

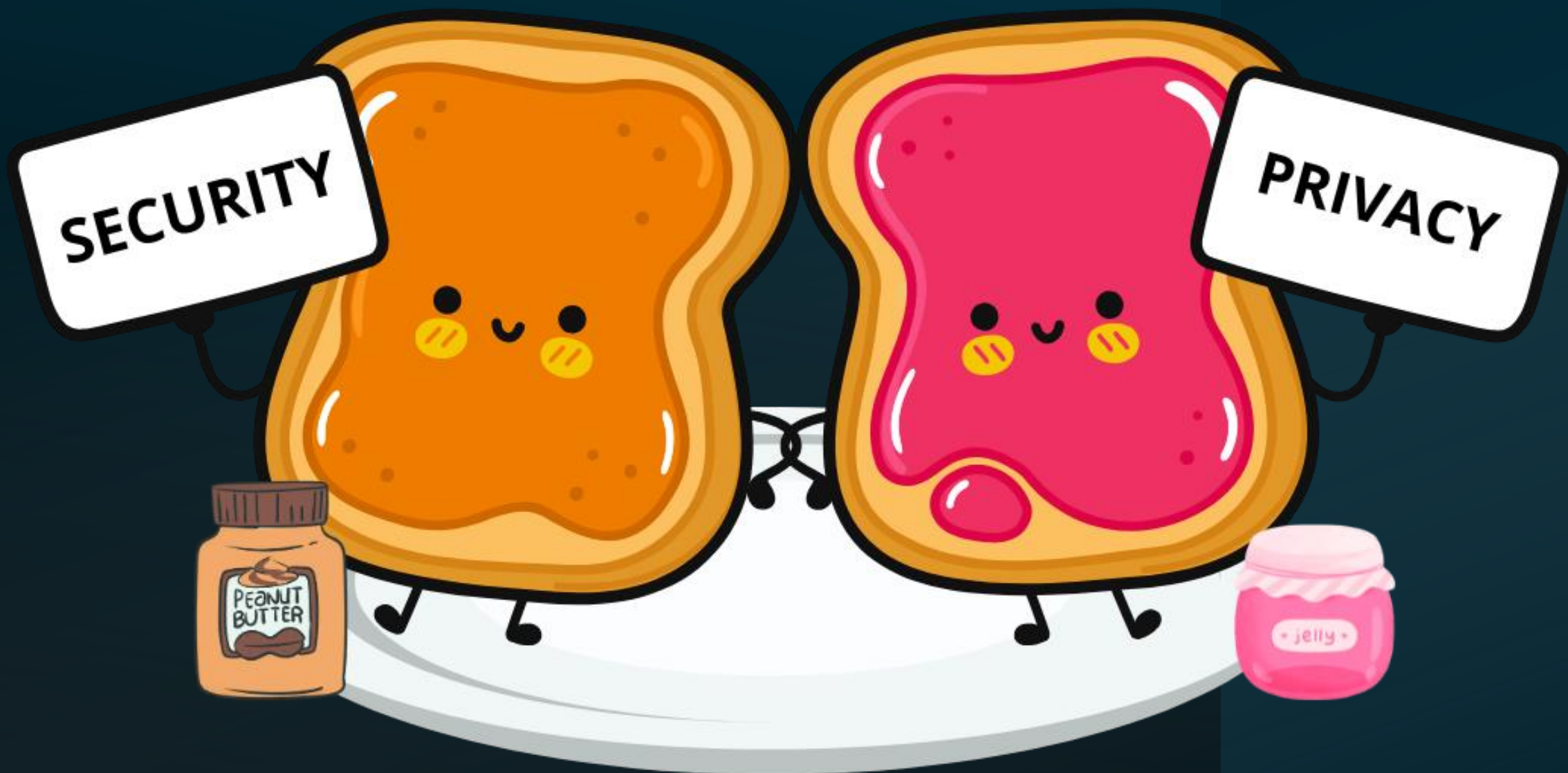
Privacy: What Security Teams Need to Know

Jodi Daniels

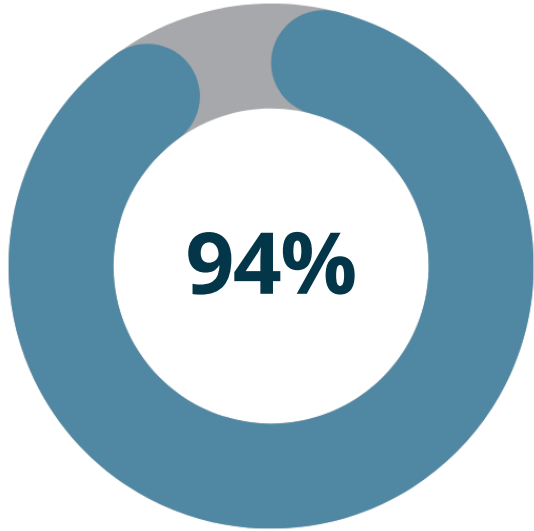
December 2024

REDCL^oVER
ADVISORS



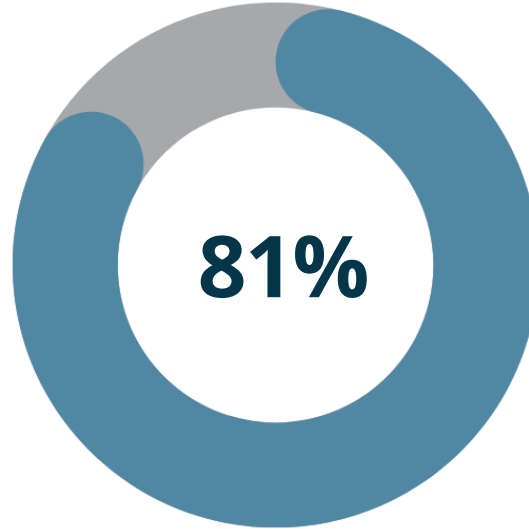


How People View Privacy



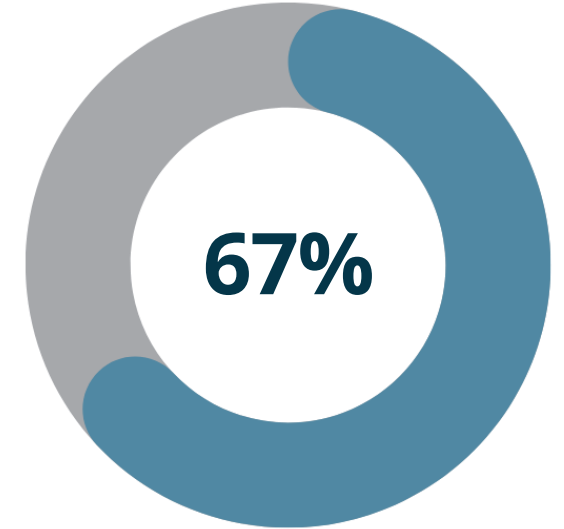
94% of organizations say their customers won't buy from them if data is not properly protected

Cisco 2024 Data Privacy Benchmark Study



81% of Americans are concerned about the way companies use the data collected about them

Pew Research How Americans View Data Privacy



67% of Americans have little to no understanding about what companies do with the data they collect about them

Pew Research How Americans View Data Privacy



Building Trust



72% of Americans are reluctant to share personal data with businesses

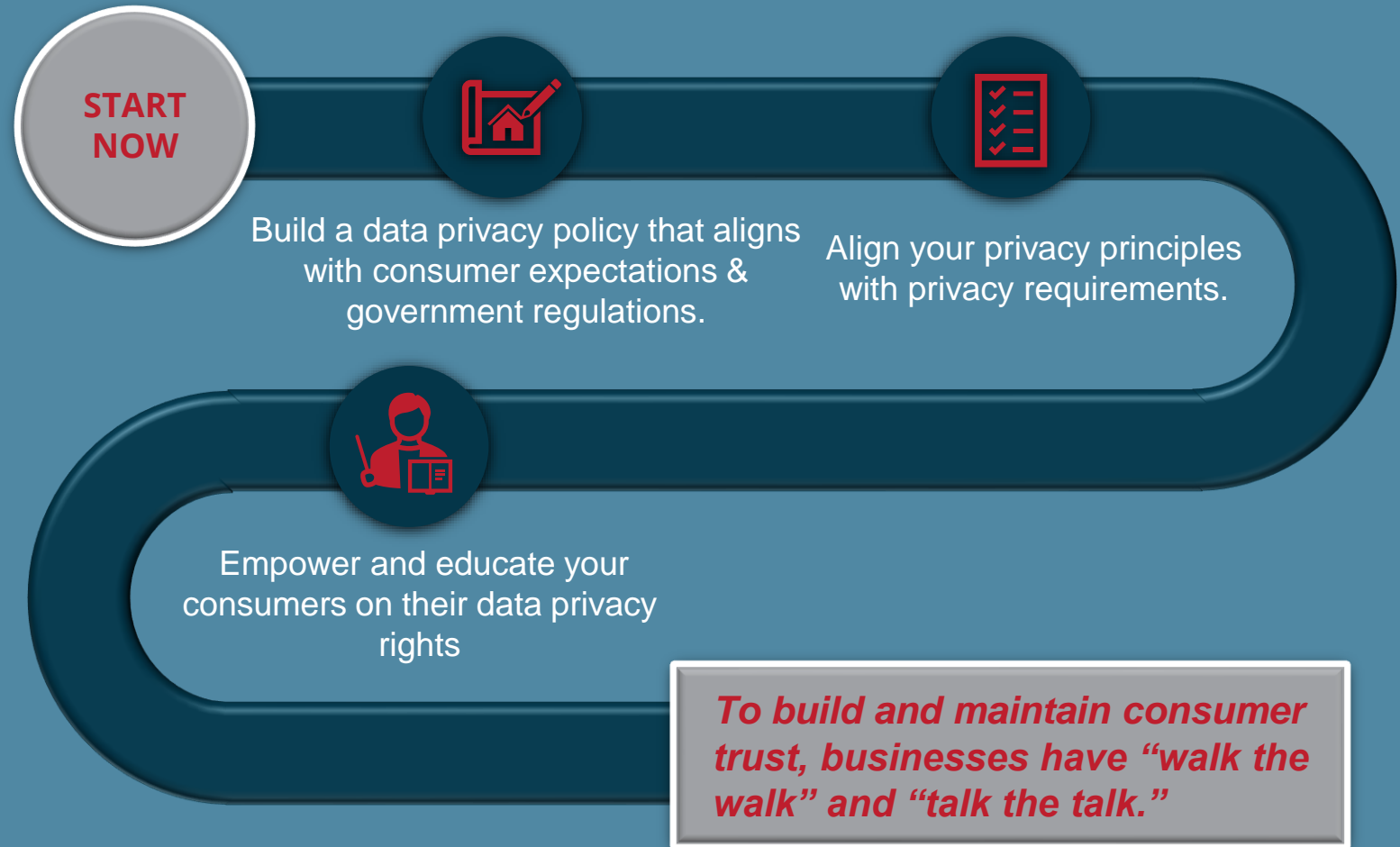


73% of customers "would spend significantly less" for products or services from a business that lost their trust



81% of customers familiar with AI, believe their personal information will be used in ways they are not comfortable with

