



Chief Privacy Officer Models – Roles and Responsibilities

| | | Public Sector | | | Public Sector | | | Private Sector | | Global Sector |
|-------------------------------|---|-----------------|-------------------|-----------------|-----------------------|-----------------------|--|------------------------------|-----------------------|--------------------------|
| | | City of Calgary | | | City of Seattle | State of California | Office of the Privacy Commissioner of Canada | Telus | Stanford University | Price Waterhouse Coopers |
| Roles and Responsibilities | | FOIP Head | Deputy City Clerk | Other City Dept | Chief Privacy Officer | Chief Privacy Officer | Chief Privacy Officer | Chief Data and Trust Officer | Chief Privacy Officer | Chief Privacy Officer |
| Access | Manage the access to information process | ✓ | ✓ | | X | X | ✓ | ✓ | X | X |
| | Enhance and develop mechanisms for access to information, data, and records | ✓ | ✓ | | X | X | ✓ | ✓ | ✓ | X |
| | Create and publish a public data inventory | ✓ | ✓ | | ✓ | X | X | X | X | X |
| Privacy Protection Compliance | Manage and conduct privacy impact assessments | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | X | ✓ |
| | Formalize, conduct, and monitor privacy procedures and compliance | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |



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| Privacy Protection Compliance | Formalize an internal privacy impact assessment audit program | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | X | ✓ |
| | Formalize an internal privacy breach audit program | ✓ | ✓ | | X | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Implements a privacy plan response for privacy complaints and notifying individuals of improper collection, retention, use, disclosure, or destruction of their personal information | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Privacy investigations and privacy incidents management | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |



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| | Establish rules over the collection, use and disclosure of personal information | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Collaborative Data Governance | Monitor systems development and assure that the use of technologies maintain privacy protections related to use, collection, and disclosure of personal information | ✓ | ✓ | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| | Develop and implement directory of personal information banks | ✗ | ✗ | | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| | Evaluate legislative and regulatory proposals involving the collection, use, and disclosure of personal information | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |



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| Privacy Program Administration | Report privacy matters and risks to the leadership team and/or board(s) or other responsible individual or committee(s) | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Privacy Program Administration | Review privacy policies and procedures and update as necessary | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Collaboration/ Relationship Building | Intra-organizational collaboration - Work with organization administration, legal counsel, and other related parties to represent the organization's information privacy interests | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Internal collaboration (e.g. departmental FOIP Program Administrators, Law, Corporate Security) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |



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| | External collaboration (e.g. stakeholders, government agencies, regulators) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Privacy Training/ Awareness | Provide privacy training to staff | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Provide leadership to internal privacy staff | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Represent the organization by providing privacy awareness to internal and external stakeholders, customers, and regulators | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Provide privacy leadership for the organization's privacy program | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |



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| | Provide privacy guidance across Administration and the leadership team | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Security Measures | Identify and use standards and technologies that protect privacy relating to the use, collection, and disclosure of personal information | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Security Measures | Work with staff to ensure that personal information is safeguarded from improper access, loss, use, disclosure, or destruction | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |