

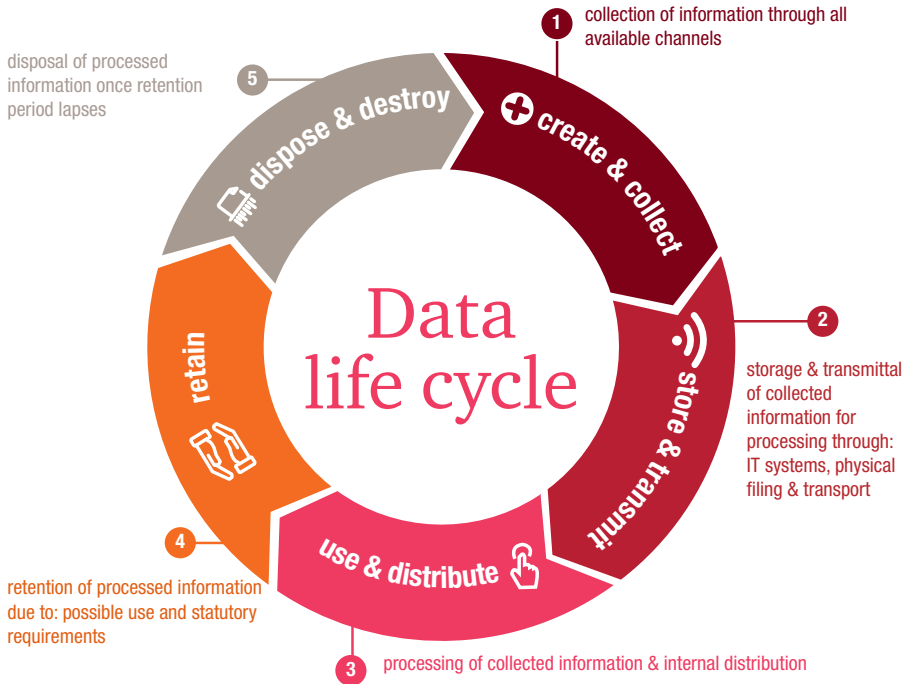


# Journey towards DPA compliance

Data privacy  
compliance

# What is Data Privacy Act of 2012?

An act protecting individual personal information in information and communications systems in the government and the private sector, creating for this purpose a National Privacy Commission, and for other purposes



Data privacy encompasses the rights of individuals and obligations of organizations with respect to the collection, storage, use, disclosure, retention, and disposal of personal data i.e. across the data life cycle.

## The Five Commandments of the National Privacy Commission

**1** Commit to comply: Appoint a **Data Protection Officer (DPO)**

**2** Know your risk: Conduct a **Privacy Impact Assessment (PIA)**

**3** Write your plan: Create your **Privacy Management Program (PMP)**

**4** Be accountable: Implement your **privacy and data protection (PDP) measures**

**5** Be prepared for breach: Regularly exercise your **Breach Reporting Procedures (BRP)**

# What's on your mind?

## **What does privacy mean to you?**

You need to better understand the importance of privacy within your organization and how it fits within your overall business strategy.

## **Are you maximizing the potential of personal data in a legally compliant way?**

You want to balance your need to gain a good return on your personal data assets with your need to be compliant with your legal duties and your desire to build and maintain customer trust.

## **What data is held?**

You are not sure what personal data is held and the purposes for which it is being used. Therefore you are unable to ensure that all personal data is being properly protected and used in a legally compliant way.

## **Where is the data?**

Personal data is distributed across the organization, often sitting within numerous divisions and technologies, and as a consequence there are significant challenges in controlling its utilization.

## **Who has access?**

You are unable to determine who has authorized access (including third parties) to personal data versus those who may have accidentally or intentionally elevated their privileges resulting in a breach or loss.

## **How vulnerable are you and your data?**

You are unclear of the internal and external threats to the security of your data and looking for assurance that appropriate controls are in place to ensure compliance with all relevant regulation and standards. In addition, you are not confident that you are well prepared to respond to a breach and you are looking to test your capability.

## **Where do I begin, to make sense of it all?**

## **Where am I today? Where do I need to get to? How do I get there?**

You know that you need to have a strategy for handling personal data and for achieving legal compliance, but you do not know where to begin, or how to justify your choices.

**We can help.**

# Our approach

The Five Commandments has been set by the NPC as the baseline for DPA compliance. Collectively, these are used as reference by organizations in crafting their “compliance journey”. Having been at the forefront of the conversations with the NPC on DPA compliance, we are able to have a good grasp of the regulator's perspective on what compliance would look like and the specific areas that they will look into when they conduct their compliance monitoring. We have mapped our approach to address each commandments as follows.

## **Activities where we can assist**

Data Protection Officer (DPO) • Data Privacy Charter • Baseline calendar of DPO office

Personal data inventory • Data flow narratives (data life cycle) • Privacy Impact Assessment report • Foundational roadmap for remediation

Data Privacy manual

Data privacy training • Vulnerability Assessment and Penetration Testing (VAPT) • ISO 27001 Gap/Readiness assessment

Personal data breach management plan

## How PwC can help

For a deeper discussion on data privacy, contact our team:

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