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Unraveling the Complexity of Data Privacy

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Unraveling the Complexity of Data Privacy

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Abstract

As we have entered a new digital age where technology is a crucial part of everyday practice, data has risen in priority as a crucial part of business. With this the idea of data privacy – an idea rooted in human rights – has also received increased attention, for example, the EU passing the General Data Protection Regulation (GDPR) applicable to any organization collecting data from European citizens. Previous research into data privacy, and the GDPR in particular, has largely focused on conceptual recommendations related to its implementation, paying limited attention to how firms are implementing the GDPR in practice. To address this limitation in previous studies, we analyze how firms are translating the idea of data privacy into practice. We answer this based on interviews with, and documents from, a large European streaming provider and its work with the GDPR. We show that it is far from straightforward for firms to translate the data privacy idea (as materialized in the GDPR) into practice, since the traveling data privacy idea clashes with ideas in residence. We also show how these ideas coexist in a competitive relationship in the firm and how this shapes how the data privacy idea is translated into practice. In doing this, we contribute to the research into data privacy, and the GDPR in the following ways: first, we respond to the call for more empirical research on how organizations implement the GDPR. Second, the study adds empirical support to the previous literature on the relevance of contextual factors through the traveling of ideas. Lastly, the study brings forth empirical findings that corroborate and adds value to previous research highlighting the misalignment between the legislative framework and the technical reality.

Key Words: GDPR, Data Privacy, Translation, Coexisting, Ideas in Residence, Ecologies of Translation, Institutionalism

Introduction

Technological advancements have created a time when more data is being collected, stored, and analyzed than ever before (e.g., Joyce, 2015). This digital age has generated opportunities for businesses to utilize the data and create business models driven by data (Gimpel et al., 2018; Wisniewski et al., 2021). Moreover, the processing of data amongst organizations can generate opportunities as consumers' preferences and behaviors can be analyzed and more informed strategic decisions can be made. In addition, innovation and new revenue streams are other advantages as companies can tailor their products and services on an individualized level (Wisniewski et al., 2021). In other words, data can be a source of competitive advantage for organizations (Morey et al., 2015). The flipside of data becoming valuable is the rise of data breaches and the loss of personal information amongst well established multinational organizations. There are also concerns about data privacy given the increased amount of data and information flowing in the digital era (Gimpel et al., 2018). More specifically, these concerns have come to elevate the impending challenges of preserving data privacy rights in a digital era as current practices have come to face much scrutiny (Nair, 2020; Floridi & Taddeo, 2016; Arthur & Owen, 2019; Saltz & Dewar, 2019). It is difficult to pinpoint the exact origin of the ideas such as the data privacy idea (e.g., Wedlin & Sahlin, 2017; Bourdieu, 1980). It is though clear that the data privacy idea is closely related to the idea of an individual's human rights as illustrated in, for example, the Universal Declaration of Human Rights (UDHR) (United Nations, 1948).

The data privacy idea has been translated and manifested in different ways over the years and most recently into the General Data Protection Regulation (GDPR), which main purpose is the protection of individual's personal data (GDPR, 2016/679). Previous research into data privacy and the GDPR in particular has largely focused on conceptual recommendations related to its implementation (e.g., Tamburri, 2020; Tikkinen-Piri et al., 2018; Teixeira et al., 2019). For example, scholars have stressed challenges such as lack of awareness of the legislative framework and lack of financial resources in implementation (Tikkinen-Piri et al., 2018), as well as the misalignment between the legal rules and the technical reality in which practitioners operate (Kutylowski et al., 2020). Scholars have also stressed that each firm operates in its own local context and each implementation process will depend on factors such as culture and the organizational structure (Faifr & Januška, 2021). This aligns with the call for future research at the individual firm level in order to gain a better understanding of how organizations tackle the challenge of implementing the GDPR (and the overarching idea of data privacy) into organizational practices (Tikkinen-Piri et al., 2018; Teixeira et al., 2019).

To address this gap in previous research, we ask: *how are firms translating the idea of data privacy into practice?* In answering this question, we draw on interviews with, and documents from, a large European streaming provider and its work with the GDPR. We analyze this empirical material based on concepts from theories of institutional change and translation. We show that it is far from straightforward for firms to translate the data privacy idea (as materialized in the GDPR) into practice, since the traveling data privacy idea clashes with ideas

in residence. We also show how these ideas coexist in a competitive relationship in the firm and how this shapes how the data privacy idea is translated into practice.

In showing this, our contributions into the research of data privacy and the GDPR is threefold. First, we respond to the call for more research on a how organizations implement the GDPR on a practical level (Tikkinen-Piri et al., 2018; Teixeira et al., 2019), providing empirical insights rather than conceptual outlooks. Second, the study adds to the previous literature demonstrating the relevance of contextual factors and organizational structure through the notion of traveling ideas (Faifr & Januška, 2021). Specifically, by exemplifying the clashing and coexistence of traveling ideas and ideas in residence at Company X. Lastly, the study brings forth empirical findings that corroborate previous research highlighting the misalignment between the legislative framework and the technical reality, (Kutylowski et al., 2020).

Theoretical Framework

The theoretical framework is composed in a way that starts broad with the overarching concept of institutional theory and works its way towards a specific illustration of the previously conducted research of the GDPR. Initially, the theoretical framework covers the institutional theory and the institutional pressures that circle the organisational field. From here, the notion of institutional change is introduced through Scandinavian institutionalism and translation. Against this backdrop, the concept of travel of ideas is introduced as it illustrates how ideas travel and translates into local contexts. Next, ideas in residence and the construction of ideas are elaborated upon as a way to demonstrate how ideas interact and change as they do so. Lastly, the final section narrows the scope towards the data privacy idea and the GDPR; previous research is expanded upon to provide a better understanding of the current state of data privacy and its associated challenges.

Institutional Theory

An institutional framework provides an interesting perspective as it is founded upon the norms and values of the organizational field. An institutional point of view will provide an understanding of routines, norms, and values, where action is not always assumed to be inherently rational but understood as a product of the institutional environment (Meyer & Rowan, 1977). Coming out of Selznick's (1957) ideas of organization expressing values of the society, DiMaggio and Powell (1983) concluded that organizations do not only compete for the traditional resources and customers, but for institutional legitimacy. Meyer and Rowan (1977) argue that many organizations do not reflect what their work activities demand but are instead manifestations of their institutional myths. Myths, in this context, meaning "formal organizational structures" that come out of "rationalized institutionalized rules". By adapting to these myths, organizations gain legitimacy, which leads to increased survivability (Meyer & Rowan, 1977). According to Lindblom (1994) legitimacy is what occurs when an entity's value system aligns with the one of the social systems it acts within. Schuman (1995) points out that an organization can be legitimate, even though it does not comply with the social norms, since legitimacy is created by the social group's beliefs. If deviant behavior goes unnoticed the organization can still maintain a reputation of being legitimate. Legitimacy is, therefore, a social

construction happening between a social group and the perceived actions of an organization. Additionally, Weaver et al. (1999) states that working with ethics can bring legitimacy to an organization since it signals to the public that the organization is conforming to expected societal norms. But, also highlighting those external pressures of legitimacy and ethical processes can result in decoupled social performance (Weaver, et al., 1999).

In order to incorporate the concept of institutional change Scandinavian institutionalist brings forth the notions of translation theory which is where we turn next.

Scandinavian Institutionalism

Institutionalist have traditionally been found to fall short concerning the concept of organizational change, as stability and homogeneity is rather found to be the norm. As such, Scandinavian Institutionalism brought forward the concept of translation building on the concept of diffusion which was seen as too much of a physical bound process (Czarniawska & Sevón, 1996). Czarniawska and Sevón (1996) makes a useful analogy comparing translation to the children's game of telephone. Children create a chain and whisper a phrase to the next child in line, word travels and at the end of chain the last child utters a phrase with little resemblance to the one from the beginning. This illustrates translation and the fact that ideas, objects, and practices travel and as they do they become transformed. The concept of translation originates from Serres (1982) and went on to inspire seminal works of Bruno Latour, Michel Callon, and many more to follow (Czarniawska & Sevón, 1996).

In Wæraas and Nielsen's (2016) review the authors bring forth three different "translations" of translation theory illustrating differences but also overlapping characteristics amongst the various strands of Actor-Network Theory (ANT), Knowledge-Based Theory and Scandinavian Institutionalism. Building on that notion, Wedlin and Sahlin (2017) attempts to distinguish Scandinavian Institutionalism from other translation theories by providing some distinctive features. First feature is the understanding of change, that it is viewed as constant and continuous. The ideas that travel and become translated will be transformed in such a way that it will be difficult to know what can be considered to be original and what is copied. Second, actors and actorhood is central to Scandinavian Institutionalism meaning that actor's interests and motives matter in the translation process and they become translators themselves as the translation process becomes cultural and context dependent. Third is the close connection to the study of practices. As previously mentioned, actors play a central role in the translation perspective and this results in the interpretation, altering and creation of practices in a local setting which stands in relation to the overarching institutional frameworks and ideas. Lastly, Wedlin and Sahlin (2017) brings forth the notion of variation, addressing the fact that Scandinavian institutionalists find different types of outcomes from their translation processes as they are embedded in local settings and influenced by actors in that context. As demonstrated the concept of organizational change is closely related to translation and can be used to better understand important topics such as the traveling of ideas which will be covered in the following section.

Travel of Ideas

Before embarking on the translation journey of ideas, it is fair to raise the questions of what constitutes an idea. It is not an easy question to answer and scholars as well as philosophers have grappled with finding an answer. As a result, various definitions have emerged over time. Whitehead (1961) addresses the concepts of change and stability. Where an idea is defined as a *force* that facilitates change or preserves the status quo. While on the other hand, interactionists argue that ideas are formed through interaction and relationships amongst people and do not lay at the heart of the individual, but is instead formed in relation to others (e.g., Mead, 1934; Blumer, 1969). Arguably, building on this notion of interaction, Czarniawska and Joerges (1996) defines an idea as “. . .communicated images, intersubjective creations, and therefore a “property” of a community rather than of a single person” (Czarniawska & Joerges, 1996, p. 33). Demonstrating that an idea is communication from a collective that can take many shapes and forms. Further, it is also this definition that will serve as the underlying base for our upcoming analysis.

