



WRANGU

EBOOK

Top 10 Tips To Address Fast Changing US
Data Privacy Requirements

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Introduction

Data Privacy Law is gaining momentum across US states. The California Consumer Privacy Act (CCPA) is now in force and others are quickly following.

Over the last few years, several US states have passed data privacy and data breach laws which place specific regulatory requirements on private sector organisations, charities, not-for-profit bodies and governmental institutions who process personal information of consumers and individuals located in these US states. For most organisations, these requirements have led to the introduction of new processes, systems and personnel to enable them to meet their obligations. So, what can an organisation do to prepare? We have put together our top 10 tips for organisations to get started.

Top 10 Tips

A look into the details of the US state laws reveals several requirements of interest including consumer rights fulfilment within specific timelines, maintenance of a record of processing activities, sending of personal data breach notifications to relevant state Attorney General and impacted data subjects, the conducting of privacy impact assessments and processing of personal information with appropriate, and in some cases, specific safeguards. So how should you approach these challenges:

01 Know exactly what data is collected by the business

This can be done by establishing a comprehensive and sustainable data inventory. A business must know what data was collected and where it resides to protect it, produce it, and eventually delete it. It simply can't meet obligations effectively without having a vigorous data inventory.

How Privacy Hub by Wrangu helps: Privacy Hub allows you to map your data against your key business processes and assets, allowing you to very quickly identify and manage as required.

02 Create transparency on how you use collected data to meet state privacy policy obligations

It is key that organisations understand how data comes into the business, how it is used, and for how long it is kept. The most advanced organisations have clear data flow maps to help them and their customers/clients/employees easily understand.

How Privacy Hub by Wrangu helps: Privacy Hub is built on live data that is always available. It is possible to define and capture data retention rules, privacy statement and, with the consent management module, map historical consents.

03 Put in place policies and controls that support compliance with Data Privacy Laws and state constitutional requirements

It is vital to identify and select data protection strategies and set up policies and controls that will work in your organisation. It is important to consider where potential consumers of your products and services might reside as well as where your employees will be based.

How Privacy Hub by Wrangu helps: Being built on the ServiceNow platform Privacy Hub seamlessly integrates with the ServiceNow IRM module allowing you to put in place automated policies and controls and execute them through the Privacy Hub.

04 Implement privacy-by-design practices and standards

Assessing all new projects, as well as existing services, to understand whether there is a data privacy impact is essential. Adopt a multi-stakeholder approach ensuring you include departments that collect and use the personal data. Ultimately consider data privacy as a holistic risk management issue for the organisation and not just something confined to technical experts. This, in itself, will act as safeguard to the use of personal information.

How Privacy Hub by Wrangu helps: Privacy Hub facilitates documentation, review and acceptance/mitigation of the risks in acquiring, and processing of, personal data, including capturing what data and for what purpose, right from the very beginning of a new project/activity.

05 Determine which of your partners you share personal information with

Some US laws, such as CCPA, stipulate that you need to inform consumers who you have sold their information to, and thus this is essential in maintaining consumer rights and mitigating against fines and legal actions.

How Privacy Hub by Wrangu helps: Privacy Hub captures which partners data is shared with, and on what legal basis. It also links seamlessly into the ServiceNow Vendor Risk module ensuring that complete vendor evaluation and management around data requirements can be managed in a single place in real time.

06 Review your contracts with relevant vendors to ensure they are aligned with your data privacy policies

A data processing agreement can be the easiest way to ensure your vendors respect and adhere to your policies and required security practices.

How Privacy Hub by Wrangu helps: Privacy Hub captures the legal basis by which the data is transferred to a partner and can be configured to create positive confirmation of contract conformance. In addition, the link into ServiceNow's Vendor Risk module allows continual transparent supplier management.

07 Stay up to date with new regulations and changes in data privacy laws

In today's very fast-moving regulatory environment it is essential that organisations stay up-to-date with the changes and additions to privacy regulations and requirements.

