



WEST VIRGINIA EXECUTIVE BRANCH

PRIVACY IMPACT ASSESSMENT

TRAINING

JUNE 15, 2015

Agenda (10:15 am to Noon)

- ❖ **The Evolving Privacy Landscape**
- ❖ **What is a Privacy Impact Assessment (PIA)?**
- ❖ **PIA Practice Guide Overview**
- ❖ **Pilot Test Update**
- ❖ **PIA Tool Overview/Demo**
- ❖ **Example Risk Evaluation**
- ❖ **Questions and Wrap-up**

TECHNOLOGY IS changing...

THEN

NOW

We wrote letters

We send messages via **social media**

BUSINESS WAS DONE
IN PERSON AND IN PRINT

Business is done **online** using our
personal information

We stored information
on a bookshelf

We store information
in the cloud

...so are THE **PRIVACY RISKS**

166,801 Privacy complaints in Korea in 2011-12

92% of Canadians say companies should ask permission to track them online

68% of 2012 internet privacy complaints were about social media and smartphone applications in Hong Kong

88% increase in public education and outreach in British Columbia in 2011-12

30% increase in privacy investigations each year from 2007-12 in Macau

\$33.85M assessed in US for privacy violations in 2011-12

78% of Australians have refused to provide personal information online

65% of school children in Mexico learn about online privacy at school

NT 100% increase in time spent providing privacy advice from 2007-12

QLD 86% of people think privacy is important when using or installing mobile apps

NSW 300% increase in privacy enquiries from 2007-12

VIC 33% of complaints in 2011-12 were about data security

88% of New Zealanders say to punish businesses that misuse personal information

What are you **doing** TO PROTECT **YOUR PRIVACY?**

WWW.PRIVACYAWARENESSWEEK.ORG



What is a PIA?

