

Privacy for Non-Profit Organizations



BAMBOO
DATA CONSULTING



oasis

That's me.

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Founder of Bamboo Data Consulting



Objectives

1. Benchmark your NPO
2. Identify privacy risks
3. Assist you in communicating those privacy risks
4. Action remediation for the risks



Privacy Confidence

How confident are you in your privacy knowledge?

81%

of charities do **NOT** feel confident about their privacy posture

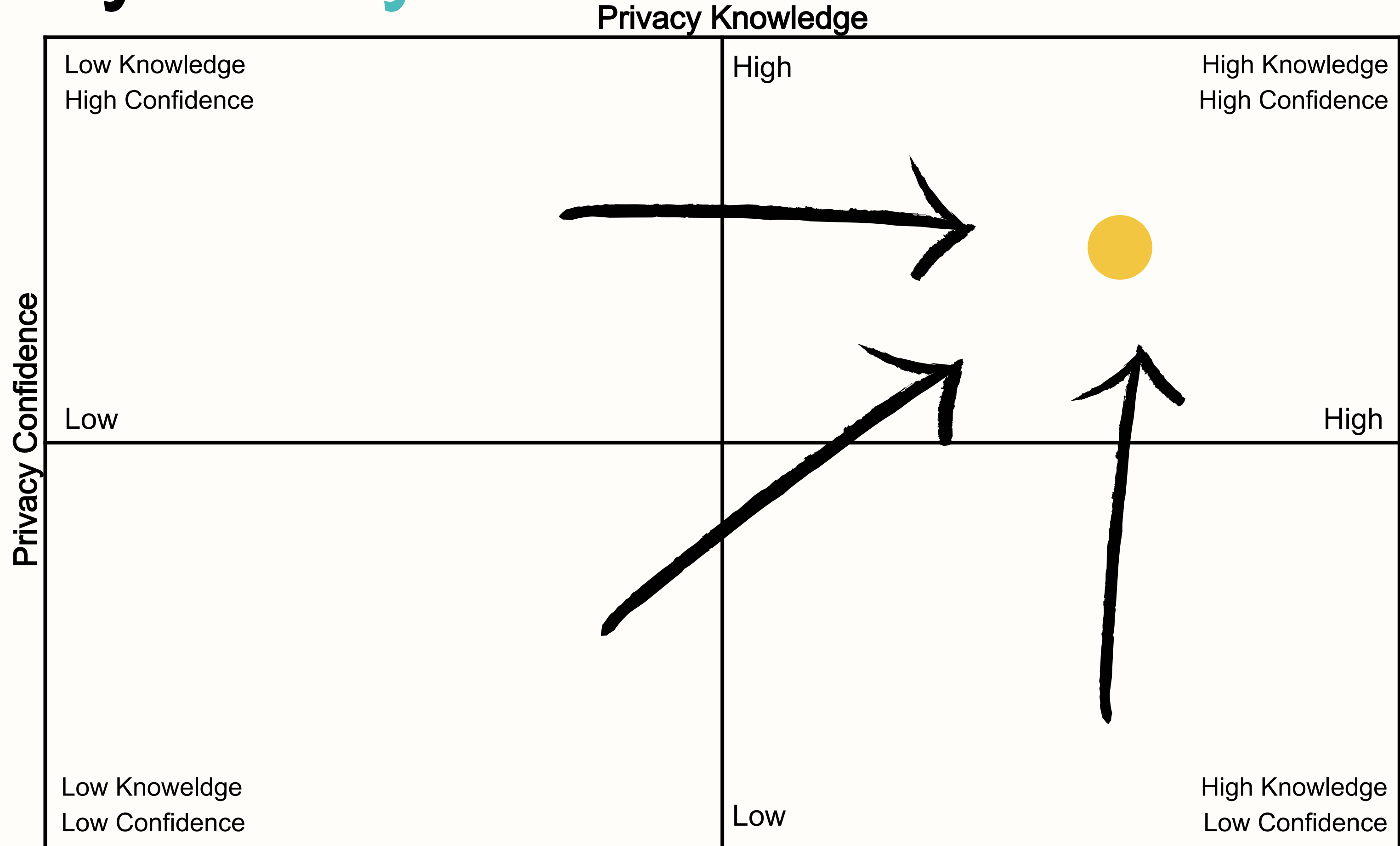
		Privacy Knowledge	
		Low	High
Privacy Confidence	Low	Low Knowledge High Confidence	High Knowledge High Confidence
	High	No Knowledge No Confidence	High Knowledge No Confidence