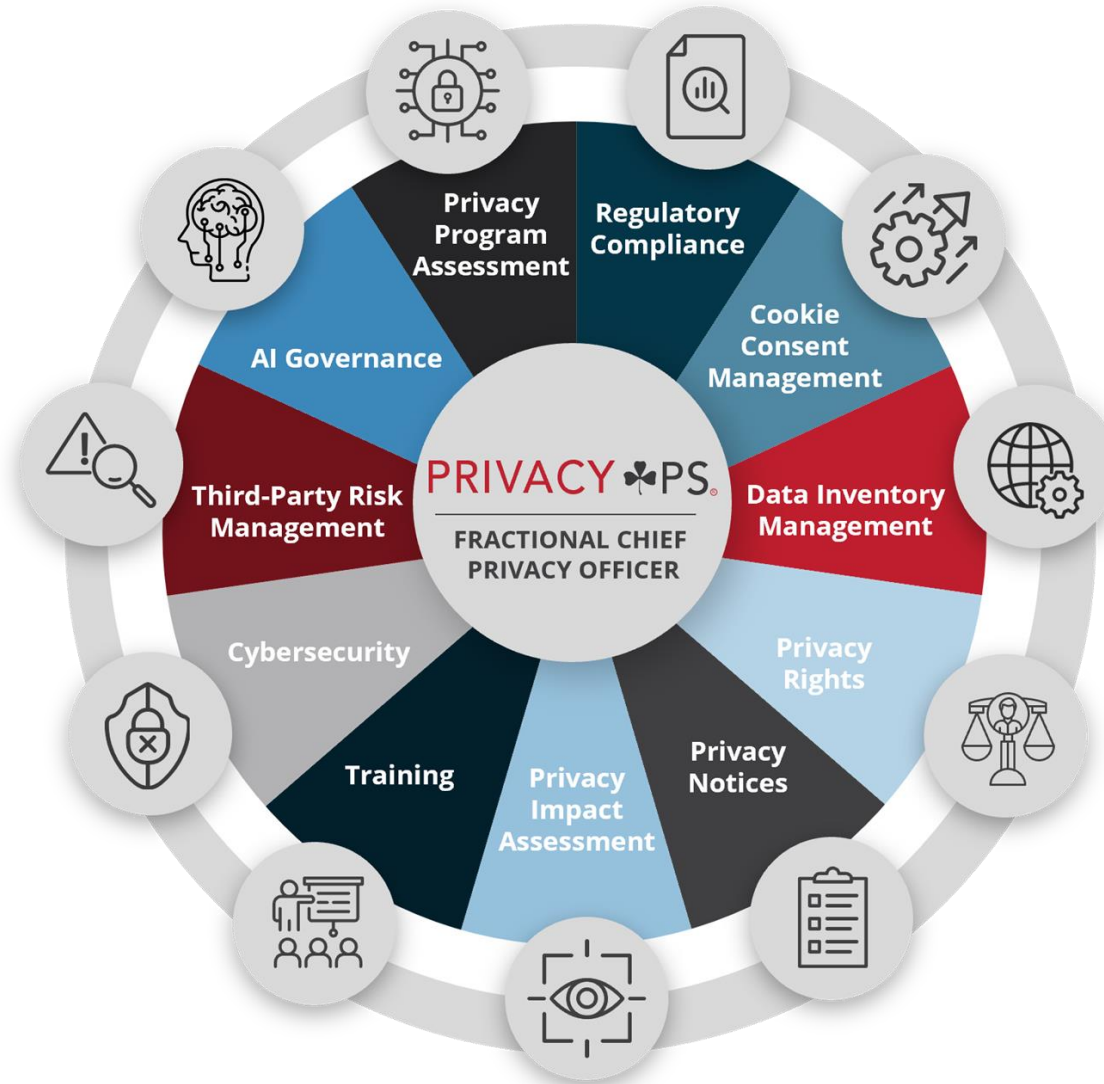
The roadmap to building customer trust begins here:



