

Organizational Data Competency



Actionable Tips for
Championing Data Maturity
Across Your Organization



Speakers



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AGENDA



Motivating Factors

Key Market and Consumer Forces
Driving The Urgency Around Data
Privacy, and Compliance

Data Competency

4 Data Pillars of Data Competency, &
Key Questions to Assess Your Data
Maturity and Readiness

Key Learnings

Practical Findings & Strategies to
Guide Your Internal Corporate
Compliance Journey



Most discussion today

Global Privacy Laws

CCPA, GDPR, Global Privacy Controls (GPC)

Cookie-Less Addressability

ID resolution platforms

The Consumer Privacy Protection Act

A new privacy regime under PIPEDA

Personal and Information and Data Protection Tribunal Act

Establish a new personal information and data protection tribunal

Oregon SB619, Bill 25...

Statutory frameworks

Data Privacy

Constantly changing and
can be easily overlooked!





Business Leaders

"FTC fines BetterHelp **\$7.8 million** over sharing data"



"Meta's AUD Facebook facing **\$10 million fine.**"



"Instagram settles for **\$68.5 million** over alleged BIPA violations."

engadget

Three Samsung employees reportedly leaked sensitive data to ChatGPT

engadget

Home Depot Canada found sharing customer personal data with Meta - privacy regulator



Ransomware group behind Indigo hack says it released stolen employee data, but nothing has appeared yet



Consequences

Significant data breaches and violations

Increase in +15% in Data Breach Costs - \$4.45 Million
– IBM

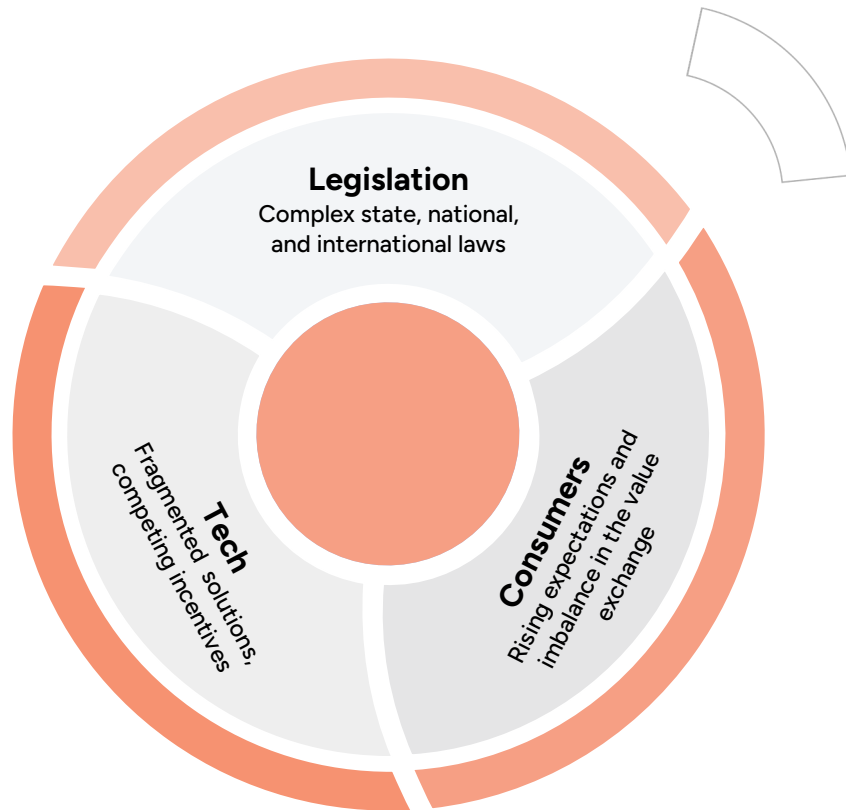
Data Competency
= maturity, fitness, and readiness

