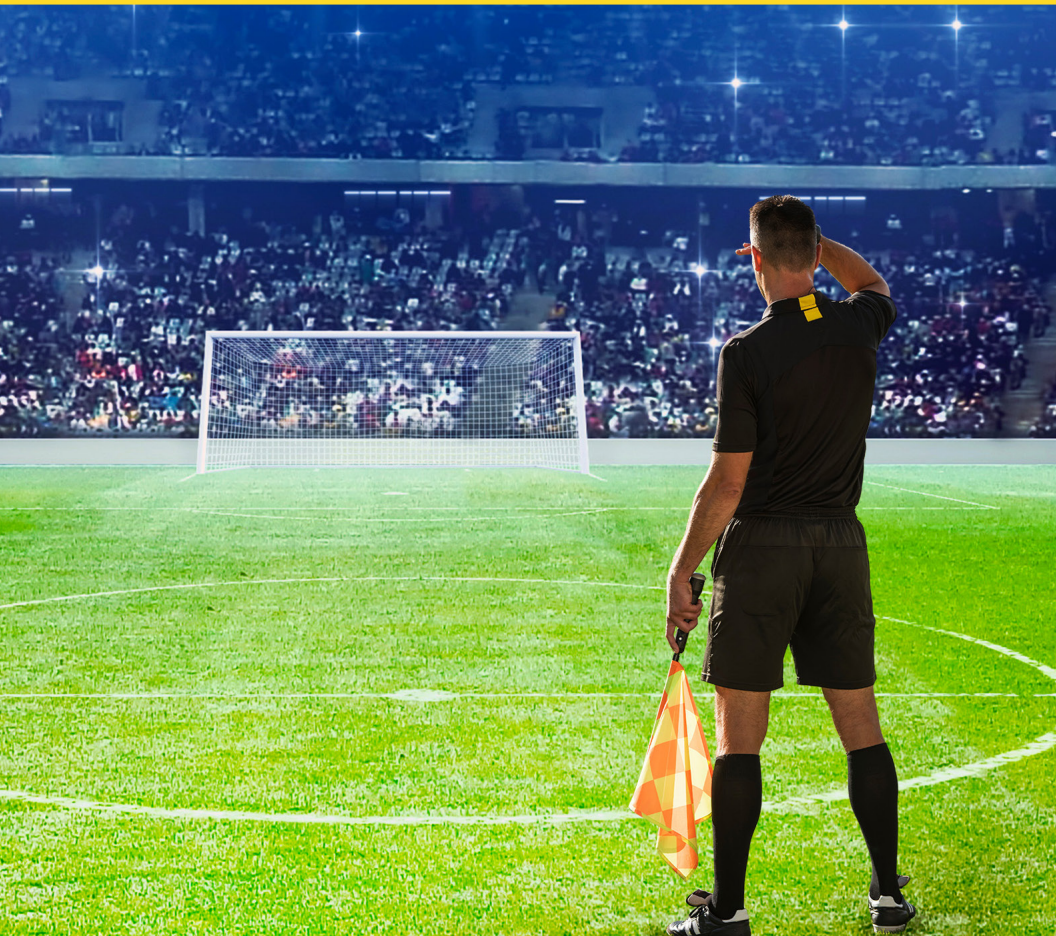
PRIVACY REF

PRIVACY PROGRAMS PERFECTED

www.privacyref.com • 888-470-1528 • info@privacyref.com

ASSESSMENTS | CONSULTING | TRAINING



CONTENTS

About Us

Privacy Ref's mission is to build effective privacy programs for our clients, emphasizing alignment of privacy practices with organizational goals, operational goals, and compliance requirements.

The way companies use and store the personal information of their customers and employees has been changing rapidly over recent years. Regulations constantly evolve and vary between jurisdictions. People have become more sensitive to the collection and processing of their information. It's for these reasons Privacy Ref was started.

Our team of seasoned IAPP-Certified Privacy Professionals, with real-world experience, take pride in delivering complete, practical solutions.