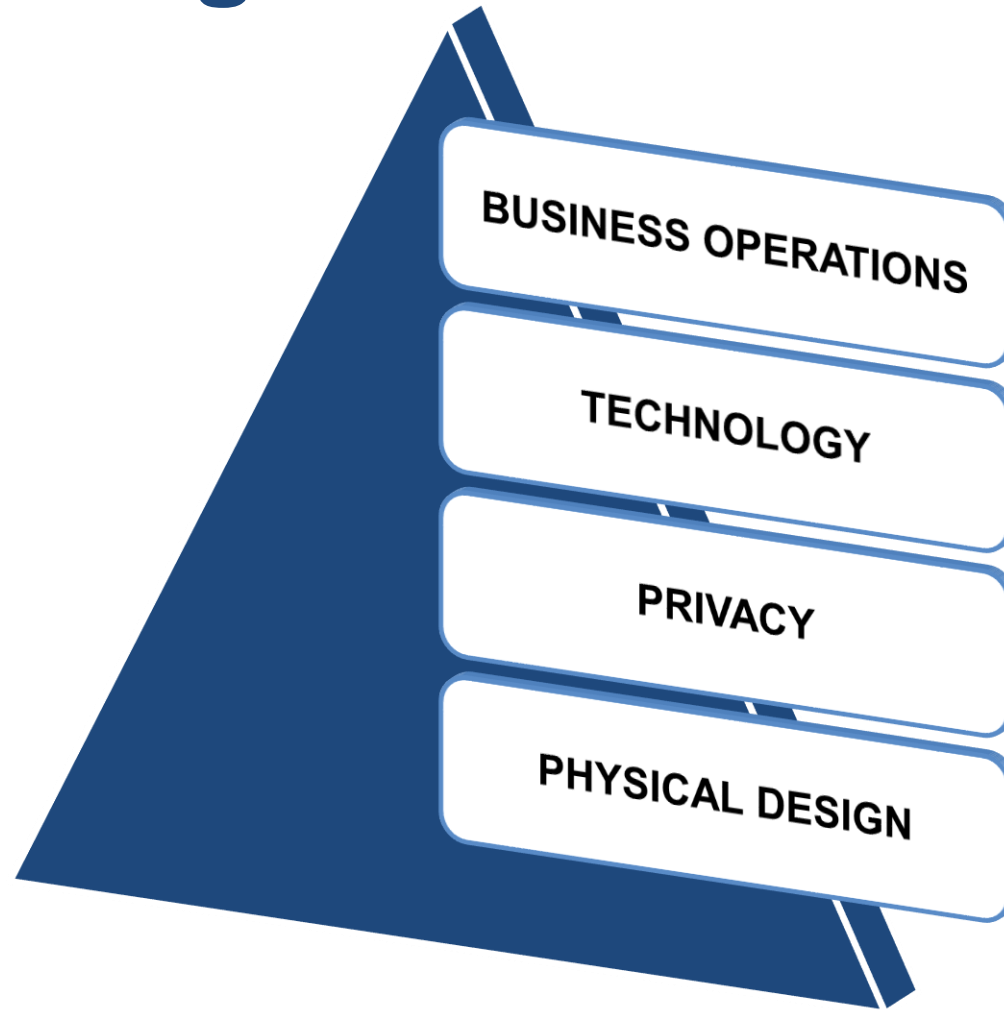


PIA Practice Guide

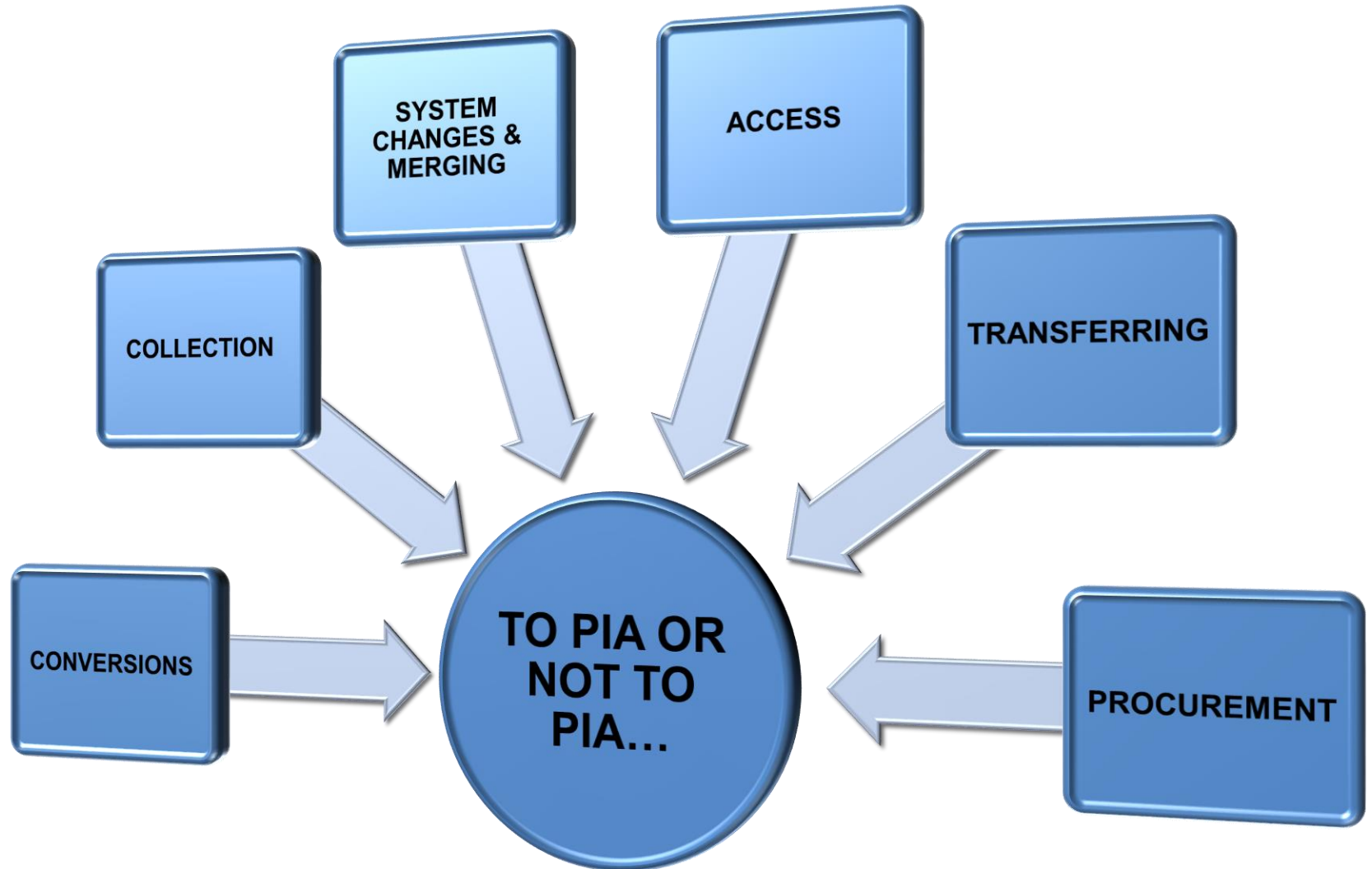
- ❖ **Introduction (Purpose)**
- ❖ **Background**
- ❖ **When to Conduct a PIA**
- ❖ **PIA Process**
- ❖ **Identifying and Evaluating Privacy Risk Solutions**