Privacy Confidence

Privacy Knowledge



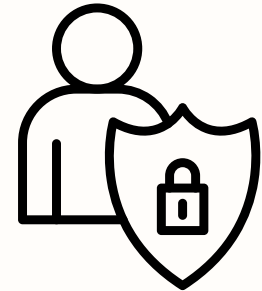
PrivacyMaturity



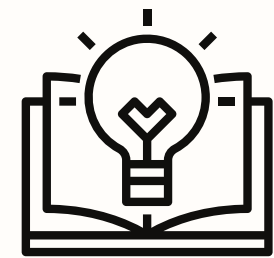
Privacy Barriers



Funding



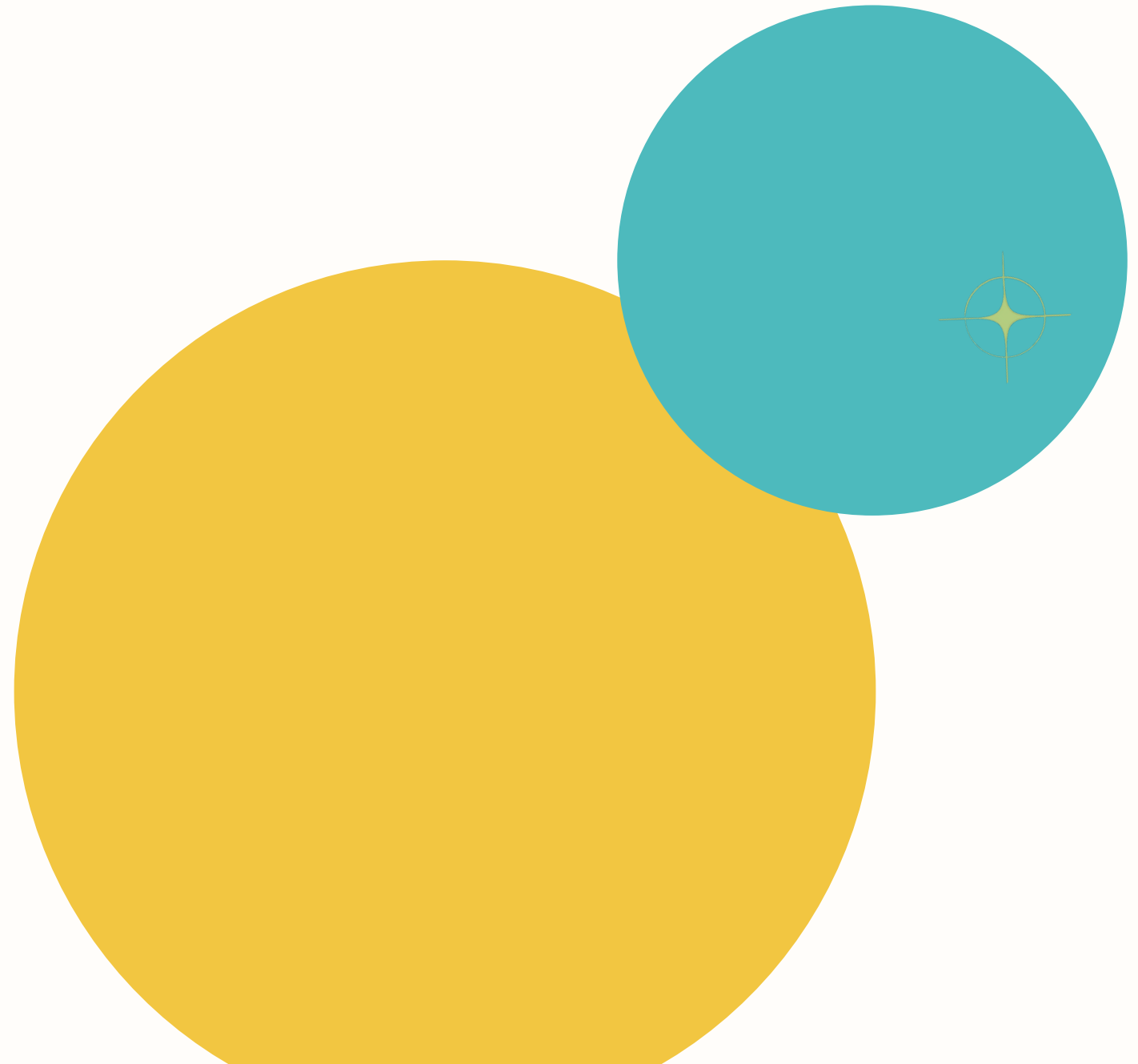
