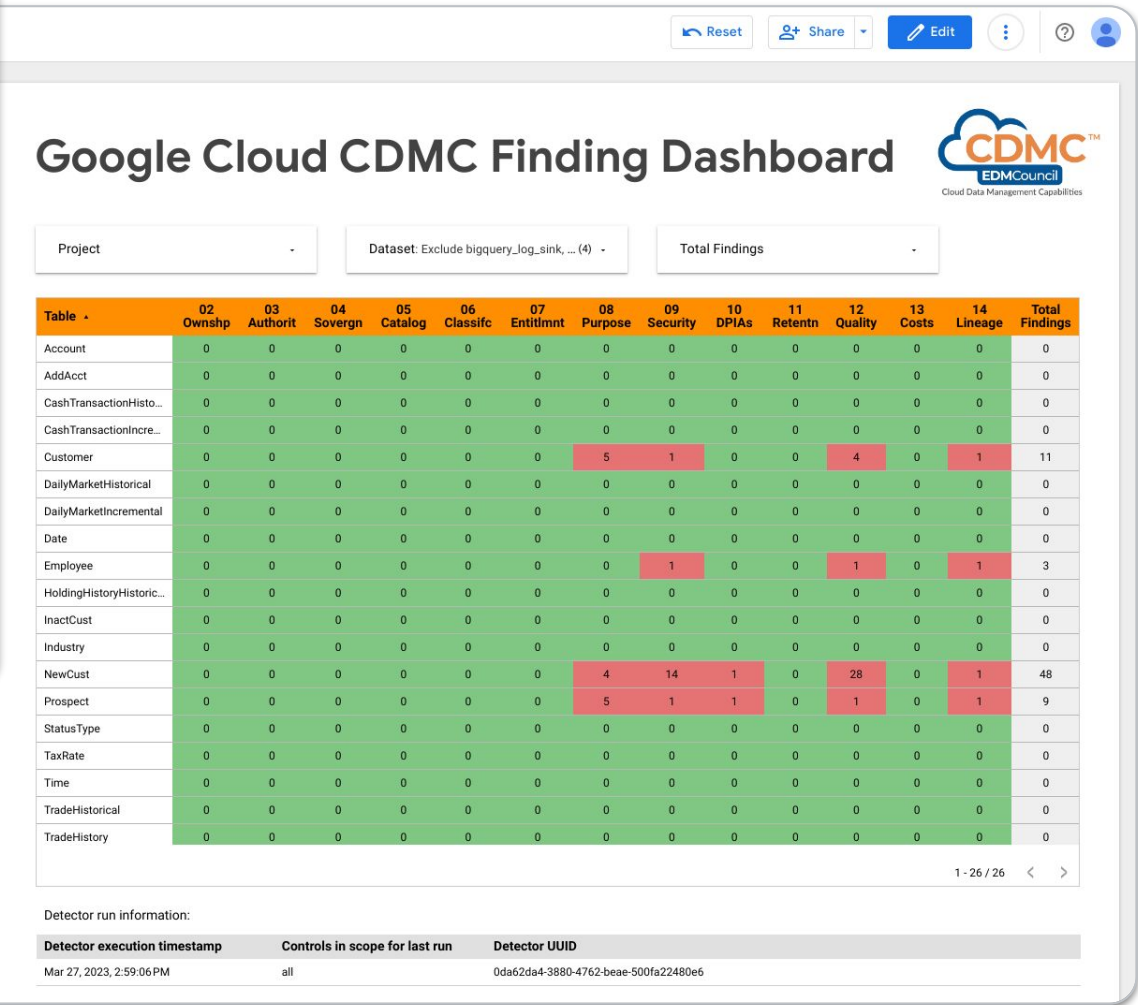
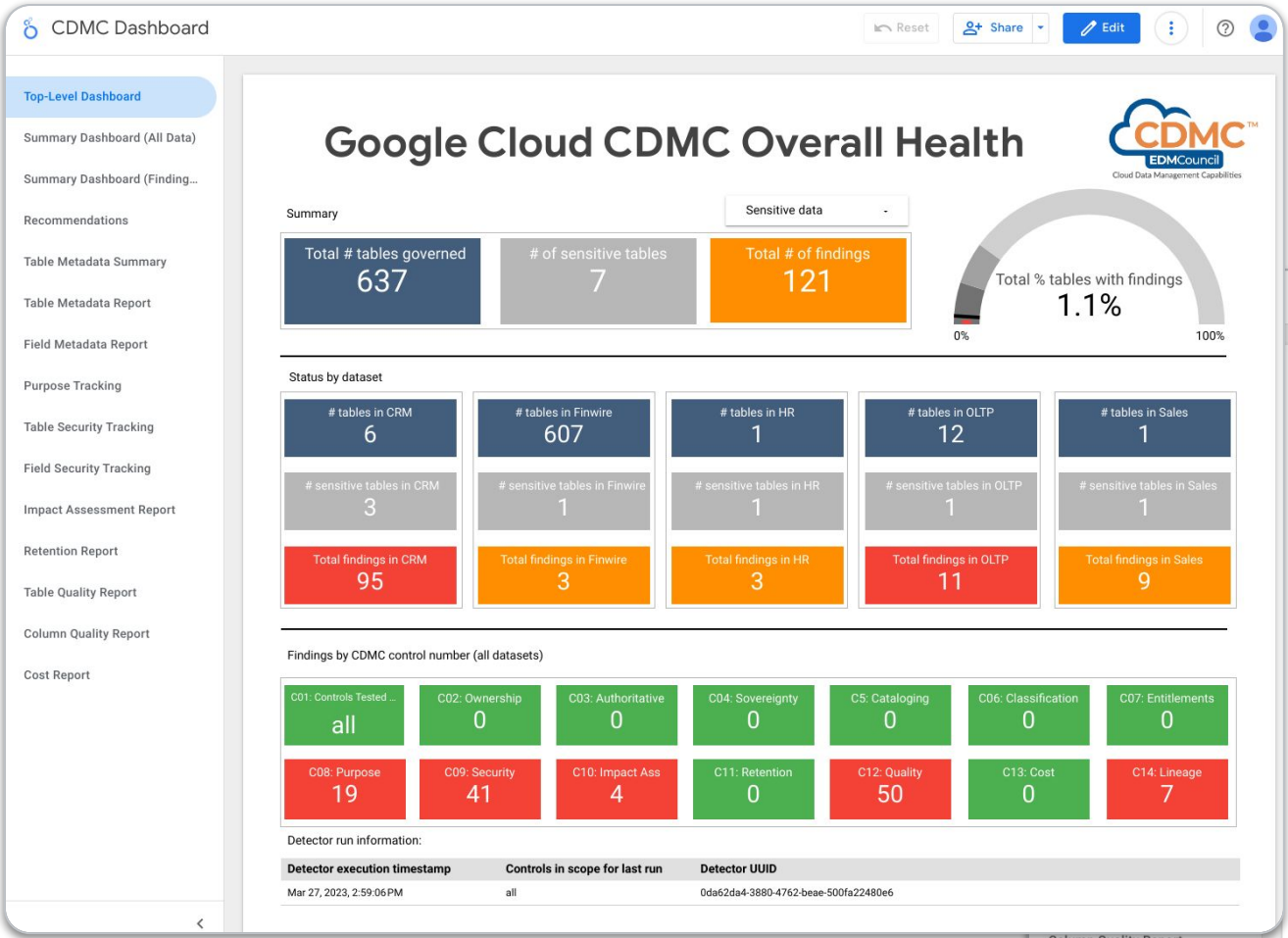
Implementation: Overview and Control Map



