

## **Service Description**

# Data Privacy Workshop & Subject Matter Expert Consulting

# Contents

<b>Data Privacy Workshop &amp; Subject Matter Expert Consulting .....</b>	<b>3</b>
SERVICE DESCRIPTION .....	3
BASE SERVICE FEATURES.....	3
SecureTrust Portal.....	3
Global Compliance & Risk Services .....	3
DELIVERY AND IMPLEMENTATION.....	4
Project Initiation .....	4
Phase I: Workshop, Organizational Review and Discovery .....	4
Phase II: Workshop Subject Matter Expert Consulting .....	4
SECURETRUST RESPONSIBILITIES .....	5
CLIENT RESPONSIBILITIES.....	5

# Data Privacy Workshop & Subject Matter Expert Consulting

SecureTrust™ is a division of Trustwave Holdings, Inc.

## SERVICE DESCRIPTION

SecureTrust's Data Privacy Workshop and Subject Matter Expert (SME) Consulting service is a professional services engagement. The Data Privacy Workshop and SME Consulting helps identify, assess, and plan any gap treatment for the protection of personal data captured, stored, or maintained throughout business processes. The Data Privacy Workshop and SME Consulting help facilitate senior management endorsement and cross-functional collaboration to plan and prepare for compliance with privacy regulation.

## BASE SERVICE FEATURES

SecureTrust's Data Privacy Workshop and SME Consulting service includes the following standard features:

### **SecureTrust Portal**

The SecureTrust Portal consists of, among other features, a Compliance Manager application to manage the engagement process as well as collect and securely store evidence, documentation, and final deliverables.

### **Global Compliance & Risk Services**

The Global Compliance and Risk Services (GCRS) team consists of, among others, the following key personnel and functions:

**Security Consultant** – An information security consultant serves as the primary resource to deliver the Data Privacy Workshop and SME Consulting to assist Client in identification of gaps and remediation planning regarding how privacy data is captured, stored, maintained and protected.

**Managing Consultant (MC)** – An MC provides guidance, project oversight and reporting quality assurance to the Security Consultant and serves Client as a secondary point of contact for escalations and queries.

**Data Privacy Workshop** – An on-site workshop with interactive question and answer sessions, with all personnel involved in handling personal data to identify key gaps and processes with high risk to data subjects focusing on processing activities across the organization.

**SME Consulting** – Consulting assistance and an executive summary report documenting observations and recommendations from the Data Privacy Workshop to establish a record of potential risks regarding the confidentiality and integrity of personal data processes within Client's organization.

## DELIVERY AND IMPLEMENTATION

### Project Initiation

The SecureTrust GCRS team is assigned to facilitate delivery of the service which includes scheduling and conducting the remote kickoff meeting to define and agree to a high-level project plan consisting of milestone dates, key steps, estimates for duration, deliverables, resource requirements and escalation procedures.

Key activities in the Project Initiation phase are:

- Scheduling the workshop date, timing and location;
- Identification of key Client personnel required to facilitate the workshop; and
- Engagement with senior management representatives to understand expectations.

### Phase I: Workshop, Organizational Review and Discovery

SecureTrust will work with Client to identify relevant business environments, procedures, processes, systems, and controls which should be considered during the finite duration of the engagement.

Key activities will include:

- Delivery of a workshop presentation focusing on privacy regulations specific to organizational requirements
- Education for Client to achieve understanding of the privacy regulation requirements
- Engagement with key management to understand the business strategy, objective, scope and risk appetite
- Discussion and question and answer sessions for how personal data is captured, stored, maintained and protected on physical and logical media, with consideration of the following:
  - Business goals and strategic directions that impact the handling of personal data
  - Business operations including internally performed and outsourced processes
  - Key IT systems and their security
  - Data flows which may contain personal data
  - Processes and documentation for all controls ensuring the confidentiality and integrity of personal data
  - Roles of Controllers and processors used to process personal data
  - Data protection officer (DPO) requirements and responsibilities
  - Privacy notices
  - Data Transfer outside of the European Union (EU) if applicable
  - Legal basis for data capture
  - Documentation needed to meet Privacy regulation requirements
- Identify gaps verbally with potential recommendations
- End the workshop with a close out meeting, summarizing gaps and potential next steps

### Phase II: Workshop Subject Matter Expert Consulting

SecureTrust will create, prepare and deliver an executive summary report to Client, documenting observations and recommendations from the workshop to establish a record of potential risks regarding the confidentiality and integrity of personal data processes within Client organization and aligned to applicable privacy regulations including the EU's General Data Privacy Regulation (GDPR).

The following documents and content will be included in the final deliverables:

- An executive summary report of the workshop and high-level outcomes:
  - Scope and approach
  - Identified gaps, high priority risks and mitigation recommendations
  - Recommended solutions and specific security controls recommendations

SecureTrust will conduct a closeout meeting with Client.

## SECURETRUST RESPONSIBILITIES

- Establish and maintain contact with Client.
- Establish communication and escalation plans.
- Create Client account in the SecureTrust Portal.
- Define high-level project plan consisting of milestone dates, key steps, estimates for duration and resource requirements.
- Schedule and conduct kickoff, periodic status and closeout meetings.
- Provide an executive summary report.

## CLIENT RESPONSIBILITIES

- Establish and maintain contact with SecureTrust.
- Establish communication and escalation plans.
- Agree to high-level project plan consisting of milestone dates, key steps, estimates for duration and resource requirements.
- Accurately provide all necessary information including key stakeholders, applicable Client environment information and configuration requirements.
- Inform SecureTrust of all Client environment maintenance activity and changes that may impact the workshop.
- Accurately respond to requests from SecureTrust teams when establishing contact and collecting information.
- Provide complete and accurate details of the relevant environment and other business operations information.
- Make available Client resources capable of participating in workshop activities.
- Participate in and understand materials explained during the workshop.
- Client acknowledges:
  - All security and feature updates for SecureTrust Portal software will be included in major version release upgrades.
  - Personnel from the following departments are generally involved:
    - Privacy and Security Governance, Information Technology, Enterprise Risk Management, Legal and Compliance, Procurement, Internal Audit, Human Resources, Facilities, Complaints, Sales, Marketing, Operations and Finance.
  - The workshop complements and does not replace Client internal gap and/or risk assessment process.
  - The engagement consists of both remote and onsite assessment activities.
  - SecureTrust is not responsible for defining systems in scope or whether information provided by Client is accurate.
  - SecureTrust retains the right to reject or accept Client comments based on the facts and circumstances of the assessment.
  - SecureTrust will perform the service in the English language.
  - SecureTrust will not create or modify Client documentation as part of the Data Privacy Workshop and Subject Matter Expert Consulting service.
  - SecureTrust will not provide remediation services as part of the Data Privacy Workshop and Subject Matter Expert Consulting service.
  - SecureTrust will not offer any legal guidance or counseling. The provision of the Data Privacy Workshop and Subject Matter Expert Consulting does not guarantee compliance

- with data privacy regulation. Client is responsible for making all management decisions with regard to its data privacy policies.
- The quality and accuracy of the Privacy Workshop and Subject Matter Expert Consulting service is dependent on Client's provision of accurate information and access to Client systems and resources to SecureTrust.