

Your Next Chief Privacy Officer – What Skills Are Important?

Your organization is hiring a new Chief Privacy Officer (“CPO”) in today’s state of affairs where data security, regulatory compliance and financial risk morph daily. How do you define the skillset necessary for your business?

In prior years, most organizations determined that a candidate was required to have a legal background or law degree based on the concept that privacy was a legal and regulatory matter. Most regulatory agencies required a well-documented set of policies and notices that were conceived from privacy law and/or regulation.

In today’s world, CPOs are accountable for all personal data collected, transferred and processed by an organization. They interpret and translate the legal and regulatory requirements, provide direction and communicate the risk levels to executive management. In addition, they need to understand operational, employment, compliance and marketing practices, data transfers, retention periods, systematic processing and storage and information security fundamentals.

So, what skills and experience should your next CPO have under their “belt”? To answer this question you may need a crystal ball. If you don’t have one or yours has been wrong in the past, here are a few thoughts:

- ” Leader – ability to motivate, mentor, develop and guide staff, employees and vendors;
- ” Technologist – understand systems, databases, networking, cloud computing, access, and audit controls. Not at the “geek” level, but enough to validate what IT is recommending;
- ” Advocate – able to battle for the privacy rights of the consumer, customer, client or employee;
- ” Partner – business savvy, ability to work with legal, compliance, marketing, info sec, human resources (to name a few) departments and provide risk based solutions and alternatives;
- ” Politician – must be able sell the program internally and externally;
- ” Strategist – capable of understanding the business vision and translating the privacy requirements to enable the use of personal data in order to enable the vision;
- ” Accountable – for regulatory compliance, data use, data breaches, business and financial risks; and
- ” Lawful – work with the legal department to secure guidance, overlay the guidance onto the operational practices and report to regulators on the level of compliance.

With increasing oversight and scrutiny by customers, clients and increasing expansion of regulations, the privacy office will be tasked with measuring, reporting, managing and selling the organization’s compliance level to regulators, the board, executive committee and media.

With this said, finding the perfect lawyer, operations, technologist or compliance candidate is a complex task. Any experienced individual in the privacy field would be the first to advise finding a CPO who can master all of these concepts would be like finding a needle in the haystack. A successful CPO who grasps these concepts will hire staff who are specialized in each or a few of these areas and unite them to create a privacy program that excels.

For assistance in defining the CPO role, advising executive management, insight on privacy requirements or recommendations on global requirements for data transfers, feel free to contact Jim Keese, Privacy International, LLP at jmkeese@privacy-international.com.