Our clients' industries include:

• Cloud computing services	• Professional training
• Education	• Product testing
• Entertainment	• Public utilities
• Financial services	• Retail
• Government	• Software product development
• Healthcare	
• Human resources management	• Student testing
	• Talent acquisition
• Manufacturing	• Technology services
• Membership associations	• Vehicle rental
• Not-for-profit organizations	• Multi-industry enterprise

Assessments

As laws surrounding data protection are established and evolve with the changing landscape of the global market, organizations need to know how well their privacy program meets these compliance requirements.

The requirements for a privacy program are constantly changing. New laws and regulations, revised interpretations of laws and regulations, and changes in your business environment can all lead to a need to review and revise your privacy practices. Privacy Ref has **three privacy program assessment offerings** to help you assure your practices meet your organization's needs.

- **Rapid Privacy Program Assessment**
- **Transfer Impact Assessments**
- **DIY-Assessment Toolkit**

Rapid Privacy Program Assessment™

Our Rapid Privacy Program Assessment™ takes a top-down approach to evaluate an organization's privacy program and practices by comparing them to requirements from existing and forthcoming laws and regulations, industry-recognized privacy frameworks, and organizational priorities.

From this review and subsequent analysis, we identify risks and areas for program improvements. We focus on actual day-to-day activities of individuals and how they handle personal data.
This permits us to conduct a rapid, minimally invasive interview and observation process that can take place over a single business week.

Assessment Process includes:

- Review of client-supplied artifacts
- Minutes for review and approval after each meeting
- Preliminary assessment document for review and acceptance
- Final assessment document

Examples of **Privacy Ref's Requirements Framework™** that may be applied during an assessment include:

U.S. Laws	International Laws
• Health Insurance Portability and Accountability Act (**HIPAA**) • Gramm-Leach-Bliley Act (**GLBA**)	**European Union** • General Data Protection Regulation (**GDPR**) **Canada** • Personal Information Protection and Electronic Documents Act - Federal (**PIPEDA**) • Act Respecting the Protection of Personal Information in the Private Sector - Quebec (**ARPPIPS**) • Personal Information Protection Act -British Columbia (**BCPIPA**) • Personal Information Act - Alberta (**APIPA**) **China:** The Peoples Republic of China Personal Information Protection Law (**PIPL**) **Brazil:** The Brazilian Data Protection Law (**LGDP**) **Israel:** • Protection of Privacy Law, 5741-1981 • Privacy Protection (Transfer of Data to Databases Abroad) Regulations, 5761-2001 **New Zealand:** Privacy Act 2020 **Mexico:** The Federal Law on the Protection of Personal Data held by Private Parties
U.S. Emerging Laws	
• California Consumer Privacy Act (**CCPA**) • California Privacy Rights Act (**CPRA**) • California Shine the Light Law (**STL**) • Colorado Privacy Act (**ColoPA**) • Connecticut Data Privacy Act (**CTDPA**) • Nevada Security and Privacy of Personal Information (**NRS**) • Ohio Personal Privacy Act (**OPPA**) • Oklahoma Computer Data Privacy Act (**OCDPA**) • Utah Consumer Privacy Act (**UCPA**) • Vermont Data Brokers and Consumer Act (**VSC**) • Virginia Consumer Data Privacy Act (**VCDPA**)	

After defining the scope, we schedule a kickoff meeting with your organization's project sponsors to review the scope, schedule, logistics, and deliverables of the process.

Process stages:

1. Kick-off meeting	2. Artifact review
• Meet the team • Understand your privacy program • Discuss joint objective, processes, deliverables • Answer questions	• Privacy policy • Codes of conduct • Relevant procedures • Charters • Other applicable documents
3. Interview	**4. Compile**
• Conduct expert interviews • Observe behavioral practices • Identify areas that may increase risk	• Analyze observations to deliver preliminary report
5. Discuss	**6. Final report**
• Address any concerns in the preliminary report	• Publish report with prioritized list of actionable items found during the assessment • Final meeting

Artifact Review:

The assessment process continues with Privacy Ref reviewing documents and other artifacts related to your privacy program. This includes items such as privacy policies, privacy notices, codes of conduct, relevant procedures, security practices, and charters of privacy-related organizations. Our goal is to understand your business, policies, and procedures before we begin our discussions with your team, saving time for everyone involved.