Bridge



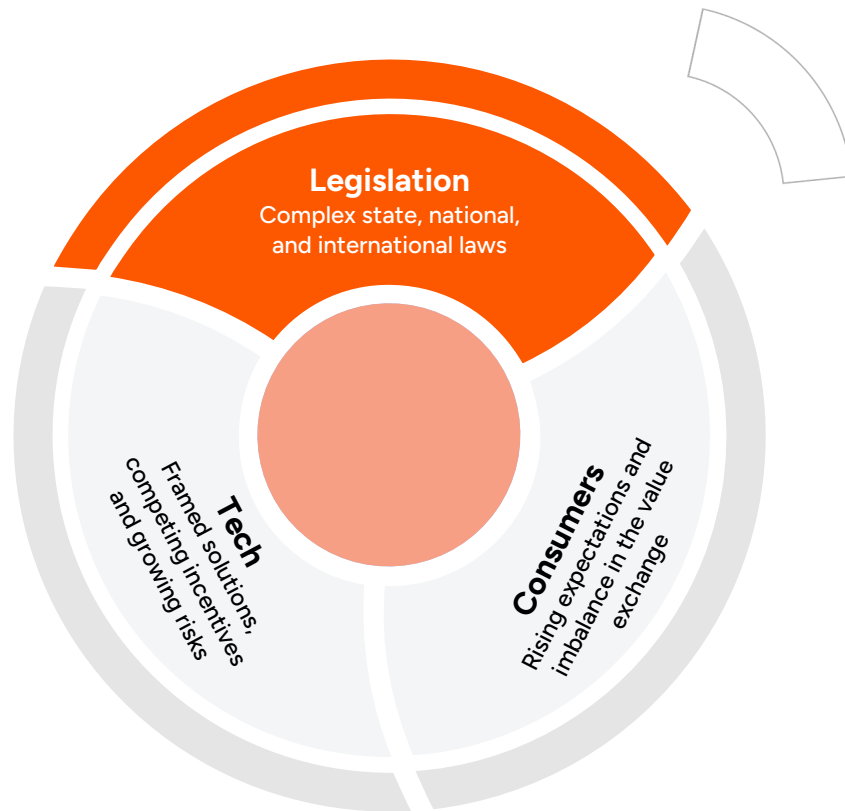
Driving Forces

Creating a need for
better privacy controls

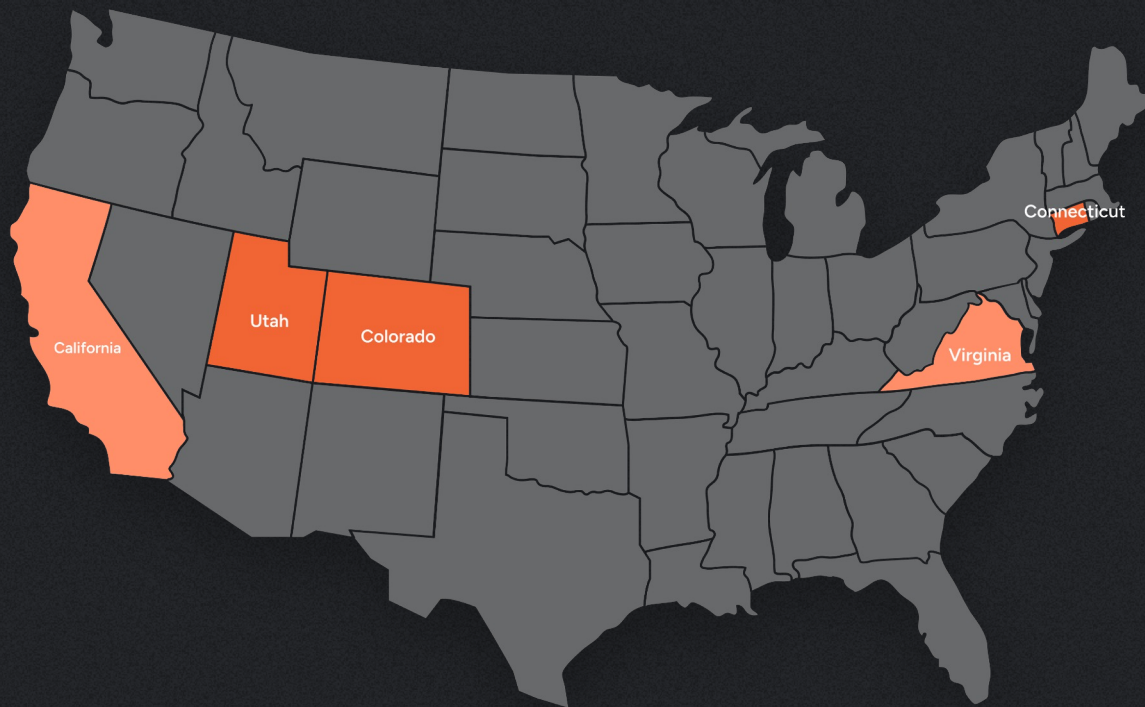


Driving Forces

Creating a need for better privacy controls



A Look at the **Data Privacy Landscape** in 2023



Active Consumer Privacy Initiatives

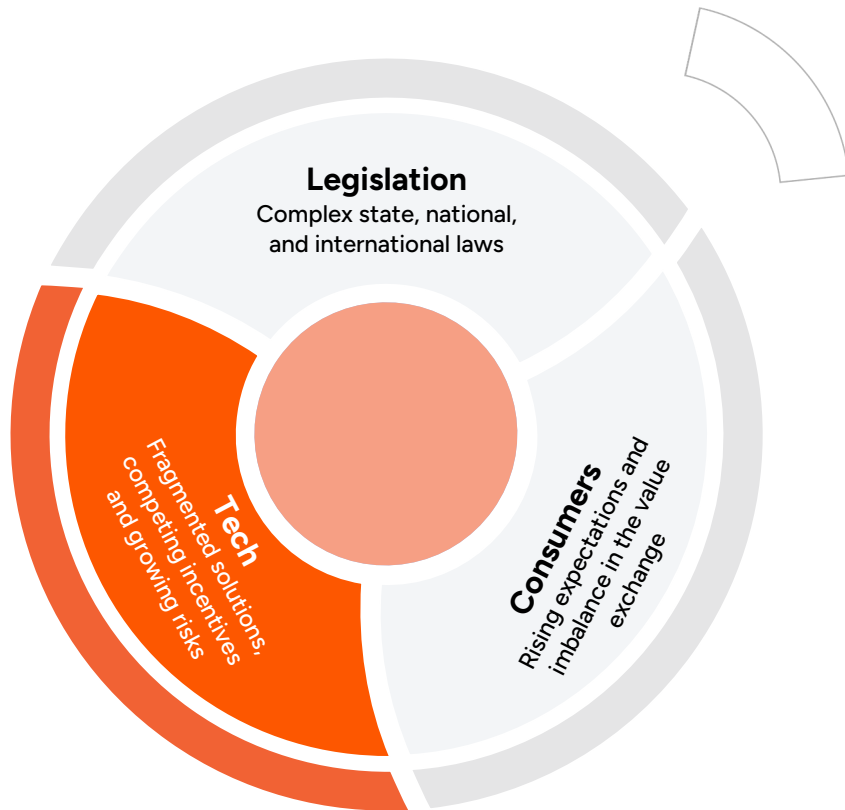
- ▶ **Oregon SB619 signed into law.** On July 18, 2023
- ▶ **Norway's DPA banning behavioral advertising by Meta.**
- ▶ **Colorado Privacy Act (CPA) & Connecticut Data Privacy Act (CTDPA)**
- ▶ **Quebec Bill 25** - Requires implied consent for all data sets and tools.

2023: 4 New Laws/Initiatives Taking Effect

- ▶ January 1: California Privacy Rights Act (CPRA) & Virginia Consumer Data Protection Act (CDPA)
- ▶ December 21: Utah Consumer Privacy Act (UCPA)
- ▶ EU-US Data Privacy Framework finalized.
- ▶ Proposal would ban government entities from purchasing private data.