***Data privacy is everyone's
responsibility***



Steps To Compliance



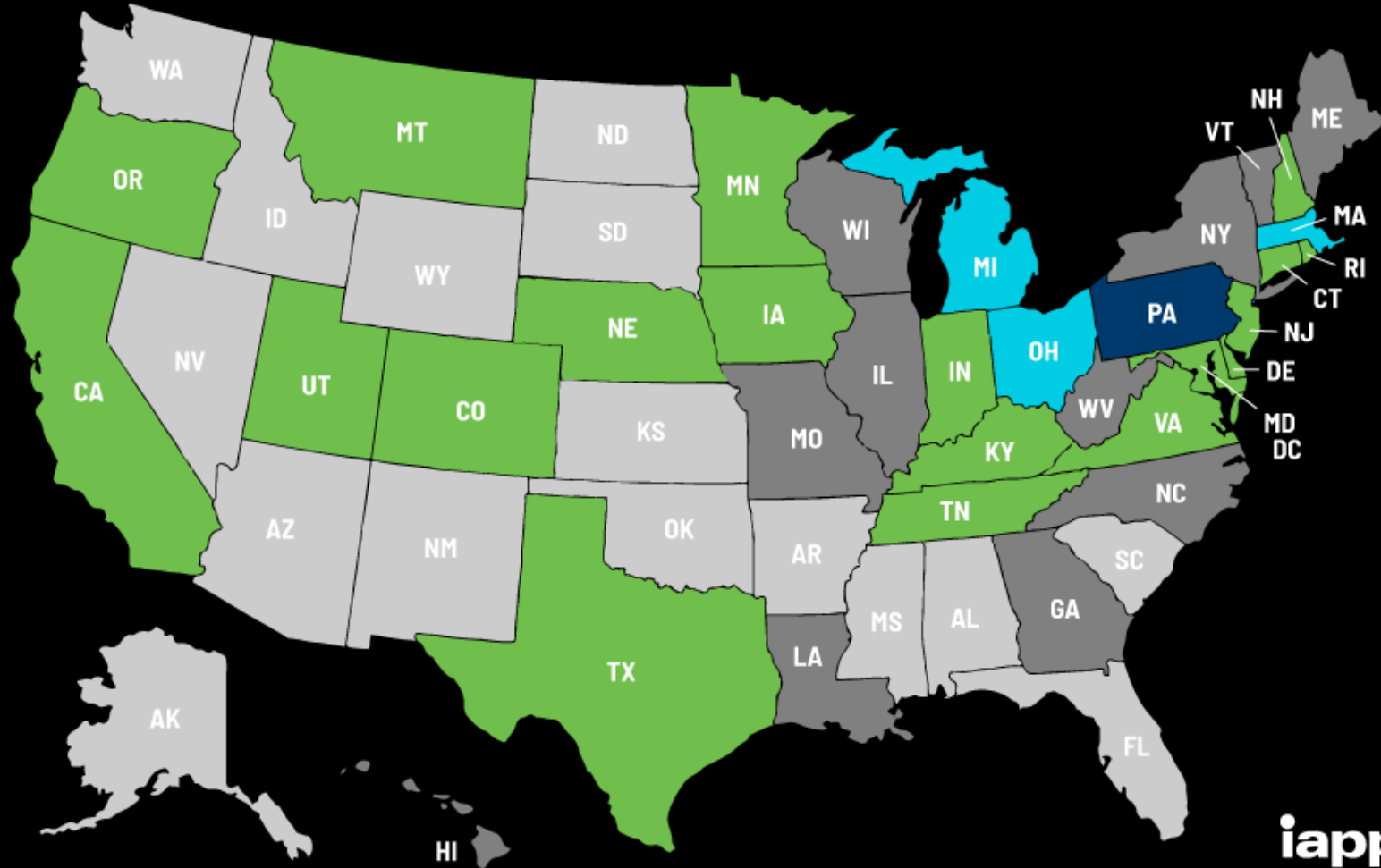
Privacy 101



US State Privacy Legislation Tracker 2024

Statute/bill in legislative process

- Introduced
- In committee
- In cross chamber
- In cross committee
- Passed
- Signed
- Inactive bills
- No comprehensive bills introduced



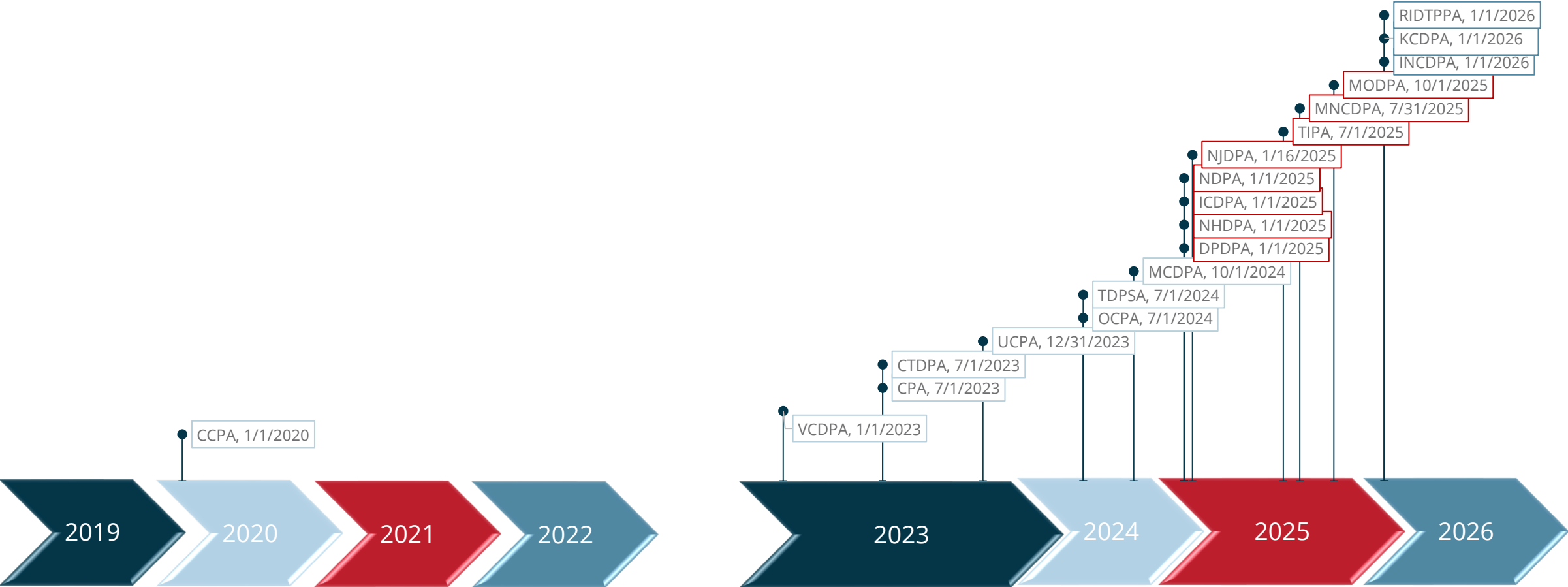
🔄 Last updated 22 July 2024

iapp



US State Privacy Laws by Effective Date

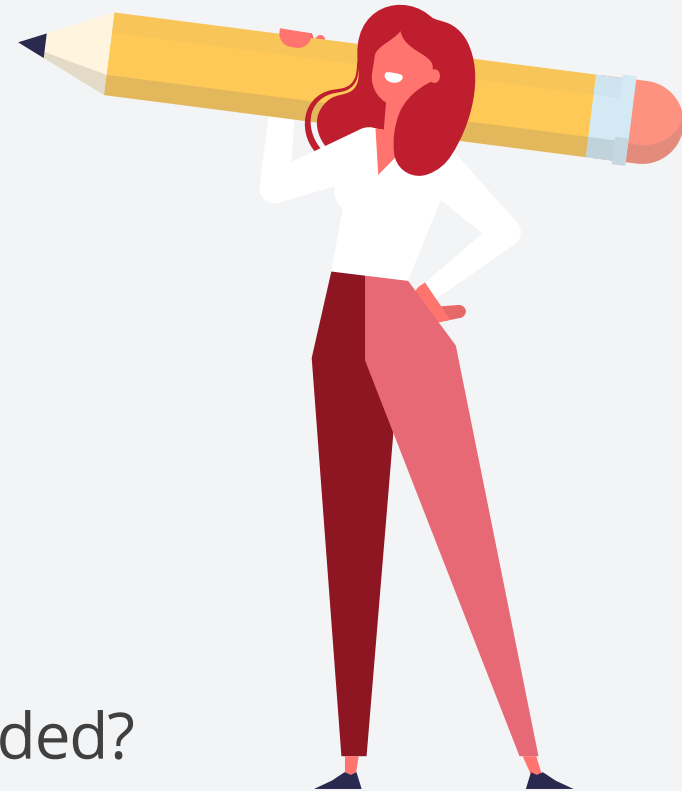
Updated September 2024



Privacy Considerations before kicking Off a New Product, Service Or Marketing Campaign



- Ask what type of data is being collected?
 - Is it sensitive?
 - Is it required?
 - Where will it be stored?
 - What will my customer/prospect think?
- Is it covered in the privacy notice?
- Are there any privacy laws in scope?
- Are there additional security measures needed?