Interview:

Privacy Ref will interview key individuals and stakeholders that you identify from various areas of your company, asking them about their daily routines and how they handle personal information. We are also interested in meeting with organizational leaders to learn their perspectives on privacy. Our goal for these interviews is to determine

the understanding of privacy and practices in place within the organization. We identify privacy benefits and potential risks posed by the activities and perspectives shared by these individuals.

Our experience has shown that interviews for privacy assessments are most effective conducted face-to-face. Alternatively, interviews can be conducted remotely or in multiple locations, if necessary.

Preliminary Assessment Report Delivery:

Based on all the information gathered, your Privacy Ref consultants draft a preliminary report.
The Preliminary Privacy Assessment Report includes:

- A discussion of Privacy Ref's methodology and our observations for the assessment
- Documentation of our understanding of your current privacy and operational environment
- A high-level review of your compliance with applicable privacy laws and regulations (General Privacy Assessment only)
- An overview of your privacy program's performance compared against the selected frameworks
- A detailed table specifying your privacy program's performance measured against the individual requirements of the select framework(s)

We provide a preliminary version of the report for you to review our observations. You can then express any concerns or questions for us to address prior to publishing the Final Assessment Report.

Final Assessment Report:

The Final Assessment Report enhances the Preliminary Assessment Report by adding recommendations for improvements to your privacy program.

Table of Contents

CONFIDENTIAL

Sample of Table of Contents

These recommendations are provided in-line with our observations and then summarized in a separate section of the report.

In the summary Privacy Ref prioritizes the recommendations.
As part of establishing the priorities, we identify the perceived risk to the organization if the recommendation is not applied, as well as the effort anticipated to implement the recommendation.

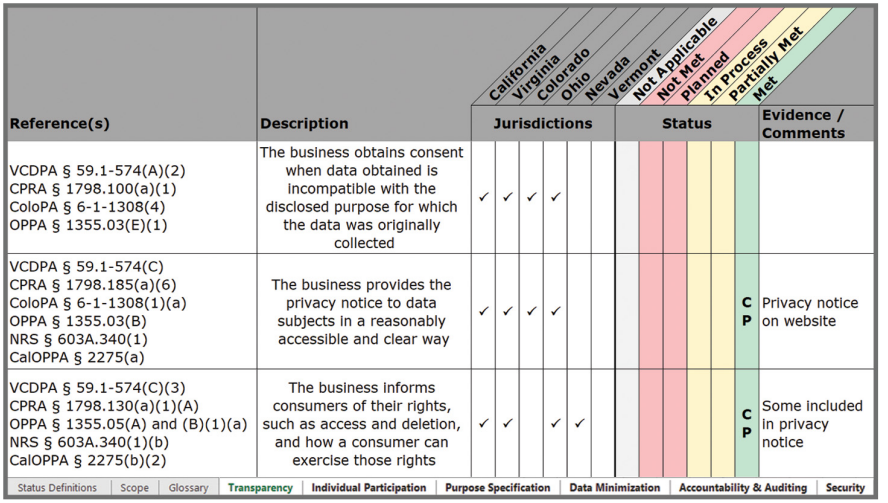
We present the information on how your privacy program supports your business objectives using a Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis.

Strengths	1. Executive and staff commitment to privacy 2. Privacy program has documented policies and practices 3. Privacy training and awareness programs 4. Physical and cyber security practices 5. Data destruction practices 6. Choice and consent are well explained and implemented 7. Notice is provided to customers	1. Replace existing CRM as planned 2. Notice is not provided to partners providing personal information 3. Privacy training for new hires delayed until next training cycle as opposed to when they come on board 4. Clarify data breach roles and responsibilities with vendors 5. Implement data incident handling procedures	Opportunities
Weakness	1. Vendor's privacy practices are not reviewed 2. Encryption not fully deployed 3. Access by individuals to information maintained about them is not provided	1. Unmet legal and regulatory requirements 2. Personal information is regularly transferred in the clear although alternatives have been implemented	Threats

Sample of SWOT analysis

Easy-to-Understand Findings: Receiving the report is just the start of your privacy program improvement. You will need to convey the results to your organization, which can be its own challenge if the findings are not in an easy-to-understand format.