In the book *Global Ideas, How Ideas Objects and Practices Travel in the Global Economy* Czarniawska and Sevón (2005) are interested in the journey ideas have. Moreover, how they become translated into different objects and sent to new places different from where they originally emerged, and how that context transforms the idea into new objects or practices. Specifically, they illustrate how one thing that moves from one place to another will not remain the same. As they put it “to set something in a new place is to construct it anew” (Czarniawska & Sevón, 2005, p. 8). The authors describe the importance of creators and users and how they can affect and influence ideas, making them translators in the translation process. This aligns with Wedlin and Sahlin (2017) and the importance of context, how different interest and drivers will vary depending on the translators and the context they act within.

Czarniawska and Sevón (2005) describes translation as being a vehicle, imitation the engine and fashion sitting at the steering wheel. Imitation as the engine is demonstrated by the fact that individuals and organizations tend to copy and imitate what they believe is superior. What is considered to be superior and worthy of imitation is guided by fashion which is described as the collective choice amongst an abundance of options. So, in short, fashion is the guiding tool, imitation the desire and driver for making the change while translation is the vehicle to make the adaptation possible (Czarniawska & Sevón, 2005). Another key insight is brought forward by Wedlin and Sahlin (2017) as they point out that ideas interact with other ideas, and they can influence one another. This dynamic interaction amongst continuous processes of translation is what the authors call *ecologies of translation*. Several scholars also highlight the importance of looking at practices for understanding the intricacies of the translation process. Guzman and Diedrich (2015) shed light upon the practice of organizing and by better understanding the interaction amongst human and non-human actors new insights can be drawn in the translation process. Moreover, the authors proclaim that every situation is an ongoing translation, and the translation process is only successful when it has become taken-for-granted. Czarniawska and Sevón (2005) support the notion of a better understanding of the relationship between objects, humans, and ideas. In addition, in one of the few studies covering translation processes in the

organizational context Breese et al. (2015) explains how ideas need to undergo the translation process before it can become organizational practices.

But where does an idea originate from? Researchers have spent much time on this question thinking that a “good idea” will spread more effectively. However, comparing ideas found out to be a challenging task and determining any specific characteristic of a “successful” idea is no easy task (Wedlin & Sahlin, 2017). Bourdieu (1980) went as far as deeming it almost impossible to find the origin of an idea. As such, less focus has been put towards what type of ideas that circulate and instead been focused on how these ideas are formulated, by what actors the ideas are supported, and the timing of the ideas (Wedlin & Sahlin, 2017). It is here the concept of *attention* or what Bruner (1957) refers to as *perceptual readiness* comes to play an important role as the idea need to become recognizable before being translated, this often happens through categorization as it is a way to compartmentalize and make sense of something we encounter. Moreover, categorization facilitates the process of understanding and preserving something as we are not able to perceive an idea without something to relate it to (Czarniawska & Joerges, 1996; Bruner, 1957). Czarniawska and Joerges (1996) state that ideas are communicated images and the easiest way for an idea to become objectified is through the use of metaphors, platitudes, or labels. In order for ideas to be able to travel between settings they need to become adopted by enough people to create collective action and then be materialized into objects that can make the journey. The ideas are too abstract to travel themselves and are therefore turned into images in various shapes and forms. It is from here in the local context the objectified idea then can become translated into action, materialization being explained as the magic moment when words become action (Czarniawska & Joerges, 1996).

Ideas In Residence

When an object has traveled into a new context, it encounters a new frame of reference, consisting of local practices and experiences that Czarniawska and Joerges (1994) calls “ideas in residence”. As explained further by Lindberg (2014), when ideas travel, they meet ideas in residence which can create friction, however, this can be seen as energy to the ongoing translation processes. Negotiations amongst different interest will take place as the new idea will try and position itself in its new context. As a result, the ideas in residence also becomes translated. Over time the idea being translated into practice can become institutionalized and taken for granted with the organization and as result turn into an idea in residence (Lindberg, 2014; Czarniawska & Joerges, 1994). There appears to be a research gap as to what type of ideas that exist in relation to other ideas, and how that affects the translation process calling for more contextual studies on the matter (Wedlin & Sahlin, 2017), and it is here, to the intricacies, inherent characteristics, and variations of ideas that we will turn next.

Constructing an idea

It has been established what an idea is and why it is relevant as it travels and translates from context to context, with the possibility of finally materializing within organizations. What requires further elaboration is to which extent ideas can vary. In contrast to the concept of logics where scholars have illustrated several distinct types of logics such as the market logic, state

logic, and professional logic (Lindberg, 2014), most of the ideas that circulate have been labelled as management ideas (Wedlin & Sahlin, 2017; Czarniawska & Joerges, 1996; Czarniawska & Sevón, 2005). A limited amount of previous research has focused on the comparison of ideas and their inherent characteristics, perhaps in part due to the complexity and difficulty of the task (Bourdieu, 1980; Wedlin & Sahlin, 2017). Or possibly due to the fact, that ideas are not stable and that they constantly get reconstructed as they travel across different contexts making it challenging to determine any intrinsic features (Wedlin & Sahlin, 2017; Czarniawska & Joerges, 1996). That being said, we argue that there can be value in attempting to understand some of the underlying characteristics of an idea, that they can pick up characteristics that fundamentally define them as they are being translated. It has been shown that multiple ideas can exist within the same context as they are translated in ecologies (Wedlin & Sahlin, 2017) or face friction against an existing idea in residence (Czarniawska & Joerges, 1996). This insight would provide a valuable starting point to analyze how the dynamic translation process unfold.

Organizations today are heavily impacted by the pressures of the market, which has been described and illustrated as the market logic (Lindberg, 2014). Logics are not the main scope of this study, but can be understood as guiding principles for the interrelatedness of ideas, the environment, and actions. According to Czarniawska and Sevón (2005) logics or practices cannot travel as they are but has to be abstracted into ideas upon which they can travel in the form of words or images. In this state of translation, it can be argued that ideas are just ideas, awaiting context upon which they can materialize anew. As ideas concretize in the new environment the friction towards the existing context, referred to as ideas in residence, fuel the translation which aids the processes of integrating the idea into the new local context (Lindberg, 2014). But friction is not the translation of ideas, it is the measurement of resistance between two objects, which in this case are two or more ideas unraveling in a dynamic process of translation. The amount of friction depends on the objects interacting, which would allow for the argument that ideas themselves can inherently possess different characteristics affecting the friction, and in turn the outcome of the translation into new context.

To recall back to the market logic, Czarniawska and Sevón (2005) argued that logics travels as ideas, which would entail that they previously, before materializing in their current state, were also translated as an idea. The market logic within a certain organization can naturally be the result of the translation of a variety of ideas, but for the sake of the illustration it can be argued that the original idea behind the market logic is the overarching idea of profitability. An image of a business that creates a profit surplus. On the other hand, as an example, the overarching idea of data privacy travels on a completely different trajectory, as it naturally would be, due to contextual differences. Previous research on the coexistence of more than one idea is rather scarce, but the findings of Reay and Hinings (2009) on the coexistence of logics provides a path of reasoning when understanding the intricacies of multiple ideas coexisting. The interplay of ideas and the competing nature caused by institutional differences is fundamental in understanding coexisting idea's travel and impact on practice.

Coming out of DiMaggio and Powell's (1983) reasoning on institutional isomorphism and collective rationality three major mechanisms of institutional isomorphic change can be determined. First, *coercive* change has its roots in politics and legitimacy and the pressure it provides onto organizations. It is characterized by a strong dependency between the organization and the entity the idea originates from. The organization is therefore left with little to no choice but to adapt. Second, *mimetic* processes are usually a response to uncertainty and is conducted through the copying of established ways of working. Finally, isomorphic change through *normative* pressure is brought forward and described as being largely based on professionalism. Due to the similar teachings of universities and narrow-minded recruiting within the fields of business processes, ideas, and mindsets become increasingly alike (DiMaggio & Powell, 1983). According to Oliver (1991), institutional processes of change can easily be overlooked or taken for granted, but can, through institutional theory, be understood and used in order to improve strategic decision-making. By understanding the institutional motives one can create an understanding of necessary decisions even though they might differ from what the dominating logic might deem "right". In the process of change the context becomes crucial; the institutional influence is affected by the uncertainty and interconnectedness of environmental factors on an organizational level, which in turn would affect the produced level of friction and/or conformity (Oliver, 1991). To once again look back at the example of the idea of profitability and the idea of data privacy, this suggested institutional approach that builds on the work of previous institutionalists would allow for the possibility to characterize and categorize the two ideas with the intent to better understand its translation process. By understanding in what way the idea asserts its pressure and influence onto an organization one will be provided a tool which can be utilized to navigate the complexity of traveling ideas and more efficiently handle the friction as the ideas clash with the ones in residence.

Unpacking the idea of Data Privacy

The phenomenon of data privacy is central to this report, and as such it is important to grasp the underlying history and characteristics of the idea as we progress in our study. The seminal article by Warren and Brandeis (1890) state that the right to privacy is the "right to be left alone". This notion of being left alone have stood the test of time and over a century later it could easily be argued that the notion is more relevant than ever before. The following subset from the Universal Declaration of Human Rights (UDHR) article 12 supports the relevance of Warren & Brandeis notion of fundamental human right in the modern day, it also illustrates the interrelatedness between data privacy rights and the idea of an individual's human rights:

No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks (United Nations, 1948).

In line with the rapid technological advancements being made in the 21 century this idea of an individual's right to privacy needed to expand and adapt to the digital age (Joyce, 2015). What has followed are several governing regulations with the aim of protecting personal data and individuals' rights to privacy from various types of exploitation. This has been brought to light

against the backdrop of several data breaches and privacy intrusions in the early 2000's (e.g., Nair, 2020). The most recent and prominent legislation being implemented in the European Union is the GDPR. It can be argued that this legislation translates the idea of data privacy rights into something concrete and tangible which then forces organizations to adapt their practices. Moreover, this illustrates an idea that is inherently driven by coercive characteristics (Tikkinen-Piri et al., 2018), as non-compliance means breaking European law. All organizations that need to implement the GDPR to their organizational structures will experience this coerciveness.