Resources



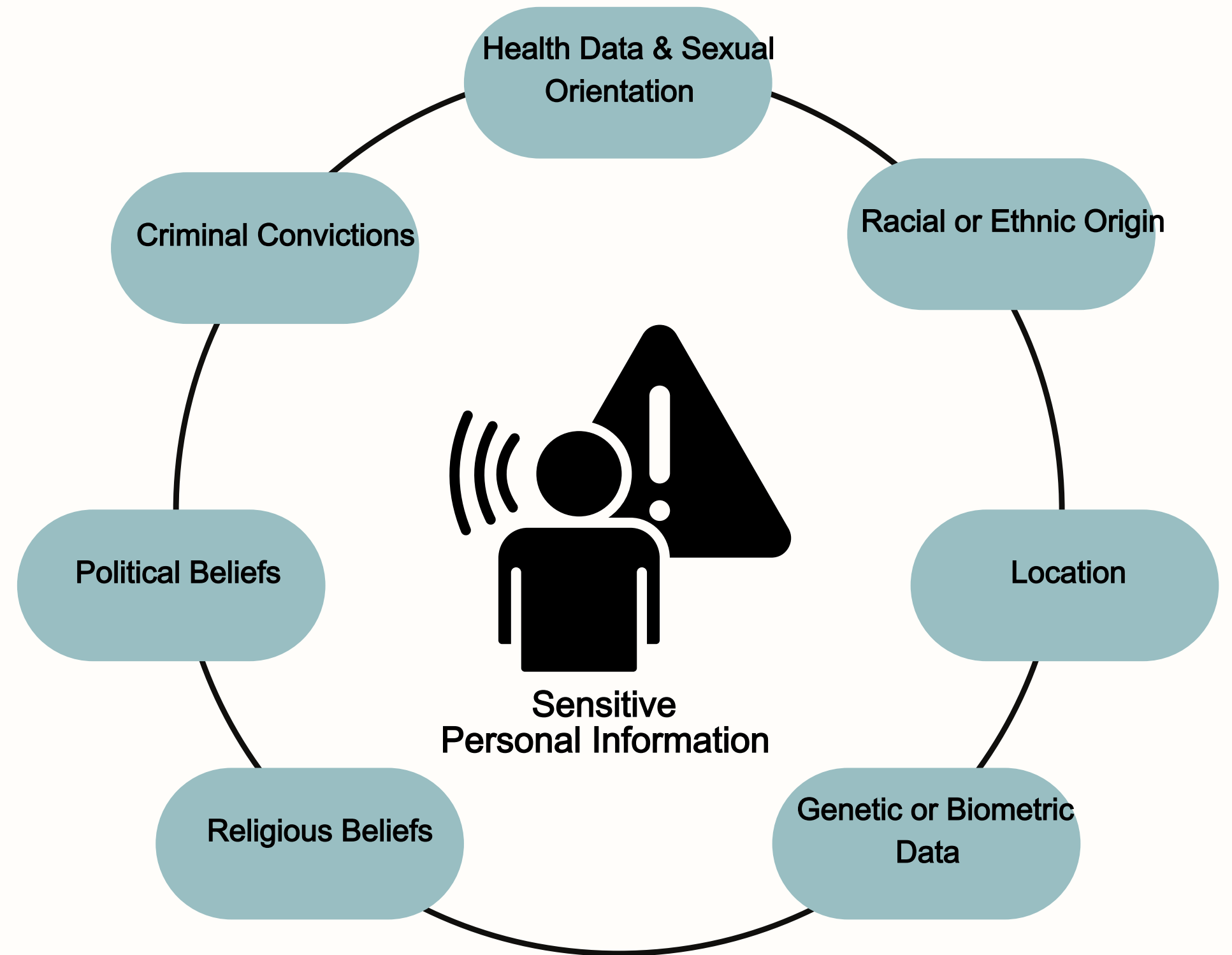
Training and Education



Business Case **Privacy**



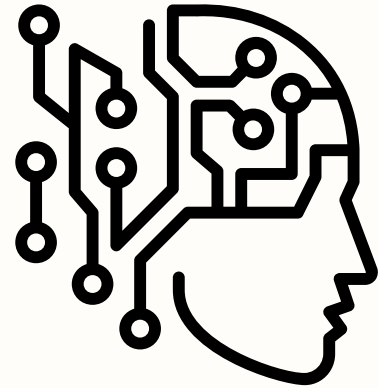
Personal Information



Why You Should Care About **Privacy**



Regulatory Landscape



Emerging Technology



Breaches



Naming & Shaming





Companies that **invest in privacy** initiatives will see a significant return on their investment.

