

Crafting Effective Privacy Policies

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COMPLIANCE WEEK 2013
POWERFUL INSIGHTS, PRACTICAL IDEAS, REAL SOLUTIONS

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Crafting Effective Privacy Policies

One Global Policy

Consistent, global operation

Single source updates

Lower costs

All business units in a single place

Crafting Effective Privacy Policies

Plain Language

Greater transparency

Written with user in mind

Encyclopedia, not a novel

Dramatic change in user's behavior

Crafting Effective Privacy Policies

The screenshot shows the gmac.com website. The header includes the logo, navigation links (About Us, Virtual Library, mba.com, LOG IN), and a search bar. The main navigation bar lists: Home, The GMAT, School Services, Career Development, Research & Trends, News Center, and About Us. A sidebar on the left contains a table of contents for the Privacy Policy page, with 'Special Notes' highlighted in green. The main content area features a 'Special Notes' section with links to 'Professionals from GMAC@ Schools', 'GMAT@ Score Report Recipients', 'Event Participants', and 'Survey Participants'. Below this is a section for 'Professionals from GMAC@ Governing Schools' with an 'Information Collection' sub-section. A 'Truste' logo is visible in the bottom left corner of the page content.

Privacy Policy

- Highlights
- Purpose
- Information Collection
- Data Uses and Your Choices
- Data Security
- Data Sharing
- Enforcement
- Special Notes**

[Home](#)

Special Notes

Use the following links to jump to specific information on this page regarding the following user groups:

- [Professionals from GMAC@ Schools](#)
- [GMAT@ Score Report Recipients](#)
- [Event Participants](#)
- [Survey Participants](#)

Professionals from GMAC@ Governing Schools

Information Collection

Certain authorized professionals participate in GMAC@ governing activities. Deans of their respective governing member schools will provide details of these authorized professionals to GMAC@ for authentication and incorporation into a closed online directory.

Certain governance professionals also may participate in committees or advisory groups. In limited circumstances, GMAC@ may provide secure online areas on gmac.com in order to facilitate communication between committee members and staff. These Web site areas would not be available to the general public; only

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GMAC
GRADUATE MANAGEMENT
ADMISSION COUNCIL

Register Login Contact Us About Us News Center Language Pages

Reach & Recruit Students The GMAT Exam Market Intelligence & Research Professional Development & Careers Why GMAC? Tools

Privacy Center

GMAC is Committed to Protecting Your Privacy

Allen Brandt, GMAC's Chief Privacy Official, explains our privacy commitments.

See our other privacy videos on Information Collection, Data Use, Data Sharing and Web Support.

[Watch Videos](#)

Contact Us:

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+1 (800) 811-8042
- ▶ Mail: Graduate Management Admission Council
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TRUSTe

Privacy In a Minute

- ▶ Introduction
- ▶ Information Collection
- ▶ Data Use
- ▶ Data Sharing
- ▶ Web Support

Privacy Rights & Responsibilities

- ▶ Overview
- ▶ Agreement & Modification
- ▶ Information Collection
- ▶ Information Use & Sharing
- ▶ Retention & Security

Specific Rights & Responsibilities

- ▶ Event Attendees
- ▶ GMAT Test Takers
- ▶ Local Privacy Requirements
- ▶ Member Schools
- ▶ Products and Services
- ▶ Score Report Recipients
- ▶ Survey Participants

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Regulatory View

Language & format have been approved

Everyone wants their own

Be prepared to push back!

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Local Privacy Requirements for Test Takers & Web Site Registrants

[Home](#) › [About Us](#) › [Privacy Center](#) › [Privacy Rights & Responsibilities](#)
[Overview](#) › [Specific Rights & Responsibilities](#) › [Local Privacy Requirements for Test Takers & Web Site Registrants](#)

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With limited exceptions, the same privacy and security requirements apply to all test takers and web site registrants. However, there are multiple national and state governments around the world that have laws that apply to their residents of certain rights and responsibilities. See the below links for further information.

- [Argentina](#)
- [Croatia](#)
- [France](#)
- [Greece](#)
- [Hungary](#)
- [Norway](#)
- [Romania](#)
- [Serbia](#)
- [Spain](#)
- [Sweden](#)
- [US- California](#)

Data Protection in Romania

[Home](#) › [About Us](#) › [Privacy Center](#) › [Privacy Rights & Responsibilities](#)
[Overview](#) › [Specific Rights & Responsibilities](#) › [Local Privacy Requirements for Test Takers & Web Site Registrants](#) › [Data Protection in Romania](#)

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Residents of Romania understand that pursuant to Law no. 677/2001 they have certain rights: the right of access (art.13), the right of intervention (art. 14), the right of opposition (art. 15), the right not to be subject to automated individual decisions (art. 16) and the right of access to justice (art. 17) as provided in this Privacy Policy and for test takers, as provided in the GMAT Handbook. To exercise these rights, individuals may contact the local representative of GMAC in Romania for data protection issues, review My Profile, contact GMAC Customer Care or contact GMAT Customer Service (for test takers) by email, mail or telephone, as stated in the Contact Us section.

