

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
 - Encryption at rest & transit (data and hard drives) for sensitive data
 - Access and password management
 - Backups
 - Antivirus and firewalls
 - Internet, IM, and email controls
 - Regular software updates
 - Mobile device management
 - Security awareness training – cover malware, ransomware, phishing, social engineering