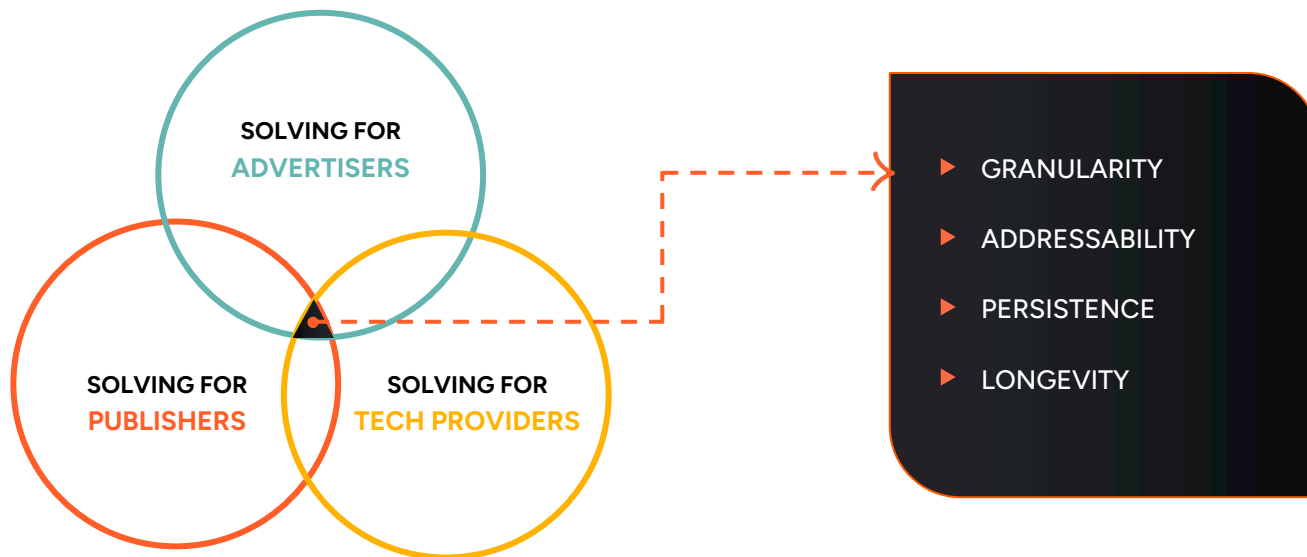
Driving Forces

Creating a need for
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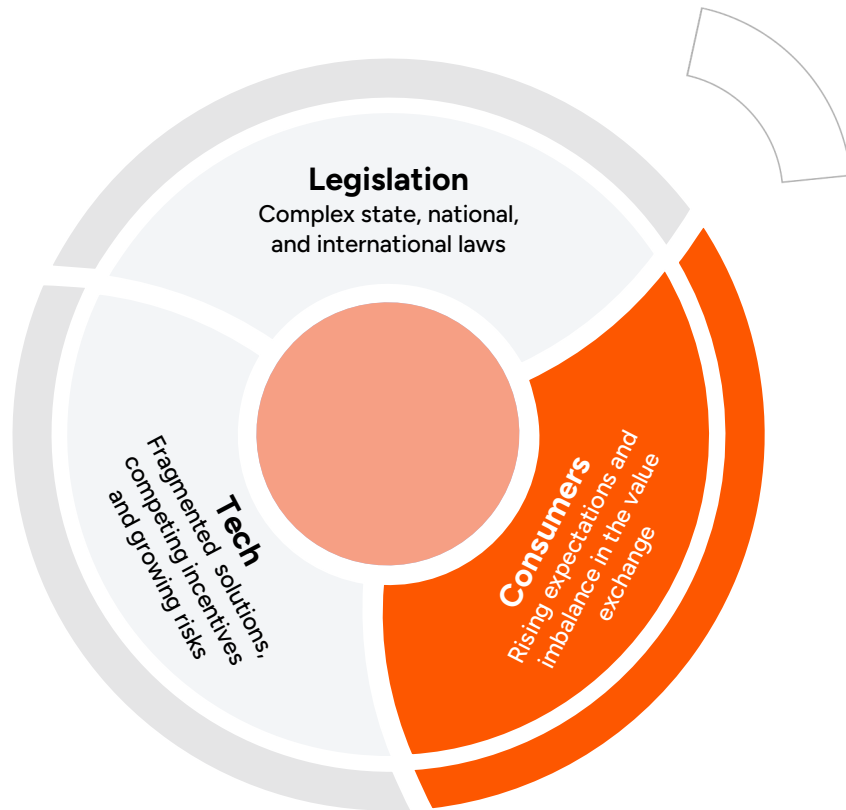
Solving for different needs ...

Competing incentives can result in brands having to pick between different solutions, which may not effectively addressing legal requirements



Driving Forces

Creating a need for better privacy controls





vevo

Source: Official Music Video for "Somebody's Watching Me"
performed by Rockwell, 1984 album of the same name.

Consumer Sentiment Across the Data Journey



Sharing

Are you comfortable sharing your personal data with organizations?



Utility

Are you satisfied with the value provided to you in exchange for your personal data?



Collection

Are you comfortable with the amount of data organizations are collecting on you?



Control

Do you have full control over what data organizations use, keep, share, and delete?



