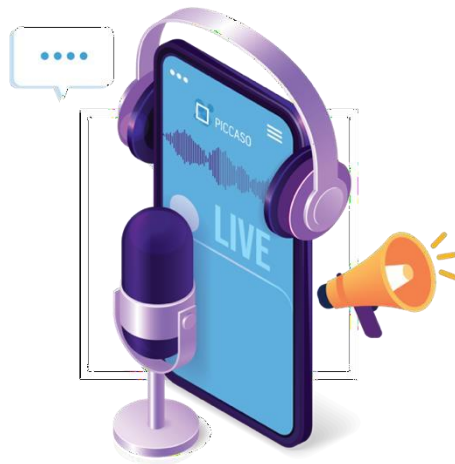




# Privacy & Security Insights with **PICCASO**



## Privacy Operations



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# Privacy Operations

## How to make Data Protection scalable by Building and Maintaining “a” continuously improving Data Protection Management System

We are all evaluating processing activities across our companies, using the tools of other functions and licensing our own privacy tech, yet are we evaluating our own core data protection function related activities and processes enough?

My first in-house boss used to say: *“A fool with a tool is still a fool.”* This short rhyme is obviously agnostic to the data protection in-house industry; however, it captures the core challenge of privacy operations. If we cannot create smooth and sound core and support processes at our data protection function, we cannot digitize them and we cannot serve our internal stakeholders and the data subjects in an efficient and effective way.

Therefore, we have to get things right including: proper core and cross functional processes (procurement, legal, information security), deployment of tools like ChatGPT, or calculation of the impact of new data protection and other digital acts on budget and headcount.

### What does Privacy Operations mean?

Privacy Operations (or Privacy Ops) is a framework involving a set of business processes and activities aimed at running the in-house privacy and data protection function like a business. It aims at maximizing efficiency, reducing costs, creating value for the business, and overall improving the privacy function’s bottom line. Furthermore, it reimagines how to efficiently implement privacy management throughout an organization, also (but not exclusively) by means of automation.

Our Privacy Ops framework is based on a Legal Operations Framework conceived around the early 2010s. The Legal Operations Framework grew serious traction when [CLOC \(Corporate Legal Operations Consortium\)](#) was founded in the US in 2016. CLOC is a global community of experts focused on redefining the business of law by promoting effective and efficient management of corporate legal departments. Today, it counts around 4,000 members and hosts a variety of events (from industry-leading meetings to webinars and podcasts), offering opportunities for professional development and networking, and to stay current on the latest innovations, projects, and technologies.

### How did we get started and how can you get started?

How did we start with Privacy Ops and building-up a data protection management system (DPMS)? We read the CLOC Core 12 and identified the 12 core competencies taking into account all the existing privacy obligation under privacy regulations across the globe. Then audited our processes via a Data Protection Maturity Assessment (DPMA). We saw how much we had already achieved and also how much we had to do. We created a plan (or a project roadmap) with an overview of what we needed to achieve in 1-3 years. As with all other legal and privacy team goals, we aligned the privacy operations goals with the main goals of Allianz Partners overall, and of each single business unit (or BU). We needed to consider budget limitations and discussed the goals with the Group CFO.

How should you get started? Start with getting to know your budget related processes, fighting for budget successfully, allocating budget for consulting support, tools and new resources and getting the buy-in of key stakeholders.

### The Importance of Assumptions

Allianz Partners’ Data Protection Privacy Ops efforts follow a work-from-assumption approach (i.e. assumption-based planning). As all decisions and plans are indeed based on premises

that are not yet confirmed or proved to be true, this approach requires. Assumptions must be identified and tested both at a global and local level as they might vary. While building-up a DPMS, do not forget to write down your assumptions, to test them and to communicate them to your top management on a regular basis.

### **Building and maintaining “a” Data Protection Management System – a Marathon**

First, there is not the one DPMS There are many. Second, if you implement a DPMS, a comprehensive privacy and data protection program within an organization cannot be considered a one-time exercise. Changes within the organization, new processes, as well as the employment of new tools and technology impose the need to develop a system including continuous improvement cycles where processes can be easily adapted and ameliorated, while securing improvements by updating existing guidelines (i.e. global and local functional rules) and informing the employees by updating the company’s intranet.

### **Building a Data Protection Maturity Assessment**

Our Allianz Partners DPMA plays a central role our DPMS. The DPMA is a self-assessment on legal entity level consisting of 12 sections providing a comprehensive and accurate assessment of the current maturity privacy and data protection state. It is the core tool to increase effectiveness and efficiency of our core and support processes while supporting us to fulfill our accountability obligations under data protection laws and regulations.

We based the DPMA on the IDW PH 9860.1 (The guidelines IDW PH 9.860.1 on auditing principles, procedures and measures in accordance with the EU GDPR and the German Federal Data Protection Act), which is published by the Institute of Public Auditors in Germany (In German: *Institut der Wirtschaftsprüfer* or *IDW*). After taking out the German elements, we developed maturity levels and a scoring for the different areas under the IDW PH 9860.1.

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### **The Data Protection Maturity Assessment as a Jack of all Trades**

The DPMA has been proven a real jack of all trades, amongst others, it

- integrates the data protection organization more easily into the existing compliance landscape and internal system of governance;
- facilitates to obtain a structured and reasonable data protection level for the data subjects via a clear governance according to risk profiles;
- decreases the likelihood of data breaches via effective processes;
- serves as a starting point for local hyper care in case of a new data protection law;
- enables a risk-based approach for DPPs/DPOs while mandating harmonized measures and facilitating oversight responsibilities;
- supports proving accountability (e.g. under GDPR) via a control framework and therefore prevent and reduce fines respectively;
- acts as a trigger for gamification;
- allows effective financial benchmarking by comparing DPMA results from different years;
- is used for prioritization of data protection quality assurance efforts;
- is used for reporting to the Board of Management (BoM) and other committees;
- is used to tell privacy stories.

### So what is next?

We are currently developing an AI management system. Needless to say, we are and will be leveraging on our experience with Privacy Ops and the DPMA during build and run.

Listen now on:



### About Us:

We are a UK based non-for-profit privacy special interest group, led by seasoned volunteers who are senior leaders in privacy and data protection.

The primary aim of PICCASO is to create a community of professionals that share the value of exchanging 'know how', insights, clarity and explanation on specific privacy and data protection topics designed to distinguish between legal requirements, operational implementation, and strategic objectives, with the aim of greater understanding in how to achieve optimal outcomes based on good practice and thought leadership.

The PICCASO community is drawn from across the UK, Europe, and beyond, and from all industry sectors.

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