Robert Half® Talent Solutions

protiviti® Global Business Consulting

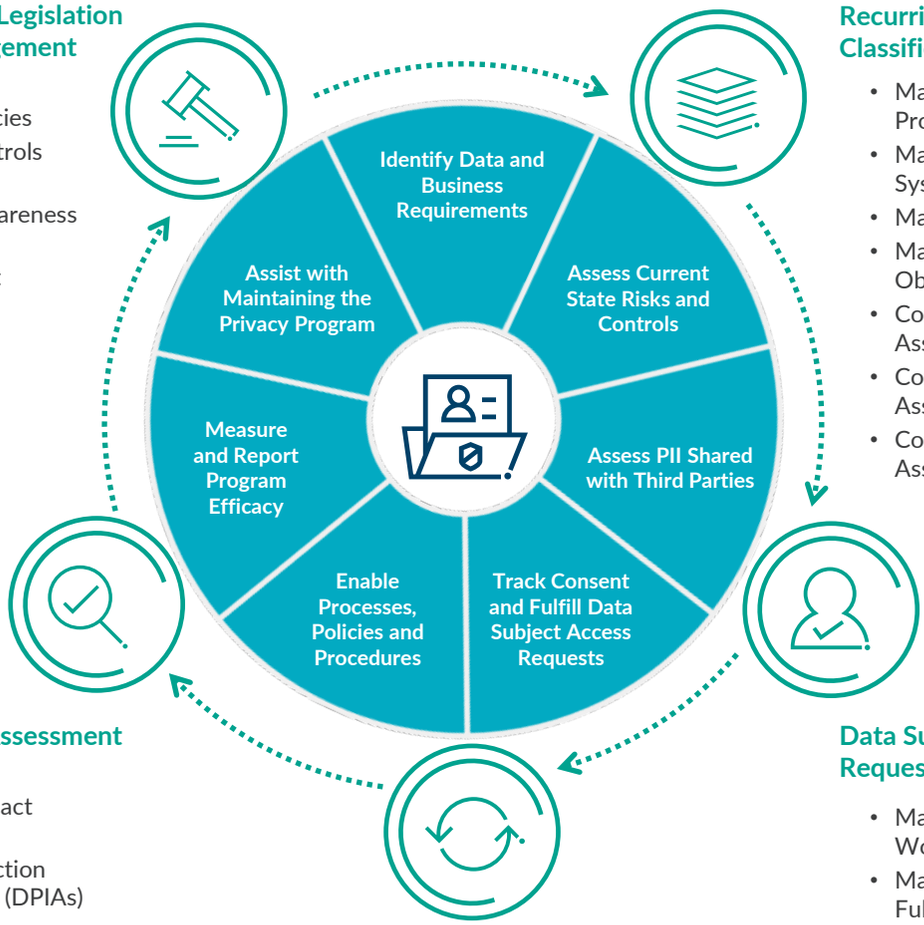
Protiviti PraaS™ – Privacy as a Service

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 Fulfilment Process
- Manage Third-Party Request Fulfilment Process
- Monitor Consent Management Practices

Privacy Platform Management

- Continuous Administration and Configuration of the OneTrust Environment

INNOVATE. TRANSFORM. SUCCEED.

Protiviti PraaS™ – Privacy as a Service

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.

Maintain Data Processing Inventories and Data Maps

Protiviti maintains Record of Processing (ROPA), IT System and Data Inventory repositories, ensuring all records are complete, accurate and up to date.

Privacy Compliance Assessments

Protiviti executes privacy assessments against privacy and data protection regulations to identify gaps, develop and facilitate remediation plans.

Third-Party Risk Management

Protiviti conducts privacy relevant assessments of third-party data processors and integrates these with your Privacy by Design reporting.

These services could include the following key components:

- 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.

- 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.

- 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.

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

Robert Half® Talent Solutions

protiviti® Global Business Consulting

Protiviti PraaS™ – Privacy as a Service

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.

- 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.

