

# RSA® Conference 2016

Singapore | 20-22 July | Marina Bay Sands

SESSION ID: SDS2-R03

## The Questions You Should Be Asking Your Privacy Pro



Connect to  
Protect

**Vivienne Artz**

Managing Director  
& General Counsel  
Citibank



#RSAC

# Introduction:



- Who is your privacy pro?
- What is their role?
- Areas of focus
- Conclusion



# Who is your “privacy pro”?

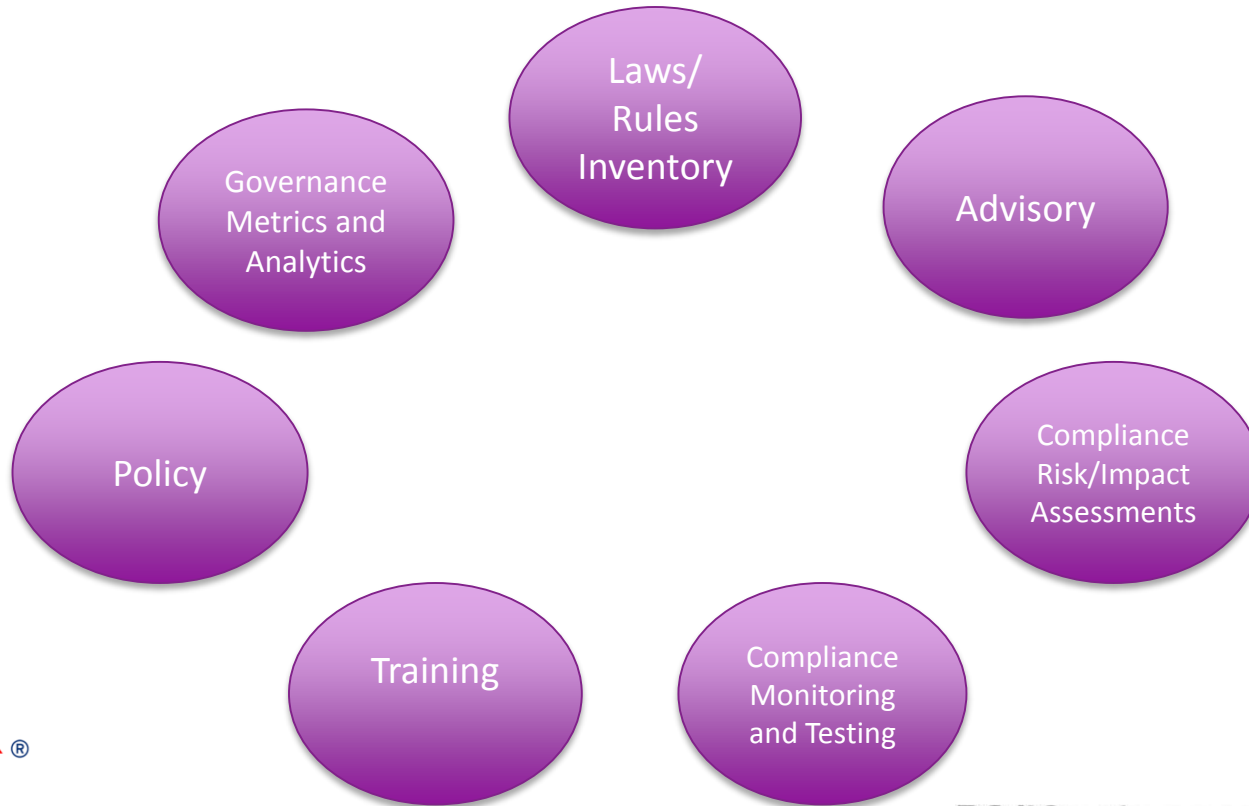


#RSAC

- i.e. Legal, Compliance, Risk, Information Security, HR



# Privacy Program Elements



# What is their role?



- What is their role?
  - i.e. national law requirements for DPO's eg GDPR, Singapore, etc

# What is their role?



- Article 37 GDPR
  - Private or public body
  - Staff member or contract eg law firm?



