

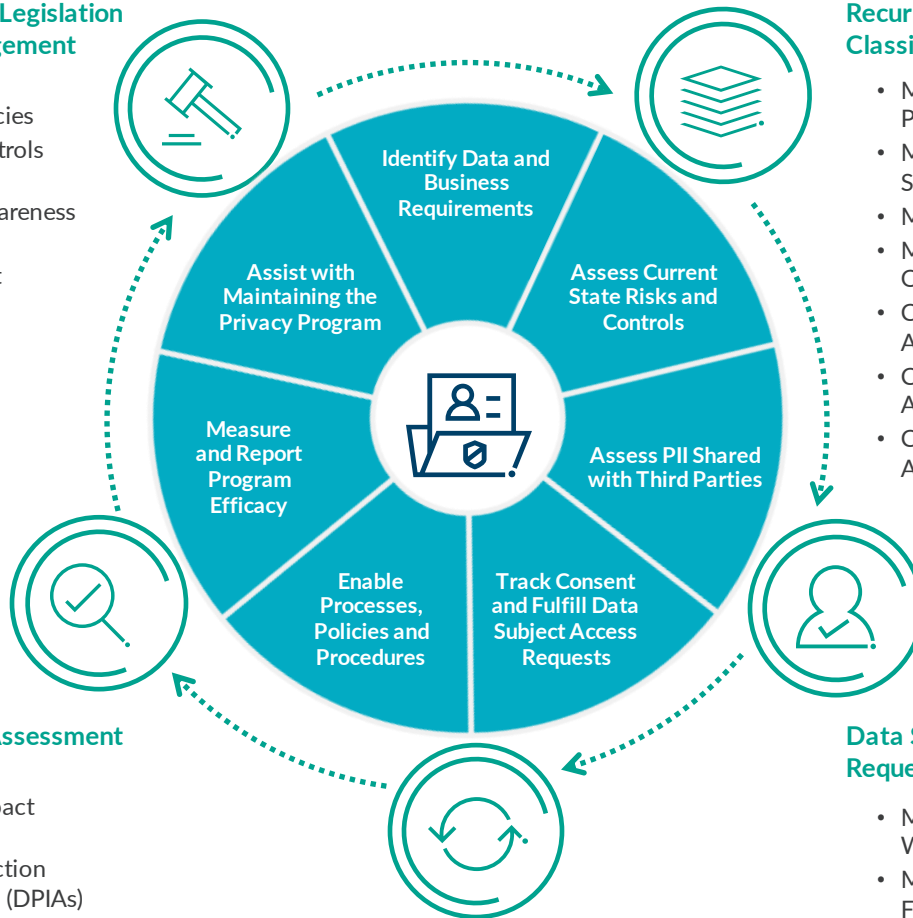
Protiviti PraaS™ – Privacy as a Service

Tailored, full-service support for privacy priorities

At Protiviti, we partner with our clients to understand your jurisdictions and obligations, assess needs, implement appropriate compliance measures and safeguards, and respond to new and changing regulations. Protiviti PraaS™ delivers a customized privacy service which uses market-leading analytics, optimizing your overall investment to manage privacy data governance and compliance.

Monitoring Privacy Legislation and Program Management

- Update Privacy Policies
- Update Privacy Controls Baseline
- Conduct Annual Awareness and Training
- Measure and Report Program Efficacy
- Maintain Privacy Notifications



Recurring Data Inventory, Classification and Assessments

- Maintain Inventory of Processing Activities
- Maintain Inventory of IT Systems and Data Classifications
- Maintain Data Maps
- Maintain Inventory of Privacy Obligations
- Conduct Compliance Assessments (GDPR, CCPA, etc.)
- Conduct Data Protection Assessments
- Conduct Third-Party Assessments

Privacy By Design Assessment & Engineering

- Perform Privacy Impact Assessments (PIAs)
- Perform Data Protection Impact Assessments (DPIAs)
- Support Privacy by Default & Design Engineering

Data Subject Rights (DSR) Request Management

- Manage Request Intake and Workflow Process
- Manage Access Request Fulfillment Process
- Manage Third-Party Request Fulfillment Process
- Monitor Consent Management Practices

Privacy Platform Management

- Continuous Administration and Configuration of the OneTrust Environment



Recurring Data Inventory, Classification and Assessments

Sustainable privacy programs are built on a foundation of **data management and governance**. We operationalize privacy management and dynamic compliance changes with transformative techniques that embed privacy, risk and compliance controls with business objectives. Our team assists with **building and maintaining accurate records** for how personal information is handled, ensuring you are compliant with evolving privacy laws and manage your third-party due diligence.