General Data Protection Regulation

As previously mentioned, the idea of data privacy has been translated into the GDPR. The following section demonstrates some of the underlying features of the legislation and how organizations need to respond accordingly. The GDPR (2016/679) came into effect in the European Union on May 25th, 2018, and as a result it became the toughest data protection law globally. Important to realize however, is that the notion of data protection and privacy is older than that. The GDPR replaced the European Data Protection Directive (1995/46EC) from 1995 which was created as a minimum standard of data privacy and protection as a response to the rapidly changing technological environment (GDPR.EU, 2022; & EDPS, 2022). The new data protection law is a comprehensive legislation that directly affects any organization that collects or processes data which is connected to individuals in the EU. The overarching governing authority is called the European Data Protection Supervisor (EDPS) (EDPS, 2022). Covering all the chapters and stipulates covered in the legislation is beyond the scope of this study, however understanding the general principles can help facilitate a better understanding of the phenomenon. At the heart of the GDPR lays the seven data protection principles which are as follows:

1. **Lawfulness, fairness, and transparency** – Referring to the approach towards the data subject.
2. **Purpose Limitation** – The purpose for collection and processing data needs to be legitimate and clearly expressed.
3. **Data Minimization** – The least amount of data should be collected for the intended purpose.
4. **Accuracy** – All data need to be updated and correct.
5. **Storage Limitation** – The duration of storing data is only allowed as long as it is necessary for the assigned purpose.
6. **Integrity & Confidentiality** – The processing of data needs to undertake appropriate security, integrity, and confidentiality measures.
7. **Accountability** – The Data Controller needs to stay in GDPR compliance with all of the addressed principles.

(GDPR, 2016/679).

Failure to comply with the data protection law can result in fines of a maximum of €20 Million or 4% of the organization global revenue depending on whichever is highest (GDPR,

2016/679). The new data protection law has faced intense scrutiny particularly concerning the associated implementation challenges (Kutyłowski et al., 2020; Tikkinen-Piri et al., 2018). The overarching goal of the GDPR was not only to increase EU citizens data privacy and protection rights but also to harmonize the legislative environment. This in itself poses some challenges as a streamlined legislative framework can have a tendency to overlook the impact of the local context (Faifr & Januška, 2021). As such, there has been a call for more research on how firms implement and manifest the GDPR in local context (Tikkinen-Piri et al., 2018; Teixeira et al., 2019). Faifr and Januška (2021) contributes to the empirical research on the topic of data privacy through their quantitative approach of the implementation process and its related costs, arguing that it all ties into contextual factors. A contrasting concern regarding the implementation of the GDPR is brought forward by Kutyłowski et al. (2020) who argues that there is a gap between the legislators formulating the law and the technical realities of actually implementing the law. A misalignment that could potentially have negative effects on the level of security achieved by an implementation of the GDPR (Kutyłowski et al., 2020). Faifr and Januška's (2021) and Kutyłowski et al.'s, (2020) points resonate with the Tikkinen-Piri et al. (2018) statement that organizations today are not prepared for the changes the GDPR brings. They lack awareness and ability to handle the coerciveness of the GDPR (Tikkinen-Piri et al., 2018).

Methodology

The following section will demonstrate the methodology of the study, starting with the research design and the case study setting. Next, the data collection process and data analysis will be illustrated. Finally, limitations and ethical reflections on the study will be presented.

Research Design

A qualitative research study with a grounded approach aligns well with our chosen research question of investigating how firms translate the idea of data privacy into practices. Moreover, as our given phenomena is dealing with human affairs and how they unfold in practice, a case study approach which can provide in-depth context dependent knowledge is justified (Flyvbjerg, 2006). In addition, a case study approach is further justified by the call for more empirical research on the phenomenon. Conventionally, case studies have received much criticism in terms of the value of practical knowledge vs theoretical value and the inability to generalize from case studies. However, Flyvbjerg (2006) addresses and corrects these arguments as misunderstandings and illustrates the strength of the case study and how it through exemplars adds value to social science.

According to Silverman (2019) qualitative research allows for the study of phenomenon that is simply out of reach for quantitative methods. The absence of numbers and statistics was filled with qualitative data gathered mainly from interviews and accompanying literature research. The strength of qualitative research which elevates our study is its ability to observe naturally occurring data and in turn deduce the “how”, the “what”, and the “why”. In this particular study the concentration will fall upon the “how” question and by adopting this single case study

approach the aim is to get an in-depth understanding of how an organization functions on an operational level.

Case Study Setting

The setting of this study took place at a leading European streaming company that collects and manage vast amounts of data on a daily basis. The company in question requested that we anonymized the organization's name as well as the names of the employees partaking in study, for privacy reasons. Consequently, we had to act with caution and reflect on how we approached our interviews and reported our findings. What we did was that we decided to call the organization in question Company X, which is the name that was used throughout this report. In addition, at the beginning of each interview we informed the interviewees on the anonymization process and how their name or personal information would be removed from our study. In our writing we ensured that none of the organizational values or employee titles could be connected back to the said organization. Therefore, it is worth keeping in mind that some of the more specific employee titles used throughout the text is altered for anonymization purposes.

Company X's offering spans across a broad spectrum of products and services such as streaming services, radio, TV Channels, and the creation of content (X, Website, 2022). With over 1500 employees, and geographical footprint spreading across 10+ countries Company X platforms engages with millions of individuals every day. The company has and continue to undergo a rapid expansion into new lucrative markets, as it launches new services and products. Company X is a publicly listed corporation (X, Website, 2022).

The selected case setting is of particular interest as the company handles a vast amount of data as a part of their business model. As an extension of this, Company X is facing challenges of managing consumer data, especially pertaining to how the data is being used and processed throughout the company in such a way that it is in compliance with the current data regulations. Recognizing the complexity of studying data privacy in practice, a comparative study within the company will serve as the foundation for this study. As we believe transparency into the process of this research study adds credibility to the report we aim to share how the process unfolded. Furthermore, grounded theory allowed us a flexible approach and we could let the study lead us to previously unforeseen directions which widened the initial research setting and allowed for a deeper understanding of the phenomenon being studied. This became reality as we slightly changed the focus of our study after continuously reviewing the gathered empirical data. This will be further illustrated in the next two sections.

Data Collection

In terms of data collection methods, document analysis was used to acquire secondary data and serve as a means of triangulation to the interview method in order to establish the previous research done within the field and on the topic, but also as a way to further understand the structures within the chosen organizations (Bowen, 2009). Examples of documents that were analyzed, not considering previous research on the phenomenon, were internal steering

documents such as the Codes of Conduct, the Annual Report, and the Data Protection Policy. These documents were relevant for the study as they are meant to guide employees, suppliers, and other external stakeholders connected to the organization on how to act and behave on an operational level. Furthermore, certain sections of the documents explicitly refer to data privacy and the managing of personal data, increasing their relevance for this study.

Another popular data collection method within qualitative research that we decide to incorporate and rely on for our data collection was interviews. The selection of this particular method was justified by the fact that it is a method that aligns well with the grounded theory approach, and as it allows room for adaptability (Silverman, 2019). As Silverman (2019) so eloquently describes, semi-structured interviews ensures that the focus is never lost, but neither is the possibility to react to the conversation at hand. Semi-structured interviews were used for the study, and it was further justified as the focus of this study was on practice. We contended that some initial structure and direction to the interviews would ensure that the answers remained within the scope and did not drift off towards more philosophical reasonings. Several methodological choices followed the process of selecting interviewees. The aim for the interviews was to get multiple viewpoints and thoughts from a diverse group of individuals in order to obtain a holistic picture of the organizational practices. Since managers possess a broad overview of the organization, but also the in-depth knowledge necessary into the organizing of practices they became targets for our interviews. Only managers that worked with or in relation to data management within Company X were selected. After revising our initial data, we realized that in order to get a broader picture we need to complement the manager interviews. Therefore, other interviews were conducted and this time with both managers and employees with non-managerial roles. In other words, the interviewees were held with employees from different areas of the organization such as the commercial and technical side. We were under impression that this would provide us with an alternate view of how the organization works, structures, and implements the idea of data privacy. This was also done with the intent to bypass the manager's view of how business is supposed to be conducted, and instead see what processes and structures that guided the practices within the organization. This approach of including a diverse set of interviewees gave us the best possible outlook to gather sufficient data. Especially since this type of case study did not demand a large array of different organizations, but rather depth and breadth of an organization handling large amounts of data on a daily basis. As our attached table 1 illustrates, interviews have been conducted with a wide range of individuals dealing with data on an operational level. The Interviewed candidates held titles such as Senior Manager of Data Science, Data Engineering Manager, Machine Learning Manager, Data Protection Manager, Data Analyst, Senior Manager of Customer Segments, etc.

Data Analysis

As previously stated, this study adopted a grounded theory approach. Inductive theoretical analysis guided further research, which promoted an open mind and minimal preconceived notions, letting the research guide the way to discoveries (Silverman, 2019). Secondary data sources such as the steering document for Company X were analyzed and coded into excel documents which then was used to make comparison with the primary data gathered from the

interviews. It started with taking notes and making observations during the interviews, which led to internal discussions and slight adjustments to the interview questions as the study progressed. From here we came to the realization that our data did not only shed light upon how Company X manage data in an ethical way but how the organization was attempting to translate the GDPR into organizational practices. We kept an open mind and let this discovery guide our analysis and additional interviews were done in line with our discovery (Silverman, 2019). The interviews were then coded in a similar manner as the secondary data. After working through the code and recoded parts of the collected data some overarching themes started to emerge *External pressures* where a common theme, linked to reorganization, uncertainty, and several challenges affecting day-to-day operations. This was then quite naturally followed by the theme of *internal structures*, including deeper insights into structures, frameworks, and any process in play to manage data and ensuring compliant processes. The concluding theme found inspiration in the previous two as it uncovers the *grey areas* the organization must navigate in the strive to manage and process their data in an efficient, productive, and ethical way. The last section of the data analysis allowed for the establishment of a relevant connection between the empirical data and the chosen theoretical framework. Moreover, the methodology for the analysis of the empirical data can best be described as an iterative process of analyzing and reexamining perpetually.