LESSON:
Common capability groupings regardless of implementation

LESSON:
Anticipate and budget for the evolution of the platform

Control # Map



All findings in one place

Implementation: Test Datasets, subset of TPC-

Confidential Data Perimeter

Confidential Data Project sdw-conf-b1972e-bcc1

BigQuery (us-central1)

Dataset crm	Dataset finance	Dataset ...
Table AddAcct	Table FINWIRE1969Q3_SEC	Table ...
Table CloseAcct	Table FINWIRE1998Q2_FIN	Table CashTransactionHistorical
Table InactCust	Table ...	Table CashTransactionIncremental
Table NewCust		Table Customer
Table UpdAcct		Table DailyMarketHistorial
Table UpdCust		Table ...

*LESSON:
Test data selection
critical*

Our [TPC-DI](#)-derived test data provides a large selection of data classifications and meaningful volumes to demonstrate our capabilities.

KPMG Assessment process

CDMC GCP Reference Architecture Control 3 Assessment Evidence

Control Procedure and Test Specification	
CDMC Component:	1.0 Governance & Accountability
CDMC Capability:	1.3 Data sourcing and consumption are governed and supported by automation
Control Description:	A register of Authoritative Data Sources and Provisioning Points must be populated for all data assets containing sensitive data or otherwise must be reported to a defined workflow.
Assessment Procedure:	Inspect the data register to confirm it contains information on authoritative data sources and consuming users/distributors of the information or otherwise must be reported to a defined workflow.
Procedure Assumption:	The control recommends automation, however an ad hoc report is sufficient as part of a regular data governance review.
BAU Procedure Frequency:	Compliance is reviewed regularly such as quarterly and/or automated to require data source to be populated at the point of creation and/or classification of data assets as sensitive, and consistently maintained.
Data Requirements:	<ul style="list-style-type: none"> Data assets classified as sensitive/critical data assets. Register of authoritative sources and authorized distributors.
Evidence & Output:	<ul style="list-style-type: none"> Reporting/dashboard evidencing all data assets, where classification is sensitive, have an assigned authoritative source that can be found in the register.

Introduction

The Google Cloud Reference Architecture aligned to the CDMC v1.1 Key Control Framework is based on Google's Secure Data Warehouse [Blueprint](#). The Blueprint includes a design for securely storing confidential data in the cloud and a set of Terraform configurations and scripts used to deploy an example environment.

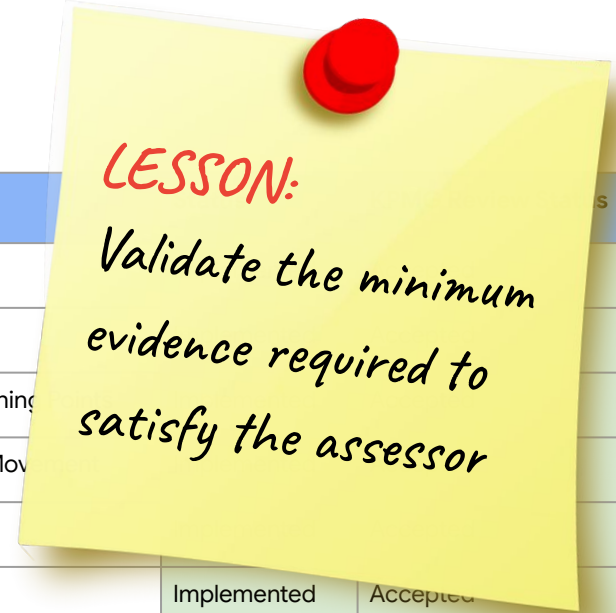
The following Google Cloud Platform (GCP) Services are used for the implementation of this control:

- BigQuery (BQ)**, a serverless, highly scalable, and cost-effective multi-cloud data warehouse. This is the datastore for the data assets, and also used as the storage mechanism for any control findings.
- Data Catalog**, a fully managed and highly scalable data discovery and metadata management service. This provides the data catalog used to store metadata about the data assets.
- Technical metadata about all GCP data assets is automatically populated and synchronized.
- Tag Engine** is a self-service tool used to bulk populate metadata in Data Catalog.
- Terraform** is an open-source infrastructure as code software tool. It is used within the Blueprint and control configuration to automate the deployment and configuration of data assets.

