KIRKE CONSULTING

**Strategy.
Transformation.
Results.**

Privacy Program Checklist

The privacy readiness program checklist helps organizations determine what foundational items need to be implemented in a privacy program.

- ○ Understand regulations that apply to the organization

- ○ Have a designated CPO

- ○ Have clear and simple policies around Privacy, including a Privacy Notice on the official website

- ○ Keep Privacy principles in mind for new campaigns, processes or initiatives

- ○ Ensure 3rd party contracts have clear Privacy provisions

- ○ Educate employees and relevant stakeholders on their obligations – provide regular training

- ○ Ensure that questions, gaps, complaints are easily funneled to the CPO

- ○ Have an Incident Management Protocol in place

- ○ Review Privacy practices periodically – at a minimum annually

- ○ Manage Digital Marketing strategies compliantly and according to regulations (e.g. CASL in Canada)

- ○ Ensure cybersecurity coverage is included as part of insurance

- ○ Ensure Personal Information is identified and protected – include IT security measures and policies

  1. Encryption at rest & transit (data and hard drives) for sensitive data
  2. Access and password management
  3. Backups
  4. Antivirus and firewalls
  5. Internet, IM, and email controls
  6. Regular software updates
  7. Mobile device management
  8. Security awareness training – cover malware, ransomware, phishing, social engineering