Privacy Ref has broken down the **Privacy Ref Requirements Framework™** requirements into easy-to-understand tables. For each requirement, Privacy Ref's tables identify the source of the requirement, a plain-language description of the requirement, and the status of your organization compared to the requirement. No legalese. No equivocation. Just a simple-to-understand statement about where you stand.



Reference(s)	Description	California	Virginia	Colorado	Ohio	Nevada	Vermont	Not Applicable	Not Met	Planned	In Process	Partially Met	Met	Evidence / Comments
		Jurisdictions						Status						
VCDPA § 59.1-574(A)(2) CPRA § 1798.100(a)(1) ColoPA § 6-1-1308(4) OPPA § 1355.03(E)(1)	The business obtains consent when data obtained is incompatible with the disclosed purpose for which the data was originally collected	✓	✓	✓	✓									
VCDPA § 59.1-574(C) CPRA § 1798.185(a)(6) ColoPA § 6-1-1308(1)(a) OPPA § 1355.03(B) NRS § 603A.340(1) CalOPPA § 2275(a)	The business provides the privacy notice to data subjects in a reasonably accessible and clear way	✓	✓	✓	✓								C P	Privacy notice on website
VCDPA § 59.1-574(C)(3) CPRA § 1798.130(a)(1)(A) OPPA § 1355.05(A) and (B)(1)(a) NRS § 603A.340(1)(b) CalOPPA § 2275(b)(2)	The business informs consumers of their rights, such as access and deletion, and how a consumer can exercise those rights	✓	✓		✓	✓							C P	Some included in privacy notice

Status Definitions | Scope | Glossary | Transparency | Individual Participation | Purpose Specification | Data Minimization | Accountability & Auditing | Security

Sample of Privacy Ref Requirements Framework

The same is true for the recommendations we make. We provide an easy-to-understand chart identifying the risk and effort for each recommendation, allowing you to quickly see the "low-hanging fruit" to improve your program.

At the end of the engagement Privacy Ref will provide an Executive Briefing to present the findings, recommendations, and proposed next steps.

Transfer Impact Assessment (TIA)

International transfers of personal information are undergoing increased scrutiny by regulators and, therefore, data exporters. Privacy Ref can assist your company in assuring that transferred personal information will be appropriately protected when it is moved to a new jurisdiction through our Transfer Impact Assessment process.

A TIA is the analysis, conducted by a data controller or a processor, of the risks and implications to the privacy of personal data that will

be transferred to a third country. It considers whether the laws of the third country would permit government agencies access to the personal data and possible mitigations for any identified risks.

DIY – Assessment Model

Privacy professionals need to monitor emerging laws, interpretations of regulators, and acceptable practices for implementation. Then they need to determine if their privacy practices comply with these requirements and explain any gaps in compliance to their stakeholders. ***Privacy Ref makes this easy.***

Privacy Ref Requirements Framework™ has taken global privacy laws and identified the requirements for both data controllers and processors. Each requirement is explained using language that your organizational members who are not privacy professionals can understand.

The reference for each requirement is provided as well as a scorecard so that you can easily identify the status of your organization's compliance.

With the Frameworks provided as a subscription, Privacy Ref will update the Frameworks as new statutes are signed into law. Only new requirements need to be evaluated; previously identified requirements do not need to be re-evaluated.

Privacy Ref Requirements Framework™ may be customized to combine the requirements for your unique set of applicable laws. For example, the requirements of GDPR, LGPD, and PIPL can be combined into a single evaluation framework.

Consulting Services

Whether you need an Interim Privacy Officer, a Data Protection Officer, on-demand subject matter expertise, or project resources, our privacy consulting services can deliver a scalable solution to fit your needs.