How Privacy Hub by Wrangu helps: Privacy Hub is updated at least on an annual basis for changes in privacy laws and regulations. In addition, if there is a specific mid-release change that is urgent Wrangu will release that as fast as possible.

08 Simplify your privacy policy and explain clearly how you will use personal data

Ensure your privacy policy is visible in your online presence, especially landing pages, online forms or any other data collection points. This is often a regulatory requirement so will also aid in overall compliance.

How Privacy Hub by Wrangu helps: Privacy Hub tracks privacy policy and consent policy by specific process and enables those managing your online environment to have clarity.

09 Create clear process in case of potential data breach

All privacy regulations have elements that relate to data breach and most are time based. Organisations should have clear processes in place in advance of a potential data breach to ensure an efficient response, thus reducing cost as well as the risk of non-compliance.

How Privacy Hub by Wrangu helps: Privacy Hub acts as a data breach register, supporting your Incident Response process by ensuring all information that is required to be submitted to a regulator is captured as part of the core triage process. In addition, if ServiceNow's Security Operations module is in use, it can become a seamlessly integrated part of the normal Security Incident Response process ensuring privacy requirements are captured and available real time without the need for sub-processes.

10 Understand, under what criteria a request for information can be made and what information needs to be provided

Develop a process/technology to cover all potential data requests otherwise you risk costly reactionary responses and potentially fall out of compliance with regulation.

How Privacy Hub by Wrangu helps: Privacy Hub offers very simple data subject request forms to be deployed as you wish within, and outside, the organisation. A structured process aligned to the information captured within Privacy Hub (and ServiceNow modules if available) ensures significant efficiencies are gained over ad-hoc manual approaches.

How The Privacy Hub By Wrangu Supports US Law Requirements

The Privacy Hub by Wrangu, is a data privacy management solution that automates and harmonises the disparate activities of various teams into one seamless process, ensuring ongoing compliance.

Tailored to fit your business needs, the privacy hub by Wrangu includes multi-regulation support for multiple US Privacy Laws such as the CCPA, Nevada, New York, Washington DC, Texas, Illinois and New Jersey. As well as global privacy regulations such as GDPR, Singapore, Canada, Brazil's LGPD and Turkey's LPPD among others.

The following US states data privacy and data breach laws are supported by Privacy Hub by Wrangu:

- California - California Consumer Privacy Act (CCPA)
- Illinois - Personal Information Protection Act (PIPA)
- Nevada - Online Privacy Law (OPL)
- New Jersey - New Jersey Consumer Privacy Act (NJCPA)
- New York - New York Privacy Act (NYPA)
- Texas - Texas Consumer Privacy Act (TCPA)
- Washington - Washington Privacy Act (WPA)



Consumer Rights Requests (DSR) Module

The data subject rights requests module provides the ability for data privacy teams and consumers to raise and manage consumer rights requests allowing organisations to:

- 01** Capture DSR request details.
- 02** Validate the consumers and / or agents' identity and data subject rights requests.
- 03** Manage specified SLA durations to fulfil requests.
- 04** Have a consolidated view of all open and closed consumer rights requests received from a particular consumer over a given period.
- 05** Indicate whether a DSR request should be fulfilled based on the lawful basis of processing the information and possible reasons to decline requests.
- 06** Request approval from a vendor or third party controller to process a DSR request when acting as a data processor.
- 07** Confirm with consumers how they would like to receive information in response to right to access requests.
- 08** Dynamically create action tasks for the notification of third parties when fulfilling a right to erasure or right to rectification request.

