



## Privacy chief important role in modern firm

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*On the Cutting Edge / Brian T. D. Bowman*

Over the last decade, a new type of business professional has become mainstream. Reportedly first created in 1999, a growing number of businesses today have hired chief privacy officers, or CPOs, to manage their privacy practices. It has become a vital position for organizations operating in this privacy-sensitive business environment.

Canadian privacy laws now require businesses to designate an individual or group of individuals to oversee their management of personal information. Most businesses designate one person for this role, commonly referred to as the chief privacy officer.

It is an important position because most businesses are collecting ever-increasing amounts of personal information.

Properly managing all of this data has become more demanding in light of heightened customer expectations regarding privacy, evolving laws and rapidly changing technologies.

Choosing the right person to be the CPO is crucial, as they are the human face for customers with questions or complaints.

They are also on the front line for internal business decisions that touch on privacy. As a result, the CPO has to possess excellent people skills.

They do not necessarily have to possess specialized training, although the more expertise they have in the area should be of assistance.

What is important, however, is that they are familiar with the privacy principles enshrined in Canadian privacy laws and understand the organization's personal-information-management practices.

The role of CPO largely depends on the size and business of the organization.

At a minimum, the CPO should ensure compliance with privacy laws and deal with customer questions and complaints, such as access to information requests.

Typically, these professionals are already serving a business in another role, such as information technology, marketing or human resources managers. As a result, the role of CPO is often part-time and in addition to other duties.

However, a growing number of businesses are expecting much more from their CPOs, including the responsibility to conduct staff training, draft policies and procedures, liaison with legal counsel, manage privacy breaches, work with privacy commissioner offices and highlight privacy issues internally that may affect business decisions.

Typically, these CPOs serve the role on a full-time basis.

It is a good idea to work with legal counsel to determine the appropriate scope and role of the CPO in the context of specific business operations.

A job description should be drafted to clearly articulate the CPO's responsibilities.

It is also a good idea to ensure that the CPO has senior management support so that they can effectively get privacy 'buy-in' within the organization and can intervene on privacy issues as needed.

On an ongoing basis, the CPO should receive resources, support and training to ensure that the role serves its intended purpose -- to make sure a business properly manages personal information in this privacy-sensitive business environment. The role of CPO has grown in scope and importance over the last decade and in doing so, has become a mainstream business position.

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