- DPO is involved, properly and in a timely manner, in all issues which relate to the protection of personal data
- Must be supported by the controller/processor and provided with resources to perform responsibilities and maintain expertise
- Must report to the highest management level; must not be dismissed for performing DPO tasks, and must not receive instructions
- Individuals may contact the DPO in relation to all issues related to the processing of their personal data
- The DPO is bound by secrecy or confidentiality concerning the performance of the tasks



- Inform and advise those who carry out processing of their legal obligations
- Monitor compliance with data protection requirements including, assigning responsibilities, training and audits
- Provide advice on privacy impact assessments
- Cooperate with and be the contact point with the Supervisory Authority



# Top Down or Bottom Up?



#RSAC

- Do you have a data protection strategy for the firm?
- Does the culture see data protection as a positive (enabler) or negative (expense)?
- Is your DPO following the rules or helping to shape the rules?



# Do you have multiple privacy pros?



#RSAC

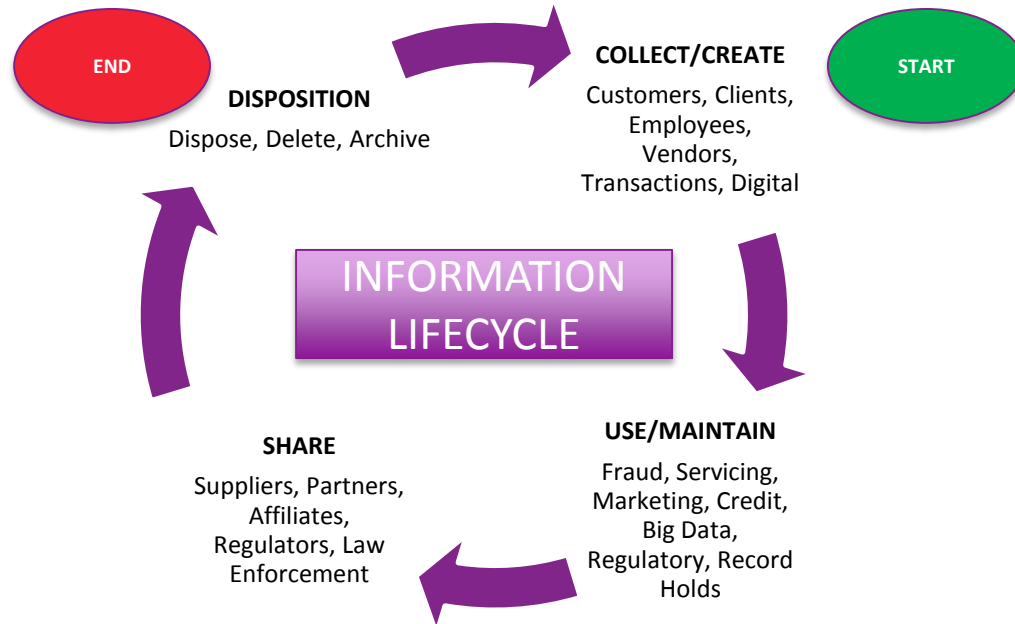
Eg. Legal, Compliance, Cross Border analysis team, in-business privacy officers

- Consider:
  - Roles and responsibilities
  - When they get involved – before the project?  
During the project? At the end of the project?
- Partner or enforcer or both?



# Information Life Cycle

The rapidly changing information landscape is creating increased business opportunities as well as increased risk throughout the information lifecycle.



# Examples of initiatives on which to engage your privacy pro early:



#RSAC

Cloud

Big Data

FinTech

Innovation

Restructuring



# Conclusion:



- Work out what your organisation needs
- Your privacy pro should be an enabler who is empowered to help
- Embed privacy in the business so it is everyone's responsibility, not that of the control function
- Your privacy pro should be influencing change, not tidying up after you!