STRUCTURING YOUR PRIVACY TEAM

2012 Connecticut Privacy Forum

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STRUCTURING YOUR PRIVACY TEAM

Topics for discussion

Like any other compliance program, how do you organize & staff this important function?

Who, and how best to handle an array of responsibilities:

- Privacy and data management policies and procedures;
- Risk assessments;
- Consents, authorization forms, and notices;

- Training and orientation;
- Auditing and monitoring;

- Periodic reporting to the board, CEO, and others;
- Strategic guidance to corporate officers regarding;
    - Planning, design, and evaluation of privacy and security- related projects; and
    - Management of third-parties.

KEY ELEMENTS TO SUCCESSFUL PROGRAM

1) Documented Governance Program – Clearly assigned roles & responsibilities, documented policies & procedures, documented exception process, etc.
2) Senior Leader Support – Senior executive support is a MUST in order to make privacy & information security part of your corporate culture
3) Strong partnership between CIO/Information Security and Privacy Office – Neither one can do it alone!
4) Dedication to awareness – Employees are the key element to all privacy programs. A commitment to training and awareness is critical to get the message out.
5) Incident Response – A security breach can be a financial and reputational disaster. Plan ahead!

Where To Begin?

•Conduct an information inventory

•Understand your regulatory and contractual obligations

•Understand your company's risk tolerance

•Work with Internal Audit to understand needs and address and gaps

•Build a network of privacy contacts – internal and external

Audience Poll Question

How many of your companies have documented privacy and security policies?

Scary Facts:

- 23 percent of IT professionals reported that they work for a company that does not have security policies.
- 47 percent of employees and 77 percent of IT professionals worldwide believe that their companies' security policies need improvement and updating.*

*According a 2008 study conducted by InsightExpress and commissioned by CISCO

Audience Poll Question

How many of your companies have made a commitment to privacy and information security awareness?

Scary Facts:

- 20-30 percent of employees are NOT aware that they work for a company has privacy and security policies.
- The majority of employees believe that employees don't always adhere to policies because they don't understand the risks involved with their behavior, either because security isn't a top-of-mind priority or issue, or because the employees just don't care.*

*According a 2008 study conducted by InsightExpress and commissioned by CISCO

Audience Poll Question

How are your companies privacy and security programs structured? Are they distinct or combined?

Scary Fact:

•Total number of records containing sensitive personal information involved in security breaches in the U.S. is 562,943,732 in 3,241 data breaches since January 2005.

* *A Chronology of Data Breaches*, Privacy Rights Clearinghouse, July 2012

Questions