 <p>Maintain Data Processing Inventories and Data Maps</p> <p>Protiviti maintains Record of Processing (ROPA), IT System and Data Inventory repositories, ensuring all records are complete, accurate and up to date.</p>	 <p>Privacy Compliance Assessments</p> <p>Protiviti executes privacy assessments against privacy and data protection regulations to identify gaps, develop and facilitate remediation plans.</p>	 <p>Third-Party Risk Management</p> <p>Protiviti conducts privacy relevant assessments of third-party data processors and integrates these with your Privacy by Design reporting.</p>
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These services could include the following key components:

<ul style="list-style-type: none"> Conduct an annual or as-needed review and updates of the Processing Activities (ROPA), IT System/Data Inventory, Data Classifications, and Data Maps to ensure completeness and accuracy. Process ad-hoc requests related to changes in Processing Activities (ROPA), IT System/Data Inventory, Data Classifications, and Data Maps. 	<ul style="list-style-type: none"> Conduct an annual Privacy Compliance assessment against applicable regulatory privacy obligations. Conduct ad-hoc assessments for new privacy requirements. Conduct data security assessments to validate data protection and data security controls for high-risk internal IT systems and applications- 	<ul style="list-style-type: none"> Conduct annual third-party assessments, including prioritizing all vendors who process personal data on behalf of the client and evaluating high-risk vendors against contractual and regulatory privacy obligations. Conduct ad-hoc assessments for new vendors.
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Business Outcomes

	Continuously updated visibility of your data and process flows		Monitored privacy program compliance
	Managed vendor risk assessments		Managed ROPA with process owner support and guidance
	Replicable/scalable vendor risk assessment framework		Proactive risk identification and reporting



Data Subject Rights Request Management

Centric to today's data privacy regulations are Data Subject Rights (DSR), aimed at providing consumers with **more transparency and control** over their personal information. Consumers may exercise these rights via a privacy request that can typically be categorized as an **informative request** (e.g., Right to Access), a **corrective request** (e.g., Right to Deletion or Erasure, Right to Rectification or Correction), or a **restrictive request** (e.g., Right to Restriction of Processing).

Manage Request Intake and Workflow Process

Protiviti offers a **support service** suitable for data privacy obligations, and is committed to providing a **positive data subject experience**.

Manage Access Request Fulfillment Process

Protiviti **executes against established workflows** to collect, analyze, communicate and fulfill data subject 'Access' requests.

Manage Third-Party Request Fulfillment Process

Protiviti leverages pre-established communication templates to engage with third-parties.





These services could include the following key components:

- Supplement the organization's first and second level support teams by providing an end-to-end management solution for Data Subject Rights Requests and complaints.
- Integrate with established intake mechanisms and identity verification processes offered by the organization for privacy requests to record, track and manage fulfillment.

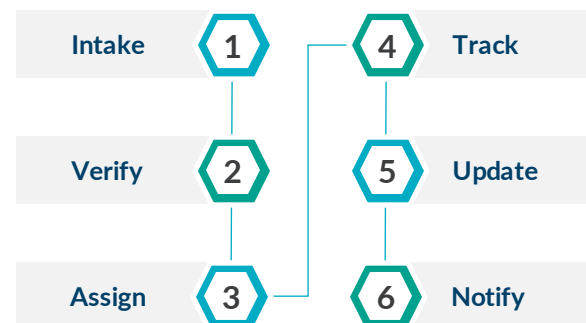
- Collect and process, using industry standard technologies, to normalize personal data, identify and remove duplicate or non-responsive data, analyze results, format report content and communicate results to data subjects.
- Leverage communication templates during the fulfillment lifecycle.
- Align management of data subject rights requests with applicable regulations and jurisdictions.

- Engaging service providers for the fulfillment of 'Deletion' privacy requests.
- Engaging with third parties for which 'sale' of data occurs for the fulfillment of 'Do Not Sell' requests.
- Client will be responsible for the deletion of data records within systems.

Business Outcomes

-  Reduced organizational burden to staff, train and govern privacy rights
-  Reduced risk of regulatory fines and private right of action suits
-  Scalable solution to accommodate unpredictable spikes in requests
-  Implementation of an effective and cost-efficient data subject rights request lifecycle

Data Subject Rights Consumer Request Flow





Privacy Platform Management

Few companies effectively leverage the full functionality and benefits from their licensed privacy management solution. That's where we can help. Protiviti, in partnership with OneTrust, serves as your integrated, highly-automated platform management team to design, build and maintain your privacy program. With OneTrust certified experts around the globe, we are positioned to implement cost-effective development, optimization and management capabilities for your privacy platform investment.