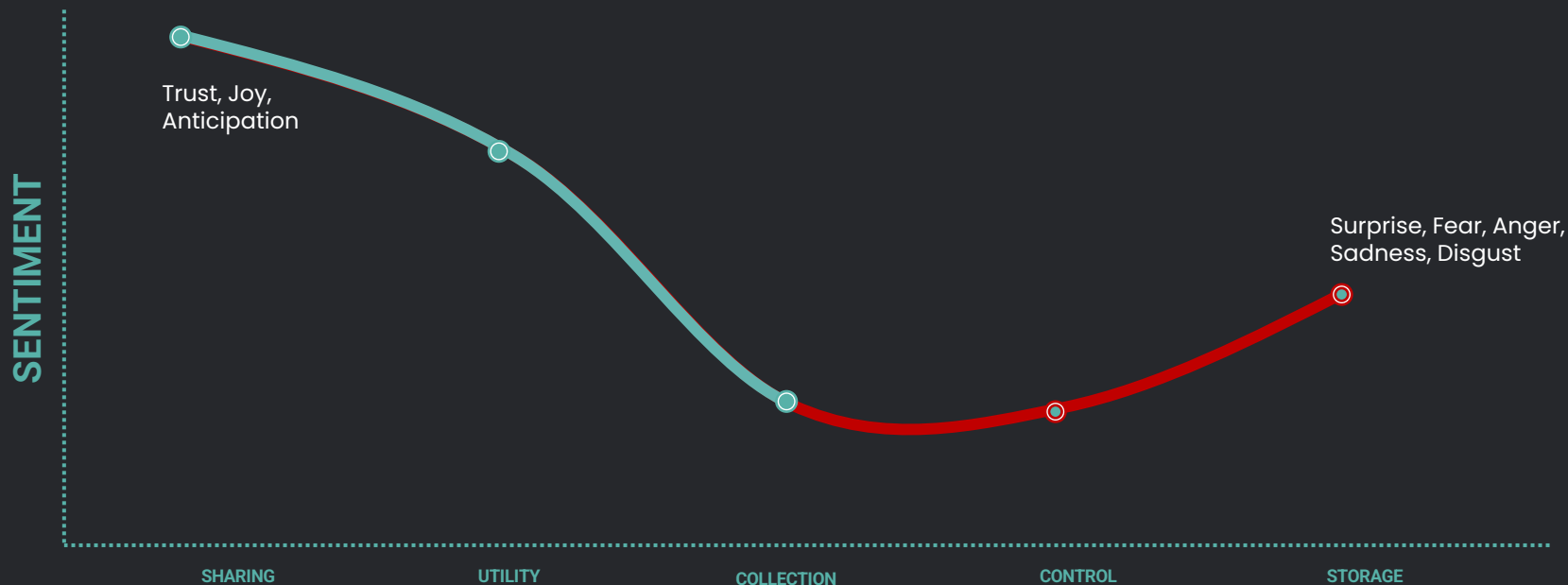
Storage

Are you confident that organizations can keep your data safe?

THE FORCES DRIVING THE CHANGE: CONSUMERS

consumer sentiment

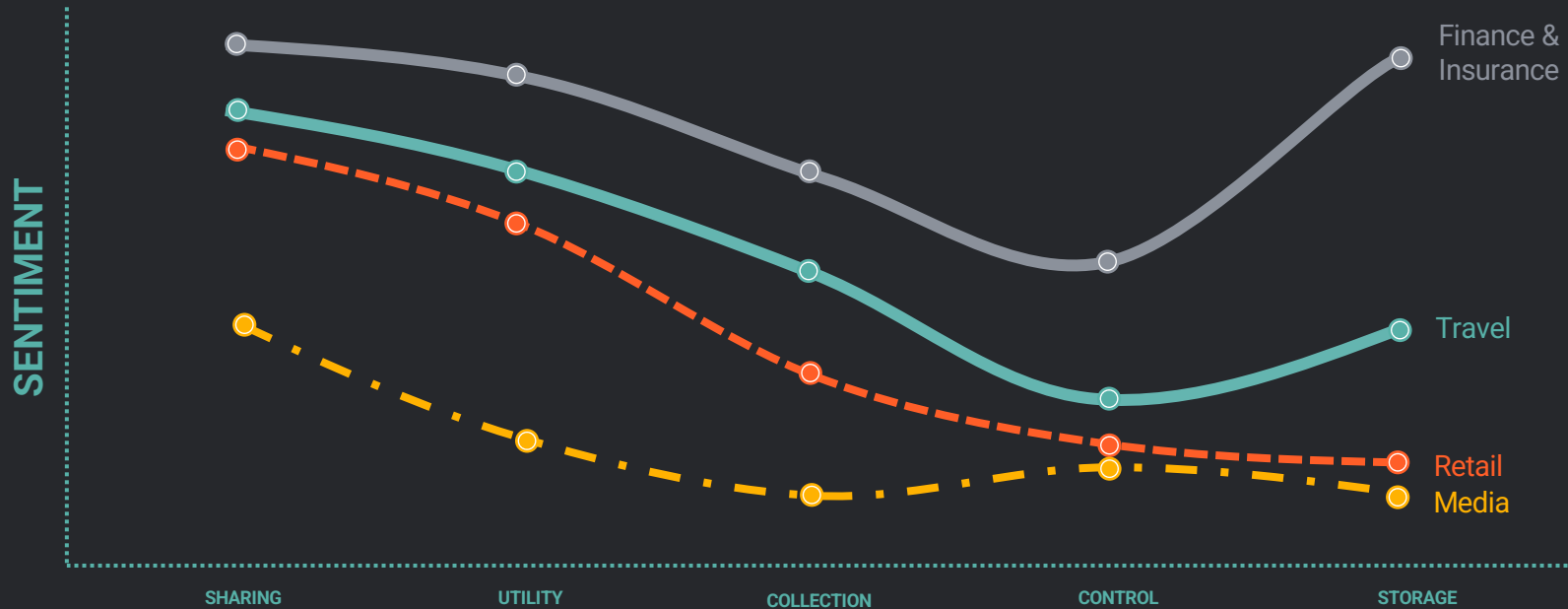
The consumer sentiment **becomes less positive** as we move further within the journey