— Cisco 2022
Privacy Benchmark Report

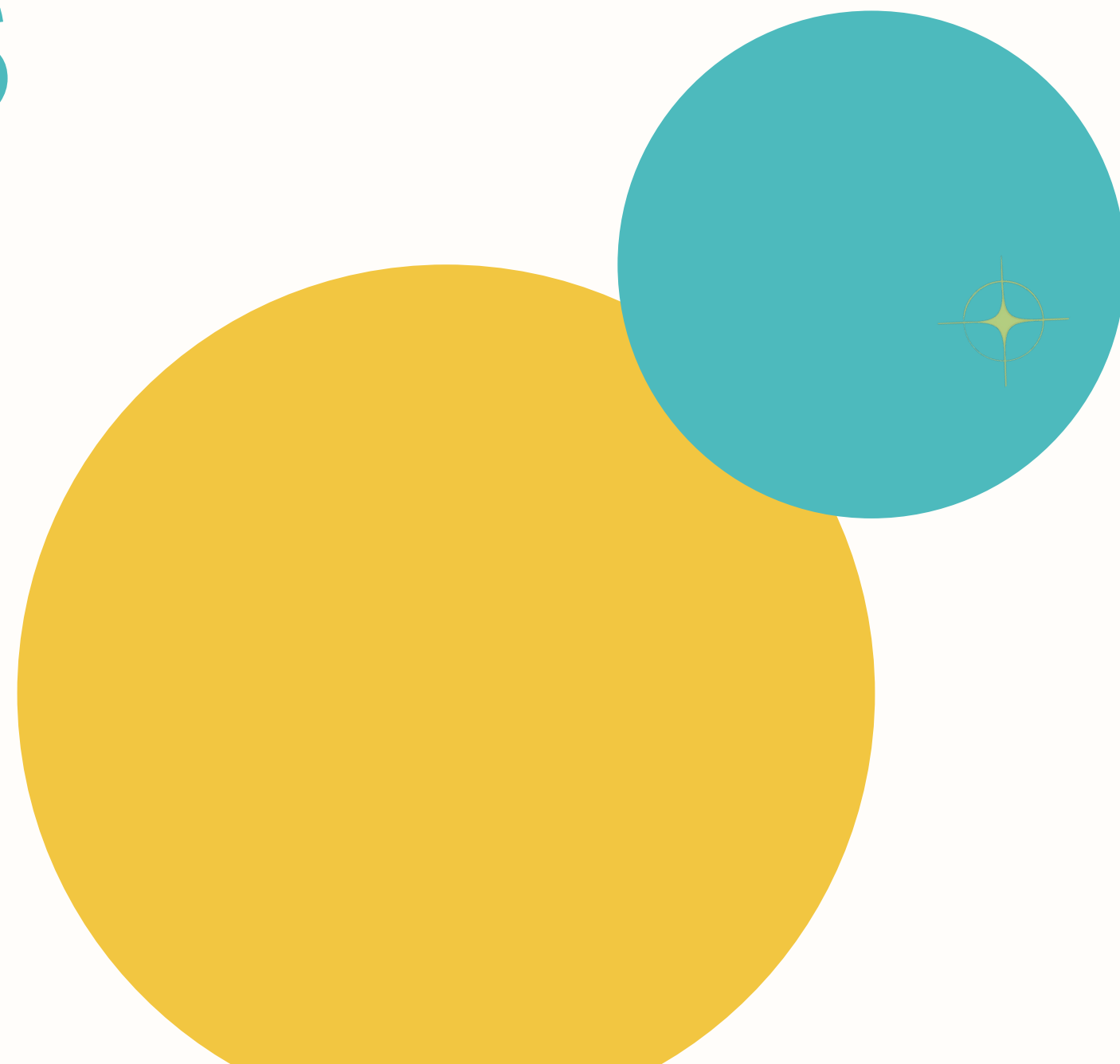
TRUST drives

ACTION

LOYALTY

DATA

Legal and Regulatory Requirements



NPOs Are **Not** Exempt From Privacy Laws

Do you know which laws apply to you?



Common NPO Privacy Mistakes

and how to
avoid them



Mistake #1. Lack of Consent and Transparent Notice



Transparency and Consent

- ✓ Notice must be simple, clear and easy to understand
- ✓ The Privacy Policy must:
 - be easily accessible
 - include what information you are collecting, how it will be used, who it will be disclosed to, how long it will be retained, where it will be stored, how it will be protected, and the privacy rights of the individual.
 - contact information of the privacy officer
- ✓ Identify if you need express consent or implied consent
- ✓ All consent must be off by default - an affirmative action must be taken
- ✓ No bundled consent - separate consent for different purposes
- ✓ A method to withdraw consent at any time (with as little effort as possible)



Example: Donor Lists

1. Use opt-in consent
2. Provide transparency to make an informed decision
3. Provide transparency each time consent is sought
4. Included detailed information about the disclosure



Mistake #2. Lack of Privacy Breach Plans



It takes 20 years to build a reputation and **few minutes** of a cyberincident to **ruin** it.



