



Data Privacy
& Security
Advisors LLC

CASE STUDY

Privacy Compliance Program Benefit:
Enabling A More Effective Breach
Response



The Challenge



A large retail group that owns several widely known brands engaged DPSA with **concerns about the Company's ability to demonstrate compliance** with the General Data Protection Regulation (GDPR) and preparedness for the (then) upcoming California Consumer Privacy Act (CCPA).

Leadership was committed to the engagement and while the organization had started to build a privacy program, it lacked direction, starting compliance activities but losing momentum partially through. **The fractured approach resulted in a challenge for the Company to effectually determine what personal data was being processed**, whether proper consent was obtained, how frequently data was transferred to vendors, and the extent to which privacy obligations were understood and complied with across the Company.

Ultimately, **Leadership needed to assure the Board of Directors that the Company was on the right path** to having a mature and effective governance program in place.

The Solution



To establish a baseline of the Company's privacy posture, **DPSA conducted an all-inclusive Global Privacy Risk Assessment tailored to the client's industry, online and retail operations, and geographic markets.** Business units and stakeholders from the United States, Canada and Europe participated, and DPSA provided the Company with a report detailing identified gaps across both the GDPR and CCPA, as well as PIPEDA, Canada's privacy regulation.

Critically, **each gap was linked to an actionable remediation recommendation, sorted by priority.**

Addressing both an area of risk and of Leadership's concerns, one of DPSA's top remediation recommendations was to complete a Data Inventory & Mapping of Processing Activities involving personal information – advancing the Company's ability to answer the critical questions around processing, consent, data transfer and third-party risk.

Quickly identifying the Company's highest risk processing activities to allocate resources where most needed, **DPSA worked with Company stakeholders to complete the first phase of the Data Inventory & Mapping documenting more than 30 key Data Processing Activities.**

The Outcome



The actionable remediation recommendations from DPSA's multi-regulation risk assessment brought a systematic approach to the privacy program; and **after the first phase of a comprehensive Data Inventory & Mapping documentation effort, the Company could now readily visualize what personal data different units actively collected**, with what consent, how it was being processed, and whether it was shared with external organizations with flags where appropriate contracts were in place.

Unfortunately, shortly after this engagement phase ended, **the Company suffered a significant data breach.**

DPSA was called in to provide guidance to Leadership and to coordinate with federal law enforcement and the external breach response team. **The detailed dataflow information DPSA captured in the Data Inventory allowed the response team to more quickly assess the overall impact of the breach; and led to an increased speed in breach containment and eradication, and a decrease in recovery response times.**

The Company currently boasts a mature privacy program, supported by DPSA's *Privacy Expert on Demand* services (Privacy Office as a Service) and in full collaboration with the Information Security team – a partnership that did exist **before**, and that further strengthens the Company's privacy and security posture.

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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