

Road to PIPA 2024

A quarterly guide to readiness for the implementation of PIPA (2016) which comes into full effect 1 January 2025 from The Office of the Privacy Commissioner (PrivCom)



Organisational Committment Ground Work

Inventory

Risk Assessment Policy & Procedure

Training

Service Providers

Incident Response PIPA Rights Requests External Comms

PIPA

| Incident Response |
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| Review the section regarding breach notification in the 'Guide to PIPA' |
| Prepare an incident response plan with your leadership team and other stakeholders, such as the Privacy Committee, that includes step by step instruction for managing a data breach (i.e. who can make public statements; how is harm analysed; what documentation is required) |
| Draft generic template letters, in line with your organisation's communication strategy, that can be used to notify PrivCom and individuals about a data breach |
| Break up the elements of the incident response plan into sections and schedule time for further review and completion – remember to involve staff and include testing |

| PIPA Rights Requests |
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| Define what a PIPA Rights Request means for your organisation and identify uses of information that might be exempt under PIPA |
| Create a workflow for how PIPA Rights Requests are received and access to information is granted – take into account compliance with statutory timelines and the need for documentation |
| Notify and train staff about the procedure for general awareness and so that they are prepared to direct individuals appropriately |

| External Communications |
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| Create a Privacy Notice to post on your website and at your place of business |
| Privacy Officers should set reminders to re-evaluate the Privacy Programme annually and advise stakeholders accordingly of any changes |
| Celebrate your organisation's commitment to Privacy and readiness for PIPA Implementation – 1st January 2025 |