

**PRIVACY KPIS: HOW TO MEASURE THE SUCCESS OF
YOUR PRIVACY PROGRAM**

ANNA ZEITER, EBAY CPO



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WHY MEASURE AT ALL?

“What gets measured gets done.”

W. Edwards Deming

“There is nothing quite so useless, as doing with great efficiency, something that should not be done at all.”

Peter F. Drucker

Effective measurement helps us both improve and prioritize our efforts. In many ways, measuring *is* management.

OVERALL CONSIDERATIONS

- **Use metrics to tell a story.** What's the moral / takeaway of the story? How can you make the insight obvious without the audience needing to be a privacy expert.
- Get metrics to **highlight specific needs** for investment or resources.
- Think about what you can measure that **shows how you are executing your strategy.**
- Enable your organization to **take smart business decisions.**

NOT ONLY A NICE TO HAVE...

KPIs are not only a nice to have – they are legally required, i.e. by CCPA

(Proposed Text of Regulations, § 999.317. (g) (1)):

- (1) Compile the following metrics for the previous calendar year:
 - a. The number of requests to know that the business received, complied with in whole or in part, and denied;
 - b. The number of requests to delete that the business received, complied with in whole or in part, and denied;
 - c. The number of requests to opt-out that the business received, complied with in whole or in part, and denied; and
 - d. The median number of days within which the business substantively responded to requests to know, requests to delete, and requests to opt-out.
- (2) Disclose the information compiled in subsection (g)(1) within their privacy policy or posted on their website and accessible from a link included in their privacy policy.



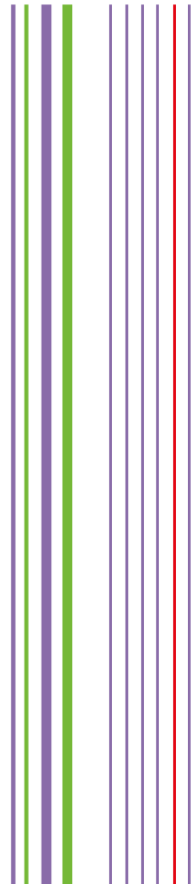
HOW TO MEASURE KPIS

IF IT'S EASY TO MEASURE, IT'S RARELY INSIGHTFUL.
IF IT'S INSIGHTFUL, IT'S RARELY EASY TO MEASURE.

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S U M M I T
S E S S I O N S

IMPORTANT CHARACTERISTICS OF KPIS

- Develop **organizational goals that follow the SMART model**— i.e. *specific, measurable, achievable, realistic, and timely*.
- Ensure that the KPIs are **tailored to your organization** and are **clearly defined/understood** within the parameters of the business.
- They will be reported to a number of different audiences, ranging from privacy professionals through to the board of directors - therefore **they need to be easily understandable and logical**.



MAKE SURE YOU USE THE RIGHT METRICS FOR THE RIGHT JOB



Activity
Metrics



Trend
Metrics



Outcome
Metrics

METRICS EXAMPLE: SUBJECT ACCESS REQUESTS

- **Activity metrics:**
 - » Number of subject access requests / user inquiries received
- **Trend metrics:**
 - » Trend in average time to respond to a subject access request (and comparison vs. legal requirement)
 - » Trend in % of customers happy with initial response
- **Outcome metrics:**
 - » Total number of escalations / lawsuits settled, total number of regulator complaints answered



A man with a beard and short brown hair is wearing a red and black headset. He is smiling and looking at a laptop screen. He is wearing a light blue button-down shirt. He is sitting on a green couch. The background is a blurred office or meeting room with large windows and wooden pillars.

HOW TO COMMUNICATE KPIS

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COMMUNICATE VALUE IN ALL DIRECTIONS

 Executives

- Air-cover / Support
- Budget

 Management
Peers

- Align priorities
- Resolve conflicts

 Team

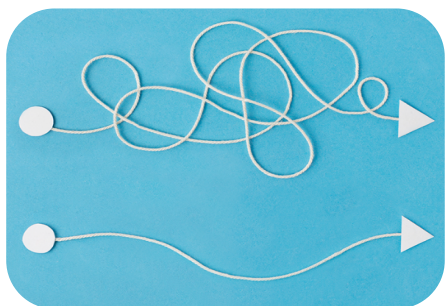
- Agree priorities and messaging

WHAT METRICS SHOULD I USE FOR WHICH AUDIENCE?

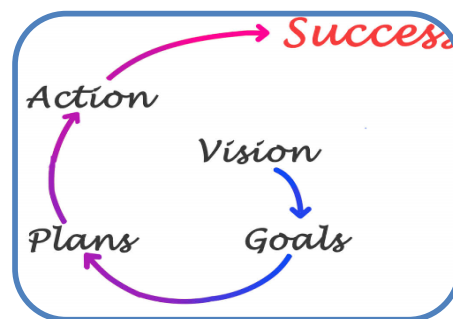


Executives	Management Peers	Team
☐	Narrow	☒
☒	☒	☒
☒	☒	☒

COMMUNICATING WITH EXECUTIVES



Keep it simple!



Emphasize
impact on
strategic
priorities!

