

# Interview with a Data Protection Officer



**Mark Crosbie** is Vice President and Data Protection Officer at Dropbox. Based in Dublin, he's been in the role of DPO since 2018 and prior to that, he built and led the privacy program at Dropbox. Before Dropbox he worked at Facebook, IBM and HP in security and technology roles. Mark holds a Masters degree in Computer Science from Purdue University, and a Bachelors in Computer Science from Trinity College Dublin.

## What are the biggest challenges for DPOs in 2024?

DPOs are constantly being challenged to stay on top of technology innovation, whilst also continuously tracking emerging regulations. We are constantly navigating evolving legislation and regulatory guidance, especially as the EU AI Act comes into force. But, while it's easy to attend briefings and conferences, how do you put all that advice into practice? As a DPO you need to find the right language to speak to your business leaders and help them understand the obligations they face, and then give them practical and useful advice to achieve the right outcome.

## Is the outlook for DPOs in 2024 more or less uncertain than last year?

In the 6 years since I took up the role in 2018, there has been constant change; first as we got to grips with GDPR, then understanding the new EU-US data transfer framework, and most recently with the huge rise in the use of AI globally. DPOs have been a busy bunch!

## How do you think the role has changed in recent years?

In the early days of GDPR it was about providing context to the business, helping to demystify this daunting thing they read about in the press. That involved a lot of education and explaining, while showing how, in a lot of ways, good privacy was simply good business sense as it earned customer trust.

Over time, the DPO role has shifted as today's businesses better understand how to operate in the GDPR environment. Companies have seen that customers are more aware of their rights, and they

expect businesses to provide a way for them to exercise them. And I think that savvy businesses now recognise that taking a "privacy first" approach is a win with customers.

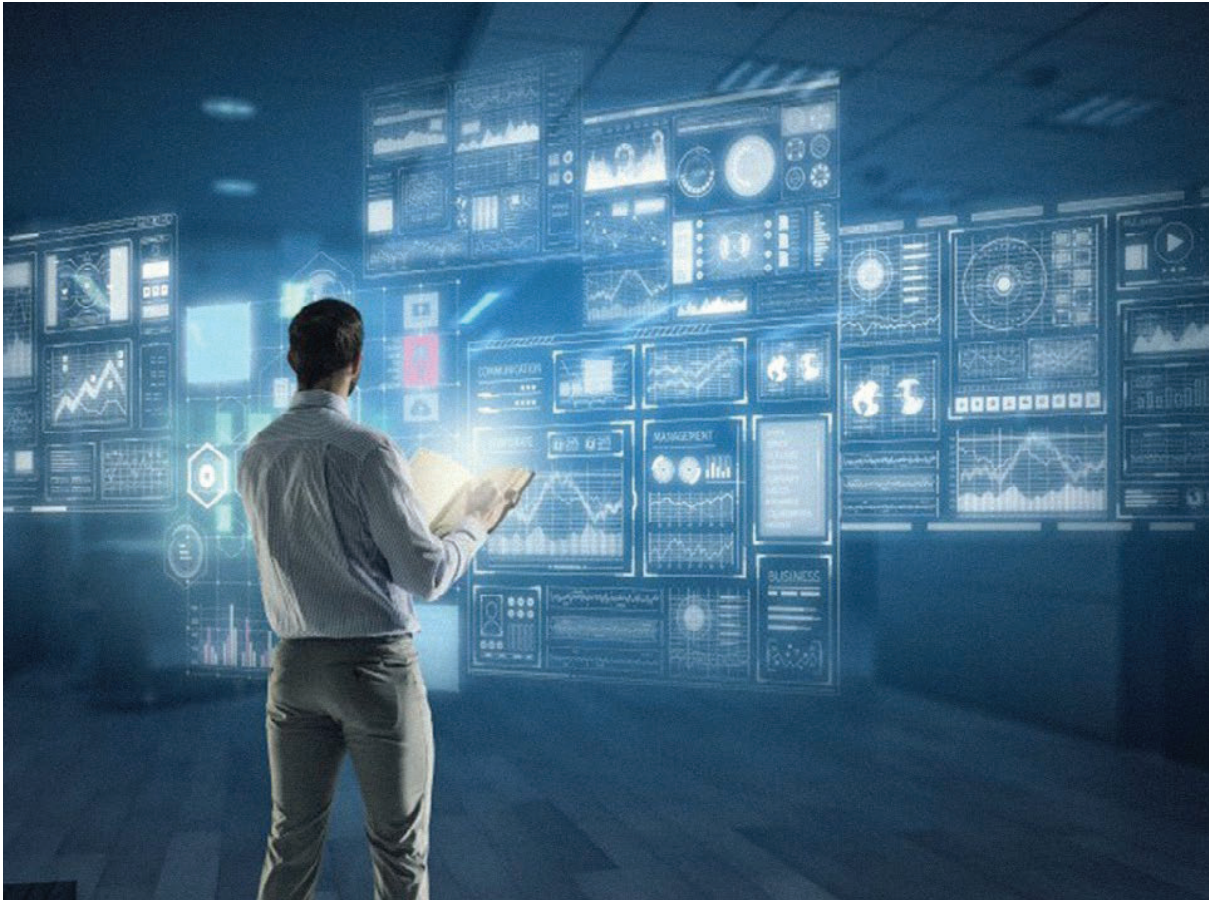
The DPO has had to adapt with these changes, pivoting from an educator in the early days into a more strategic role today - which, in my view, is one that helps the business to balance innovation with its obligations under GDPR, while doing it in a way that builds and maintains customer trust.

