1: Accountability

Analyze and document all personal information handling practices including ongoing activities and new initiatives. Here is a checklist to guide you:

☐ What personal information do we collect?
☐ Is it sensitive, and if so why?
☐ Why do we collect it?
☐ What do we use it for?
☐ Where do we keep it?
☐ How is it safeguarded?
☐ Who has access to it?
☐ Who is it disclosed to?
☐ When and how is it disposed of?

Develop, document and implement policies and procedures to protect personal information. Here is a checklist to guide you:

☐ Define the purpose for collection
☐ Obtain consent
☐ Limit collection, use and disclosure
☐ Ensure use and disclosure are consistent with purposes for which information was collected
☐ Ensure completeness and accuracy
☐ Ensure adequate security measures
☐ Develop a retention & destruction timetable and procedures
☐ Develop and implement policies and procedures to respond to access requests
☐ Develop and implement policies and procedures to respond to inquiries
☐ Develop and implement policies and procedures to respond to complaints
☐ Develop and implement policies and procedures to manage breach of privacy and security incidents
☐ Conduct risk assessments
☐ Develop, document and implement appropriate service provider management practices
☐ Develop, document and deliver appropriate privacy training for employees