Common Myths

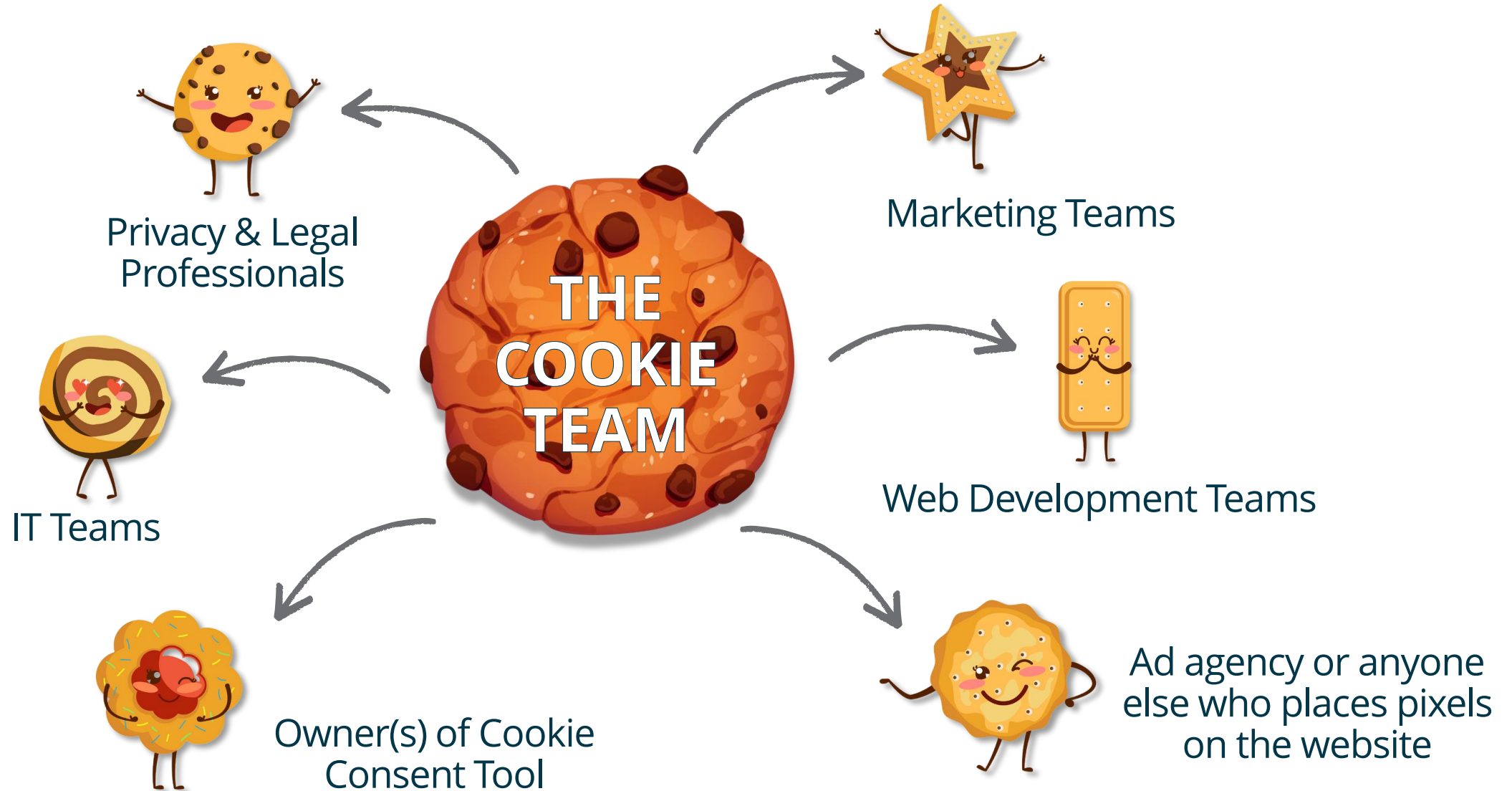
- Organization is TOO small
- All websites need a cookie banner
- All marketing is opt-in
- No one cares about privacy
- All our data is in the cloud and we're fine



What You Need to Know About Cookies & Pixels



Who Should Be A Part of the Cookie Team?



Typical Type of Cookies:



Marketing Cookies
collect identifiable data about an individual user's online activity in order to deliver relevant advertising.

Strictly Necessary Cookies

are essential to site functionality. These are the cookies that keep items in a shopping cart or remember login credentials.

Preference Cookies,
also known as functionality cookies, allow a site to remember things like language preferences, region settings, etc.

Statistics Cookies,
sometimes called performance cookies, anonymously collect information about how users interact with a site (Google Analytics, for example, are statistics cookies).



Cookie Program Roadmap

Once you have a cookie program in place, it's important to review it regularly (at least once a year).



Know What Laws Apply

Know what laws apply to your company and your notice and choice obligations around cookies, targeted ads, and profiling.



Perform a Cookie Audit

Ensure cookies are firing as they should, and consent mechanisms are in working order.



Review Your Current Cookie Set-Up

Determine what cookies are currently running on your site and if they are properly categorized.



