

INITIAL PRIVACY AUDIT CHECKLIST



Identify key stakeholders within your organization that will play a role in any audit/overhaul of your organizational privacy and data security.



These often include individuals in Compliance, HR, Legal, C-suite.



Prepare a list of key stakeholders, their titles, responsibilities, and a summary of various categories of information, data, records – whether electronic or otherwise (the “Data Categories”), and frequently used third-party vendors and/or service providers.



Thoroughly vet the listed categories of information prepared by each stakeholder and locate and review all pertinent TOS, PSAs, MSAs, or other agreements governing the various relationships your organization maintains with third-party vendors or service providers managing the Data Categories.



Engage experienced in-house or outside counsel to review the Data Categories and have them confirm/identify triggered compliance obligations under various state and federal data privacy regulatory frameworks and/or data breach notification laws.



Identify, gather, and audit internal policies and procedures regarding vendor and service provider contracting, records retention and destruction, privacy policy audit/update, and work with IT, HR, Legal to ensure all changes are properly implemented across the board.

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