

Ram Pratti: Sam brought a good point up for report attestation. What do you think about that, and how do you see the people, what kind of activities they're doing in that area?

Simon Hankinson: It's becoming a requirement to have attestation for the largest institutions for CCAR reports, and often what institutions seem to be designing is a typical perimeter, collecting signatures and sign-offs to say, "I followed the process, the process is adequately controlled, and you can rely on the numbers I've provided," which is great, but if I think ... I have a background doing SOX work, and I think about the first time someone was asked to sign something, they're very nervous about doing it, but the sixth time you ask them to sign it, they sign it with maybe not quite as much thought and consideration. It becomes a bit more business as usual.

I think one of the real values that we can provide is, we can combine the collecting of the signatures and the sign-offs to say, "Yes, I followed the process, the process is appropriate," and combine that with the actual data governance scores and the data quality scores and the results of the fed-edit checks. A signature is supported with, "I signed it, but now I have detail and facts, fact-based evidence supporting whether or not that signature was appropriate," or, "the signature was appropriate, but here are the limitations or some of the errors that we're aware of in our process or in the data that we're submitting." At times that's going to happen. I think it makes it a much more powerful attestation. It means it has a lot more substance and a lot more credibility if you combine the signature with an actual score or result from the data that you're submitting.

Ram Pratti: Do you see those things about the report attestation process, the certification process?

Koen Van Duyse: Yeah. That's also one of the things I would say is not, like so many things, not just common to banks but as we see in a lot of other organizations as well. That's what drives trust in the organization. If you look at the report, that's why a lot of organizations put actually a stamp or a logo on their reports, so that when it goes out, people know right away that it's backed by the data authority, and it can mean that it's fit for purpose and so on. I think that's one of the biggest end goals, I would say, establishing that trust.

Simon Hankinson: When I read the BCBS 239 principles, one of the statements or expectations that stood out to me is, it doesn't expect that your data's going to be perfect, but it does expect that the person that's receiving my information is aware of limitations in the data or information they're receiving, and so I think having this ability to have an attestation or a certification with, "Here are the limitations," it really meets the intent of the BCBS 239 principles. It's quite an advanced capability, but with an enabling technology like Collibra it becomes relatively straightforward to achieve

BCBS 239 is focused on business as usual reporting when you've got 30 days and you can follow your process, but it's also focused on crisis reporting when you might have to create that same report in 24 hours or less. There are a lot of process shortcuts you have to take when you create that report in a crisis. The users aren't always aware of the limitations or the possible impacts, and so I think being able to relate, "This is what we've created, we didn't follow the usual process, here's the impact of that," and even be able to provide a trend history, so, "We cut out these six processes but by the way, we've never had any adjustments resulting from those six controls in our BAU process, so we think this

information is still reliable to be used." That's a lot of rich information about the reliability of a report that a lot of organizations struggle with but really gets to the heart of what BCBS 239's about.

- Ram Pratti: One thing in that reporting certification is a manual touchpoint. There's not enough manuals at points of the consolidation of the report. Do you see the clients looking for tracking that kind of information in Collibra?
- Koen Van Duyse: Yeah, I think that's key. That's what needs to be shown in the lineage. Where are the controls? Where are they not adequate yet? Where are the validations lacking? Where do we not have data quality? That's what they want to see in the lineage. They're high level, but that's what they want to see.
- Sam Weibel: Yeah, because I think that's also one of the points that a lot of people forget about when they're talking about lineage, especially if you look at it from a technical perspective. They're very focused on, "It went from system to system and here's what happened as it moved along the lines," but when it comes down to it, and as Simon had mentioned, when you look at it from the regulatory point of view, they're honing in on your processes, and where are those manual touchpoints, because that's probably where there's going to be the most risk of a problem occurring.
- Simon Hankinson: When you think about the BCBS principles, they're focused on IT and architecture, data, and then reporting. The data pieces, that's really where data's moving through pipes, and there are usually systematic controls around what comes in reconciles to what comes out. There may be some kind of transformations going on, there may not be. It may be actually the same amount, but there are checks that ...
- Where the real risk lies and where issues tend to happen and where the controls are maybe not as strong is once it comes out of those pipes and starts moving into the usage, the end user computing, which is when you're moving into Access, SQL, Excel, PowerPoint, to another PowerPoint, to another PowerPoint. The risk of fat finger becomes really high. How are you going to control that? That's where I see the user risk-based approach. Identify those key manual steps, and then determine how you're going to control them.
- Ram Pratti: Thank you, guys. Thanks for joining me. Today's panel discussion was very helpful.
- Koen Van Duyse: Very interesting, absolutely.
- Ram Pratti: Thank you.