THE FORCES DRIVING THE CHANGE: CONSUMERS

consumer sentiment

observed similar trend across various verticals and industries



Moving Towards Competency



Data Competency =
Better Prepared and Engaged
On The Topic of Data Compliance,
and Data Privacy

The Four Pillars of

Data Privacy Competency



GOVERNANCE

DATA WORKFLOWS & TRANSFERS

Proper Controls Around Data Capture, Storage and Sharing



PEOPLE & CULTURE

TALENT & PEOPLE

Common Language, and Empowered Team to Make The Right Decisions



MEDIA ACTIVATION

DATA UTILITY & MEASUREMENT


First Part Data Creation, Data Utility and Media Measurement



LEADERSHIP

FUTURE READINESS

Risk Assessment, Readiness to Act to improve Organizational Fitness



MOVING TOWARDS COMPLIANCE

Competency 1:

Governance

1. Data Collection



Are our IT, marketing, and legal teams aligned on what user data **we need to collect** to achieve our business goals?

Is all data we collect on our users **mapped and inventoried**?



2. Data Storage

Do we have a solid
understanding of systems
and technologies that
process consumer data?

Do we leverage encryption
when storing consumer
Data?

3. Data Sharing

- ▶ Are all Consumer Data Flows Between Internal and External Platforms Are Well Understood and Documented?
- ▶ Are data flows between internal and external platforms well understood and documented?

MOVING TOWARDS COMPLIANCE

Competency 2:

People & Culture



1. Competency

- ▶ Do we have the internal expertise to make decisions on technologies and assess the **privacy compliance practices** of partners and vendors?
- ▶ We Have the Right Internal Team and Expertise to Understand, and Navigate Data Legislative Changes
- ▶ Have we established an internal **data governance body** that encompasses people from different teams and departments?


2. Development

- ▶ Do we have, or plan to hire, a Chief Privacy Officer to **lead and guide** our internal privacy processes and risk assessments?
- ▶ Are we (continuously) investing to **train our teams** on data privacy, data security, and data compliance?



3. Accountability

- ▶ Do we have a clear understanding of roles and accountability as it pertains to user data collection and storage?
- ▶ Is there a single point of accountability on data compliance, and who should be engaged?



MOVING TOWARDS COMPLIANCE

Competency 3:

Media Activation

1. Audience Creation

- ▶ Is our marketing reliant on user PII data?
- ▶ Do we transform user data for marketing activation purposes (e.g. profiling)?
- ▶ Do we have a clear understanding of how our media partners generate and transform user data?

2. Data Utility



Is our **data analytics** inputs and outputs evaluated for bias?



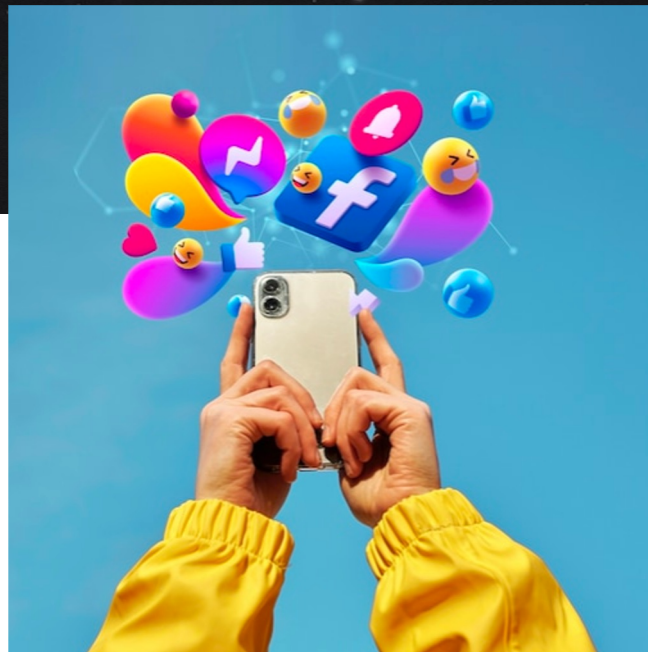
Do we pass-on customer data to external partners for **marketing activation** purposes?



Do we currently sell or share customer or **audience data** with external partners?

3. Media Measurement

- ▶ Do we leverage **data-driven attribution**?
What is our primary measurement framework?
- ▶ Have we tested new measurement frameworks to track the impact of our **marketing spend** on business outcomes?