Interview Table/Schedule

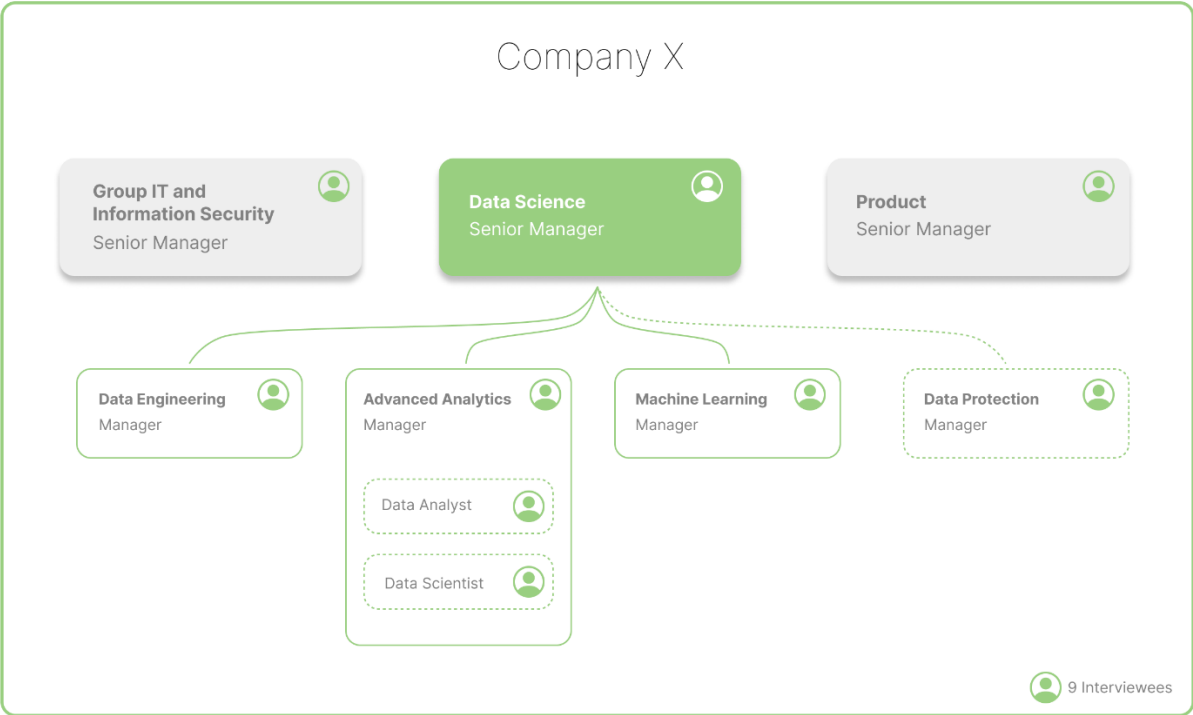


Table 1.

Ethical Considerations & Limitations

As for ethical consideration during the research study we have been consciously aware of the fact that data privacy and data management as an umbrella topic can be sensitive for the data subject but also for the controller of said data. This became even more clear as we approached

our case study setting as the organization opted to remain anonymous. Our interview guide was also revised with this in mind, and consequently our questions were framed in an open-ended way to avoid any personal offense or discomfort. All individuals were participating on a voluntary basis, and informed consent was given (Silverman, 2019). In addition, we were also reflective of the apparent power asymmetry between the interviewer and interviewee (Kvale, 2006). We tried to mitigate this power asymmetry by engaging in friendly conversation at the beginning and/or end of an interview. In addition, we were completely transparent with the intentions of the research study hoping it would build good rapport. Regarding limitations of the study, the fact that the study only revolved around one organization can be seen as a limiting factor since context tends to differ between, organizations, industries, and countries. However, according to Flyvbjerg (2006) the impact of an example is underestimated and as such a single case study can provide to be contributive to research.

Empirical Section

The empirical chapter will take the form of an illustrative presentation of the gathered data from Company X. The series of conducted interviews bring depth and width from multiple parts of the company's organization to enable an elaborate empirical section to set up for the following analysis. Complementing the interviews, internal documents will bring the corporate perspective in order to contrast the findings of the practices and processes highlighted through the interviews. The corporate steering documents touches upon or relates to data management and acts as a reflection of the intended way of business, which plays a crucial part in understanding the complete picture of Company X's way of managing their data. First the idea of data privacy will be introduced with focus on how traces of the idea can be found within Company X. Moving on, the focus will broaden to external pressures, bringing forth the forces which impact the organization from the outside. Following the external pressures an account of the internal structures will provide a picture of how the idea of data privacy actually has taken root internally. Finally, the empirical section will be rounded off by presenting concrete examples and scenarios illustrating the challenges an organization might face in relation to data privacy.

Unpacking the Idea of Data Privacy – Company X

The overarching idea of data privacy can be found within Company X. More than through the way the company work and how they portray themselves as an organization, which will be covered in the following sections, but in the mindset of the employees. A customer's right to privacy was brought forward as a human right. That right entail proper management of the individual's data, since Company X does not view it as their data, but as a tool to provide for the customer. Which raised the question that there might be limits to protection, where a customer should be protected and not exploited, but neither controlled to the degree where their freedom is restricted.

It is really important to respect individual's rights, respect data protection, take privacy seriously, because this is something that is really important and getting more and more important the more aware people get. [...] for me it [data privacy] is a branch of modern human rights. [...] The

principle is that every company should know about the personal data that they are processing because at the end of the day it is not Company X's personal data, it is an individual's personal data. Company X is doing something with that data and the customer want something for it (Data Protection Manager).

But also,

It is a thin line to walk; on the one side you want to protect the users, on the other side too much protection is control (Data Engineering Manager).

When debating privacy, Company X's focus is on the protection of customers and their integrity. As of now privacy actions has been focused on compliance rather than risk minimization, even though a more ethical approach might be something to strive for.

Our focus is on the business, customer, caring, respect, and transparency. If they are in place the rest will follow naturally. [...] As for compliance and risk minimization it is a dilemma for organizations today, to balance the compliance people with innovation and liberty. Personally, I believe the ethical is more important. It is interesting that we actually do not have an ethics manager. (Senior Manager of Group IT and Information Security).

External Pressures

The GDPR undoubtedly plays a major role for any European organization processing data. Company X, as a European streaming service, exemplifies that clearly. The company has recently seen a reorganization, where every department within Company X received a Data Protection Manager (DPM). Interviewing a DPM provided insight not only into the GDPR as a law, but its practical implications and how Company X goes about it. The GDPR is, compared to many laws, young. Required compliance came into effect in 2018, and this fact is one of the primary factors impacting the practical tasks related to data management. Since the law has just been in practice for a few years, not much case law has been established. It is still evolving, as decisions are being judged and organizations are being fined. As previously stated, the goals of the GDPR are clear, but when employees of Company X were presented with the question of its applicability it seemed to be surrounded by uncertainty.

This is a new law as it's getting four years old now in May. That's nothing. And there is very little case law. We are still trying things out. And when one company gets fined, we further understand how not to do it (Data Protection Manager).

Company X is committed to complying to the regulation but do also intend to push the limits and do more than what is required by law when handling and processing data. But, there is not a direct financial gain from improving data protection, but a matter of shielding oneself from the threat of being fined. If compared to the carrot and the stick metaphor, the GDPR is solemnly motivated by the stick, being the fines, but the financial reward, being the carrot, for exceeding requirements is zero.

We don't earn money when we work with protecting personal data. That is not what you do, for me it is a branch of modern human rights. [...] But, at the end of the day it's a private company,

and money is what's interesting for a company. It's the society we live in (Data Protection Manager).

The shift becomes more prevalent in an older organization, already set in its ways and routines, where drastic change is required in order to comply with the updated set of laws. Company X is compliant with the GDPR, but in their efforts to improve even further they face the issue of updating systems and routines from before the GDPR was a factor.

We are getting to a point where the requirement for administration is getting so large that we were starting to consider not even run our own server infrastructure, not having our own homegrown systems. Instead buying from a 3rd party provider (Senior Manager of Data Science).

Today Company X implement privacy by design, which follows their data privacy policy (X, Data Protection Policy, 2021). On their quest for improvement, they factor in the GDPR requirements and the privacy of their customers as early as the development of new systems and structures to ensure that they will be compliant and function efficiently in a corporate landscape where respecting privacy is crucial. Privacy by design does, of course, not apply to existing systems, since their design phase has long passed, but it is taken advantage of in order to make sure that old non-compliant ways are broken and updated.

I think that there is an opportunity to work with personal data if you do it right. For example, by following a principle called "privacy by design" where you design, from the beginning, with the intent to be GDPR compliant (Data Protection Manager).

As much as the lack of financial incentives might seem discouraging in the strive to perfect the management of data and securing the privacy of customers, it is not the only factor to act as a motivator for Company X. More European citizens are becoming aware of the corporate usage of data and their right to privacy. With the increasing awareness comes increasing pressures on the organizations to act responsibly in order to maintain legitimacy and reputation.

But I also think that apart from the fine, I think the population in Europe begin to be more aware of their personal data and their rights, which bring higher expectations on ethical data storage (Data Protection Manager).

Even though strict external pressures from legislations, such as the GDPR, pose substantial challenges it is not the only external factor influencing the organization. An organization is driven by returns on investments and making a profit which acts as the main motivating factor for staying compliant with the current legislation; to avoid fines that can damages the profitability of the organization. The Data Protection Manager states that "without this kind of threat [fines from the GDPR] hanging, maybe companies will not put in as much effort" (personal communication, March 7th 2022).

The Organization is unlikely to spend money on new data management tools or to organize the data as it does not give any apparent return on investment to the stakeholders. Furthermore, the organization need to stay competitive on the market and therefore puts at least part of the

responsibility on the customer, saying that it is up to the consumer if they want to use the service. If they do, data will be used to make it better and in turn ensuring that customers stay.

If the customer doesn't think that's a good idea [using data], then they can just turn to another big audio streaming provider that doesn't use data. Which I don't think they will find (Advanced Analytics Manager).

Internal Structures

The importance of complying with the GDPR has been established, but also the importance of staying true to the customers and their rights to privacy. To make this work the data privacy function has been decentralized, where all the DPMs work in their respective departments to ensure that data is handled and processed as intended. In this way GDPR guidance is never far away whenever there is an obstacle or question related to data. Even though all employees have access to the data protection policy, an internal steering document, they often turn to DPMs for guidance. The internal practices of the DPM are constituted by shadowing the assigned team, always present and available to provide counsel in questions regarding the GDPR. The collaboration between the department and the DPM is based on recommendations from the side of the DPM. Meaning that the words of the DPM are not mandatory, but to act as guidance towards compliance.

