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PRIVACY AS A STAKEHOLDER: HOW TO GET A SEAT AT THE TABLE

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Privacy as a Stakeholder Overview



“Privacy as a Stakeholder”

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Privacy as a key component of day-to-day business decisions, strategies, and program development.



- **The Privacy Officer** should be a senior member of the leadership team
- Ensures privacy equities are being considered from the beginning



- Embed privacy throughout organizations
- Build relationships with stakeholders
- Strategically leverage resources to best address risk

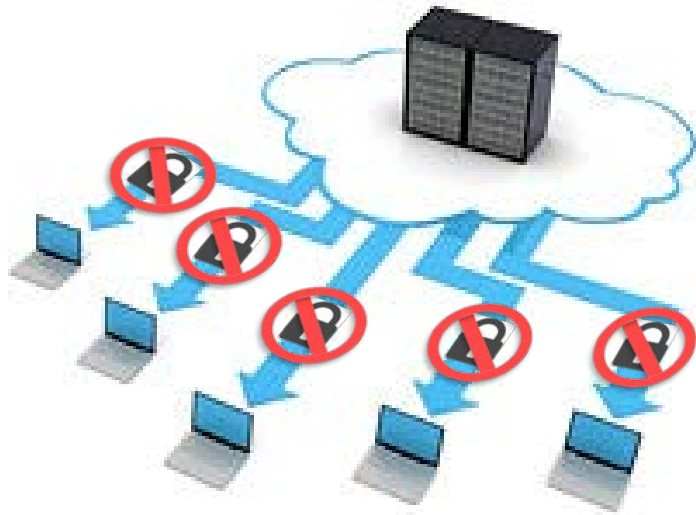


- Helps achieve business goals and cost reductions
- Protects the organization’s reputation
- Ensures compliance

Scenario 1 – The Breach



The IT Department recently procured a new IT system without consulting privacy



- Public facing web app that collects large amounts of PII
 - Collected without the user knowing
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- *System was just breached*
 - *Users are outraged that their PII has been compromised*

Scenario 1 – How Privacy as a Stakeholder would have helped?



Authority

Determine authority and business need to collect information

Data Minimization

Ensure data minimization to only that which is relevant and necessary

Transparency

Increase transparency around what information is collected

Scenario 2 – The PR Nightmare



A prominent employee is arrested for armed robbery



Local newspaper gets a comment about his employment status and disciplinary actions taken



A few days later, turns out the police had the wrong guy!



Some information provided to public by the organization was incorrect



Damaged Reputation



Personal



Organization

Scenario 2 – How Privacy as a Stakeholder would have helped?



Consent and Individual Participation

Determine what information can be disclosed and obtain consent and individual participation where necessary

Data Quality and Integrity

Ensure the quality and integrity of PII maintained by the organization

Accountability

Provide appropriate training so employees are aware of responsibilities for accessing PII and can be held accountable

Scenario 3 – The Insider Threat



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Agency's New Insider Threat Program



One of the most sensitive systems containing large volumes of client PII was not included



PII was misused by an employee who was looking to steal the information and sell to a competitor



Program is misusing employee information for purposes beyond investigations



There are now various employee complaints and threats to sue

Scenario 3 – How Privacy as a Stakeholder would have helped?



Transparency

Ensure transparency around insider threat policies and processes

Notice

Provide notice to employees regarding the Insider Threat Program and the use of their PII

Use Limitation

Put policies in place to ensure PII usage is limited to investigations

Accountability

Deliver training to ensure employees are accountable for the proper use, handling and protection of PII

Summary



- Privacy should be embedded across organizations
- Building relationships is key
- Find ways to get to **YES!**
- Use privacy as a differentiator and value-add to win the trust of your clients, stakeholders, etc.
- When in doubt, call your Privacy Officer
- Questions? Contact: Chris Marsalis: camarsalis@tva.gov or Liz Tribelli: tribelli_elizabeth@bah.com