Competency 4:

Leadership

1. Risk Appetite

Are the **risks associated** with processing user data well researched, documented, and communicated?

Have we made the necessary decisions to mitigate the **highest risk areas** of our business?

2. Mission/Vision

- ▶ Do we have a **good understanding** of the benefits that user data has for our business?
- ▶ Is there a clear understanding of the overall organization's **mission and objectives** that inform and guide our data privacy processes and decisions?



3. Partnerships

- ▶ Do we have a clear roadmap of the technology changes we need to make to mitigate data risk?
- ▶ Are we actively working with our data and tech partners to ensure we're prepared to meet upcoming changes to government legislation?

Complete the Questionnaire & Report Findings

Complete Assessment and Establish a Score

PRIVACY READINESS ASSESSMENT

In mathematics, the **Fibonacci numbers**, commonly denoted F_n , form a **sequence** the **Fibonacci sequence**, in which each number is the sum of the two preceding ones. The sequence commonly starts from 0 and 1, although some authors start the sequence from 1 and 1 or sometimes (as did Fibonacci) from 1 and 2. Starting from 0 and 1, the first few values in the sequence are [11](#) 0, 1, 1, 2, 3, 5, 8, 13, 21, 34, 55, 89, 144.

Source: Wikipedia

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LEADERSHIP

Questions

- We Have a Good Understanding of The Benefits That User Data Has On Our Business, including Our Ability to Effective Execute Marketing Strategies and Tactics
- There is a Clear Understanding of The Overall Organizations' Mission and Objectives, Which Inform and Guide our Data Privacy Processes and Decisions
- The Risks Associated with Processing User Data Are Well Researched, Documentation and Communicated (*Data Inputs, Outputs Documented, Reviewed and Communicated Based on Risk to Business*)
- We've Identified The Data Risks For Each of Our Data Platforms and Are in the Process of Mitigating those Risks, Either by Working Directly with our Vendor, or By Identifying New Partners to Switch to
- We're Equipped and Prepared To Comply With All Government Legislation, Regardless of Region
- We Have a Clear Roadmap of The Technology Changes We Need to Make to Meet New

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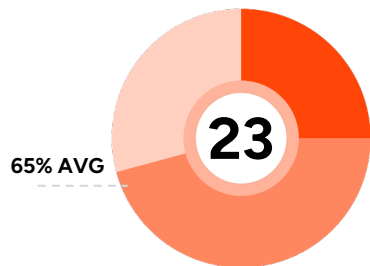
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Track Your Readiness

Identify key workflows and areas to accelerate evolution and disposing of potential liability

GOVERNANCE

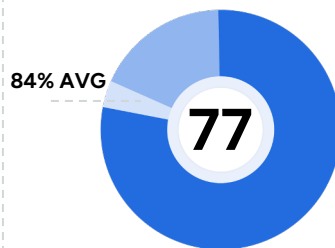
DATA WORKFLOWS & TRANSFERS



Adherence to a Future Proof Data Policy, Including Proper Controls to Minimize Risk

PEOPLE & CULTURE

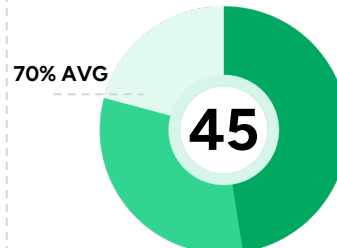
TALENT & PROCESSES



Enabling Teams and Individuals to Engage in data Privacy Dialogue

MEDIA & ACTIVATION

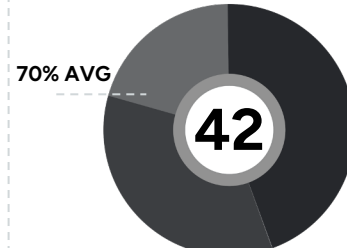
DATA UTILITY AND PARTNERSHIPS



Protection of Zero Party Data and Ability to Achieve Marketing Results Using Internal Data Data Pools - Ability to Create Unique Data Partnerships

LEADERSHIP

FUTURE READINESS



Understanding of Ecosystem and Climatic Patterns and Decisions that Improve Organizational Fitness

1. Map Data Flows

Develop/update data map(s)

- ▶ Sensitive data
- ▶ B2B contact data
- ▶ Employee/contractor/applicant data
- ▶ Exempt data

Make sure to account for

- ▶ Cookie and non-cookie technology and data flows
- ▶ Profiling and automated decision-making processes



Determine reasonable retention periods and processing purposes for each data category

2. Update Privacy Policies and Practices

Update/develop policies to ensure compliance, incl.:

- ▶ Privacy policies and notices
- ▶ Consumer rights procedures



Collect only what is minimally necessary



Ensure data is used as authorized



State how long data is to be kept and how to handle sensitive information

Key Question

Why do we collect this data?