Ongoing Support

Protiviti OneTrust certified consultants will support the **day-to-day management of your OneTrust modules.**

Module Customization & Optimization

Protiviti's Subject Matter Experts **operate as your in-house OneTrust mechanics.**

Cookie Consent Management

Protiviti initiates and architects Cookie Consent Services with a complete, comprehensive and updated understanding of your business, technical and regulatory requirements.

These services could include the following key components:

- Monthly service delivery lifecycle: Protiviti will monitor, report, configure, test and implement as per defined requirements per module.
- Protiviti has more OneTrust certified consultants than any other consulting firm.
- OneTrust Expert Certified offshore resources available to reduce fees.

- Introduce OneTrust services with a rigorous initial design process ensuring efficient, effective services are aligned to your business needs with optimized performance and results.
- Customized assessments to support Assessment Automation, Data Mapping and Vendorpedia included in the support model design.
- Project teams document business and technical requirements.

- Collaborate with stakeholders and crystallize analysis, validation and categorization criteria.
- Capture most representative and responsive policies and procedures for evaluation, processing and clean up (where applicable).
- Formalize cookie consent templates, managed preferences and banner properties across sites, based on highly informed service design principles; realize maximized performance and responsiveness through this calibrated design.

Business Outcomes

Manage cost and complexity

Platform designed for maximum agility and efficiency

Reduced management cost

Services tailored to your evolving business needs

Issue reporting and resolution

Flexible module-based support model



Privacy By Design Assessment & Engineering

Privacy must be incorporated into technology systems by default and must become integral to organizational priorities. We operationalize Privacy by Design by deploying skilled privacy and software development resources to support your project planning and software engineering initiatives. Privacy by Design calls for privacy to be considered throughout the entire product engineering process and is based on the following principles:



Proactive, Not Reactive



Privacy as a Default Setting



Privacy Embedded into Design



Full Functionality



End-to-End Security



Visibility and Transparency



Respect for User Privacy



Privacy Impact Assessments (PIAs)

Protiviti performs PIAs in the event of any changes to the company's data processing activities and IT applications.



Data Protection Impact Assessments (DPIAs)

Protiviti performs a Data Protection Impact Assessment (DPIA) for high-risk processing activities.



Privacy by Design

Protiviti's subject matter experts operate privacy components of clients' Software Development Lifecycle process.

These services could include the following key components:

- Facilitate annual PIA self-assessment process to guide business and IT stakeholders in evaluation of privacy risks.
- Evaluate business and organizational changes for privacy impacts, including a threshold analysis to determine if a formal DPIA should be performed.
- Conduct ad-hoc PIAs for new changes, as requested. Evaluate business and organizational changes for privacy impacts, including a threshold analysis to determine if a formal DPIA should be performed.

- Perform an annual DPIA refresh process.
- Perform on-demand DPIAs for new processing activities and changes to existing processing activities that may result in high-risk to data subjects.

- Work with client stakeholders to understand the scope of proposed changes, identify and document applicable privacy requirements.
- Select privacy strategies to be included in the design of the product, application or service.
- Work with project teams to document business and technical requirements.
- Support the design and implementation of privacy solutions.
- Validate privacy controls prior to production deployment.

Business Outcomes



On-going (perpetual) services



Ability to provide solutions for privacy companies of all sizes



More flexibility and scalability with staffing options



Ability to provide management full process transparency



Allows client to focus on their core competencies



Experience with use of leading privacy management tools



Monitoring Privacy Legislation and Program Management

New privacy and data protection regulations promulgate a myriad of demands for updating policies, procedures, controls and overall governance of your organization. Frequently, organizations find themselves tasked with researching, updating and maintaining consistency for a long list of potential governance artifacts, including:



Multiple privacy policies and notices



Data classification and retention policies, data disposal procedures



Third-party contracts and data processing agreements



Data protection programs



Incident response and breach notification policies and procedures



Training and awareness content and regimens



Privacy Monitoring and Reporting



Privacy Awareness and Training

These services could include the following key components:

- Monitor changes to applicable privacy regulations and adjusting the baseline of privacy obligations and impacted privacy policies, as necessary.
- Process on-demand client specific privacy requirements resulting from changes to contractual obligations and adjust the program requirements, as needed.
- Establish a standard baseline of privacy and data protection controls to guide and advise organizations on implementation of appropriate technical, organizational and legally informed measures.
- Measure and report program efficiency (e.g., KPIs, KRIs).

- Awareness and enablement training, incorporating the latest developments and relevant content intended for your broader personnel base.
- Role-based data protection training, designed for individuals that are tasked with key data protection functions.
- New hire privacy onboarding, designed to outline their data protection responsibilities and activities in your organization.

