



Privacy Rights Roadmap: Business Guide



PRIVACY RIGHTS GUIDE

A roadmap to lead you to compliance

Depending on jurisdiction, your customers, employees, web visitors, and others may have rights over their personal data that you hold. These may include any or all of the rights below.



Right to Access

Individuals have the right to request access to their Personal Data.



Right to Portability

Individuals have the right to request a copy of their Personal Data.



Right to Correct

Individuals have the right to request rectification of their Personal Data when it is inaccurate or incomplete.



Right to Object/Opt Out

Individuals have the right to object to some processing of their Personal Data – notably, sale, sharing and targeted advertising.



Right to Delete

Individuals have the right to request deletion of their Personal Data.



Right to Restrict

Individuals have the right to restrict processing of their Personal Data in some circumstances.



Right to Limit Use of SPI

Individuals have the right to limit the use of their Sensitive Personal Data.



Automated Decision-Making

Individuals have rights around the use of their Personal Data for automated decision-making that results in significant impact to them.



Create Long-Lasting Compliance

Compliance with privacy rights obligations is a cornerstone of a responsible privacy program. How you comply with your privacy rights obligations is influenced by many factors, particularly these below.



OPERATIONAL NEEDS

OWNERSHIP

Establish an owner of your privacy rights program to ensure your program stays current with your practices and obligations.

POLICIES & PROCEDURES

Create clear, enforceable and repeatable policies and procedures to ensure that employees understand their responsibilities.

TRAINING

Provide regular training and awareness materials to ensure all employees know their role in and the importance of privacy in your organization.



Privacy Rights Process & Decision-Making

As you create systems and processes to comply with your privacy rights obligations, consider the factors that influence long-lasting compliance outlined earlier.

1 TELL PEOPLE ABOUT THEIR RIGHTS AND HOW TO EXERCISE THEM

NOTIFICATION

- What individual rights do we need to include?
- Where do we need to provide notice (anywhere you collect personal data)?
- Do we need to provide notice in multiple formats?
- In what language(s) do we need to notify?

2 SET UP APPROPRIATE METHODS FOR PEOPLE TO SUBMIT RIGHTS REQUESTS

SUBMISSION

- What methods make sense for us to provide to individuals to submit their rights requests?
- Do we need multiple methods?
- Do we want to use third-party technology to manage requests?
- Who will monitor the requests?

3 CREATE A CONSISTENT APPROACH TO VALIDATING REQUESTS

VALIDATION

- How will we approach provision of rights – all rights for all people or by jurisdiction?
- What exemptions apply to us?
- When can we deny a request?

4 MAKE SURE PEOPLE ARE WHO THEY SAY THEY ARE

VERIFICATION

- How will we verify the identity of the individual?
- How will we ensure third-party requestors are authorized by the individual?
- Are there specific rules we need to follow for verification?
- Do we want to use a third-party technology for ID verification?



Privacy Rights Process & Decision-Making

5 GATHER INFORMATION AND RESPOND TO RIGHTS REQUESTS

RESPONSE

- How long do we have to respond to a request?
- How will we find the personal data related to a rights request?
- How will we make sure the data is about the individual?
- In what format will we transmit data in response to an access request?
- What protections do we need to include on provision of personal information in an access response?
- How will we communicate denials of rights requests?

6 COMMUNICATE REQUESTS TO RECIPIENTS OF THE DATA

PROCESSORS & THIRD PARTIES

- Do our contracts with service providers and third parties include their obligations regarding rights requests?
- How should we communicate requests to third parties?
- How frequently should we communicate rights requests?

7 ESTABLISH AN APPEALS PROCESS

APPEALS

- Do we need an appeals process?
- What method will we provide individuals to file an appeal?
- How long do we have to respond to an appeal?
- What happens if we deny the appeal?

8 MAINTAIN RECORDS ON RIGHTS REQUESTS

RECORD-KEEPING

- What information do we need to maintain records on?
- How will we capture the information?
- Where will we retain the records?
- Do we need to publish metrics on our rights requests?

