



Il Privacy Officer: ruolo chiave in azienda nell'era del 'big data'.

Come prepararsi alle nuove regole in arrivo dall'Unione Europea

[www.privacyassociation.org](http://www.privacyassociation.org)

# CHIEF... NINJA?



## SEZIONE 4 RESPONSABILE DELLA PROTEZIONE DEI DATI

### Articolo 35

Designazione del responsabile della protezione dei dati

1. Il responsabile del trattamento e l'incaricato del trattamento designano sistematicamente un responsabile della protezione dei dati quando:

- a) il trattamento è effettuato da un'autorità pubblica o da un organismo pubblico, oppure
- b) il trattamento è effettuato da un'impresa con 250 o più dipendenti, oppure
- c) le attività principali del responsabile del trattamento o dell'incaricato del trattamento consistono in trattamenti che, per la loro natura, il loro oggetto o le loro finalità, richiedono il controllo regolare e sistematico degli interessati.

2012/0011 (COD)



search ID: mfl0236

## Heading Off Privacy Problems—Before They Arise

*With 'privacy-impact assessments,' companies understand how regulators and consumers will react to new products and services*

When [General Electric Co.](#) was getting ready to launch a home energy-monitoring appliance last year, it called in an unusual expert: the company's chief privacy leader, Nuala O'Connor Kelly.

### More in Leadership in Information Security

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- The Dangers of Remote Access
- The Government's Cybersecurity Model Is in Demand
- Security Experts Pick the Best Hacker Movies
- Read the complete report .



When companies set to launch new products, there's a new voice heard among the product developers: the privacy professional, Julia Angwin reports on digits.

Ms. Kelly quizzed the product developers on how they planned to use the data collected by the device and advised them on what to write in the appliance's "energy data privacy policy" for consumers.

Welcome to the new world of corporate privacy.

For years, companies have conducted environmental-impact assessments to determine the effect of prospective construction projects and operations. Now, many leading companies are conducting privacy-impact assessments before launching products and services.

### Legal Land Mines

The goal of these assessments: avoid running into regulatory fire in the complicated landscape of privacy law. Global companies have to manage privacy laws that differ by country—and by state in the U.S. And the stakes are getting higher, as regulators world-wide are increasingly cracking down on privacy violations.



Eli Meir Kaplan for The Wall Street Journal  
Nuala O'Connor Kelly of General Electric is one of a growing cadre of corporate privacy professionals.

As a result, a growing cadre of professionals is being hired to manage companies' privacy risk. Founded in 2000 by just 15 people, the International Association of Privacy

## CEDPO Position Paper:

- 'The Regulation should provide for incentives in favour of the appointment of DPOs... An independent study commissioned by the Dutch Ministry of Justice found that organisations that have appointed a DPO have a higher degree of compliance awareness and knowledge. CEDPO thinks that the recitals to the Regulation should emphasise the advantages of appointing a DPO and stress its central role for compliance, especially in light of the new duties of data controllers/data processors aiming at more effective data protection, such as the necessity of data protection impact assessments, breach notification, privacy by default and staff training'
- 'CEDPO agrees with the Commission on the necessity to avoid undue administrative burdens, particularly on small and micro-enterprises. Nevertheless, this must not lead to the conclusion that smaller organisations could not benefit from appointing DPOs. For example, smaller start-up companies active in the information and communications sector may very well benefit from data protection officers as a competitive advantage'

UK industry calls for a more 'business-friendly playing field':

- 'A more restrictive and prescriptive regime for the use of...data, as is being proposed, risks denying small businesses and retailers the revenue they require to support, drive and develop their activities'
- 'The proposals do not just risk chilling the evolution of business models. They would also place significant burdens on existing businesses, in the form of unnecessary and burdensome red tape. Rather than saving businesses money we believe that the proposals will make it more difficult to do business in the UK and across international borders'

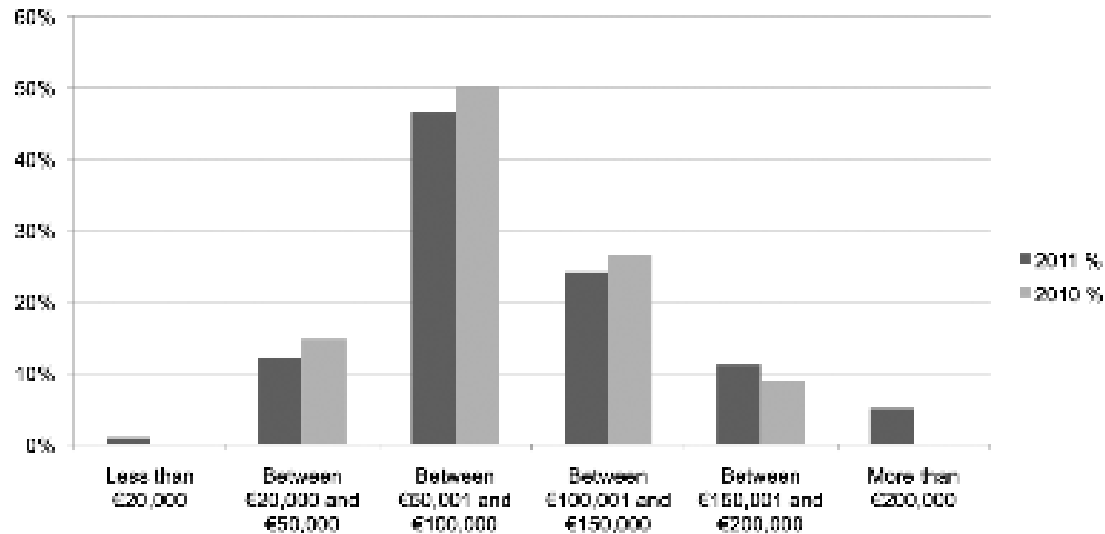
# BIG DATA



## Time Allocation

Time allocation	Currently spend most of their time on this	Should spend most of their time on this
<b>STRATEGIC</b>		
Developing privacy strategy	51%	64%
Analysing regulations	50%	48%
Advising/consulting to the organisation	80%	61%
<b>PROCESS</b>		
Developing and performing training and communications	61%	52%
Monitoring and measuring compliance (enforcement)	42%	53%
Responding to incidents	37%	20%
Reporting to management	36%	31%
<b>FOUNDATIONAL</b>		
Performing risk assessments and data inventories	47%	47%
Developing and implementing policies and guidance	68%	50%
Administration (personnel and budget)	21%	5%
Other	3%	2%

## Base Salaries



Salary range	2010 %	2011 %	Change since last year
Less than €20,000	0%	1%	1%
Between €20,000 and €50,000	15%	12%	-3%
Between €50,001 and €100,000	50%	47%	-4%
Between €100,001 and €150,000	26%	24%	-2%
Between €150,001 and €200,000	9%	11%	2%
More than €200,000	0%	5%	5%

Grazie!

[rdiantonio@privacyassociation.org](mailto:rdiantonio@privacyassociation.org)