GCP CDMC RA Evidence Docs

Evidence documents for each Control validating alignment to criteria in test specification (300+ pages)

#	Description	Implemented	Accepted
1	Data Control Compliance		
2	Ownership Field		
3	Authoritative Data Sources & Provisioning		
4	Data Sovereignty and Cross-Border Mov		
5	Cataloging		
6	Classification	Implemented	Accepted
7	Entitlements and Access for Sensitive Data	Implemented	Accepted
8	Data Consumption Purpose	Implemented	Accepted
9	Security Controls	Implemented	Accepted
10	Data Protection Impact Assessments	Implemented	Accepted
11	Data Retention, Archiving and Purging	Implemented	Accepted
12	Data Quality Measurement	Implemented	Accepted
13	Cost Metrics	Implemented	Accepted
14	Data Lineage	Implemented	Accepted



Documentation & Publication: Our primary technical deliverables

Implement the CDMC key controls framework in a BigQuery data warehouse

Preview

This product or feature is covered by the [Pre-GA Offerings Terms](#) of the Google Cloud Terms of Service. Pre-GA products and features might have limited support, and changes to pre-GA products and features might not be compatible with other pre-GA versions. For more information, see the [launch stage descriptions](#).

Many organizations deploy cloud data warehouses to store sensitive information so that they can analyze the data for a variety of business purposes. This document describes how you can implement the [Cloud Data Management Capabilities \(CDMC\)](#) Key Controls Framework, managed by the Enterprise Data Management Council, in a BigQuery data warehouse.

The CDMC Key Controls Framework was published primarily for cloud service providers and technology providers. The framework describes 14 key controls that providers can implement to let their customers effectively manage and govern sensitive data in the cloud. The controls were written by the CDMC Working Group, with more than 300 professionals participating from more than 100 firms. While writing the framework, the CDMC Working Group considered many of the legal and regulatory requirements that exist.

This BigQuery and Data Catalog reference architecture was assessed and certified against the CDMC Key Controls Framework as a CDMC Certified Cloud Solution. The reference architecture uses various Google Cloud services and features as well as public libraries to implement the CDMC key controls and recommended automation. This document explains how you can implement the key controls to help protect sensitive data in a BigQuery data warehouse.

Architecture

The following Google Cloud reference architecture aligns with the CDMC Key Controls Framework Test Specifications v1.1.1. The numbers in the diagram represent the key controls that are addressed with Google Cloud services.

The diagram illustrates a reference architecture on Google Cloud. It includes components like 'Data Ingestion project', 'Non-confidential data project', and 'Confidential data project'. Specific services shown include 'Stream data', 'Re-identification toolset', and 'Organization Policy Service'.

GCP CDMC Whitepaper (40+ pgs)

Overview of the reference architecture and controls

Search or jump to...

GoogleCloudPlatform / cdmc Private

Code Issues Pull requests Actions Projects Security Insights

main 4 branches 0 tags

Go to file Add file Code

swainjo Merge pull request #16 from Google... 8cf74ff 2 days ago 48 commits

dashboard	Initial dashboard commit	last week
data-ingestion	Merge pull request #4 from GoogleCloudPlatf...	last week
data-quality	minor docs updates	last week
data-scanning	Update inspect_datasets.py	3 days ago
report-engine	renamed report-engine folder	3 weeks ago
tagging	added remaining steps to the tagging guide	3 weeks ago
.gitignore	changed setup and successfully run terraform ...	2 days ago
CONTRIBUTING.md	Add files via upload	last month
LICENSE.md	Add files via upload	last month
README.md	Fixed dashboard link in main README	last week
environment-variable...	Update environment-variables.example	last week
setup.sh	changed setup and successfully run terraform ...	2 days ago

Google Cloud CDMC Reference Architecture

This repository contains the CDMC reference architecture for Google Cloud. This architecture includes the detailed instructions and technical details for implementing the CDMC Key Controls Framework in a BigQuery data warehouse.

