



Centre for Information Policy Leadership

— HUNTON ANDREWS KURTH —

# Webinar: Have We Finally Reached the Age of Accountability in Data Protection?

CIPL to discuss: UK ICO Accountability Toolkit; CISCO Survey on ROI of Accountability; CIPL Accountability Mapping Report

April 6, 2020

- 11:00 – 11:10 **Introductions**  
*Bojana Bellamy, President, CIPL*
- 11:10 – 11:25 **Return of Investments on Privacy: the Cisco's Data Privacy Benchmark Study**  
*Robert Waitman, Director of Data Privacy and Valuation, Cisco*  
*Shea Wynn, Americas Privacy Officer, Cisco*
- 11:25 – 11:35 **What Does Good and Effective Accountability Look Like: the CIPL Accountability Mapping Report**  
*Nathalie Laneret, Director, CIPL*
- 11:35 – 12:10 **Practical Examples of Accountability Measures and Views on Accountability**  
*Moderator: Bojana Bellamy, President, CIPL*  
*Anny Pinto, Chief Privacy Officer & Legal Head of Group IT, Adecco*  
*Florian Thoma, Senior Director, Global Data Privacy, Accenture*  
*Knut Mager, Head of Global Data Privacy, Novartis / Johan Wisenborn, Head of Group Data Privacy Risk Management, Novartis [TBD]*  
*Damien Kieran, Global Data Protection Officer, Legal Director and Associate General Counsel, Twitter*
- 12:10 – 12:30 **Questions and Answers**



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# Introductions

**Bojana Bellamy, President, CIPL**

# New Trends for Accountability

Organisations view privacy and accountability as a **digital corporate responsibility and a business enabler**

**Increasing demands** for accountability from investors and shareholders

Accountability and global interoperability is **top priority for the Global Privacy Assembly**

However, **DPAs are still not convinced** of the effectiveness of accountability for data protection

**CIPL's accountability mapping project** illustrates common accountability practices

ICO is launching an **ICO Accountability Toolkit**, similar to CIPL's Accountability Framework

Now more than ever, accountability is needed in the context of the **COVID-19 crisis**

# CIPL Accountability Framework

Organisations must be able to demonstrate accountability – internally and externally

Accountability is not static, but dynamic, reiterative and a constant journey



Accountability requires comprehensive privacy programmes that translate legal requirements into risk-based, verifiable and enforceable corporate practices and controls

Company values and business ethics shape accountability

## Overview:

- Survey published online on 28 October 2019
- Closed on 9 December 2019
- 163 responses from a wide variety of responses
- Additional events organised, including Joint CIPL-ICO Roundtable on the ICO's Accountability Toolkit on 11 February 2020

## Toolkit categories:

Management structures	Policies, procedures and training	Monitoring and revision	Contracts and third parties
Records of processing activities	Lawful basis	Transparency	Data protection impact assessments
Data protection by design and by default	Security	Data breaches	Data subject rights

# Return of Investments on Privacy: the Cisco's Data Privacy Benchmark Study

**Robert Waitman**, Director of Data Privacy  
and Valuation, Cisco

**Shea Wynn**, Americas Privacy Officer, Cisco

# From Privacy to Profit: Achieving Positive Returns on Privacy Investments

Cisco Data Privacy Benchmark Study 2020



Most organizations are seeing very positive returns on their privacy investments



Over 70% are reporting significant privacy benefits in areas such as operational efficiency, agility and innovation



Organizations that are more accountable were more likely to have avoided significant breaches, had less downtime, shorter sales delays, and higher returns overall

