What you really need to know as a CPO

Trevor Hughes
Executive Director, IAPP

Know, Say, Do

KNOW WHAT YOU DO

SAY WHAT YOU DO

DO WHAT YOU SAY

The Compliance Chain

Develop Privacy Strategy, Identify Key Participants Gather Info Assess Practices

Update
To Comply

EDUCATE EDUCATE







Monitor, Audit, Maintain

Know What You Do



- Who should participate?
- (Everyone!)
 - Compliance
 - Legal
 - Sales/Marketing

 - Customer Service
 - Claims
 - (All parties with data handling responsibilities)
- Senior support is critical

Know What You Do

- Find all of your uses of customer data
- Why do you use it?
 - Marketing
 - Underwriting
 - Administrative processing
 - Claims handling
 - Aggregate reporting
 - Secondary distribution
- How long do you keep it?
- Review against applicable standards

Say What You Do

- Create a master policy
 - Identify categories of data and the uses for each
 - Make it available to customers as appropriate
 - Do current business practices support the disclosures made?
 - Don't forget your website!



Do What You Say



- Security (stay tuned!)
- Education
 - Perhaps the most important component in your privacy policy
 - Educate yourself
 - Educate all data handlers
 - Educate your boss
 - Educate your vendors

Do What You Say

- Ongoing Compliance
 - Add privacy considerations to all product development teams
 - Add privacy considerations to all marketing plans
 - Consider external audits
 - At a minimum, use designated privacy professional to push regular privacy audits of multi-channel, multi-level practices

Know the Space

Are you a master of your profession?

- Media
- Advocates
- Regulators
- Legislators
- Professional Associations
- Local Network



Know the Media

The New Hork Fimes





The Boston Blobe









Tell the Truth

- When the media calls tell the truth
- When the media calls don't answer if you are not sure
- When the media calls follow up if you have better responses later
- When the media calls don't obfuscate

Know the Advocates



American Civil Liberties Union

DEFENDING THE BILL OF RIGHTS







≜U.S. PIRG



Nonprofit Publisher of Consumer Reports



The International Association of Privacy Professionals is the nation's leading association for privacy and security professionals. It helps its members build and maintain privacy programs while effectively navigating rapidly changing regulatory and legal environments.

Mission of IAPP

- 1. To promote privacy programs and safeguards their introduction, development and maintenance.
- 2. To provide a forum for interaction and information exchange for our members.
- 3. To create high quality educational opportunities for those involved



Phone: 800-266-6501 www.privacyassociation.org information@privacyassociation.org

Stay Informed!

iapp

international association of privacy professionals

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The IAPP is the world's leading association of privacy and security professionals. With more than 1,000 individual and corporate members, the IAPP is helping define and support the profession of privacy by being a forum for interaction, education discussion across industries.

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Bush Administration / Security

GAO cites U.S. Dept. of Justice as Being Open to Hackers

--A government report released August 12 cited years of
IT security negligence at the Department of Justice office
responsible for the day-to-day support of the nation's 93
U.S. attorneys' offices. Specifically, the Executive Office
for United States Attorneys (EOUSA) is cited as having no
intrusion-detection system despite the fact that it has one
of the strongest security programs within the Department.
http://www.computerworld.com/securitytopics/security/story/0,10801,8

Financial Privacy/State Law, Policy & Enforcement

Financial Industry To Compromise in California --To avoid an expensive campaign, the financial industry has decided to compromise their position on a comprehensive information privacy law. The deal gives legislators a deadline of Tuesday evening to pass the financial privacy law backed by California State Sen. Jackie Speier, which imposes restrictions on how banks and insurance companies can share information about their customers. It is estimated that if this bill were to pass, financial institutions more than likely would change their data-sharing standards across the country to comply with the stricter laws in the state of California. http://www.wired.com/news/politics/0,1283,60037,00.html

Identity Theft/State Law, Policy & Enforcement

A Social Security Number Makes One Prone to Identity Theft --13 Million Americans have been victims of identity theft.

Thanks!

J. Trevor Hughes jthughes@maine.rr.com