

# Virtual Privacy Officer (vPO)

## The challenge:-

Canadian privacy laws require organizations to have a Privacy Officer, a person responsible for their organization's privacy program. As personal data increases in volume and type, becomes more important to core business activities, and as privacy laws evolve and new technologies are introduced, the Privacy Officer's role is becoming more important - and much more challenging. Organizations themselves face multiple challenges:

**Compliance burden increasing:** More laws impact your data (federal privacy laws, provincial privacy laws, global privacy laws (e.g., GDPR, CCPA) and require your Privacy Officer be familiar with multiple jurisdictions and requirements.

**COVID-19 challenges:** With employees working from home, your privacy program may not have kept up with your new practices or new technologies (e.g., online payments, video conferencing, etc.) that you are now using. With employees partially returning to work, your privacy program may need to be adapted again to reflect the 'new dynamic' of your organization.

**Reductions in force:** Layoffs, furloughs or parental or maternity leaves may mean your existing Privacy Officer may not be available, so the Privacy Officer role is unfilled (or, being filled by a CEO, CTO or GC, in addition to their already significant work duties).

**Talent shortage:** Hiring a skilled Privacy Officer with demonstrated privacy program experience is challenging due to a talent shortage. Many organizations have hired more junior employees to fill this role and hope they will "grow into it".

As organizations escalate their use of sophisticated technologies, migrate more information to the cloud and move their workforces to digital, the role of a Privacy Officer becomes integral to keeping your data safe.

## Our solution:

Virtual Privacy Officer (vPO): We provide you with experienced counsel to fill the role of Privacy Officer in relation to your business' needs.

### How it works:

The vPO solution is a monthly flat-fee subscription service.

Clients subscribe to a fixed monthly tier of hours and are free to call with their questions, ask for assistance with their privacy program, or seek advice on how to manage privacy incidents. No more concerns about being "on the clock".

There are a variety of tiers, so clients are able to choose the tier that works best for them. The vPO can be an enterprise-wide resource, or a resource aimed at supporting a specific role or function.

### The vPO can:

- Assist in managing risk to your organization by overseeing corporate compliance with applicable privacy laws;
- Ensure necessary privacy work gets done, risk is addressed, and projects move forward;
- Relieve the General Counsel of a substantial portion of privacy and privacy-compliance work, freeing them up to address other legal issues;
- Serve as a subject matter expert for privacy-related concerns and assist management in navigating the current changes and guidance provided by legislating bodies;
- Ensure other in-house resources have visibility into the various privacy issues and processes;
- Fill knowledge gaps for Privacy Officers new to their role, or for less experienced Privacy Officers.

### Success stories:

- **Project at risk of interruption:** A commercial landlord/retail property was embarking on a digital transformation project that saw it begin to accumulate a significant amount of personal information. It recognized the need to create a Privacy Officer role and did so. However, after about a year, the Privacy Officer took parental leave. The client needed someone with privacy experience to manage risks associated with its now-stalled digital transformation project. Dentons vPO solution was able to provide a tailored solution that allowed the project to continue on time.

- **Privacy Officer laid off:** A network of medical clinics acquired multiple other medical clinics and was working to integrate their various privacy practices. However, COVID-19 meant a reduction in force was necessary and the organization lost its Privacy Officer. Dentons vPO solution continued the work of integration of the clinics in a high risk, highly regulated health environment.
- **Record retention project:** The company had tried for many years to institute a records retention/information governance framework but the work never seemed to get done. As the company moved to embrace the digital economy, the digitization and effective management of information, both past and present, became critical. Dentons vPO solution was able to drive the records retention project to conclusion.

### How clients benefit:

- Peace of mind: We provide a worry-free solution to navigate the fluctuating landscape of privacy legislation and privacy risk.
- Customized and scalable: Our solution is completely customizable to our clients' business, and can be scaled up for cross-jurisdictional organization, or scaled down for our clients who operate in one or two jurisdictions across Canada.
- Cost certainty: We are happy to provide cost certainty with a monthly subscription model that fits your needs.
- Reduced privacy concerns: We help businesses identify relevant timelines, allowing them to destroy personal information, reducing the risk (and cost) of a privacy breach.

## Contact



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