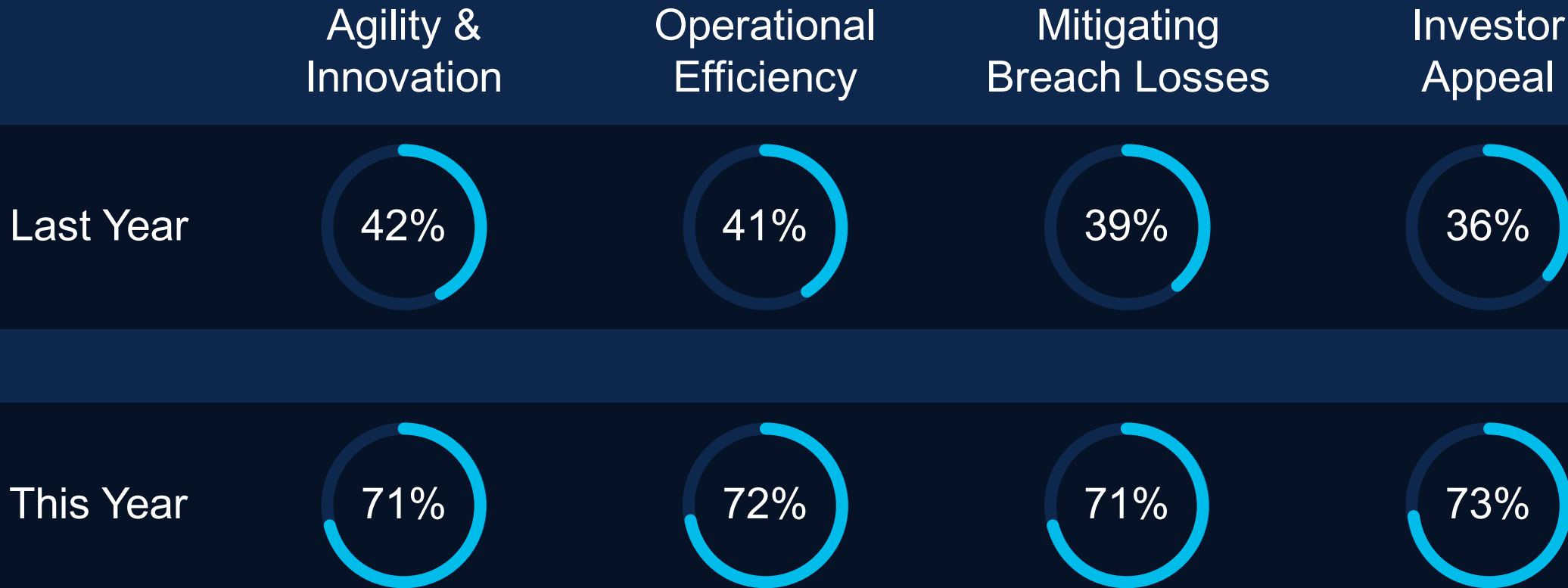


The vast majority believe privacy certifications are important factors in the buying process today