We have several functions at the company, and we have a DPM, short for Data Protection Manager, at every function. [...] We give recommendations, but if the business choose to act against, they are free to do so. I cannot be held responsible for a decision that has been taken unless I recommend it myself (Data Protection manager).

Additionally,

I have worked, just not too long ago, last year, together with one of our data protection managers, I think they're called. Where we basically went through data protection form (Machine Learning Manager).

The nature of the work is rather collaborative; it goes both ways, the DPM approaches the different parts of the department, but the departments themselves can also air questions to the DPM. The Data Engineering Manager (personal communication, March 9th 2022) states: "Usually they come to us, but sometime we go to them with questions regarding how to proceed with GDPR related matters." As for the data being processed, data is stored in a "data lake", where the employees who work with data on a daily basis can access what is necessary for them to perform their tasks. No unauthorized personnel can access it, which limits the possibility for misuse due to lack of knowledge or experience. Which corresponds with Company X codes of conduct policy of "handling information the right way" (X, Codes of Conduct, 2020). This function is controlled by the data engineering team.

We are strict on that [access to data]. Everyone in the company that have a reason can be granted access to the data. It depends on why you want it and what are you going to use it for. We [Data Engineering Team] are the gatekeepers that say yes and no. Some people just want access to

have access and if they don't have specific usage, we don't give them access (Data Engineering Manager).

As for the customer's control of their data, there are established functions which allow the customers to delete their account and with it all related data. The collection of such data can be done through cookies within the services, which are accompanied by relevant consent from the customer. The organization is required by law to ask for consent if the cookie collecting data is not strictly necessary for the service. Additionally, personal data is not stored in the data lake, but in a separate encrypted database, which provides an additional layer of security.

When it comes to customers having control over their own data, all of that is already built into the system. If someone would like to extract all their data points they can remove their account, that is structurally in place (Senior Manager of Product).

Further,

When it comes to personal information, we have it stored into a database that is encrypted, it is not in the data lake it is separate (Data Engineering Manager).

Expanding upon the difficulties of retaining personal information, an interview highlighted that an employee would have to go to extensive lengths in order to get their hands on such data. In the case of someone looking at a specific user's viewing data, the data would only be connected to an ID and not to an actual individual.

We store personal information in a secure way that makes it really hard to get our hands on. So, it would be a big effort for me to actually do that [view user data]. If we look at data, we might look at specific user IDs or profiles, but that is never connected to a person that we would be interested in. It's more like understanding the data. Sometimes you need to kind of check what a person has done that you're interested in, not in the person, but rather in what data there is and how to handle such a case (Machine Learning Manager).

Additional prevention of misuse of data is entrusted to the professionalism of the employees and the respect for contractual boundaries. Internally, Company X do not have established hard, tangible structures or processes for affected employees in order to reduce the risk to zero. The approach to data and privacy is focused on softer values. Upon employment employees accept the contract and is provided with internal steering documents such as the codes of conduct which is intended to preclude staff from handling data in a way which is not in line with Company X and the GDPR. Ethical management and processing of data within Company X rely on the values and professionalism of their employees, which are maintained and fostered through corporate culture and trainings.

There is nothing putting a stop to us, apart from the contractual. If you break the contract, you are in trouble. That, together with our professionalism is the only enforcement we have. Nobody is watching over our shoulder when we are working (Data Engineering Manager).

Which can be further illustrated by the code of conduct's impact on the day-to-day as a guidance and enforcement of desired corporate culture.

I have never thought about the code of conduct for data management but again, I am aware of the responsibility that comes with being a data analyst at large (Data Analyst).

The corporate culture is quite heavily communicated from the top. The backbone of Company X's corporate culture is constructed out of four key areas. They are core, as they extend beyond the limits of the GDPR to ensure respectful individual, as well as collaborative, behavior. The culture is integrated into the organization primarily through trainings, where employees are educated, but the culture is also communicated through internal steering documents such as the codes of conduct (X, Codes of Conduct, 2020). Relying on a strong company culture also brings the question of personalities to the day-to-day. Strong collaborations and good relations can change drastically if there is rotation in staff, which could alter the flow of business and the way it is conducted.

We have a code of conduct, the way we want employees to behave. Company X has four really strong values that we follow. It guides the way we work together (Data Protection Manager).

Additionally,

[...] some managers that you have a really good relationship with usually comes to you with questions, but if that person is replaced by someone else you lose that relationship and the way you conduct business is altered. So, I think it is very much a personality-based thing in general, that is something I have seen over my time here. If one person leaves that can shift what kind of questions we are getting (Advanced Analytics Manager).

Concrete Situations

A reoccurring response to the question of tangible situations within ethical data management is that of technicalities of the GDPR and the difficulty of properly translating the law into practice. Discussions of the GDPR has been a constant project since it came into effect in 2018. Questions of: "Can we do this?", "Is this all right?" has been frequent and efforts to decipher the law in order to ensure compliance is crucial for the sake of daily activities. Even in discussions with the DPM it is not crystal clear, which makes it complicated for them to translate it to the departments in a way that they can comprehend and apply to their work.

If you can interpret it [the law] in different ways, that makes it difficult. That's why you have case law, et cetera, in order to interpret the law. But when, for example, you raise the notion of tracking to a tech person, they will have fifty versions or definitions of what tracking is. How would I define tracking if I can't pinpoint what it is (Data Protection Manager)?

The effect is that a "rather safe than sorry" approach is taken, which might prove suboptimal. The Data Analyst (personal communication, March 29th, 2022) states that "I try to take a more conservative approach compared other business areas."

Even talking to people that know the GDPR, like our internal Data Protection Managers, even they have issues of translating it to us so that we understand what we can and cannot do. I think it's always rather safe than sorry in terms of the GDPR. It is not crystal clear (Data Analytics Manager).

Certain cases can prove difficult when the GDPR is concerned. Company X handles large data sets, some preceding the GDPR law, which required new solutions in order to be compliant.

Corner cases are difficult to handle. Especially when you have large data sets, as we have. We have data from 2014, even 2012 in some cases. There is a hard regulation on 48 months of inactivity before you have to delete them. And that is something that we have been working on through the years (Data Engineering Manager).

For example,

There are customers that try to get into the streaming service app to see if they have something for free. Which makes them to be considered as active, although they should be deleted. (Data Engineering Manager).

The challenges connected to the GDPR, and data privacy can be further illustrated in connection to data governance and data privacy. They are both important but do pose difficulties when it comes to achieving a satisfactory level. The findings reveal that what is usually hindering the progress is the budgetary limitations due to the lack of tangible profits resulting from data privacy implementations, which stems from the organization's need make money.

We have the issues with data governance and security which are also very important, but difficult to achieve as well, especially when you have smaller teams and a budget that is not maybe gigantic by any means. It is difficult to achieve due to the priorities [of the company]. The priorities are knowing how we [the company] are doing, not focusing on organizing your data sets in the company. We [the organization] want more features, more money! We don't want to spend money organizing since that doesn't bring any value, or return of investment to the stakeholders, that is always the focus (Data Engineering Manager).

To further explain the challenges the GDPR provides, a gap between the law and its technical application is evident. The DPM (personal communication, March 7th 2022) states: "There are grey areas, especially when it comes to technicalities, because the GDPR was written by legislators, not technical people." Which is not uncommon when it comes to the law. In this case it is supposed to be as inclusive as possible, which leads to questions of interpretation. A technical term for a professional working with data might mean different things. Come with shades and dimensions depending on situation and context. But, in the law it is stated as is. What definition is to be used? How can Company X ensure compliance when the threads in the terminology is entangled? An example is the issue of actually determining what constitutes PII. Company X can anonymize the data by removing name, email, phone number, or any other data that could identify an individual, and in that way produce a pseudonymized unique ID. One would expect the ID to not be classified as PII anymore.

[...] if I have removed all your information, your name, email and phone number and credit card info away, and decoupled that from your user ID, and that user ID is a hatch of random numbers and letters there is no way my company could figure out who you are anymore. But, then there is a policy question, what If one of the vendors we use that is a payment processor has your user ID and your personalized information too, which they have to for accounting purposes. Does that mean that our systems are not anonymized? This has been a big policy question that we have been dealing with and it causes these technical headaches, because all of our systems in my department revolve around having a user ID. We don't carry any personalized information in my systems, the only thing we carry is the user ID. We do that on purpose so that we can be compliant. It becomes a big question of how you keep something anonymized (Senior Manager of Data Science).

Due to the law being barely four years old it is lacking case law. There are not enough previous cases to sample from to create a reliable understanding of how to handle the situations that occur and the questions they raise. Which are made worse by the substantial fines handed out to organizations who do not manage to comply. Expressed by the Data Engineering Manager (personal communication, March 9th 2022) “Those are hefty fines. Such fines would be disastrous for Company X”. In combination with the complexity of certain questions related to data, where it is difficult to foresee the results of actions, the grey areas of the GDPR can be truly tricky.

[...] in data you need to take a lot of decisions on how to handle specific questions and often there are no obvious answers. And sometimes you take decisions where it is very hard to know what trickle-down affects they will have (Applied Machine Learning Manager).

But the grey areas of data management are not limited to the GDPR alone. Collection and processing of data allows Company X to improve the product which would, in turn, allow for a better experience for the customer. There is a difference in perspective, where a large amount of data would result in better possibilities to improve the service, but at the cost of customers having to share their data.

[...] from a data practitioner point of view, I want as much data as I can get, but from a consumer perspective I do not want to give away my data at all (Applied machine Learning Manager).

It ties into uncertainty, since, without proper research, a customer possesses limited information regarding exactly what the data is being used for.

Not knowing how your data is going to be used is dangerous. Giving it for free is dangerous. [...] if you do not know how your data is being used then there is a risk of unethical usage (Data Engineering Manager).

It is a thin line to walk when it comes to protecting users. On the one hand it is about protection, but at a certain point protection turns into control. Dealing with ethical questions and discussion is about knowing where you draw the line, a decision which once again is to be made within the uncertain boundaries of a grey area. And it does not end there. Ethical dilemmas extend to the question of whether Company X should influence the behavior of their customers, which could have ethical implications but also consequences for performance. There is the problem of using data to create recommendations within the streaming service, and by doing that

creating a too concentrated supply of content, which results in Company X being unable to retain their customers.