Another thing I've seen is that regulators globally have become increasingly tech-savvy. And, as the landscape is continuously changing, there's no doubt that regulators are now looking more deeply at businesses and asking tougher questions - rightly so! As part of this, the DPO is a key point-of-contact for engagement with privacy regulators, and businesses should look to them to guide interactions with their lead supervisory authorities.

## What skills should a successful DPO possess?

An effective DPO drives change, and so to be effective in your role you not only have to know the legislation and regulations, but you also need to be a business expert too. Look at your calendar - in a typical week how much time do you spend talking to business and operations people outside of your immediate domain? If you don't, then start building relationships into those teams, both to help them and to also learn what the business side is doing. This will pay dividends down the road.

A dose of sceptical curiosity also really helps in my opinion. You need to be constantly peeling away the layers of the onion to get to the heart of technical or



legal challenges. Asking ‘why’ over and over to really understand the needs of the business is key, but we also need to do this in a way that helps the business side refine and sharpen their own thinking.

Ultimately, a DPO needs to have an open mind, be willing to listen and ask tough questions - and then they need to have the authority to give advice which may not always be palatable to the business.

### **What advice would you give to a DPO starting out in their career?**

Network with your peers! There are many of us who have been within the industry for a long time, and one of the best ways to grow your skills and knowledge is to join a peer group of DPOs. Chat over coffee, meet in person if you can, and be open to sharing and obtaining insights that enable new perspectives. You’ll be amazed at how much everyone is willing to help and share ideas.

Take time to also get to know everyone within your organisation - even those that you don’t directly work with. A good DPO has a wide view of the business and is trusted by senior people to provide good advice. You earn that over time by building and maintaining relationships.

### **Have you found any qualifications particularly beneficial to your role?**

I came from a technical background with a degree in computer science, and I started my career building and shipping security products. I’ve found this technology knowledge to be invaluable as I work with product and engineering teams on tough challenges. But, while you may not have the luxury of going back to college for a new degree there are lots of ways you can up-skill on technology.

### **What does an effective data protection culture look like within an organisation?**

Culture is an interesting word, because it defines the social rules that we all agree to without them necessarily being written down. For example, a good data protection culture is one where everyone in the business intuitively understands what’s expected of them and has an instinctive feeling for when something is ‘off’ or doesn’t look right. Where decisions are made by fairly balancing customers’ needs with the needs of the business. Where someone can mention GDPR and privacy, and the concerns are taken seriously and acted upon. To me, this is ultimately what an effective data protection culture looks like.



However, enabling this type of culture requires continued guidance and education, and it's of increasing importance with the rise of new technologies, such as AI. That's why, at Dropbox, we rolled out our AI Principles<sup>1</sup> in conjunction with the release of some of our latest AI products last year. These aim to transparently demonstrate how we're exploring the use of AI to both our people and our customers. Rooted in our values, our principles also hold our people and our culture accountable as we continue to develop our AI powered products.

### Does hybrid or remote working make the job of a DPO more challenging?

At Dropbox, our working model is called, "Virtual First", and for me, this means that I primarily work remotely. As my role spans across Europe, most of my meetings are held virtually as my teams and stakeholders are based across various locations, so this way of working works well for me. However, it can make relationship building more challenging, which means that as a DPO, I have to approach it more intentionally.

Face to face time is incredibly important and it can never be fully replaced. That's why, I take time to travel to meet colleagues at team off-sites, and for dedicated, in-person working sessions. This time is incredibly valuable, not just for strengthening relationships - but also, business effectiveness. When we come together to meet as direct, or wider cross-functional teams, there's more opportunity to align future plans, to learn new things together, and to increase the cross-over of relevant information. So, while remote working certainly has its challenges, by taking a more intentional approach to relationship building, it's possible to overcome them.

### If you had one data protection wish for 2024, what would it be?

At the moment, we are still in a really exciting time of AI growth, with lots of new solutions coming to market. But for me, my wish for 2024 would be that we start to see AI move away from the hype-cycle, and into practical and useful applications. Businesses need to carefully understand exactly where AI can achieve the best benefits and productivity savings - while still applying the technology in an ethical and transparent way.

ChatGPT is just one example that is already showcasing the ease with which one can interact with advanced AI through a simple chat. But, that's just the beginning. At Dropbox, we see a world in which tailored AI solutions can cater to specific needs, by empowering employees with a digital assistant as part of their workday. AI-powered universal search promises to do exactly that, by surfacing what you need, exactly when you need it, and regardless of where you're based. This means employees can finally reclaim those lost hours and moments of focus that can be used to supercharge more meaningful work.

But all of this needs to be done responsibly and with careful attention paid to both the EU AI Act and the GDPR. As is the case with any groundbreaking piece of technology, getting it right early requires a thoughtful approach and an implementation framework - with careful consideration for trust and privacy obligations. For example, this is where having AI principles to serve as a north star for teams is invaluable, as AI products and features are being developed in the years to come.

#### REFERENCE

1. [https://www.dropbox.com/en\\_GB/ai-principles](https://www.dropbox.com/en_GB/ai-principles)