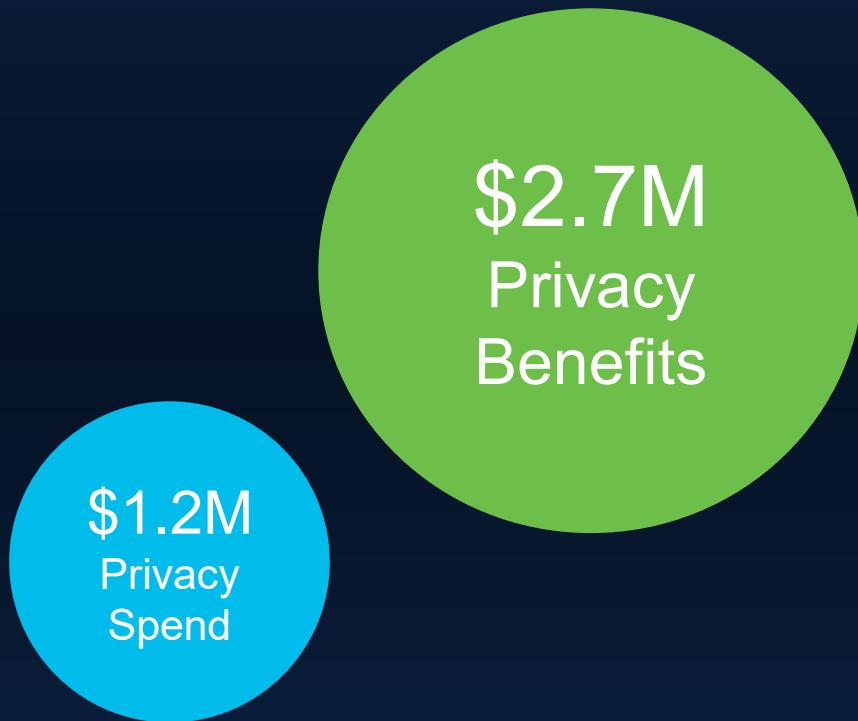
# Business impact of privacy

Percentage of companies getting significant benefits from each area



# Attractive Return on Privacy Investment

Average Organization



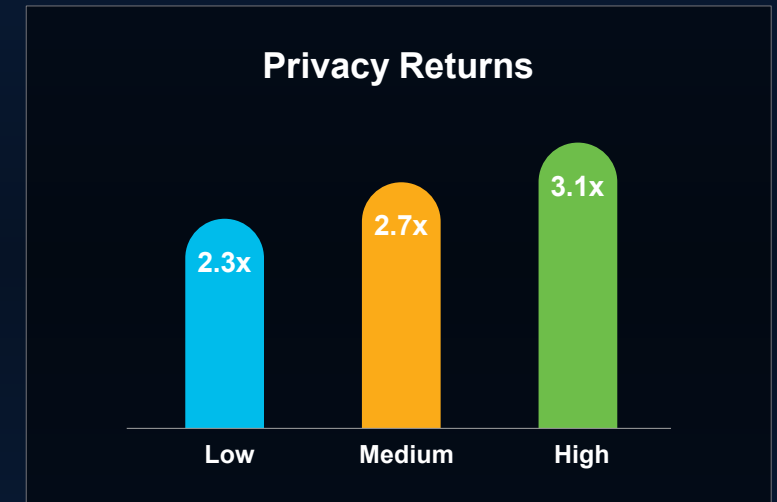
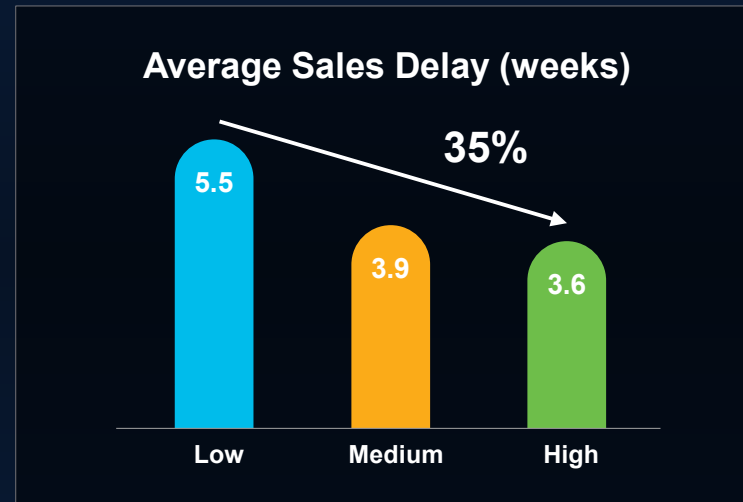
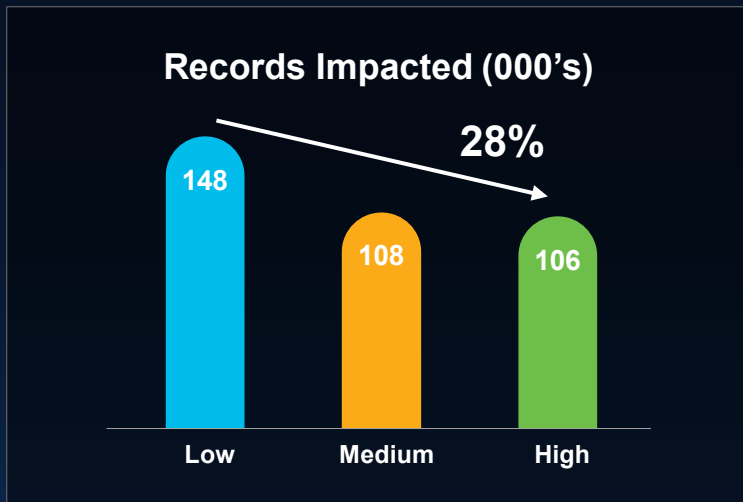
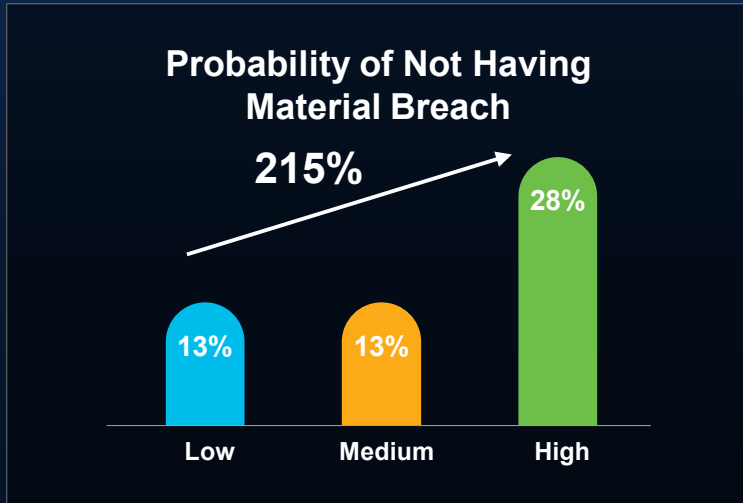
Privacy Benefits Compared to Investments  
(% of Organizations)



