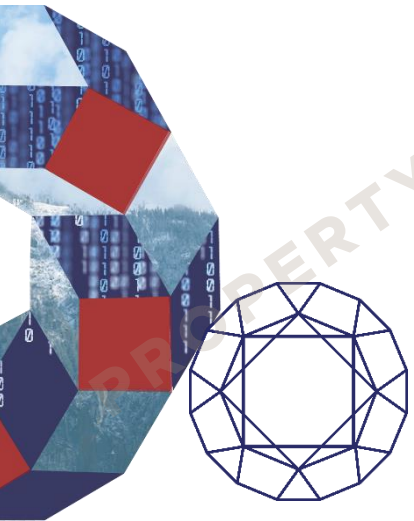


THE 90 DAY PLAN



Raymund Enriquez Liboro
Privacy Commissioner
National Privacy Commission

THE DATA PRIVACY ACCOUNTABILITY AND COMPLIANCE FRAMEWORK



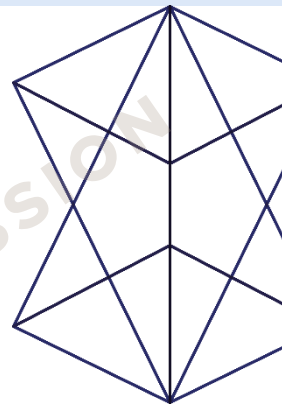
30 DAYS:

- ◆ Conduct a **Privacy Impact Assessment** & formulate a **Personal Data Inventory**



PROPERTY OF THE NATIONAL PRIVACY COMMISSION

III. PREPARING YOUR ORGANIZATION'S DATA PRIVACY RULES

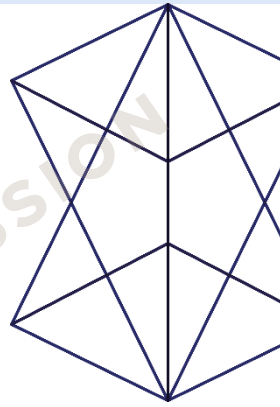


30 DAYS:

- ◆ Formulate your organization's **Privacy Policy**
- ◆ Formulate your organization's **Control Framework** for Data Protection & Remediation Roadmap



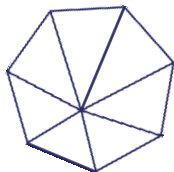
IV. PRIVACY IN DAY-TO-DAY INFORMATION LIFE CYCLE OPERATIONS



CREATION / COLLECTION STAGE

30 DAYS:

- ◆ Inform data subjects of your personal information processing activities & **obtain their consent**, when necessary
- ◆ (Privacy Notice)
- ◆ Formulate policies/procedures that **allow data subjects to object** to subsequent processing or changes to the information supplied to them

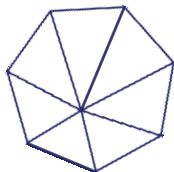
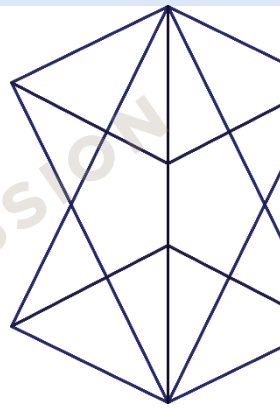


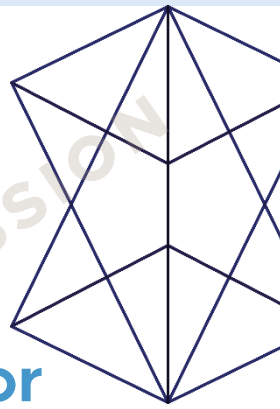
STORAGE / TRANSMISSION & USE / DISTRIBUTION STAGES

30 DAYS:

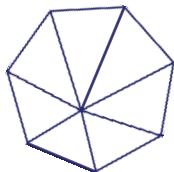
Develop policies/procedures:

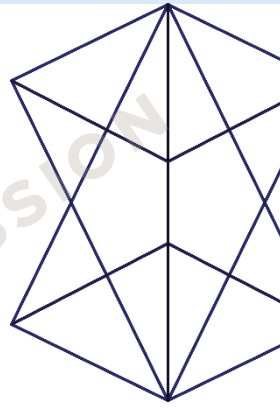
- ◆ for limiting data processing according to its **declared, specified and legitimate purpose**
- ◆ for providing data subjects with **access to their personal information** including its sources, recipients, method of collection, purpose of disclosure to third parties, automated processes, date of last access, & identity of the controller





- ◆ that allow data subjects to **dispute inaccuracy or error** of their personal information including policies/procedures to keep the same up to date
- ◆ that allow data subjects to **suspend, withdraw or order the blocking, removal or destruction** of their personal information if outdated, false, unlawfully obtained, unnecessary or used for unauthorized purposes
- ◆ for **accepting and addressing complaints** from data subjects