Romanian residents are hereby informed that the local representative of GMAC in Romania for data protection issues is the company, M.B.L. Computers SRL, with registered offices in 020331 Bucharest, 15 Fabrica de Glucoza street, Romania, Telephone:+40 21 204 67 50 Fax: +40 21 204 67 41.

GMAC is the data controller and is registered with the Data Protection Authority (DPA) (Autoritatea Nationala pentru Supravegherea Prelucrarilor de Date cu Caracter Personal) under file number 6010.

Related Resources

Data Protection in:

- [Argentina](#)
- [Croatia](#)
- [France](#)
- [Greece](#)
- [Hungary](#)
- [Norway](#)
- [Romania](#)
- [Serbia](#)
- [Spain](#)
- [Sweden](#)
- [US- California](#)

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James M. Byrne
Chief Privacy Officer
Associate General Counsel
Lockheed Martin Corp.



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Lockheed Martin

- Global security and aeronautics company with more than 300 partnerships in 75 countries.
- Support our customers with their most challenging security needs.
- Tactical aircraft to missile defense to commercial satellites to IT solutions



Lockheed Martin Facts

- 118,000 employees worldwide
- World's Largest Defense Contractor

Provide an environment in which our employees, customers, and partners trust us to use and protect personal information responsibly

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Privacy Challenges Supporting Government Agencies: Data Sets

- Employee Data
 - State Privacy Laws
- Customer Data but not consumer data
 - Federal Laws and Directives
 - Controller v. Processor

Understanding US Government and Commercial Customer
Requirements and Expectations

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Privacy Challenges Supporting Government Agencies:

- Contract Requirements
 - Risk allocations
- Opportunity
 - Shaping the customer
 - Building privacy policies into the contract

Understanding US Government and Commercial Customer Requirements and Expectations

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Training/Awareness

- Agency training
- Company Training
 - Annual Awareness/ New Employee Orientation Training
 - Certifications
 - International Association of Privacy Professionals (IAPP)
 - CIPP
 - **CIPM**

Understanding US Government and Commercial Customer Requirements and Expectations

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Gretchen S. Herault

Vice President, Compliance and Fraud
Prevention & Deputy Chief Privacy Officer
Monster Worldwide

The logo for Monster Worldwide, featuring the word "monster" in a lowercase, purple, sans-serif font with a registered trademark symbol (®) to the upper right.

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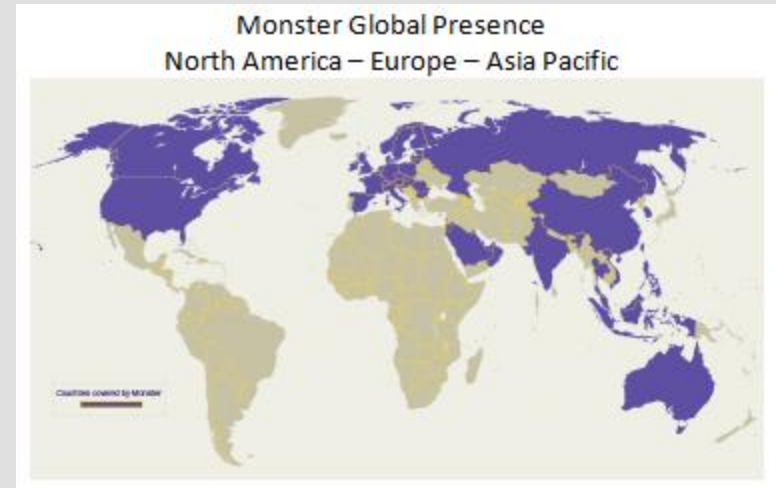
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Monster Worldwide

Website: Monster.com and other proprietary and partner sites

Business: Global recruitment website, connecting candidates and recruiters

Global Presence: 40+ countries



Monster Facts

- Visits to Monster Worldwide properties average 97 million per month
- On a daily basis over 35,000 new resumes/CVs are added to the Monster Global Resume Database
- Monster Worldwide is one of the world's largest online career resources with about 44.8 million unique visitors globally

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Monster Worldwide Business Model

- Job seekers: no-cost service to search for and apply to jobs on site
- Employers:
 - Job postings
 - Resume database license

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Privacy Challenges in Online Space:

- Jurisdiction/Geography: Global presence
 - Which law applies?
 - Different jurisdictions, different standards?
- Two sets of customers
 - Consumers
 - Paying employer customers

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Privacy Challenges in Online Space:

- New technology ahead of existing law
 - Use of cookies
 - Mobile devices and apps, texting, social media
 - New uses for data
 - User tracking
 - Behavioral advertising

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Single policy for all services:

- Plain English
- Multiple presentation formats
 - Short form
 - Long form
 - FAQ
 - Help text
- Future proof policy as much as possible
 - Anticipate possible new data uses
 - Balancing act to avoid 'kitchen sink' type policy