Recommendations can put people into bubbles [limited catalog targeted at the user] if they use data to influence behavior. [...] A bubble will work, and you can get more usage of your service, at least short-term. But, if you are working with a limited catalog that also entails that your customers will go through those limited titles the bubble promotes, which means potentially that you are maybe increasing the engagement short-term but long-term you may not be able to maintain the customers. For a mid and long-term perspective, it is interesting to nudge people out of their comfort zone (Applied machine Learning Manager).

Another ethical dilemma is the struggle of trying to win back customers as they are to cancel their subscription. That might not necessarily be ethical, as it aims to manipulate the customers original intention. But from a point of competitive advantage the severeness fades as there are no streaming providers that do not collect data. The collection and processing data is present in every streaming provider, which levitates pressure on the dilemma of privacy.

If we could communicate to people that are about to quit their subscription, is that really ethical to do that? If we were pushing customers that do not want to be a customer anymore, in order to win them back (Advanced Analytics Manager).

Analysis

Building on the previously presented empirical findings, the analysis will bring forth the theoretical framework of translation with the intention of accumulating insights related to the research question: *How are firms translating the data privacy idea into practices?* The gathered empirics provides an in-depths understanding of Company X's efforts, ranging from the external proponents to the technical intricacies an organization faces in the day-to-day. The following structure will provide the boundaries and direction which the analysis will adhere to. Initial reflections will bring forth and analyze a well packaged data privacy idea as it materializes into the GDPR. A law, fundamentally, is black and white as you either comply or get penalized. Which creates a transition into the following section focusing on the actual complexity surrounding implementing the GDPR and why the law is posing extensive challenges. Finally, the analysis will address how to unravel the complexity and in doing so reduce it to an understandable state through the framework of institutional theory, translation, and the presence of ideas in residence.

A Well Packaged Idea

Motivated previously and accordingly emerged from the empirical section, the overarching idea of data privacy can be seen as a branch of human rights (Joyce, 2015). An idea existing in the space of modern society to be assumed as widely accepted by the majority of individuals and corporate entities. This corresponds well with Czarniawska and Sevón's (2005) notion of idea's need to be widely adopted in order to inspire concrete action. Even though the origin of the idea is difficult to pin-point and comparing ideas have been argued to be challenging (Bourdieu, 1980) the power of this idea is not stemming from its inherent characteristics but rather by the

timing of the idea and what actors that have supported it (Wedlin & Sahlin, 2017). However, we contend, that ideas and the ongoing translation process is not only affected by time and space, rather, building on the work of institutional scholars (Oliver, 1991; DiMaggio and Powell, 1983) ideas are associated with fundamentally and institutionally different characteristics. As this analysis unfold, the importance of understanding these inherent characteristics will come to light.

Therefore, starting with the concept of time and place, the idea of data privacy rights needs to be viewed against its backdrop. The 21 centuries has seen a rapid technological shift where data has become a hot commodity and an important component for several businesses and their business model (Wisniewski et al., 2021; Gimpel et al., 2018; Morey, et al., 2015). In conjunction with this progression there has been malpractices and breaches on how the data has been managed, raising concerns for the field of data management (Nair, 2020). This is important to illuminate as this backdrop plays an important factor for the timing of the translation process. The changing societal landscape created a demand for regulatory action which enrolled actors and created support for the idea of data privacy rights, fashion was at the steering wheel as Czarniawska and Sevón (2005) would say. This increased support across society as a whole, led to collective action which would have been less likely to happen if the timing wasn't there (Czarniawska & Sevón, 2005). What then occurred was that the idea of data privacy was packaged in such a way that it could travel between contexts. The overarching goal was to harmonize data protection rights across the European Union and in order to do so the idea needed to be turned into something more apprehensible. As a result, after several years in the making, the GDPR came into effect in May 2018 (GDPR, 2016/679). The translation process had begun, the idea of which was data privacy had been materialized into an object in the form of a legislation framework which now gave it the possibility to travel between different local contexts (Czarniawska & Sevón, 2005). Where other management ideas such as agile and lean come across as conceptual and somewhat intangible, the idea of data privacy, in contrast, is supported by a comprehensive legislative framework. Quite simply put, it is our contention that the idea of data privacy is characterized by coercive change (DiMaggio & Powell, 1983). This is illustrated through the pressure of compliance. In order to ensure compliance, there is a governing authority in the form of European Data Protection Supervisor which also cooperates closely with national supervisory authorities to uphold compliance (EDPS, 2022). Failure to comply can be detrimental to an organization as large fines affect the organizations financials and in extension its long-term strive for survivability (Meyer & Rowan, 1977). Our empirics strengthen this notion that the organizations motivational preference of being the “stick” rather than the “carrot” if we are to use a popular metaphor. This was further illustrated by the fear of huge fines and damage to the bottom line due to non-compliance. Consequently, the GDPR now permeates the European Union, and one does not have to look far to see the practical impact. For example, on an organizational level, mandatory trainings are implemented, and data protection officers are required within organizations dealing with personal information. On a user level, most people can relate to the cookie boxes that appear when using applications or websites that contains terms and conditions which require consent for the organization to collect and process personal data. These are but some examples that illustrate how the data privacy ideas has directly impacted the European business environment for both consumers and

organizations. We argue that the wide reach of this idea is caused by the packaging of the idea into an apprehensible legislative framework. This comprehensive and well-articulated framework allows the idea to travel more expediently into new contexts. Consequently, it gives rise to the notion that the idea of data privacy comes with a “straightforwardness” that is less prominent in other management ideas.

Straightforwardness aside, firms like Company X is now faced with the task of how to implement this idea and framework into the organization, something which previous literature has showed to be a challenging task (Tikkinen-Piri et al., 2018; Kutylowski et al., 2020). Despite the raised implementation concerns, previous literature on the topic has mainly focused on the conceptual level, through the designing of principles (Tamburri, 2020), and frameworks (Tikkinen-Piri et al., 2018) which can facilitate the implementation process. Even though useful, it overlooks the value of empirical research and the insight into practical outcomes. In line with some of this previous literature which shed light on the apparent challenges of implementation our analysis will, empirically, illustrate that even though the packaging of the idea facilitates a more expedient travel, the actual implementation is complex and allows for interpretation as a result of contrasting wills and ideas. Although aided by the theoretical lens of the traveling of ideas our research and this analysis distinguish itself from past conceptual research as it answers the call for more empirical research on the implementation phase of the GDPR.

The Latent Complexity

The translation of the data privacy idea is processual, and will eventually, in this case, travel and reach the organizational level. As described by Czarniawska and Joerges (1996) ideas are communicated images and by objectifying the idea of data privacy into something tangible, as the GDPR, the idea is able to travel into the local context. Moving into the context of Company X has allowed for a clearer view of how the translation might occur internally. The empirics has made it clear that the idea is widely accepted within Company X. No doubt or mistrust in the establishment of data privacy has been shown from any of the interviewees. Leaving the notion that data privacy has been integrated into taken-for-granted practices, which, according to Guzman and Diedrich (2015), would imply a successful translation. With the empiric’s focus on the different teams within the tech department, who naturally manages most of the data, confirmation of data privacy’s importance was coherent. But, since data is a central part of the business, other departments also work with data or communicate with the tech department, such as the business department and the dedicated privacy team. All gathered empirical data points in the same direction, the idea of data privacy seems well incorporated and naturally a part of the day-to-day of managers as well as non-managers.

The following section will dive deeper into the implementation of the data privacy idea and why the previously motivated well-packaged idea might not be as straight forward as can be assumed. Various examples of practices resulting from the data privacy idea can be found in the empirics, which would strengthen the claim that the idea has translated into taken-for-granted structures. But the empirics do also present signs of contrasting ideas already prevalent in the organization, which are not only congruent with current practices, but the foundation

upon which they are built (Lindberg, 2014). This already prevalent idea is referred to as the idea of profitability and can be seen as the fundamental need for organizations to make a profit. Within Company X the focus is on developing the product, expanding features, and in turn earning money. As such, budgets are constructed based on that notion. The interviews illustrate this through the challenges that presents themselves, on a budgetary level, whenever an initiative does not align with the idea of profitability. There seem to be no room unless there is an expected return on investment, which is an issue with implementing data privacy. Company X, like most other, is portrayed as an organization that is fundamentally driven by profit, which has resulted in the day-to-day being designed with that purpose in mind. Decisions, practices, and structures in play are almost unconsciously motivated by this way of conducting business. To further expand on the idea of profitability its tendencies can be seen in the everyday management of data. It is indicated that as much data as possible would enable the development of a better product. Maximizing the data collection and the utilization of it could improve the services, which in turn would lead to more paying customers. In theory. It is also made clear, in the interviews, that the overall awareness regarding data privacy is increasing, which could, potentially, counter the argument of blindly maximizing the potential of collecting data. The idea of data privacy materializes as various practices within Company X, which becomes clear as a reorganization has been conducted in order to facilitate the idea. The reorganization placed one Data Protection Manager at every department of the company. The DPM consults in various questions regarding the GDPR and also use forms in order to track and maintain compliance. The idea of data privacy can also be seen in the measures taken to separate and keep personal information protected behind encryptions and restricted access. Personal data is also connected to the user, meaning that in case of terminated subscription the data is also removed automatically. But, the data is not connected to an individual, instead it is connected to a user ID. To more extensively enforce the idea of data privacy and communicate it there is the Steering Document Framework, which e.g. includes The Codes of Conduct, Data Protection Policy. A final impactful practice that embodies the idea of data privacy is the process of privacy by design. Company X wishes, in future projects, to incorporate GDPR compliance at an early stage, making sure that no additional, unnecessary costs are resulting from inappropriate business features.