Manage Access Request Fulfillment Process

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

- 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.

Manage Third-Party Request Fulfillment Process

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

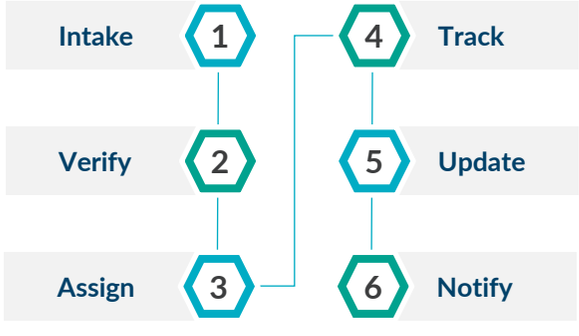
- Engaging service providers for the fulfillment of 'Deletion' privacy requests.
- Engaging with third parties for which 'sale' of data occurs for the fulfillment of 'Do Not Sell' requests.
- Client will be responsible for the deletion of data records within systems.

These services could include the following key components:

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



Robert Half® Talent Solutions

protiviti® Global Business Consulting

Protiviti PraaS™ – Privacy as a Service

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

Robert Half® Talent Solutions

protiviti® Global Business Consulting

Protiviti PraaS™ – Privacy as a Service

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.

- 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.

Data Protection Impact Assessments (DPIAs)

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

- 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.

Privacy by Design

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

- 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.

These services could include the following key components:

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

Robert Half® Talent Solutions

protiviti® Global Business Consulting

Protiviti PraaS™ – Privacy as a Service

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

- 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).

Privacy Awareness and Training

These services could include the following key components:

- 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

Robert Half® Talent Solutions

protiviti® Global Business Consulting

Protiviti PraaS™ – Privacy as a Service

MANUFACTURING AND DISTRIBUTION CASE STUDY

Data Inventory and Readiness Assessment

Need: The client needed support to understand its own compliance status versus the General Data Protection Regulation (GDPR), starting up its privacy organization and implementing the most urgent remediation actions.

Quick Results: Protiviti worked with the client to develop both a Data Processing Inventory and a Detailed Data Inventory to review with client stakeholders. We also helped the client develop a compliance roadmap to establish planning and proposed execution timelines for remediation activities.

Value Delivered: The following were the outcomes of Protiviti's involvement with the initiative:

- Data Processing Inventory and Data Map
- GDPR Current State and Compliance Roadmap
- GDPR Remediation Artifacts (Policies, Contract Templates, DPIA, etc.)

MEDIA AND ENTERTAINMENT CASE STUDY

CCPA Compliance and DSR Request Management

Need: The client need involved implementation of tooling and processes to support consumer privacy requests, in alignment with the California Consumer Privacy Act (CCPA).

Quick Results: Protiviti collaborated with the client to implement and configure a Data Subject Request portal (i.e., intake, verification, Access/Deletion/Do Not Sell, exception handling), powered by OneTrust privacy software. The technical implementation was supported with runbooks, communication templates, custom code development and role-based training.

Value Delivered: The delivery team assisted the client in operationalizing regulatory requirements, supporting fulfillment of initial consumer requests and executing against a transition plan that allowed the client team to eventually take over ongoing maintenance and fulfillment activities.

OneTrust
PRIVACY, SECURITY & GOVERNANCE

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.

Protiviti.com/TechnologyConsulting
TechnologyConsulting@Protiviti.com
TCblog.Protiviti.com

Robert Half is the world's first and largest specialized staffing firm. Robert Half Technology, a division of Robert Half, offers project, contract-to-hire and full-time technology staffing, as well as managed IT services worldwide.

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 80 offices in over 25 countries.

© 2022 Robert Half International Inc. An Equal Opportunity Employer M/F/Disability/Veterans. RH-PRO-0320. Protiviti is not licensed or registered as a public accounting firm and does not issue opinions on financial statements or offer attestation services.

Robert Half® Talent Solutions
protiviti® Global Business Consulting