3. Refine Consumer Rights Procedures

How do we respond to consumer requests?

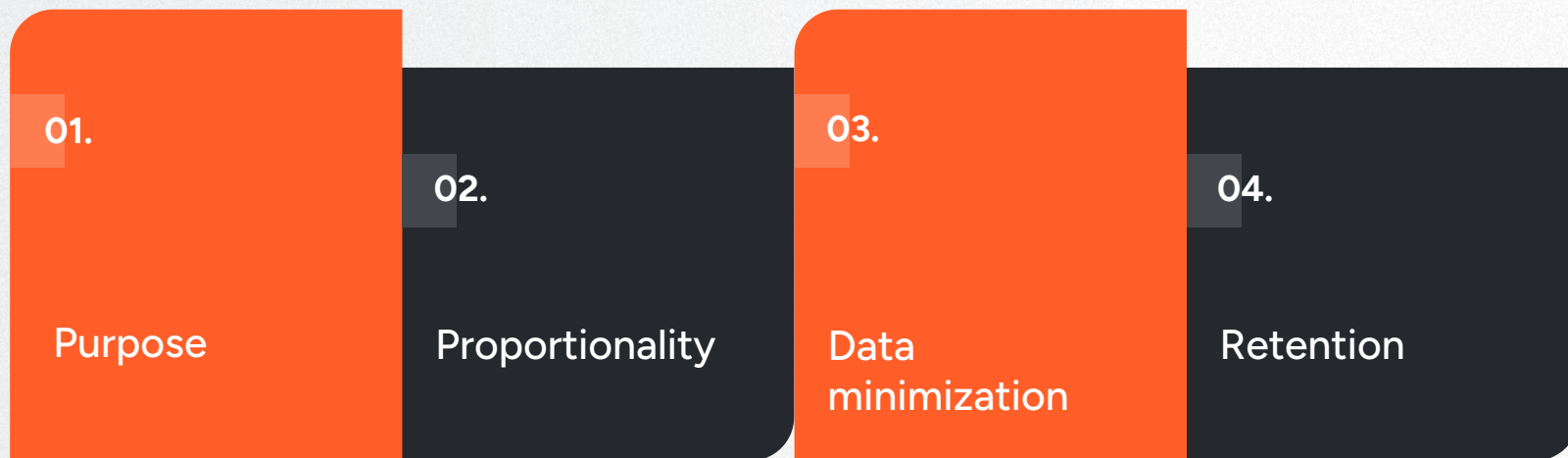
Implement or modify processes to satisfy consumer rights under new laws.



4. Conduct Privacy Impact Assessments (PIA)

Implement Privacy-by-Design

Consider a PIA program for all data processing to meet requirements relating to:



5. Implement / Update a Vendor and Data Recipient Management Program

Review and update contracts with

- ▶ data processors
- ▶ contractors
- ▶ third parties

to ensure compliance.

6. Reporting, Record-Keeping & Training



Update employee training materials to reflect new requirements



Develop/update record-keeping and reporting procedures to ensure compliance

7. Implement Data Security & Incident Response Plans


Establish an information security plan, incl.

- ▶ incident response and breach notification procedures
- ▶ acceptable use policy
- ▶ cookie management
- ▶ vendor security program

Enhance data security measures as needed

Conduct privacy compliance and security preparedness exercises





MOVING FORWARD WITH CONFIDENCE

Practical Findings to Guide Your Internal Corporate Compliance Journey

1. Governance: Be Transparent

Have a bias towards openness with the organization

Share operational insights and allow others to incorporate their thinking and challenge the existing process

Avoid building in silo, as it can will likely lead to blind spots across the organization

2. Governance: Think Small

Sweat the Details

Know the details, use small teams and break large data landscapes into small contracts. Don't be chased away by fears of complexity of management.



3. Talent: Distribute Power and Decision Making

Have a bias towards distributing power from the centre including oneself.



Involve multiple departments



Be aware of the Dunning Kruger effect



Avoid Cognitive biases

4. Media: Design for Constant Evolution

Ideally, changes should flow through your organisation without the need for constant restructuring.

Crete systems that cope with change

- ▶ contractors
- ▶ third parties

to ensure compliance.

5. Leadership: a Bias Towards Action

- ▶ There is no perfect map, or framework. Have a bias towards action because the landscape will change
- ▶ You'll learn and discover more through action



Key Takeaway

Data privacy is a continuous process.

Understanding where you are is key to understanding where you need to go.

Competency is the first step to getting there.



Questions?

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