



# 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  
Commitment

Ground  
Work

Inventory

Risk  
Assessment

Policy &  
Procedure

Training

Service  
Providers

Incident  
Response

PIPA Rights  
Requests

External  
Comms

PIPA

## Policy & Procedure

- Create a general policy regarding commitment to privacy compliance and expectation that staff act in accordance with PIPA
- Create a data retention and destruction schedule and share expectations with staff regarding collection of personal information, including how to provide notice of the purpose and, if needed, gain consent
- Update your employee handbook to reflect how you want staff to perform actions associated with various task that include personal information

## Training

- Hold a staff training event to review the importance of privacy practices and highlight policy changes to reconfirm commitment of the organisation to Privacy – PIPA comes into effect **1<sup>st</sup> January 2025**
- Develop role-based training for each business unit/process to instruct individual staff members that use personal information directly on how to follow the policies and procedures
- Solicit feedback from staff about their work following the training and make amendments as needed to procedures

## Outsourcing and Service Providers

- Assemble a list of service provider agreements/contracts and work with legal counsel to review terms relating to information sharing
- Use a checklist to identify certain elements of the contracts such as privacy compliance, breach notification, sub-contracting, etc.
- Identify the countries where information is being transferred or stored and document whether and how the contractual provisions create a reasonable belief that the protection overseas is comparable to PIPA requirements
- Create a timetable for when contracts renew and ensure any renewals are updated with regards to privacy compliance