Review Privacy and/or Cookie Notice

Review your privacy notice and/or cookie notice and update accordingly.



Create a Cookie Governance Program

Decide who is responsible for putting cookies on the site and managing them.



Train Your Team

On all of the parts of your cookie program



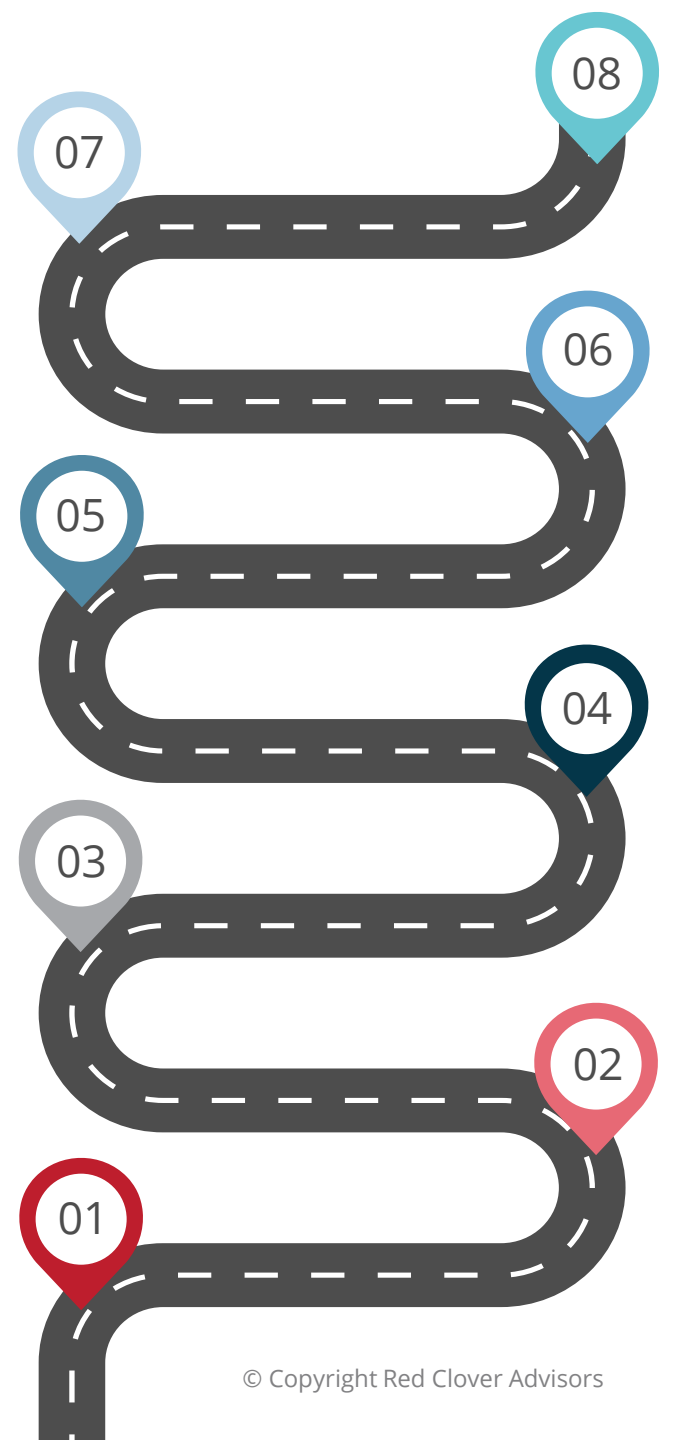
Implement Cookie Consent Software

Automate the consent process with cookie consent software.



Maintain Your Cookie Program

As business needs change and regulations evolve, review and maintain your cookie program



Know Your Data





Start with a Data Inventory

1

Locate your data

- You want to start to think about what data is being collected, where that information is being used, stored, processed and ultimately deleted.
- Consider what types of personal and sensitive personal information your business collects, and who you collect it from.

2

Identify business processes

- A good place to start is by breaking down your company into core functions.
- Then, look at how each function handles personal data to build your initial list of processing activities.

3

List systems or assets

- Think about the assets used to process personal information in each functional area.
- Identify an asset owner who understands what types of information the asset handles and the measures used to secure it.

4

Talk to asset and process owners

- Interview subject matter experts in each functional group to refine your list of processing activities and better understand how data is collected, processed, retained, and disposed.

5

Document your findings

- Create a log of processing activities, assets, and their associated data subjects and data elements.
- Note any risks the processing activity poses based on your company's legal obligations.





How Will Data Inventories be Conducted?



Manual Data Inventory – you can cover the basics of a data inventory using spreadsheet tools like Excel. This approach is cost-effective and accessible, making it suitable for small datasets or organizations just starting their data inventory journey.



Semi-automated - Using software can streamline data collection and help standardize and validate entries. uses software for gathering information. This approach still requires stakeholder interviews but is great for teams looking to optimize accuracy.



Automated Data Discovery– Automated data discovery tools can provide a more accurate, real-time picture of data elements and sources. Privacy teams must still collaborate with business units to understand flow of processing and purposes, but the high scalability and reduced manual effort is great for organizations managing complex data landscapes.



Personal Data

Examples of sensitive personal data or special categories of data



First/last name



Address



Email



Phone number



Date of birth



Photos identifying individuals



Precise geolocation



Financial information, credit and debit cards, account PIN/password



Government ID/SSN



Religious and philosophical beliefs



Biometric/genetic data



Health information



Immigration status/citizenship



This category requires additional protection



Privacy Notices





The **privacy notice** tells the customer what data is collected, how it is used, where it's stored, and to whom it has been shared, plus any individual rights



© MARK ANDERSON

WWW.ANDERTOONS.COM



"Before I write my name on the board, I'll need to know how you're planning to use that data."