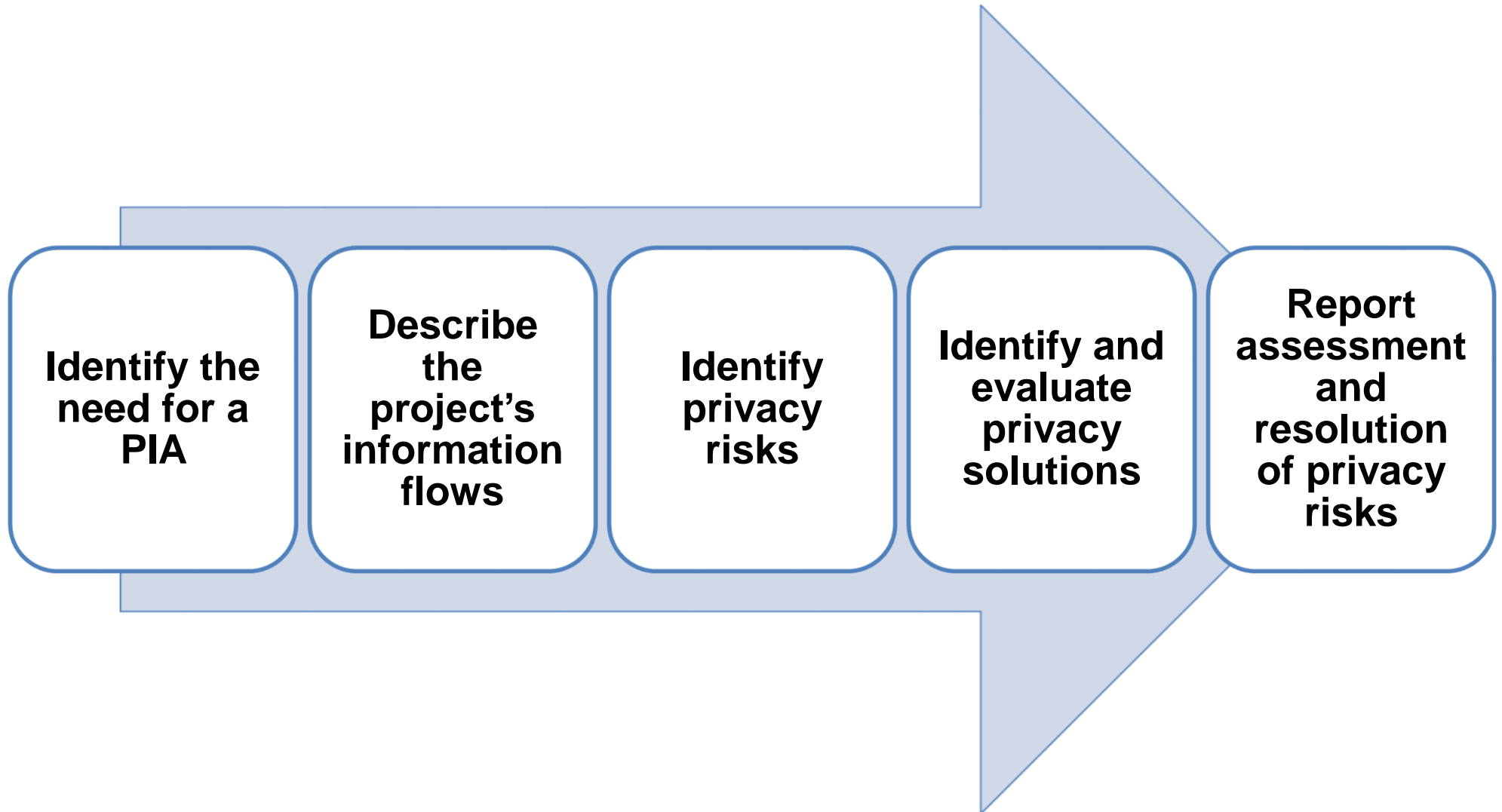
Privacy by Design







The PIA Process



PIA Tool Design Approach

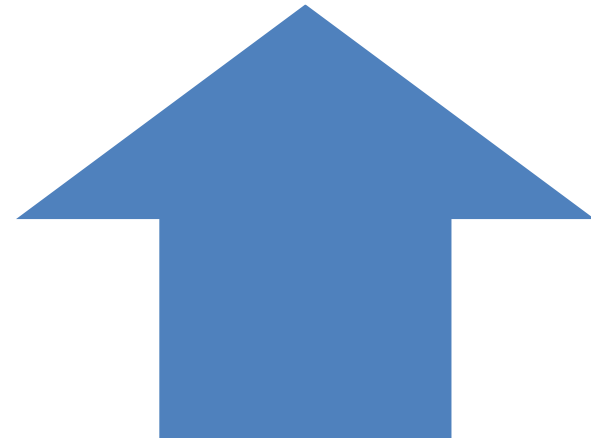


INFORMATION LIFECYCLE

- Collection
- Use
- Disclosure
- Retention
- Destruction

PRIVACY POLICIES

- Accountability
- Consent
- Individual Rights
- Minimum Necessary & Limited Use
- Notice
- Security Safeguards



25Q

- ❖ **PART 1: DEMOGRAPHIC INFORMATION**

- ❖ **PART 2: PRIVACY THRESHOLD ANALYSIS (PTA)**

- Questions 1 to 6

- ❖ **PART 3: PRIVACY IMPACT ASSESSMENT**

- Section: Data Collection, Use and Storage

- Questions 7 to 11

- Section: Disclosure (sharing)

- Questions 12 to 19

- Section: Administrative, Physical and Technical Controls

- Questions 20 to 25





Example Risk Evaluation: Cloud for Email

PRIVACY RISK	DESCRIPTION	RISK SOLUTIONS MITIGATION PLAN	PRIVACY POLICIES
Use	Unsure of legal authority to use the data collected	Review the Privacy Requirement document and/or seek legal guidance. Post Privacy Notice on website	Accountability, Minimum Necessary & Limited Use

Example Risk Evaluation: Cloud for Email

PRIVACY RISK	DESCRIPTION	RISK SOLUTIONS MITIGATION PLAN	PRIVACY POLICIES
Disclosure (sharing)	Users transmitting data that may contain PII.	Use Encryption Ensure users are following privacy/security policies regarding the use of email to disclose any PII.	Minimum Necessary & Limited Use, Security Safeguards

Example Risk Evaluation: Cloud for Email

PRIVACY RISK	DESCRIPTION	RISK SOLUTIONS MITIGATION PLAN	PRIVACY POLICIES
Security Risks	Remote access to data. Using mobile devices to access email.	The DPO will work with the CISO/Security Officer to ensure proper measures are in place to security data (i.e. File Transfer Protocols and Encryption) Ensure employees are trained on Security Policies (including BYOD) and have signed a CA.	Security Safeguards Confidentiality Agreement



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[Privacy](#) > [Privacy Impact Assessment \(PIA\)](#)

Privacy Impact Assessment (PIA)

What is a Privacy Impact Assessment (PIA)?