Looking deeper at the translation of the idea within Company X, it is apparent that even though integrated, the translation is not free from friction. The idea embarks upon friction as it is trying to adapt into the local context (Lindberg, 2014; Czarniawska & Joerges, 1996). The idea of data privacy is most clearly manifested as the GDPR, which comes with substantial fines if not adhered to. Just as all interviewees were on the same page as to whether data privacy is essential to Company X, it is fair to claim that all of the interviewees had their fair share of difficulties and challenges when it comes to being compliant with the GDPR. The apparent friction is illustrated throughout the organization as the translation continues, expressing itself through reorganization and complete reviews of existing systems. The translated idea of data privacy is now, coercively, a natural part of Company X. If an organization does not comply, they face fines, which is potentially economically unsustainable, but also a sign of illegitimate business procedure. Previously presented, Company X has several corporate documents part of the Steering Document Framework portraying Company X's data privacy initiatives and are in

place to guide the organization to remain compliant. In accordance with Czarniawska and Joerges (1996) these steering documents could be seen as local labeling attempts to objectify the idea of data privacy so that it fits in the local context. These structural arrangements were deemed necessary in order to allow Company X to manage the new challenges the GDPR entails. Furthermore, these structural arrangements can also be seen as attempts to align the organization's value system with that of the societal pressure in order to create legitimacy and in the long-term increase chances of survivability (Lindblom, 1994; Meyer & Rowan, 1977). Specifically, the visual display and attempt of incorporation of the codes of conduct as an ethical guidance tool have shown to increase legitimacy (Weaver, et al., 1999). Consequently, the risk of damage to legitimacy or finances are reduced, where flexibility regarding GDPR guidance allow for adaptation in situations of uncertainty.

Uncertainty has been a common denominator in the empirical findings. As the idea of data privacy has traveled it has been translated through various different functions and societal and corporate levels, which has left certain marks as the idea continuously translate into actions within Company X. Brought forth in the empirics, one of the company experts on the GDPR, the Data Protection Manager, emphasized the difference between the legislators formulating the law and the professionals carrying it out. The idea of data privacy has become materialized into the law of GDPR through legislative institutions that does not only create implementations and interpretation issues for practitioners but can also demonstrate how the data privacy idea becomes embedded with coerciveness. This aligns with Czarniawska and Joerges (1996) reasoning of creators and users' ability to affect ideas and its translation, and as such its inherent characteristics, becoming translators. Further, this notion is strengthened by Wedlin and Sahlin (2017) as they highlight the impact of the context these translators act within, especially their interests and motives. Meaning, that the translation process of the overarching idea of data privacy turning into European law would differ in motive from the idea's translation in an organization. This results from local contexts constituted by translators with fundamentally different goals, which creates difficulties as the idea of data privacy is translated into practice on an organizational level, where the employees are motivated by their contextual goals.

The empirics convey a picture of Company X as being compliant with the GDPR, all interviewees were on board with the idea of data privacy, and it seem to be integrated into the day-to-day. But why is there still friction in the idea's reenactment into practices within Company X? The previous section highlighted the contextual aspects of translation, which arguably affect the idea's materialization into object and in turn further translation. Where the idea, on an organizational level, might contain inherit resistance from its travel it also translates in ecologies (Wedlin & Sahlin, 2017). Meaning that different ideas can impact each other as they are translated within Company X and that there is more than one idea in circulation. As the idea of data privacy, embedded with its coercive trait undergoes process of translation it interacts with other ideas. In terms of Company X, we can draw from the empirical findings that a common path of reasoning was the one connected to profitability. Whatever angle one look from, Company X remains a money-making organization, reliant on financial results in order to keep conducting business. As for analysis this means that the idea of data privacy is being translated in an ecology of at least one other idea, the idea of profitability. As illustrated

in the empirics this idea is one that permeates the organization, all new projects and processes put into place are driven by the end goal of driving shareholder wealth. In its essence the idea of profitability is not unique for Company X, profit maximization is widely spread and commonly facilitated through professionalism. University teachings, consulting and recruiting practices all contribute to the facilitation of the idea across the organizational field. Consequently, the idea of profitability is characterized by normative traits (Meyer & Rowan, 1983). The two ideas brought forward in this analysis are but a partial snapshot of a larger complexity, as there can be multiple interacting ideas, actors, activities, and settings involved (Wedlin & Sahlin, 2017). More importantly, the idea of profitability can be seen under the light of the concept of ideas in residence (Czarniawska & Joerges, 1994; Lindberg, 2014). Referring to the already existing experiences, history and procedures operating within the contextual environment of the organization. Still, it is illustrative of the complicated process of translation underpinning organizational practices. As have been learnt, Company X would like to go beyond the legal obligation presented by the GDPR. At the same time, it showed, on multiple occasions, that the interviewees felt that data management initiatives were restricted by budgets, and underprioritized in comparison to more profitable alternatives. Where ideas can be translated in ecologies, and even strengthen one another (Wedlin & Sahlin, 2017), the idea of data privacy seem to face resistance from existing prominent ideas within the organization, already concretely manifested in established practices. This friction can provide energy to the translation process as the traveling idea and the ideas in residence negotiate and compromise (Lindberg, 2014). Practices of ensuring a profitable business has been in play for a considerable amount of time, and does now, to a degree, have to be altered in order for the data privacy idea to be enacted. As much as this friction appears within Company X it does not mean that they are mutually exclusive. Wedlin and Sahlin (2017) claims that the intertwinement of ideas in the translation process can lead to change in processes. Which, in the case of Company X, seem to have happened, but also successively keep on happening as the idea of data privacy digs its roots deeper into the organization. This change is a compromise between the two contrasting ideas, as the idea of data privacy is forced upon organizations in the form of the GDPR, meanwhile the idea in residence, profitability, still dominates the business landscape.

The journey of the data privacy idea has been argued to be rather straight forward, on a conceptual plane. It has translated into a tangible law and from there to be further translated into Company X through their establishment of practices and processes to remain compliant. However, in reality the task is far from as easy as that. Because there is currently a dominating idea in residence (Czarniawska & Joerges, 1994; Lindberg, 2014) in the form of the profitability idea. The idea of data privacy is prevalent in the organization, being the cause of reorganization and considerable changes to processes and programs. But still, it remains a challenge to employees and management as it does not align with the existing way of conducting business. Decision-making is unclear due to the need to make a profit, while at the same time having to go against established processes in order to comply with the GDPR. The idea of profitability has shown itself time and time again as interviewees express that it is hard to expand upon data privacy as the budgets are restrictive towards actions not resulting in financial gains. The idea in residence is a fundamental part of conducting business within Company X and in order to improve data privacy the idea of profitability has to be put aside, at least temporarily. As

previously mentioned, the challenges connected to the idea of profitability is often expressed when budgets are concerned. Planning and budgets are in place to ensure that business is running as intended, reaching the goals that has been set up. The goals or priorities that the company expects is reflected in the budgets, which creates friction as the idea of data privacy, and the practices and processes that follow, force actions that do not provide anything towards established monetary or profit related priorities, but burdens the budget all the same. To further exemplify, the DPM could point towards a specific, seemingly insignificant, detail in a system that handles data. The responsible manager is now required to set aside money, time, and resources in order align the system with the GDPR requirements. The result, after the detail has been changed, being that business will continue as it used to, the change might not ever affect anyone, and the department are now left with less resources to activities connected to the core business. This scenario illustrates that the potential friction between the idea of data privacy and the idea in residence. The idea of data privacy is concrete and well packaged; it comes with its own, cut in stone, set of rules, which makes it hard to integrate with the idea in residence. It therefore pushes the idea of profitability aside until compliance is achieved, upon which the idea in residence, the main established idea, regains the control and renders the idea of data privacy a non-priority. The ideas remain fundamentally different and since the idea of data privacy cannot fully make sense in a profit context its coercive nature seem crucial. This notion was also expressed important by the DPM, as the privacy idea would be less effective if not backed up by strict legal requirements and financial fines.

The dilemma of the clashing ideas creates small micro-decisions for managers internally which are really complex as the particular manager might not have the authority to approve them. The established decision-making processes are not designed to handle these questions which leads to uncertainty and inefficient processes. Previously it was a matter of: is this a good use of our money, time, and resources? Where it has now come to: can we set aside money, time, and resources without any tangible profitable results to show for it? Company X have established a structure of data protection managers who provide quick and efficient answers to new and tricky technical questions regarding the implementation of the GDPR. But the answers they provide do little unless they can be implemented in a way that does not contradict the current way of doing business. For example, the DPM:s do only provide recommendations, which allows managers to look past them if they do not meet the existing requirements of profit. It is not exclusively a question of having the answers but making sure that managers can have the possibility to implement them. Company X are aware of what is expected from them, but the idea in residence has translated into practices, routines, and values that will remain relevant as long as the idea of profitability assert its pressure on the organization. What becomes clear is that the idea in residence is still dominating business decisions as profits are crucial for Company X's survival, where the idea of data privacy is enforced through a law and non-compliance is unthinkable. The translation process of data privacy becomes truly complex on an organizational level since the idea in residence has been manifested into processes and routines that are not congruent with the idea of data privacy. As of now the case seem to be that the clashing of the two ideas creates friction, questions, and dilemmas that Company X's organization is not structured to solve, which creates uncertainty, inefficiency, but has also been

the starting point of organizational changes in a state of coexistence as the idea of data privacy clashes with the idea in residence (Czarniawska and Joerges, 1994; Lindberg, 2014).

Following the translation of the data privacy idea and its decent into Company X has brought forth the unique contextual environment impacting the idea's translation, where it clashes with ideas in residence within the organization. As previous research on the GDPR has stated there is a need for empirical studies on the topic (Faifr & Januška, 2021). As Faifr and Januška (2021) attempt to fill in the gap through quantitative measures, the study into Company X lifts the complexity organizations face through presenting the practices and the internal intricacies impacting the translation and the organization as they adopt the idea. By adopting a qualitative approach, the conducted study has been able to acquire insights from employees and managers on the complexity connected to the implementation of the GDPR, and in doing so produce needed analysis complementing the current research gap. Contrasting Faifr and Januška's (2021) quantitative research on the cost of implementation processes, the dive into Company X highlights a complex organizational dilemma where contrasting ideas compete. This perspective can potentially provide insights related to the contextual details within an organization, which will reflect on the results in a quantitative study. To further tie back to previously conducted research on the GDPR, Kutylowski, et al. (2020) raised the concern of the incompatibility between the formulating legislators and the technical aspects on an organizational level. The misalignment between law and technical reality were a concern clearly raised by the DPM at Company X and another aspect adding to the complexity of adopting the idea of data privacy. The findings within Company X supports the claim that the differences in motives on different societal or organizational levels of data privacy produce challenges.