Meeting privacy regulatory and customer requirements can be a tedious and costly endeavor. It takes research, planning, and strategizing to implement and maintain a continuously evolving privacy policy. At some point, every program requires assistance to achieve its goals.

Privacy Office as a Service: Letting Privacy Ref become your privacy office allows you to focus on the moneymaking aspects of your business. We constantly monitor changes in laws and regulations and work with you to ensure your operations stay in compliance at a fraction of the cost of hiring a staff privacy expert.

Privacy Ref can serve as your **Data Protection Officer** to meet the requirements of GDPR Article 37. For our clients, we have a partnership with a European Representative to meet GDPR Article 27 requirements as an option under this program.

Assessment Toolkit Application: Privacy Ref has taken privacy laws and identified the requirements for both data controllers and processors. Each requirement is explained using language that your organizational members who are not privacy professionals can understand.

With the Frameworks provided as a subscription, **Privacy Ref will**

update the Frameworks as new statutes are signed into law or new interpretations are provided from regulators. Only new requirements need to be evaluated; previously identified requirements do not need to be re-evaluated.

Privacy Impact Assessments: A Privacy Impact Assessment or PIA is a process meant to determine the amount of risk inherent in a particular proposed activity or product. The goal of this is to find the risk before it materializes, taking a proactive role. This type of preemptive measure is part of **Privacy by Design**.

Privacy Policy and Notice Creation: Creating these documents requires an understanding of how your business uses personal information and the applicable laws for that use in the jurisdictions you operate. Privacy Ref has constructed privacy policies and notices for their clients for **over ten years**. Each business is unique, and so are the artifacts we develop for them.

Training and Awareness Program Management: Designed to provide basic, yet comprehensive, privacy training to the workforce of organizations.

Governance Workshop: Privacy Ref's Governance Workshop allows your privacy team to establish a common foundation for a privacy program and its related activities. If you are establishing a new privacy program or need to reground your current program, this workshop provides the opportunity to develop the foundational components for your privacy program. Activities include:

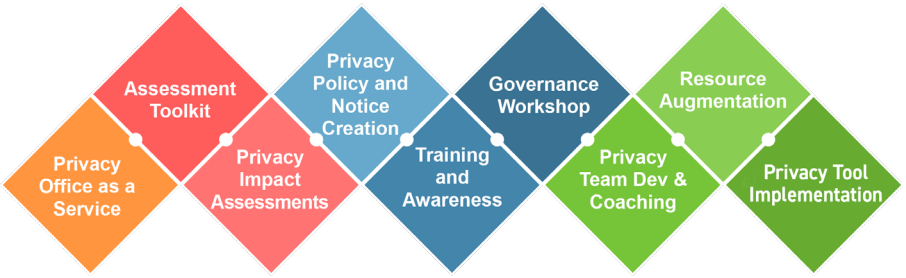
- Writing your mission/vision statement
- Defining your scope
- Identifying your participants and stakeholders
- Designating your extended team

- Setting the privacy program activities
- Choosing mechanisms to ensure compliance with your program
- Using/finding tools to estimate the cost of a data breach
- Introducing methods to compare your program to an industry standard

Privacy Team Development and Coaching: Privacy-trained employees are an asset to any organization. Successful organizations make data privacy a priority by considering training employees a vital activity. Privacy Ref offers unrivaled team development and coaching.

Resource Augmentation: A flexible, cost-effective outsourcing strategy. Our model presents organizations with a mechanism to get **subject matter experts on time** without any hassle, saving you time and money.

Privacy Tool Implementation: Many privacy programs utilize automation with tools. We have the expertise to implement, maintain, and administer OneTrust and other vendors tools.
Our OneTrust-certified privacy experts will work with you to **build and configure OneTrust** to operationalize your privacy program.



Training and Awareness

Privacy Ref offers an extensive privacy training catalog for those who want to master their privacy skills and advance their careers in today's competitive marketplace.