A PIA is a tool used to assess the privacy impact and risks to the personally identifiable information (PII) stored, used, and exchanged by information systems. A PIA evaluates privacy implications when information systems are created, when existing systems are significantly modified, or new technology is purchased.

Here are just a few benefits of a PIA:

- + It provides a proactive approach to privacy management.
- + It evaluates whether appropriate privacy protections and necessary mitigation or safeguards are present.
- + It applies privacy requirements, complementing organization-wide compliance activities (e.g. HIPAA privacy, etc.)
- + It enhances current data inventories of information collected, used, stored, and exchanged by systems.
- + It provides opportunity for additional education and awareness about privacy.

When should a PIA be conducted?

To be effective, a PIA should be an integral part of the project planning process. It should be conducted to evaluate information privacy and security throughout the lifecycle of a system, product or project, or when sharing or exchanging PII with other organizations or Departments.

A Department should:

- + Start early to ensure that project risks are identified and appreciated before the problems become embedded in the design.
- + Incorporate a PIA into the project initiation phase
- + Start today if the project is already underway, so that any major issues are identified with the minimum possible delay.

The Privacy Impact Assessment is a new program. We welcome your feedback and suggestions for improvement.

Privacy Impact Assessment Guidance

Privacy Impact Assessment Tool

Please plan for this assessment to take about 30 minutes to complete, and be aware that your answers will not be saved. You must complete the entire assessment to generate the report at the conclusion. You will be logged out of the assessment after 20 minutes of inactivity.

Privacy Impact Assessment Training Video Coming soon!

How long will it take to complete the PIA?