Unraveling the Complexity

The translation process started with the idea of data privacy rights becoming packaged into a legislative framework against the backdrop of a changing digital age. This packaging and objectifying of the idea allowed it a more expedient travel to new local contexts. As our empirical setting then illustrated once this idea "arrived" at Company X it gave rise to some challenges and complexity on how it should be implemented in practice. This section will attempt to unravel this complexity.

We contend that the studied case presented two contrasting ideas, which further can be explained by the framing of ideas in residence meeting the traveling idea, generating friction and new energy to the translation process (Lindberg, 2014; Czarniawska & Joerges, 1994). Here the idea in residence, the idea of profitability, already impacted the mindset and practices within Company X. This was illustrated in numerous ways but for instance through the prioritization of creating new products and services which in turn could increase the bottom-line. Meanwhile, the traveling idea of data privacy manifested itself in different ways such as the reorganization which presented a DPM in every department and through various data protection measures. In addition, there was apparent friction between the two clashing ideas illustrated through budget restrictions limiting some data privacy initiatives. However, the friction also generated energy to fuel the translation process (Lindberg, 2014; Czarniawska &

Joerges, 1994). Next, we will attempt to understand these interactions between the ideas and how they can relate to the iterative and ongoing translation process (Wedlin & Sahlin, 2017).

As the ideas travels and translates the local contexts change, what the idea once represented might not necessarily be the same as what can be witnessed when it takes form within an organization. The point of following the idea's journey is to pinpoint that it will not remain the same but change and transform as it translates from one context to another (Czarniawska & Sevón, 2005). And even though the clashing of the two ideas within Company X is described as complex on a micro level, it is not as hard to fathom if one broadens the scope. Internally the managing of data in accordance with the GDPR has been described as challenging but necessary. According to previous research (Czarniawska & Sevón, 2005; Lindberg, 2014) the process of translation is just an idea which interacts with its environment and materializes in a new form continuously. This reasoning seems to detach the created friction from the complex interactions of the clashing ideas, simply accepting that it is there and proposing it is fueling further translation. What the empirics highlights is that the amount of friction stems from how well the ideas match and how they interact. Within Company X two main ideas has been discussed: the idea of data privacy and the idea of profitability. The former has clear coercive traits where the second is characterized by a normative approach to change (DiMaggio & Powell, 1983). The main observation here is that these two ideas are motivated by different institutional factors. The idea of data privacy has translated into a law and is forced upon the organization, but the idea of profitability is not in itself mandatory, instead it aligns with the current way of doing business and is taught in universities and enforced in our thinking everyday due to the economic landscape in society. Both these factors make the ideas vital to the company but for different reasons.

We argue that our empirical findings from the case of Company X tells a story where two ideas, one that travels, and one in residence, coexist but compete with each other on very specific terms due to their coercive and normative characteristics. Furthermore, the rivalry of two competing ideas that coexist within the same company is a helpful theoretical lens to understand the translation process within Company X. To our knowledge there is limited research upon how ideas coexist over time. However, it has been shown that a traveling idea can with time, become taken for granted and as an extension of this become an idea in residence (Lindberg, 2014). While this notion of ideas coexisting is somewhat novel in field of traveling ideas, there are similarities to Reay and Henning's (2009) findings on how logics can coexist and be managed through collaborative relationships. Even though logics is beyond the scope of this study the similarities in reasoning that can be drawn provide highly applicable insight into the situation within Company X. The reason for the ideas being able to compete but yet coexist within the organization is due to the way the ideas have been packaged and embedded into the organization. Both ideas have strong collective action in support and even though their inherent institutional characteristics may differ none of the ideas tend to freely budge and make way for the other. Their differences, the friction that is created can on occasion fuel the translation process in ways of findings compromises and an ambience where both ideas can coexist. A clear example of such a friction and compromise is the incorporation of privacy by design into the everyday operations. By incorporating privacy by design the organization attempts to adhere

to both ideas. In essence it means that by planning (designing) for GDPR compliance from the start of projects, the chances of being compliant increases and it reduces costs and time that otherwise would be spent on restructuring the project to be compliant after the fact. This compromise illustrates how the friction between two ideas can add “fuel” to the translation process and find a solution that resonates with both ideas allowing them to coexist (Lindberg, 2014). But more frequently, the ideas seem to be competing against each other, where no common ground is found. Instead, one or the other is stronger and outcompete the currently weaker idea. It is during this state Company X faces a lot of their challenges, mainly due to the clashing of ideas leading to counterintuitive decisions. As when a manager needs to implement a GDPR related initiative instead of developing the product. The coexistence is relying on the ebb and flow relationship of normative and coercive institutional pressures. When business as usual is concerned, business decisions is motivated by profit by improving the product and the experience for the customer. This state then transitions as the GDPR requires the organization to adhere to certain requirements. Upon compliance Company X shifts back towards the idea in residence, being profitability. This state of back-and-forth coexistence seem to dominate the decisions and practices on an organizational level, but also the translation of the data privacy idea within the organization.

As our case study demonstrates, the two ideas constantly interact, and as they do they become altered in an iterative process of translation (Wedlin & Sahlin, 2017). The traveling idea of data privacy is trying to be fully integrated into the local context, but will it, with time, become taken for granted and an idea in residence (Lindberg, 2014)? As it is an ongoing process it is difficult to pinpoint where the translation process will lead. On one hand, the current uncertainty within the organization and normative nature of the current idea in residence counters the implementation of the idea of data privacy since it is a causal effect of the current capitalistic landscape. This argument benefits from continues enforcement through established practices and the notion of how business is “supposed” to be conducted. On the other hand, the changing digital landscape in combination with the coercive legislative characteristics of the data privacy idea together make a compelling argument that such a development may be on the horizon. Due to the law’s coercive nature, it does possess an undeniable presence within the organization, but the extent to which it can compete with the idea of profitability and itself become an idea in residence is yet to be determined.

The foregoing section on unraveling the complexity attempt to bring clarity to the complex interactions that follow from the idea of data privacy’s translation into an organizational setting. The case of Company X has illustrated challenges connected to the implementation of the GDPR and maybe primarily as the result of clashing with the idea in residence. Previous research on the GDPR has raised the concerns that organizations might not be prepared for the upcoming changes and the law’s coerciveness (Tikkinen-Piri et al., 2018). One argument is an overall lacking awareness, which has been raised within Company X as highly important and something that can be further developed. Based on the empirics, Tikkinen-Piri et al.’s (2018) worries regarding companies’ organizational capabilities in handling the implementation do seem to carry a large degree of truth. As the case of Company X showed, the idea in residence countered an extensive GDPR implementation and created challenges and questions that the

organization were not designed to handle, which becomes apparent through the reorganization within Company X. To elaborate further on the previously conducted research on the GDPR, Kutylowski et al. (2020) aims to raise awareness towards the risk toward security the implementation of a faulty law might have. The gap between the legislators and the technical practitioners has been elaborated upon, but Kutylowski et al. (2020) claims that this issue might lead to a “decrease in the attainable real security level, thus hurting privacy.” Where the empirics can back the claim that the misalignment between legislators and practice can pose challenges, the case of Company X provide no further foundation for the claim that it could pose a threat to privacy. On the contrary, despite challenges following the implementation of the GDPR, substantial changes and improvements has been made in ensuring the security of data.

Conclusion

The report has approached the idea of data privacy in an attempt to deepen the understanding of ideas, how they travel, and how they translate into actual practice within an organization. Furthermore, this case study is a result of the call for more empirical research on the practical implementation of the GDPR amongst organizations. The case has been conducted at a large European streaming service provider, where data is a vital part of the current business model. Moreover, interviews with employees and managers at different departments interacting with data, directly or indirectly combined with analysis of corporate steering documents provided the empirical foundation upon which the analysis followed. The collected empirical material is analyzed by the adaptation of concepts from theories of institutional change, and translation. A fitting theoretical framework as it allows for variation and consider contextual factors. In the end, this study set out to answer the following research question: “*How are firms translating the idea of data privacy into practice?*” Against the backdrop of this research question, our contributions to Data Privacy and the GDPR literature is threefold: first we respond to the call for more research on how organizations implement the GDPR on a practical level (Tikkinen-Piri et al., 2018; Teixeira et al., 2019), providing empirical insights into the practical outcome rather than conceptual outlooks. This contribution adds a nuanced view to the implementation process as it brings focus to the firm and attempts to answer the so important question of how managers and employees tackle this challenge on an operational level. Second, the study adds to the previous literature demonstrating the relevance of contextual factors and organizational structure when implementing the GDPR on an organizational level (Faifr & Januška, 2021). This is done through the notion of traveling of ideas, specifically, by exemplifying the clashing and co-existence of traveling ideas and ideas in residence at Company X. This theoretical lens helps to shed light upon the complex organizational dilemma where contrasting ideas compete. Lastly, the study brings forth empirical findings that corroborate and adds value to previous research highlighting the misalignment between the legislative framework and the technical reality of data privacy (Kutylowski et al., 2020). In addition to the contribution to the GDPR literature this study also suggests that traveling of ideas should consider the characteristics of the ideas, as our case study show tendencies of their importance in the process of translation and in the interaction between ideas. Since it appears that limited attention has been put towards

this area in the past, we encourage future research on characteristics of an idea and how it affects the translation process.

The digital age is here to stay, and as long as data's role becomes increasingly important data privacy related challenges will remain an important topic. The GDPR could potentially be one of many legislations or laws that organizations might face in the years to come. Subsequently, how organizations approach and adapt to these frameworks will become a focal point for academics and practitioners alike. In terms of implications our study highlights the importance of contextual factors throughout the implementation process. As an extension of this, one limitation of our study is regarding generalizability since our findings are at least partially connected to contextual factors, which could be argued limits the generalizability. Company X provides one environment for translation, where another organization might face or provide different circumstances. None the less, the case illustrates the importance of contextual factors, which paves the way for future research to explore similar empirical studies across organizations, industries, and countries. Another implication concerns the found empirical support for the gap between law and technical reality, which has also been targeted by previous research. This has showed to create complexity and challenges for organizations implementing the GDPR on a practical level. Future research on the gap between law and technical reality can give scholars an opportunity to level the complexity and improve organizational practices for data professionals. Managing data privacy concerns is not exclusively a concern for organizations, but could have impacts on European citizens as personal information is stored within companies today. Deepening the understanding of how data privacy works on an organizational level is a step towards unraveling the undeniably complex environment, but also one step closer towards ensuring a safer digital environment for European citizens.

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