Releases: No releases published. Create a new release

Packages: No packages published. Publish your first package

Contributors: 5

Languages: Python 79.1%, Shell 16.5%

GitHub Repo

Publication of example assets (scripts, detectors, setup guide) into new standalone repo.



Cloud Data Management Capabilities

CDMC Information Model Controls Tests Mappings

Version 1.1
October 2022

edmcouncil.org/page/CDMC



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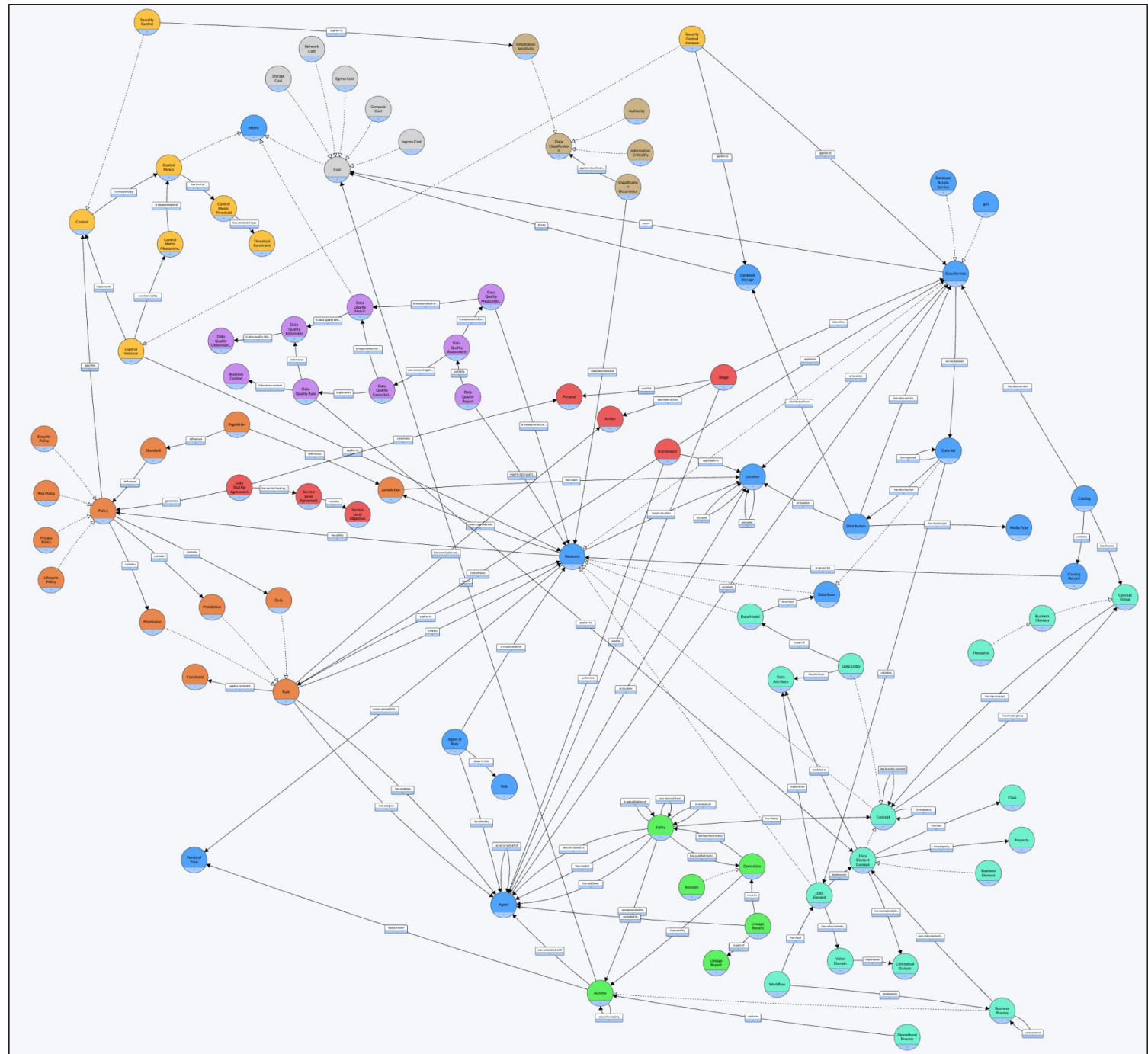