Privacy Ref offers a range of privacy training and awareness options based on your organization's needs. Our offerings include:

Privacy Pro Training

International Association of Privacy Professionals (IAPP) training courses

As an Official Training Partner of the IAPP, we offer a full suite of their official courses, including in-person or live online training, and self-paced training videos for privacy professionals and teams looking to expand their privacy knowledge. Our instructors are certified IAPP Fellows of Information Privacy with current, real-world experience, and our training classes are guaranteed to run.

In-person or live online courses uniquely include:

- Experienced IAPP FIP instructor-led training
- Participant guide, both hard copy and digital
- Voucher for certification exam
- Sample questions to prepare for the exam
- Digital and hard copy of the textbook
- 1-year IAPP membership with 1st course (applied to renewal for current IAPP members)

- Voucher for a Privacy Ref Certification Study Group at no charge (to be used within 3 months)
- Free refresher course should you fail the IAPP exam*
- Privacy Pro Packages available at a discounted rate. (See Organizational Training for more details)

*IAPP exam must be taken within three months of completing the course. Free re-fresher course must be taken within three months of completing the IAPP exam

Certification Study Groups: A two-hour session where you will be able to ask questions and hone your understanding for upcoming exams. Sessions are led by one of our top consultants.

Governance Workshop: This workshop allows you to put privacy program management theory into practice. Focused on growing and improving collaboration within your privacy team, activities include:

- Writing your mission/vision statement
- Defining your scope
- Identifying your participants and stakeholders
- Designating your extended team
- Setting the privacy program activities
- Choosing mechanisms to ensure compliance with your program
- Using/finding tools to estimate the cost of a data breach
- Introducing methods to compare your program to an industry standard

Organizational Training

Privacy-trained employees are an asset to any organization ensuring they understand the privacy landscape and your policies and procedures. This allows the staff to fulfill their specific roles while properly protecting personal information. We offer unrivaled corporate training programs including:

Privacy Pro Team Packages:

Each package includes several seats for classes at discounted rates, which may be used in any of the following ways:

- Any designated staff member may sign up for any of the IAPP classes we offer
- Seats may be used to schedule a private session of an IAPP class for your organization (a minimum of seven (7) attendees is required)
- Seats must be used within one (1) year of purchase

Foundations of Privacy and Data Protection:

Train your teams in the most fundamental privacy concepts and practices. This course will cover:

- Key privacy concepts
- Fair information practices (FIPs)
- Data life cycle
- Models for data protection regulations
- Major privacy and data protection laws
- Case studies
- Emerging privacy topics

Custom Privacy Training Videos:

Let our team develop a privacy training video for your organization featuring your brand, your policies and procedures, your company scenarios, and even real employees. All training is SCORM compatible allowing for quizzes to be included. Multiple languages are also supported.

Awareness Videos:

Need to get out a quick refresher about your privacy messages that is engaging and comprehensive? We will develop a three-to-five-minute privacy awareness video, drawing attention to key privacy issues that matter to you and your organization.

Privacy Academy

Throughout your organization, you have individuals who are responsible for personal information. Regardless of their being in the privacy office or part of an operational team, these people need to understand the basics of privacy.

Our Introduction to Privacy is a great way to teach your staff about privacy basics, and our free webinars will keep them up to date with timely topics. Privacy Academy is open to the public. It can be tailored to your organization's needs.

Introduction to Privacy:

This two-hour training will cover the basics of privacy, responding to privacy incidents, and basic regulations that may affect your organization.

Free Webinars

Need to keep up to date with the changing privacy landscape? We hold monthly conversations where our staff and special guests take a deep dive into current events happening globally and topics that have an impact on the decision-making, processing, or transfer of personal data.

Listen in as our panel of privacy experts discuss the latest in privacy challenges, incidents/data breaches, reviews, privacy programs, tips, and more.

Each month we hold a ***Quarterly Breach Review*** to discuss the good, the bad, and the ugly of how these events are handled. Our free webinars are an effective way to keep up to date with privacy matters.

Engaging, thorough, knowledgeable expert with an outstanding ability to deliver content of the book in a meaningful way! -M.G.

PRIVACY REF

Visit our website