

# Virtual Privacy Officer (vPO)

Grow | Protect | Operate | Finance

## The challenge:

Canadian privacy laws require organizations to have a privacy officer, a person responsible for their organization's privacy program. The privacy officer's role is becoming more significant, and much more challenging, as a result of the following realities:

- Personal information is increasing in volume and type
- Personal information (and therefore the privacy office role itself) is becoming more important to core business activities
- Companies are adopting new technologies which use personal information
- Privacy laws are evolving rapidly and the consequences of non-compliance are becoming much more onerous

### **Organizations themselves face multiple challenges**

**Increased compliance burden:** More laws impact your data (federal, provincial, and global privacy laws (e.g., GDPR, CCPA)) and require your privacy officer be familiar with multiple jurisdictions and requirements.

**Hybrid workforce challenges:** With employees working from both home and the office, your privacy program needs to reflect the 'new dynamic' of your organization, including the new processes and technologies in place to facilitate working across multiple locations.

**Insufficient in-house resources:** Layoffs, furloughs, parental or other leaves of absence may mean that your privacy officer role is temporarily or permanently vacant (or, being filled by a CEO, CTO or GC without sufficient expertise in the area and in addition to their already significant workloads).

**Limited talent pool:** Hiring a skilled privacy officer with demonstrated experience is challenging due to a talent shortage. Many organizations have hired junior employees to fill this role and hope they will "grow into" the role, despite not having an adequate mentor in place to guide them.

As organizations adopt more sophisticated systems and processes, migrate information to the cloud, and move their workforces to digital, the role of a privacy officer becomes integral to keeping your data safe.

## Our solution:

Virtual Privacy Officer (vPO): We provide you with experienced, business-savvy privacy counsel to fill or support your business' privacy officer role. The customizable and scalable solution provides expedient access to our privacy expertise to suit your business needs.

### How it works:

- The vPO solution is a monthly flat-fee subscription service.
- Clients subscribe to one of three tiers of service with a fixed monthly allotment of hours. They are free to call with their questions, ask for assistance with their privacy program, or seek advice on how to manage privacy incidents, without worrying about being "on the clock."
- Given the variety of tiers, clients are able to choose an offering that best suits their needs. The vPO can be an enterprise-wide resource, or a resource aimed at supporting a specific role, project or function.

### Typical vPO tasks:

- Assist in managing risk to your organization by overseeing corporate compliance with applicable privacy laws.
- Ensure necessary privacy work gets done, risk is addressed, and projects move forward.
- Relieve the General Counsel of a substantial portion of privacy and privacy-compliance work, freeing them up to address other legal issues.
- Serve as a subject matter expert for privacy-related concerns and assist management in navigating the current changes and guidance provided by regulatory bodies.
- Ensure other in-house resources have visibility into the relevant privacy issues and processes.
- Fill knowledge gaps for in-house privacy officers new to their role, or for less experienced in-house privacy officers.

### Success stories:

- **Project at risk of interruption:** A commercial landlord/retail property was embarking on a digital transformation project that saw it begin to accumulate a significant amount of personal information. It recognized the need to create a Privacy Officer role and did so. However, after about a year, the Privacy Officer took parental leave. The client needed someone with privacy experience to manage risks associated with its now-stalled digital transformation project. Dentons vPO solution was able to provide a tailored solution that allowed the project to continue on time.

- **Privacy Officer laid off:** A network of medical clinics was working to integrate disparate privacy practices following a number of acquisitions. However, COVID-19 related layoffs resulted in the organization losing its Privacy Officer. Dentons vPO solution continued the work of integrating the clinics' privacy programs in a high-risk, highly-regulated health environment.
- **Record retention project:** A company had tried for many years to institute a records retention/information governance framework but the work never seemed to get done. As the company moved to embrace the digital economy, the digitization and effective management of information, both past and present, became critical. Dentons vPO solution was able to drive the records retention project to conclusion.

### How clients benefit:

- We provide a worry-free solution to navigate the fluctuating landscape of privacy legislation and privacy risk.
- Our solution is customizable to our clients' needs, and can be scaled up for cross-jurisdictional organizations, or down for our clients who operate in one or two jurisdictions across Canada.
- We offer cost certainty with a monthly subscription model with fixed fees.

Click [here](#) for our quick guide.

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