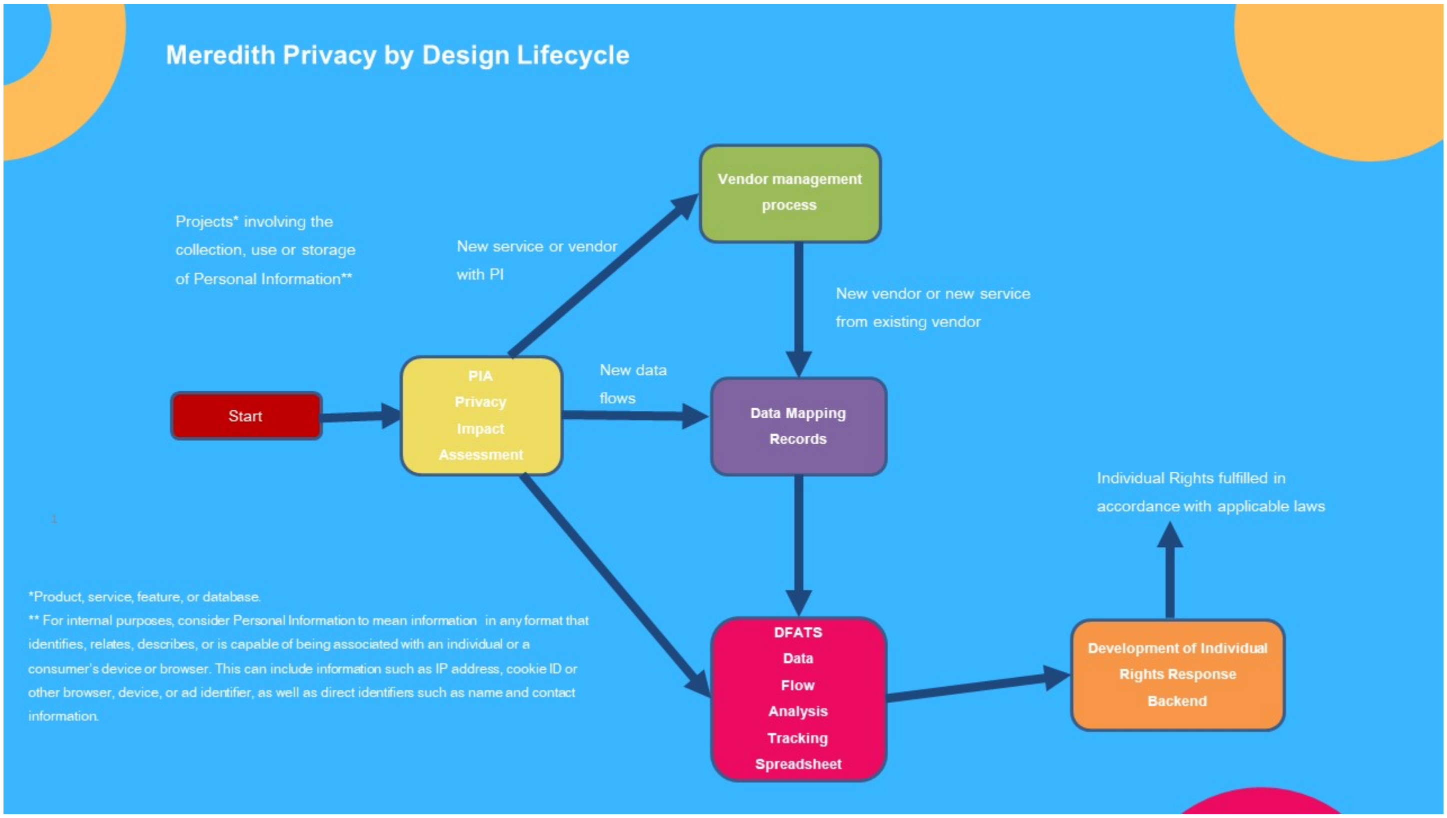
How to find and track data for rights fulfillment

Steps to implement the Data Flow Analysis Tracking Spreadsheet



I. Initial data mapping process

a. In person interviews
    i. Identifying known use cases
    ii. Identifying right business and technical owner
    iii. Asking questions to determine if sales are occurring
    iv. Following the trail to identify new uses cases

b. Deliverables
    i. Article 30 or similar record in a written form or table
    ii. Visio map
        1. Phases of data collection, use, sharing and destruction
        2. Identify individual data elements
        3. Capture visuals and written detail of data flow
    iii. Validation back to interviewed stakeholders to ensure accuracy and alignment

II. Maintaining data map process

a. Create list of business owners for each known use cases

b. Issue policy that establishes
    i. Responsibility of business owner to participate in creating data maps
    ii. Responsibility of business owner to keep maps current
    iii. Responsibility of business owner to designate a technical owner

        iv. Responsibility of business to inform Privacy Office of any new use cases
   c. Establish process to ensure the information collected remains accurate and current
        i. Processes for business owners to report changes or new use cases may be leveraging PIA process, providing a self-service tool or giving direct access to records to business owners
        ii. Privacy Office should define a regular validation process and ensure cadence and volume is practical given resource capacity such as:
            1. Providing the documents and requesting confirmation they are accurate
            2. An assessment, PIA form or tool that confirms aspects of the record
            3. New interview based on level or risk, complexity of activity or amount of change
   d. Ensure alignment with leadership on the importance and resource needs of the policy
   e. If appropriate, make outputs available to the business and key partner functions to increase transparency and coordination

Data Mapping Overview

III. Creation of Data Flow and Analysis Tracking Spreadsheet (DFATS)

   a. Create a dashboard view of when there are sales to ensure alignment with the business and for consumer rights fulfillment
   b. Pulling from the data mapping and PIA distill entries into tabs (see image below)
        i. Shares with a Service Provider
        ii. Shares with a Third Party
        iii. Shares with a Third Party (no sale)
        iv. Receives data (is the third party)
        v. Acts as a Service provider
        vi. Mixed data use (combines entries from other tabs where depending on the part of the business or the use case a vendor may be a service provider in some occasions and a third party in other)
   c. Update on a regular cadence
        i. Consider adding a tab to serve as a Change Log
        ii. Consider adding a Pending tab of activities that are planned but may not yet be active

IV. Build the backend to fullfill rights