Source: Cisco Data Privacy Benchmark Study 2020

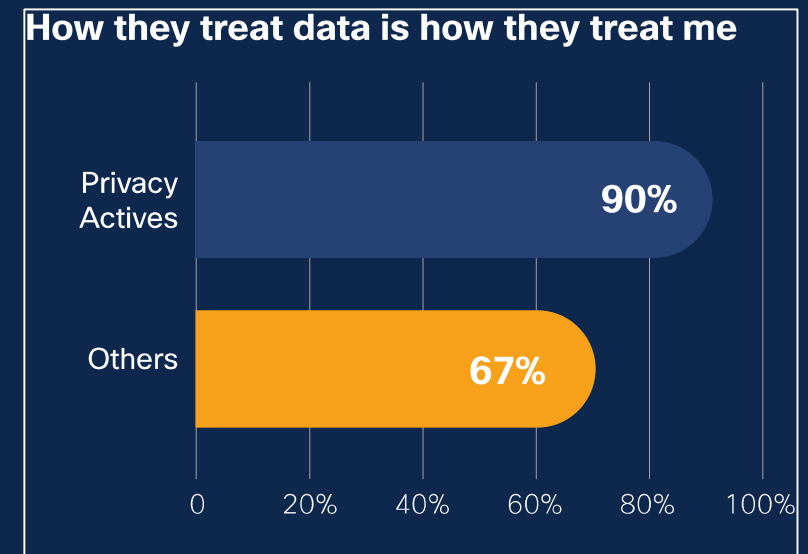
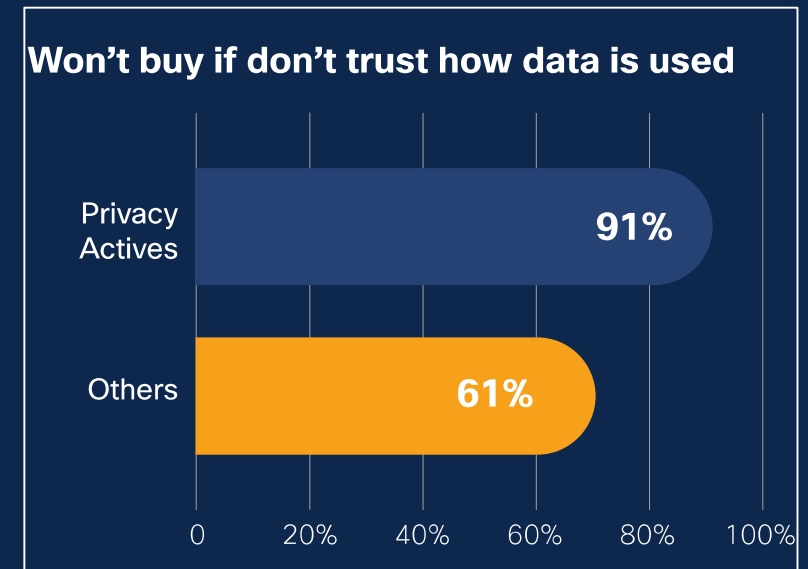
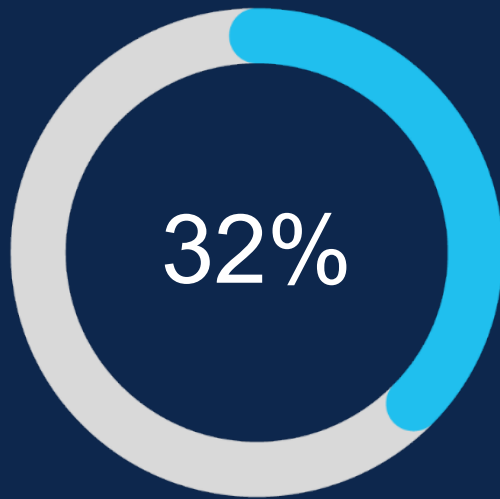
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# Value of Accountability