**Say what you do,
do what you say**



Privacy Rights



Common Privacy Rights

Right to know

Right to access

Right to correct

Right to delete

Right to data portability

Rights regarding sensitive
personal information
processing

Right to opt out of the sale
of PI

Right to opt out of
profiling used for
automated decision with
legal or similar effects

Right to opt out of targeted
advertising

Right not to be
discriminated against

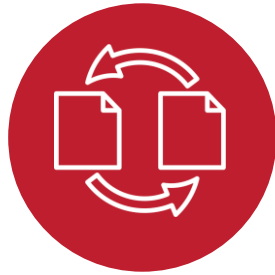
Right to appeal



Privacy Rights Process & Policy



Review what
Personal
Information is
Included



Incorporate any
changes needed to the
process & policy



Implement &
optimize privacy
rights software



Train relevant
employees



Maintain a schedule
to review ongoing to
ensure that new
vendors or personal
information is
captured

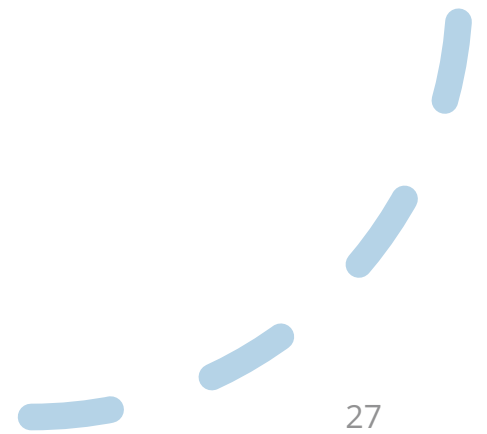


Collaborating



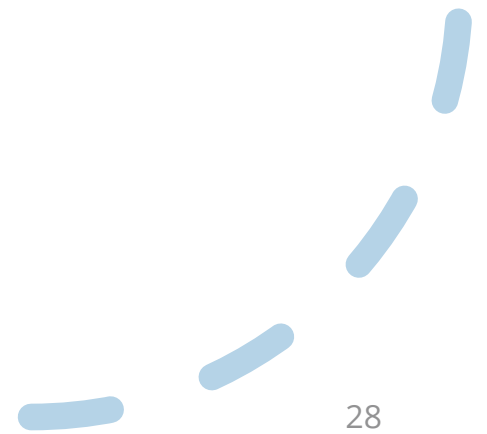
Partner Together

Privacy and security can't be present in every meeting. However, when both teams unite to proactively bring these concerns to the C-suite, you gain broader support and stronger allies throughout the organization



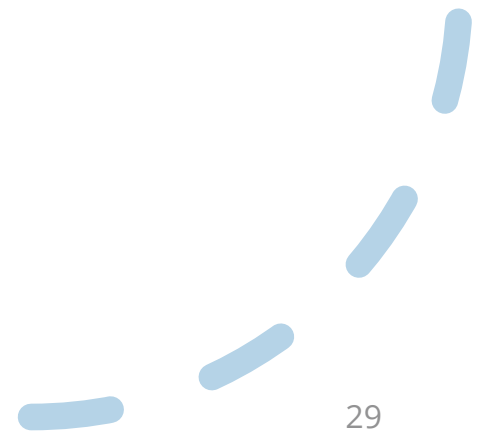
Budget & Resources

Both teams have overlapping goals, you can share resources and budget line items, increasing the chances that execs will approve your request



Technology Tools

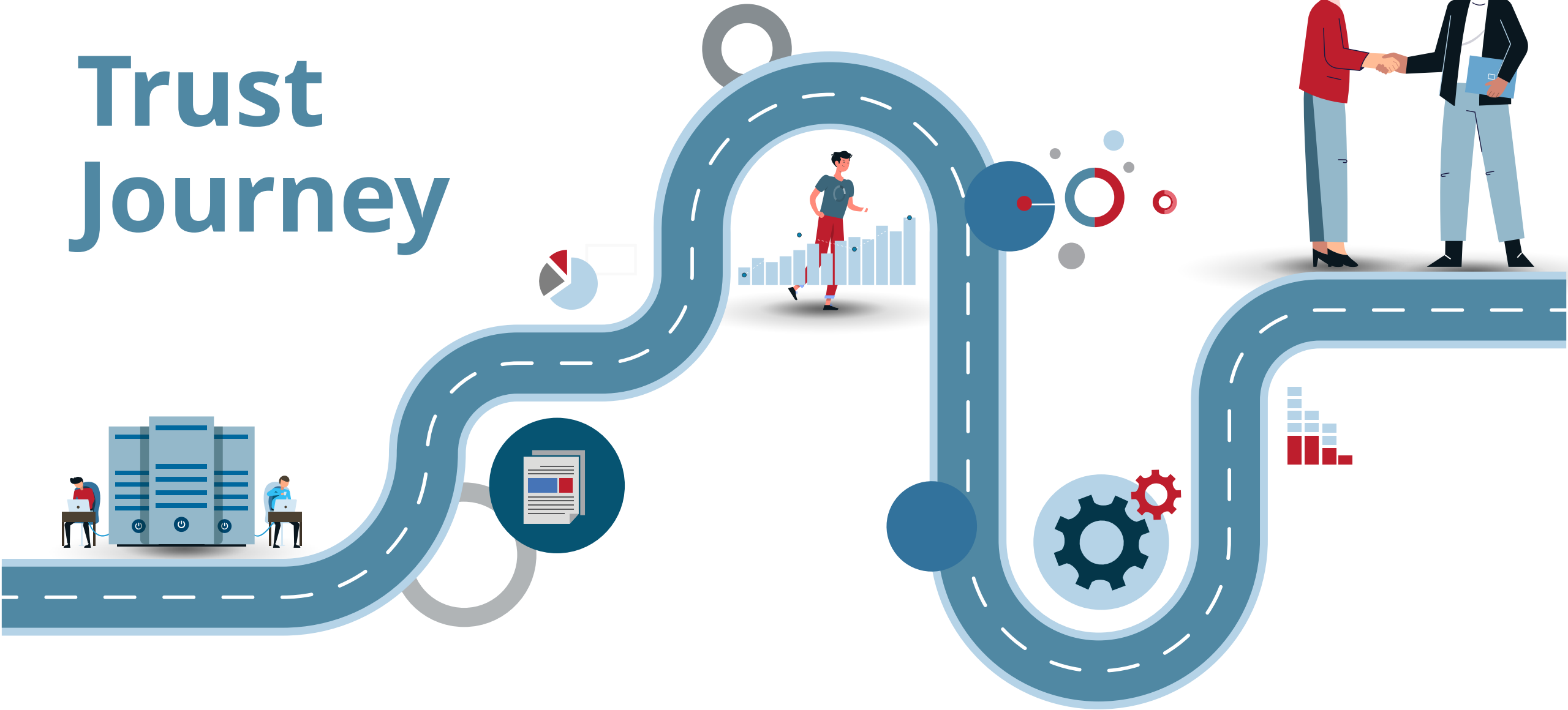
Since many privacy tools also support security programs, and vice versa, evaluating how a tool can benefit both teams can increase your chances of securing the budget for it