Privacy Threshold Assessment (PIA) Module

The PIA module provides the ability to perform an initial PIA screening questionnaire to determine if a new processing is likely to result in a high risk to the rights and freedoms of consumers and if required, conduct a full assessment for new projects or re-assess existing projects, ensuring adherence to privacy by design principles. The PIA module also provides:

- 01** Automatic evaluation of PIA responses with possible concerns raised for consideration.
- 02** Built-in configurable risk calculation engine with risk ratings displays based on responses.
- 03** Configurable approval levels throughout the lifecycle of an assessment including facility to capture and monitor advice from data protection officers.

Record of Processing Activities (ROPA) Module

Comprehensive engine enabling the robust documentation of processing activities with the ability to relate a ROPA directly to services, processes or configuration items within the ServiceNow CMDB. The ROPA module also supports:

- 01** Capture of all data sets required to fulfil the principles of the regulation on the treatment of personal data. These principles include accountability, identifying purposes of processing, consent, limiting collection and limiting use, disclosure and retention.
- 02** Maintain version history for each ROPA record to support auditing and complaints management activities.
- 03** Flag changes in the CMDB and other sources that would suggest a need to update the ROPA including provision of adequate technical and organisational measures for the security of personal data.

04

Generate and update a ROPA from a PIA utilising the same data set from the DPIA.

05

Automatically indicate what rights consumers can exercise against the data collected as part of this processing.



Data Breach Reporting Module

Acts as a register of all data breach incidents as they relate to personal data and facilitate the automatic determination of whether a report or notification should be sent to the Attorney General and other governmental institutions and / or affected consumers. This module also provides:

01

Standard process to support data gathering to determine if the personal data breach is likely to cause relevant risk or damage to the consumers.

02

Automated data breach SLA calculator to ensure regulatory stated reporting timelines are monitored and complied with.

03

Generate and assign dynamic tasks to relevant parties in addressing data breach reporting requirements.

04

Report creation for notification to the Attorney General and other governmental institutions and / or communication to affected consumers.

05

Easy integration with ServiceNow's Security Incident Response module.

What Makes The Privacy Hub Different?

Tailored for Global Privacy Compliance

Privacy Hub by Wrangu is tailored to fit for global privacy compliance, not solely CCPA or US laws. This enables organisations to take a more comprehensive approach to privacy compliance. The tool serves to fulfill a wide range of privacy compliance challenges. Built on the ServiceNow platform the tool can deeply integrate, making Privacy Hub a powerful, single source of truth privacy compliance solution.

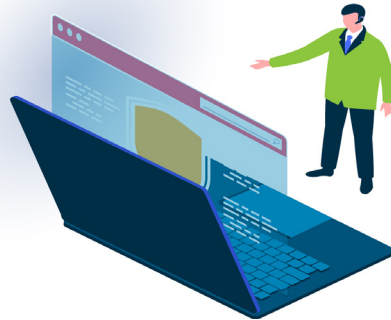
Customizable Templates & Flexible Workflows

Privacy Hub offers unmatched flexibility with customizable assessment templates and workflows to fit diverse organisational environments. The tool employs a customizable organizational hierarchy and powerful role-based access controls, offering your organization the ability to scale while maintaining a clear separation of duties.

About Wrangu

Wrangu provides tailor-made software and solutions for integrated risk, security and privacy management based on the ServiceNow Platform. Founded in 2016 with the mission to build tailored software solutions to enable clients to manage very complex requirements regarding security, privacy and integrated risk management.

More than 60 customers, among the largest enterprises across the globe, trust Wrangu's products and services for their privacy, security and integrated risk programs.



Team Of Dedicated Professionals

The #WranguDreamTeam are incredibly passionate about what they do, and 100% customer focused. Working together we build a roadmap based on our customers' needs ensuring our customers receive a solution of the highest level of quality tailored to their business needs. Wrangu's customers are supported by a dedicated global team ensuring success from consultation through implementation to ongoing support including resources and boasts a customer satisfaction score of 100%.

Wrangu's dedicated team are located across headquarters in Amsterdam with an additional office in London.



To learn more, visit www.wrangu.com or connect on LinkedIn and Twitter.