

SecureTrust[™] Privacy Services

PRIVACY, COMPLIANCE AND RISK MANAGEMENT

Benefits

A Structured Risk-Based Approach

- Informed by SecureTrust compliance and security expertise
- Structured plan to prioritize areas of high-risk and build a compliance monitoring program

Comprehensive Analysis

- Examination of business strategy, scope and risk appetite
- Investigation of all identified data flows that contain personal data
- Evaluation of operational environment, processes and documentation
- Consideration of processors in the supply chain

Strategic Planning

- Risk treatment and recommended risk mitigation solutions
- Helps to incorporate privacy by design into planning
- Additional security control recommendations

Privacy is an important aspect of our professional and personal lives, both on and offline. With increased information sharing and the proliferation of the internet, privacy is paramount for both consumers and organizations who collect, retain and process personal data. As a result, there are a number of privacy laws and regulations that affect businesses, websites and all organizations handling personal data.

SecureTrust Privacy Services help your organization realize effective data management and adhere to the European Union General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), the Protection of Personal Information (POPI) Act or other regulations governing the use of personal data.

The cornerstone of SecureTrust's Privacy Services is the Privacy Information Security Risk Assessment (P-ISRA) as an essential early step in managing risk associated with handling personal and protected information. Using a phased approach, the assessment helps you gain an understanding of the personal data captured through your business processes, how this data is stored and maintained throughout its life-cycle and whether there are controls to securely retain, process and dispose of data in a compliant manner.

SecureTrust Privacy Services

SecureTrust Privacy services help you assess how well you are meeting privacy requirements and help you create a strategic plan for improving your organizations data protection practices. Services include:

Privacy Workshop

- Helps you understand the scope of privacy regulations and requirements
- Helps plan risk assessment and risk treatment for the protection of personal data
- Helps facilitate senior management endorsement to prepare for compliance with privacy regulation

Privacy Gap

- Helps you identify and assess gaps for the protection of personal data and compliance with regulation
- Helps you remediate and treat Gaps identified during the assessment
- Helps you to amend policy and procedures to ensure effective control of privacy data

Privacy Information Security Risk Assessment

- Provides an assessment of relevant controls and policies used to identify, measure, monitor and control compliance risk
- Helps you identify and assess risks for the protection of personal data
- Helps you develop a strategic plan for treating risks to the privacy of personal data with guidelines to reduce or mitigate inherent risk

Privacy Impact Assessment

- Helps you address critical or high-risk processes in accordance with privacy regulations
- Helps you evaluate ongoing compliance and risk for critical and high-risk processes

Privacy Assessment

The SecureTrust Privacy Information Security Risk Assessment (P-ISRA) is designed to help you strategically assess your data protection practices. Using a phased approach, the assessment helps you identify types of privacy data captured through your business processes and how this data is stored and maintained throughout its lifecycle. We also help you create an actionable plan for any needed improvements and help facilitate remediation for privacy regulation compliance.

The engagement is performed in five phases:

1. Project initiation – Project scope, timeline, deliverables, key stakeholders and roles and responsibilities are defined.
2. Organizational review and data discovery – The risk environment and flow of personal data and privacy data processes are identified. Key management is interviewed so that the organization's business strategy, scope and risk appetite is incorporated into the assessment.
3. Assessment of privacy and security risks – The risk assessment process identifies and assesses associated threats, vulnerabilities and existing controls.
4. Baseline definition and treatment plans – SecureTrust delivers a risk register and a control gap matrix with gap description and corresponding risks.
5. Acceptance of risks and treatment plans – This is your opportunity to identify the risk treatment and set overall direction and risk tolerance in a management response to the final report.

Privacy by Design

Privacy by design is an important concept for data protection. It means that each new service or business process that includes personal data must build protection of that data into the design through the entire data lifecycle. A core principle of privacy by design is that it prevents data privacy infractions before they occur. As part of the SecureTrust P-ISRA, we will help you identify to what degree privacy by design is incorporated within your organization.

The SecureTrust P-ISRA will review business processes, procedures and controls against the GDPR requirements including:

- Data breach reporting
- Data security (encryption, pseudonyms, anonymization)
- Data recovery
- Security testing
- Data access rights of natural persons

The SecureTrust P-ISRA will help you identify, assess and treat risk with recommendations for remediation where necessary. We will review whether responsibilities and accountability for maintaining the protection of personal data are formally documented, communicated and recognized (this includes the third-party partnerships).

We will evaluate the security best practices and procedures that are in place. We help you identify high risks where your organization may need to conduct privacy impact assessments as well as help you execute that task. And, together with your organization, we will determine whether procedures in place are sufficient to meet the needs of privacy regulations and whether they are in line with your organizations risk management strategy.

Engaging Teams in Your Organization

Protection of personal data involves understanding the scope of personal data in all its forms and how it flows through your entire organization. Many departments must be engaged, including:

- Privacy and Security Governance
- Information Technology
- Enterprise Risk Management
- Legal and Compliance
- Procurement
- Human Resources
- Facilities
- Customer Service
- Finance
- Third-party partners with access to personal data, and More

Assessment Methodology

SecureTrust employs industry standards and general concepts specified in the ISO/IEC 31000, NIST SP 800-39 and NIST SP 800-122 for our P-ISRA and related privacy services. The proposed methodology is data privacy focused and not solely meant to conform to a single standard. Other standards may be used to facilitate the assessment, determined by the size, complexity and needs of your organization.