# The “Privacy Actives” segment

I care, I’m willing to act, and I’ve changed providers or companies over data privacy policies / practices



# What Does Good and Effective Accountability Look Like: the CIPL Accountability Mapping Report

Nathalie Laneret, Director, CIPL

### Select CIPL Members have mapped their privacy management programmes to the CIPL Accountability Framework:

- To demonstrate that **accountability is a verifiable and enforceable** framework.
- To further promote accountability as **standard market practice**, that is law - and sector - agnostic.
- To build **global consensus and expectations** on accountability with regulators.
- To demonstrate that accountability is a **scalable framework** that works for all size/type of organizations.
- To provide **concrete and diverse evidence and success stories** from companies with mature privacy programmes.

### Project timeline and next steps:

- Project start and interviews: May 2019 to Jan 2020
- Report drafting: Dec 2019 to Mar 2020
- Publication of the final report: end of Apr 2020
- Virtual meeting with DPAs for accountability mapping project participants: May 2020
- Further engagement with DPAs and policymakers to be scheduled

# CIPL Accountability Mapping Project

## Overall Findings and Top Messages

1

Accountability is a continuous process for organisations

2

Accountable organisations realise the benefits of accountability (responsible innovation, businesses benefits, sustainability)

3

Accountable organisations are better prepared to anticipate changes (regulatory, business, crisis)

4

Processors strongly embrace accountability

5

Leadership and Oversight is a key element of accountability that enables organisations articulate the importance of privacy

6

Accountable organisations view accountability as a collective effort – it is everyone's responsibility

7

Organisations of various industry sectors, sizes, business models and geographies can be accountable

8

Accountability is risk-based – it can be calibrated to the level of risk at organisation and processing levels

9

Privacy accountability is similar to other areas of corporate compliance, i.e. it is familiar to Boards and senior management

10

Accountability drives consistency and global convergence in data privacy

# Practical Examples of Accountability Measures and Views on Accountability





# Practical Examples

- **Anny Pinto**, *Chief Privacy Officer & Legal Head of Group IT, Adecco*
- **Florian Thoma**, *Senior Director, Global Data Privacy, Accenture*
- **Johan Wisenborn**, *Head of Group Data Privacy Risk Management, Novartis*
- **Damien Kieran**, *Global Data Protection Officer, Legal Director and Associate General Counsel, Twitter*

# Moderated discussions

What have been the benefits of this accountability mapping exercise, and of accountability in general in your organization?

How do you measure the effectiveness of your program?

How do you think the ICO Accountability Toolkit can support your (and other) organizations?



# Questions and Answers



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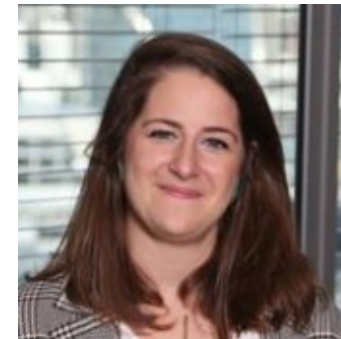
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