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

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"Privacy as a Stakeholder" = 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
- System was just breached
- Users are outraged that their PII has been compromised
Scenario 1 – How Privacy as a Stakeholder would have helped?

<table>
<thead>
<tr>
<th>Authority</th>
<th>Data Minimization</th>
<th>Transparency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Determine authority and business need to collect information</td>
<td>Ensure data minimization to only that which is relevant and necessary</td>
<td>Increase transparency around what information is collected</td>
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</tbody>
</table>
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

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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

**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?

<table>
<thead>
<tr>
<th>Transparency</th>
<th>Notice</th>
<th>Use Limitation</th>
<th>Accountability</th>
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<tbody>
<tr>
<td>Ensure transparency around insider threat policies and processes</td>
<td>Provide notice to employees regarding the Insider Threat Program and the use of their PII</td>
<td>Put policies in place to ensure PII usage is limited to investigations</td>
<td>Deliver training to ensure employees are accountable for the proper use, handling and protection of PII</td>
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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