



Data Privacy
& Security
Advisors LLC

CASE STUDY

How a CCPA Risk Assessment Did
More:

From Program Requirements to
Data Subject Requests



The Challenge



A traditional media company with a steadily growing online and digital marketing presence retained DPSA to **conduct a full-scale CCPA Risk Assessment across their print and digital properties** to ensure the organization would be compliant with all aspects of the regulation, from notice to potential data sales to data protection and breach preparedness.

Because of the political/social climate surrounding news organizations, **the Company was concerned with being able to adroitly manage Data Subject Request obligations** – specifically building functional processes to verify the identity of the individual and the legitimacy of the request.

The Solution



DPSA developed a **custom CCPA Risk Assessment** taking into consideration the Client's industry as well as identified concerns, and examined the Company's current privacy operations, identifying:

- **Strengths in information security** and data protection practices the Company could build on to protect against the CCPA's Private Right of Action in the event of a breach;
- **Opportunities to improve data minimization** to lessen the volume of data that would need to be searched and either provided or deleted per Data Subject Request obligations;
- A need for **greater transparency in posted Privacy Notices** to help individuals understand exactly what the Company was collecting, why it was being collected, and what was being done with it; and as expected,
- Confirming the Company does engage in CCPA-defined "Sales" of personal data.

The Risk Assessment **confirmed the Company's expectations but also identified risk in areas that had not been considered** – specifically the need for a Data Inventory to generate the dataflow information and tracking that DPSA used to build the Company a suitably comprehensive set of processes to validate and respond to Data Subject Requests.

The Outcome



Well in advance of the CCPA's go-live date, the Company rolled out a custom technology solution that automates the processes for validating Data Subject Requests, verifying Data Subjects' identity, and preparing fulsome response to Requests. **The DPSA-designed system routes all questionable or complex Requests to a special workflow for increased interrogation and either completion or rejection.**

To address the urgency of Data Subject Request management, **DPSA leveraged privacy technology to build an automated workflow and tracking process for the Company.** For "standard" requests, email triggers acknowledge receipt of the request; confirm verification; provide the requested information or confirm deletion; and record a date-and-timestamp for each step of the process.

Where verification is less straightforward and the Company is exposed to more risk from fraudulent requests, **DPSA created a multipoint checklist to vet the individual's identity and ensure legitimacy of the Request** – all within the CCPA's 45-day window.

Critically, DPSA worked with the Company to **build sustainable processes that can be uniformly deployed** even as US States continue to propose privacy laws with slightly differing requirements.

About Data Privacy & Security Advisors LLC

With demonstrated expertise building actionable privacy and data security strategies to lead our clients through the changing regulatory landscape, Data Privacy & Security Advisors' ("DPSA") diverse group of experts bring more than 25 years' experience in delivering tailored programs and providing pragmatic strategies to help our clients protect the trust of their customers and mitigate financial and legal risks to their organization.

Unique in a boutique firm, our team is exclusively senior practitioners and includes former Corporate Privacy Officers, Corporate Information Security Officers, and Partners from the "Big 4" Consulting Firms – bringing a diversity of perspective from both in-house and external roles.

Our mission: to mitigate the pervasive feeling among our clients of "death by a thousand cuts" as new, always slightly different, privacy regulations are enacted.

Active thought-leaders in the Privacy Community, the DPSA leadership team has seats on the International Association of Privacy Professionals' ("IAPP") Advisory Boards and is frequently asked to speak at both IAPP and other industry events.

Our clients range from start-ups to multinationals, and include B2B businesses, higher education institutions, traditional and online media, mobile application developers, technology, and financial services companies.

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