Business Outcomes



Centralized alerting of changes to requirements and guidance in the jurisdictions and industries relevant to your organization



Access interactive reports tailored to your critical privacy outcomes – anytime, anywhere

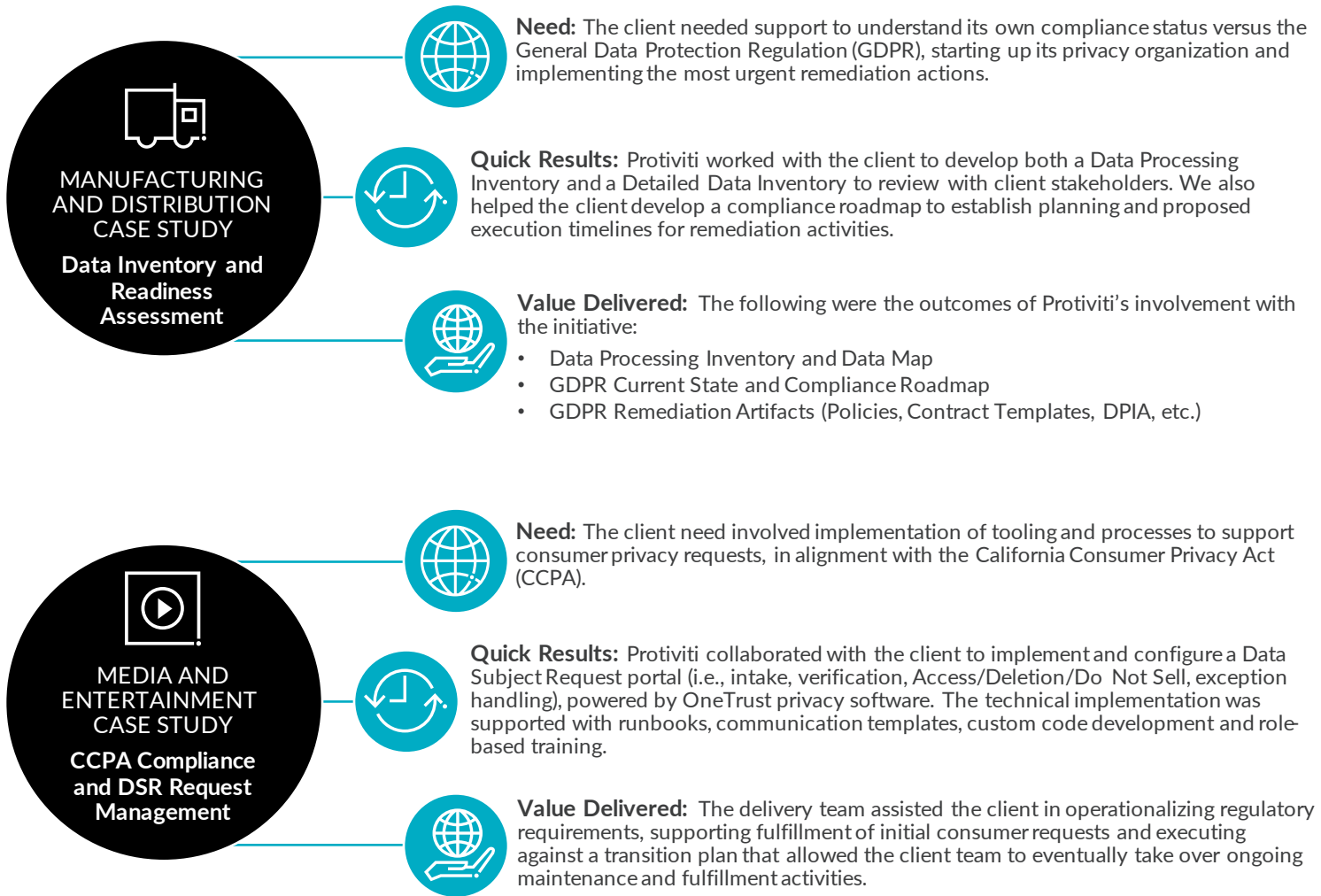


Eliminate highly manual and repetitive updating processes with centralized management of your effected policies, notices and procedures



Rapidly build and adjust data protection in your organization with updated and relevant privacy training for all your personnel

Protiviti PraaS™ – Privacy as a Service



Protiviti is a Strategic Alliance Partner with OneTrust

OneTrust is a leading privacy, security and third-party risk technology platform trusted by more than 6,000 companies to comply with the CCPA, GDPR, ISO27001 and other global privacy and security laws.



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Protiviti, a wholly owned subsidiary of Robert Half, is a global consulting firm that delivers deep expertise, objective insights, a tailored approach and unparalleled collaboration to help leaders confidently face the future. Protiviti and its independently owned member firms provide consulting solutions through a network of more than 85 offices in over 25 countries.

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