Table-level CDMC Tag Templates

CMDC Controls Template

Data Owner Name	2
Data Owner Email	2
Is Authoritative	3
Approved Storage Location	4
Is Sensitive	6
Sensitive Category	6
Approved Use	8
Sharing Scope Geography	8
Sharing Scope Legal Entity	8
Encryption Method	9
Retention Period	11
Expiration Action	11
Ultimate Source	14

Data Lineage

Auto-Discovered Lineage Nodes	14
Ultimate Source Lineage Node	14

Prepopulated Technical Metadata

Asset Type	5
Resource URL	3
Location	4
Creation Time	
Expiration Time	11

Impact Assessment Template

Subject Locations	10
Is DPIA	10
Is PIA	10
Impact Assessment Reports	10
Most Recent Assessment	10
Oldest Assessment	10

Field-level CDMC Tag Templates

Prepopulated Technical Metadata

Type	
------	--

Data Sensitivity Template

Sensitive Field	
Sensitive Type	

Security Policy Template

Platform De-Identification Method	9
Application De-Identification Method	9

Cost Metrics Template

Total Query Bytes Billed	13
Total Storage Bytes Billed	13
Estimated Query Cost	13
Estimated Storage Cost	13

LESSON:
 Consider tactical
 metamodel vs. CDMC
 information model

Field-level Policy Tags (Fine-Grained Access)

CDMC Sensitive Data Taxonomy

Personal Identifiable Information	7
Personal Information	7
Sensitive Personal Identifiable Info	7
Sensitive Personal Information	7

5

12

12

12

12

12

12

12

How to use our assets!

Established Google Cloud Clients

1. Read CDMC capability and key controls frameworks
2. Review our whitepaper
3. Perform CDMC capability assessment
4. Perform CDMC controls gap analysis
5. Download and selectively adapt CDMC GitHub repo assets to address control gaps in your environment

New to Google Cloud

1. Read CDMC capability and key controls frameworks
2. Review our whitepaper
3. Evaluate and implement Secure Data Warehouse Blueprint
4. Download and implement CDMC GitHub repo asset in its entirety

Users of Other Clouds

1. Read CDMC capability and key controls frameworks
2. Review our whitepaper to identify any architectural patterns that you could reuse in your own control design
3. Reach out to your own provider and understand about how you can reuse their certified architecture

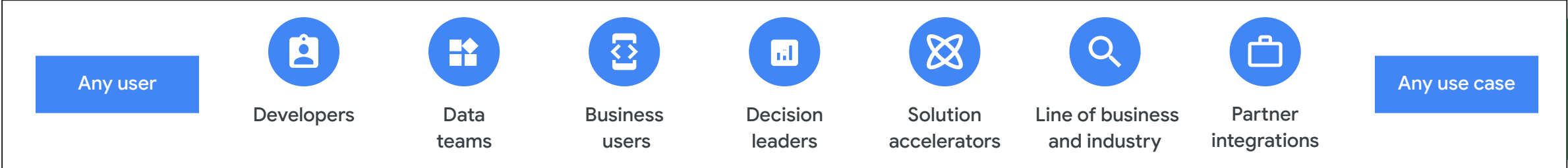
Questions?