Going Forward



Trust Journey



Tips for Success

- Someone needs to “own” privacy
- It’s not a set and forget activity
- Remember the basics:
 - Collect what you need to
 - Disclose why you are collecting it
 - Allow the individual choices (e.g. opt-out)
 - Protect the data
 - Know your vendors
- When in doubt, find a resource and ask for help!
- Put the customer first
- Don’t just copy who you “think” is doing a good job!

Any Questions?



Download Privacy Resource Guides

The screenshot displays the Red Clover Advisors website's 'Downloadable Resources' section. The page features a dark blue header with the company logo and navigation links: Services, Regulations, Learn, and Company. A red button labeled 'Schedule a Consultation' is positioned in the top right. The main content area is titled 'Downloadable Resources' and showcases a collection of resource guides. The guides are arranged in two rows, with the top row featuring a larger, more detailed view of 'The Ultimate Privacy Sketchbook: WHAT YOU NEED TO KNOW' and '2025 PRIVACY PROGRAM TO-DO LIST'. The bottom row contains seven smaller guide cards.

RED CLOVER ADVISORS

OUR PODCAST | GET OUR BOOK

Services > Regulations > **Learn >** Company >





[Schedule a Consultation](#)

Downloadable Resources

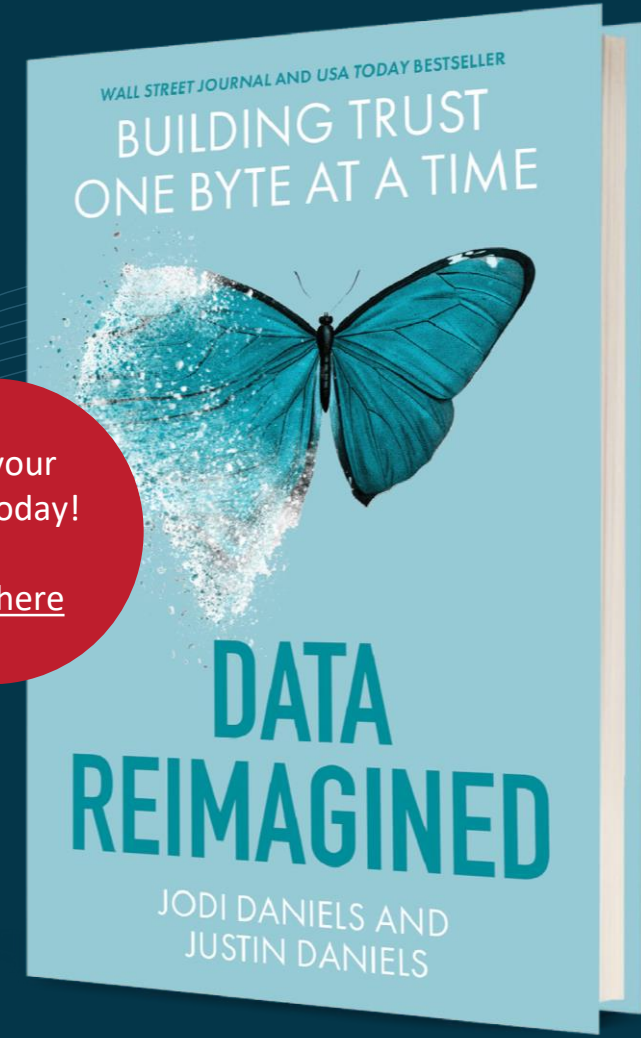
- State Privacy Laws COMPARISON GUIDE (AS OF Q4 2024)
- Data Inventory TEMPLATE
- Data Inventory Roadmap BUSINESS GUIDE
- Privacy Rights Roadmap BUSINESS GUIDE
- 2025 PRIVACY PROGRAM TO-DO LIST
- The Ultimate Privacy Sketchbook: WHAT YOU NEED TO KNOW
- Cookie Management Roadmap BUSINESS GUIDE
- Privacy Notice Roadmap BUSINESS GUIDE
- Privacy Risk Assessments PIA/DPIA BUSINESS GUIDE
- Privacy Training BUSINESS GUIDE
- AI Governance Roadmap BUSINESS GUIDE
- Third-Party Risk MANAGEMENT GUIDE
- 6 Steps to Privacy Compliance for Marketers
- California Consumer Privacy Act (CCPA) COMPLIANCE GUIDE
- Maryland Online Data Privacy Act (MODPA) 10 STEPS TO COMPLIANCE
- Colorado Privacy Act (CPA) 10 STEPS TO COMPLIANCE
- Top 10 Cybersecurity Tips for Small Business



Contact Us

-  [Jodi Daniels](#)
-  [Podcast](#)
-  info@redcloveradvisors.com
-  RedCloverAdvisors.com

Get your copy today!
[Click here](#)



DISCLAIMER

Red Clover Advisors, LLC is not a law firm. This presentation is for informational purposes and companies are advised to consult legal counsel as applicable who is competent to provide appropriate legal advice with respect to specific needs or applicable laws or regulations.