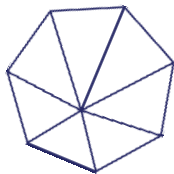


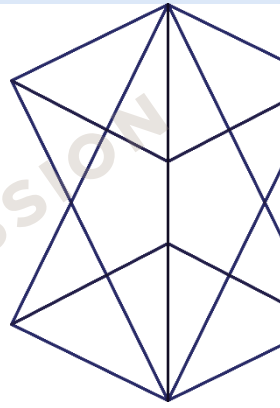


RETENTION STAGES

30 DAYS:

- ◆ Develop policies/procedures for retaining personal data for only a **limited period** or until the purpose of the processing has been achieved

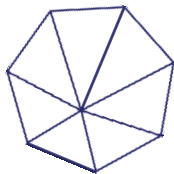




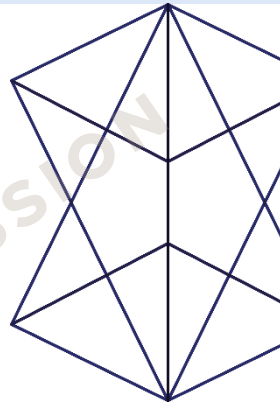
DESTRUCTION / DISPOSAL STAGES

30 DAYS:

- ◆ Develop policies/procedures for ensuring that data is **securely destroyed or disposed of**

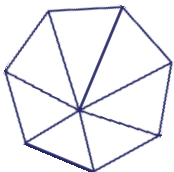


V. MANAGING INFORMATION SECURITY RISK

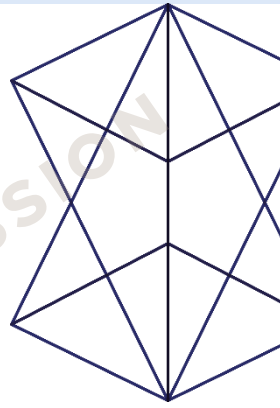


60 DAYS:

- ◆ Comply with the DPA's data **storage requirements**
- ◆ Comply with the DPA's **control access** requirements for personal data (onsite, remotely or online)
- ◆ Comply with the DPA's requirements for **personal data transfers**

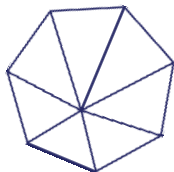


VI. DATA BREACH MANAGEMENT PROGRAM

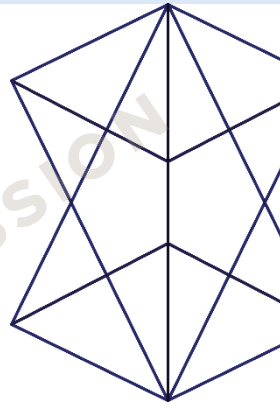


60 DAYS:

- ◆ Comply with the DPA's **Data Breach Management** requirements



VII. MANAGING THIRD PARTY RISK

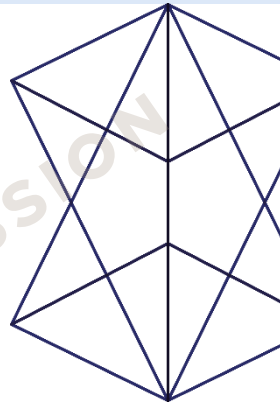


90 DAYS:

- ◆ Maintain **data privacy requirements for third parties** (e.g. clients, vendors, processors, affiliates)

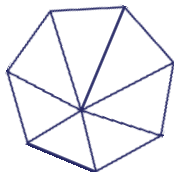


VIII. MANAGING EMPLOYEES WHO HANDLE DATA

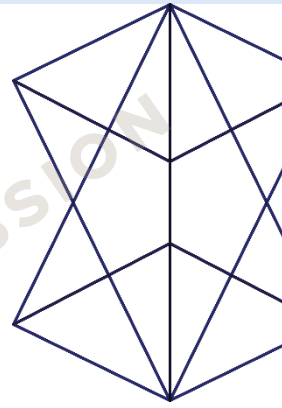


90 DAYS:

- ◆ Conduct periodic & mandatory personnel training on privacy & data protection in general & in areas reflecting job-specific content

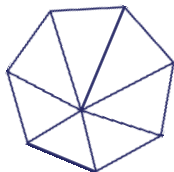


IX. MONITORING MECHANISMS FOR NEW & CURRENT OPERATIONAL PRACTICES

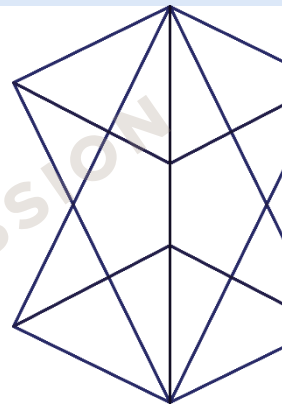


90 DAYS:

- ◆ Establish processes for the maintenance & conduct of Privacy Impact Assessment guidelines for new & existing programs, systems, processes & projects



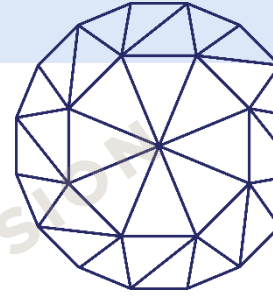
X. MANAGING YOUR LEGAL ENVIRONMENT



90 DAYS:

- ◆ Develop policies/procedures for monitoring & complying with the applicable legal requirements in all the jurisdictions in which the organization handles data





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