Cost of a Breach on avg. \$4.5M

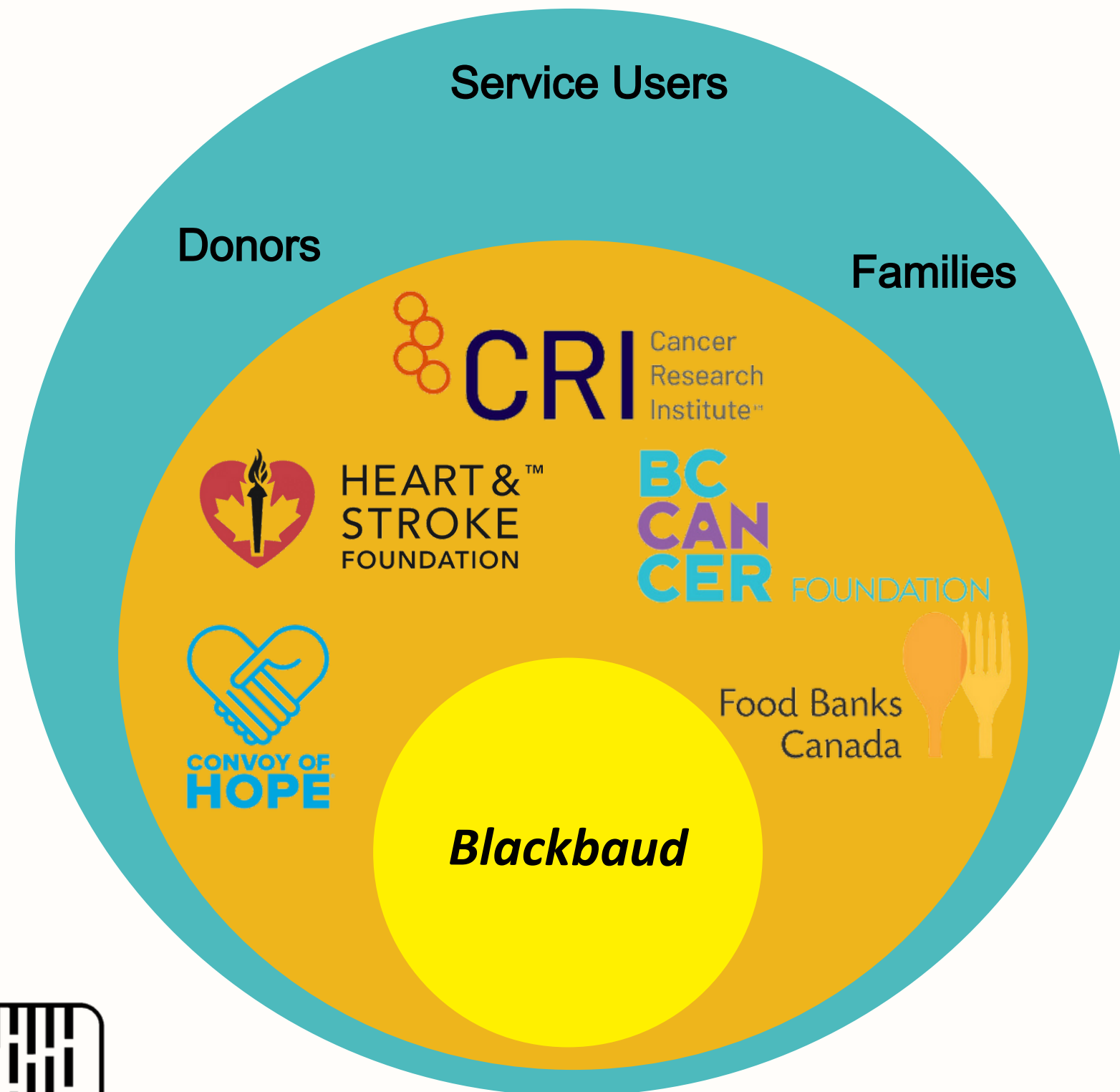
- Do you have cyber insurance
- Develop a breach privacy plan/breach coach
- Report and record the breach immediately
- Notify individuals if necessary
- Lessons learnt and remediate



Mistake #3. Lack of Vendor Due Diligence



Risks a vendor can create



Unencrypted banking info

SSN

Login credentials

Address

So what kind of **personal information** was compromised?