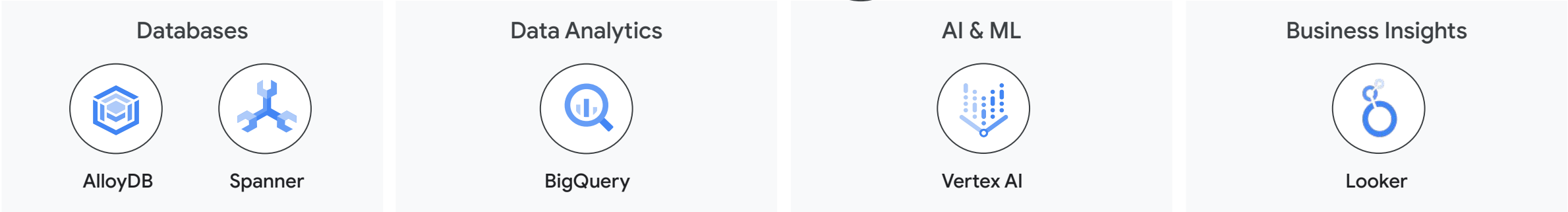
EDM Webinar 

Google's Data and AI Cloud

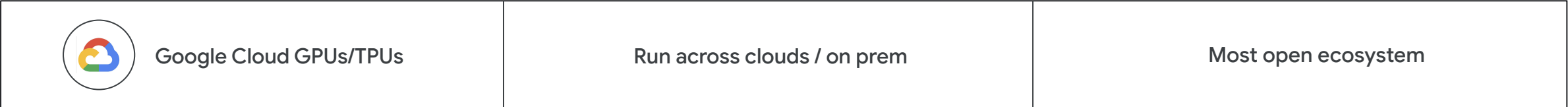
Simplifying data and AI experiences for all users with Gen AI



Govern Data and AI with  Dataplex



Google, Open Source, and 3rd party foundation models (text, chat, code, video, image, audio)



Recap of our lessons

1. Ensure **sufficient time** and investment is available
2. Check your team has the **right composition of skills**
3. **Seek clarification** in areas of ambiguity
4. Anticipate and budget for the **evolution of the platform**
5. Consider **bespoke vs. reusable** implementation
6. Consider starting with **limited automation** and iterate
7. **Common capability groupings** regardless of implementation
8. **Test data selection** critical
9. **Identify sponsoring clients early** and engage throughout
10. Validate the **minimum evidence** required to satisfy the assessor
11. Consider **tactical metamodel** vs. CDMC information model

Implement the CDMC key controls framework in a BigQuery data warehouse

Send feedback

Preview

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Architecture

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Join EDM Council and our membership community of companies...



The screenshot shows the EDM Council website homepage. At the top, there is a navigation bar with links for Membership, Frameworks, Training, Engage, Innovation, About, Sign in, and Join now. The main heading reads "Global Advocates for Data & Analytics Management". Below this, a sub-heading states "The leading global trade association providing best practices, standards and education to data and business professionals in our data-driven world." A "What we do" button is visible. On the right side, there is a "TODAY'S HIGHLIGHTS" section with three news items: "Bank of Valletta becomes the newest member to join the EDM Council", "EDM Council welcomes Webber Wentzel as its newest member", and "Lion Group joins EDM Council as its newest member". At the bottom of the screenshot, there is a banner with the text "Join a vibrant community of 25,000+ business leaders, CDOs, and data and analytics professionals across all industries." and a row of logos for member organizations: Bank of England, NOVARTIS, HSBC, AWS, Schneider Electric, Microsoft, Google, and AEGON. Two buttons are present: "Explore membership" and "See all 350+ member organizations".



350+ Member Firms

Cross-industry,
including Regulators



25,000+

Professionals



Worldwide

Americas, Europe,
Africa, Asia, Australia

edmcouncil.org



EDM Webinar 

Thank you!

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Industry Solution Architect
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 **Google Cloud**



