

Operationalising Privacy Program Through Collaboration

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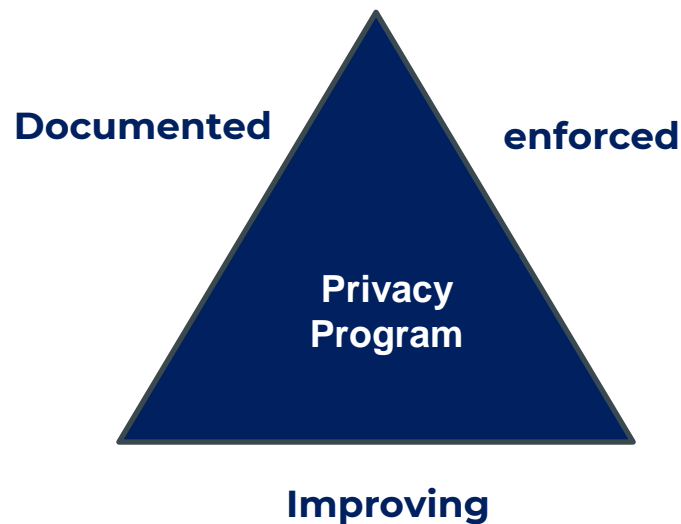
What do we mean by operationalisation?

The aim :

Bridging the gap between corporate privacy policies, standards and practices

Operationalisation efforts ensures that the privacy program is :

- Enforced
- Documented and demonstrable
- Improving



Analysis of the status quo



Surveying the maturity of the privacy program allows you to identify:

- The areas of risk
- What works & What does not work
- What are the blind spots
- How the business practices have changed

Privacy assessment frameworks such as NIST Privacy Framework and CNIL privacy maturity self-assessment model could help initiate dialogues with executives and set the priorities for your future actions.

Defining the Objectives



Define your ideal posture:

- What are the necessary requirements? 'Must-haves'
- What are the additional features that will improve your work? 'Nice-to-haves'



Identify your operational model for achieving the ideal posture.

- What is the level of resources necessary to reach to this ideal posture?
- What is the time frame?

the priority areas should be linked to the organisation privacy goals and values.

Selling the Privacy Program

- A successful privacy program needs the support from the board and engagement from people who need to implement the policy.
- Using demonstrable figures and performance indicators help you to paint a full picture of resources needed and enables the board to make informed choices and allocated budget and support
- Understanding the concerns and objectives of other teams enables you to design creatively solutions that serves the privacy objectives while delivers business values.



Using Metrics

- Using metrics allows assessing the maturity of the privacy program and tracking the improvement of the performance of privacy program over time.
- It also allows you to shed light on the activities of the privacy team.
- Metrics are very useful tools when requesting support from the board or other senior leaders.



Getting People Onboard

Define your key partners

Legal, IT, and security teams are good starting point.

Involve the design team

The engagement of Product owners R&D managers enables implementing privacy by design

Promote the privacy culture

Creating partnership with HR and marketing helps promoting privacy internally and externally.

Act together

Establish a privacy steering committee to get the support and define objectives together.



Creating a Privacy Team

- The skill sets of your privacy team needs to be aligned with the objectives of your privacy program.
- Leveraging the existing expertise in the organisation is a way to overcome the budget constraints
- By creating partnerships with different stakeholders and breaking silos between departments you can delegate some responsibilities to other teams with similar missions.



Privacy champion programs

- Privacy champion is a programs that trains and enables interested employees within different teams to identify, bring into attention, and address privacy and security risks.
- Delegating performance of certain checks and balances to a member of a team, can promote the privacy by design mentality.
- Establishing two way communication enables you to get information about the challenges that privacy champions face within their team.



Tailored Training

Some do and don'ts of privacy training:

- ✓ Make it relevant
- ✓ Opt for gradual and continuous training
- ✓ Introduce clear lines of communication
- ✓ Make it readily available
- ✗ Avoid theoretical advice: keep it practical
- ✗ Avoid legal jargons and fear mongering: keep it user-friendly

Introducing Policies and Procedures



Policies set the standard for the processing

activities.



Procedures explain how certain standards should be ensured. Procedures define the ‘how, when, where, and by whom’ the policies need to be implemented.

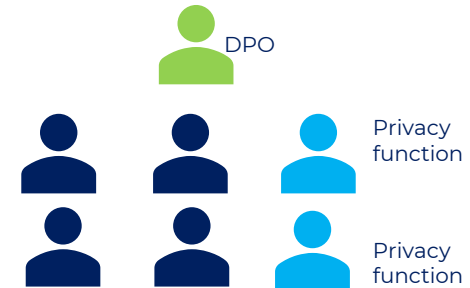
Resources: Developing User-friendly Toolboxes

- Communication or training team is your best ally when designing tool boxes.
- Collaborating with different teams such as IT, security, and product management allows you to find a common language with people who need to implement the policies.
- Tik-boxes can be an effective tool for the design team to embed privacy by design requirements into the design early on.



Establishing accountability: Assigning roles

- Define clear set of tasks for each specific role in the process based on the privacy operational model
 - Ex: Who ensures that privacy by design requirements are considered in the product design process?
 - Who approves that the privacy by design measures fulfil the requirements?
- Understanding the complexity of the organisation allows positioning the roles and defining responsibilities in a way that serves the business model of the organisation.
- Allowing for flexibility ensures the agility of the business process
- Ensuring support and defining a learning path for the roles, having the support of management helps motivating the stakeholders.



Tools & Technical Solutions

- Tools can be an important component of a privacy program which allow you to perform the task in a more automated, organized, and scalable manner
- Every tool comes with its own limitations and flaws
- Tools can support a good privacy program but without training, support, and clear policies and procedures they cannot offer a magical solution.



Final Remarks

- Operationalising privacy requires developing a privacy mentality and behaviour change in the entire organisation because every member of the organisation needs to do their part.
- Project management skills are necessary for initiating dialogues, understanding the business objectives, and managing the budgetary and time constraints.
- The support of the management and engagement of all stakeholder is essential for success of a Privacy program.

Resources

- <https://www.cnil.fr/fr/la-cnil-propose-une-autoevaluation-de-maturite-en-gestion-de-la-protection-des-donnees>
- <https://us.aicpa.org/interestareas/informationtechnology/privacy-management-framework>
- <https://fpf.org/wp-content/uploads/2022/03/FPF-PrivacyMetricsReport-R9-Digital.pdf>



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