Names

Health insurance info

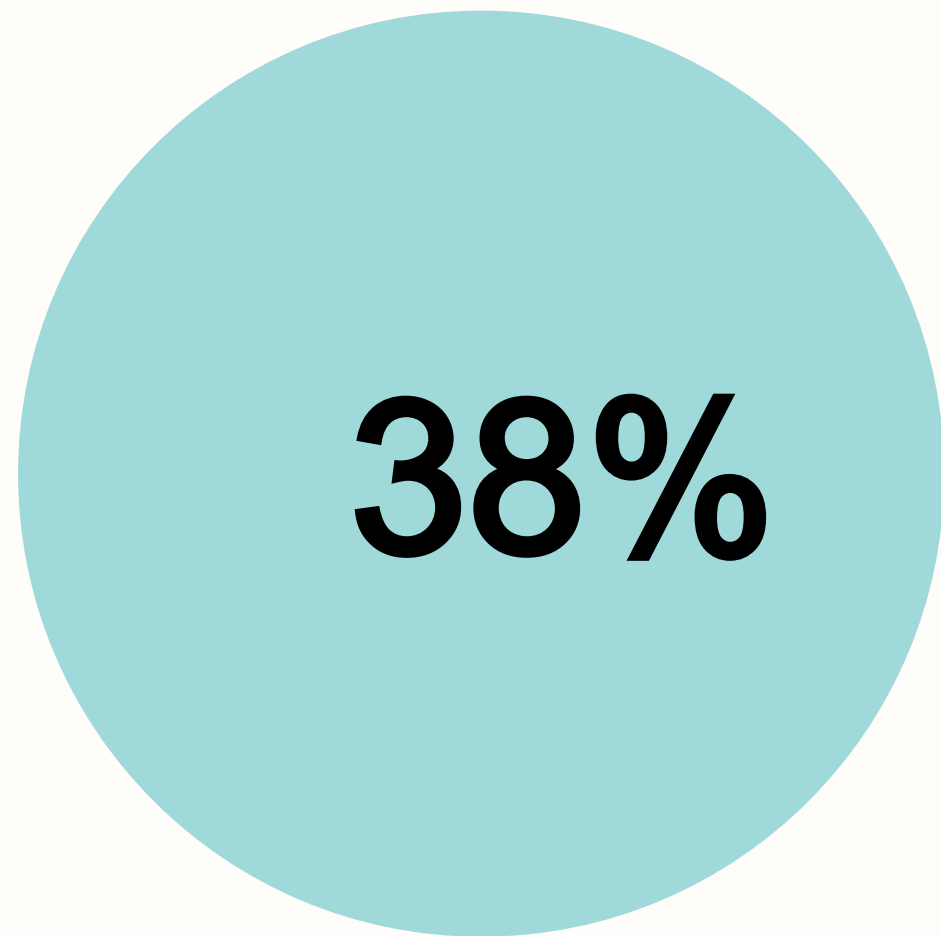
E-mail

Donation amount/history



Vendor Due Diligence

Are you conducting assessments on your vendors?



of breaches are a result of vendors

- Conduct vendor due diligence (privacy & security)
- Have proper Data Processing Agreements
- Assess how you are using the tool through a Privacy Impact Assessment (“PIA”)



Mistake #4. Retaining Data Indefinitely



Time for a spring clean of your data

*It's time to
clean out your
closet!*





**Mistake #5.
Lack of Privacy Culture**



From the top to the bottom

Who is accountable for privacy?



Tone from the top



Privacy Training and Awareness



Privacy Champions



Privacy Program - monitoring & enforcing - embed privacy checkpoints



Practical Steps To Get Started

...because prevention is always better than a cure



Immediate steps:



Tone from the Top

Data Mapping

Review Consent &
Notice

Internal Privacy
Policies

Privacy Training

Retention

*Here are some
practical tips to get
you started!*

A little gift for you...



Non-profits and Privacy Laws - Yes,
No, Maybe?



Thank You!



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