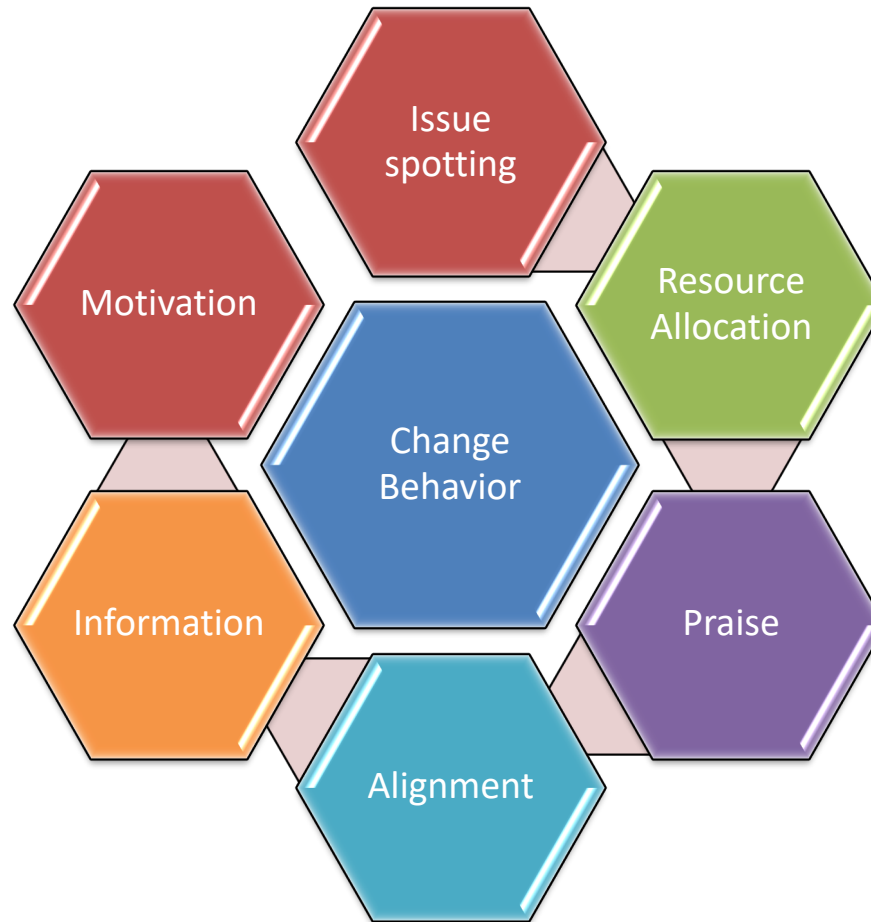


Be clear if
decisions are
necessary and
provide clear
options!



Don't leave
audience with
FUD (fear,
uncertainty,
doubt)!

COMMUNICATING WITH PEERS / TEAM





EXAMPLES

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EXAMPLE 1: PIAS



I. Activity metrics

- Number of assessments completed

II. Trend metrics

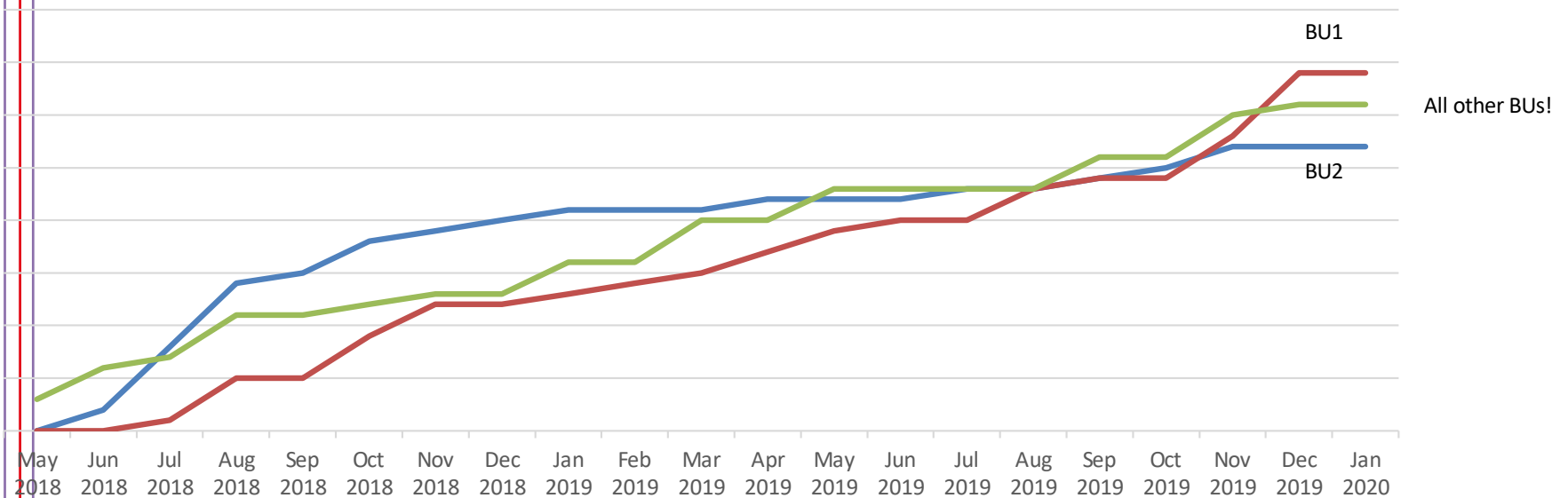
- # of assessments completed month over month
- % of assessments completed within a week, month over month

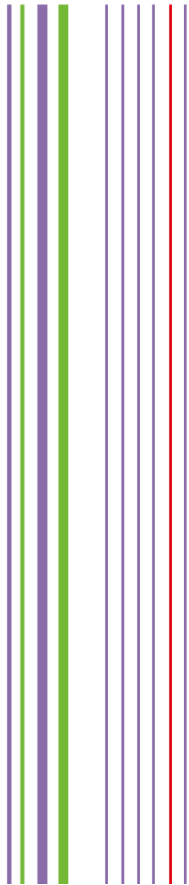
Outcome metrics

- Trend in % of Assessments indicating significant remediation required

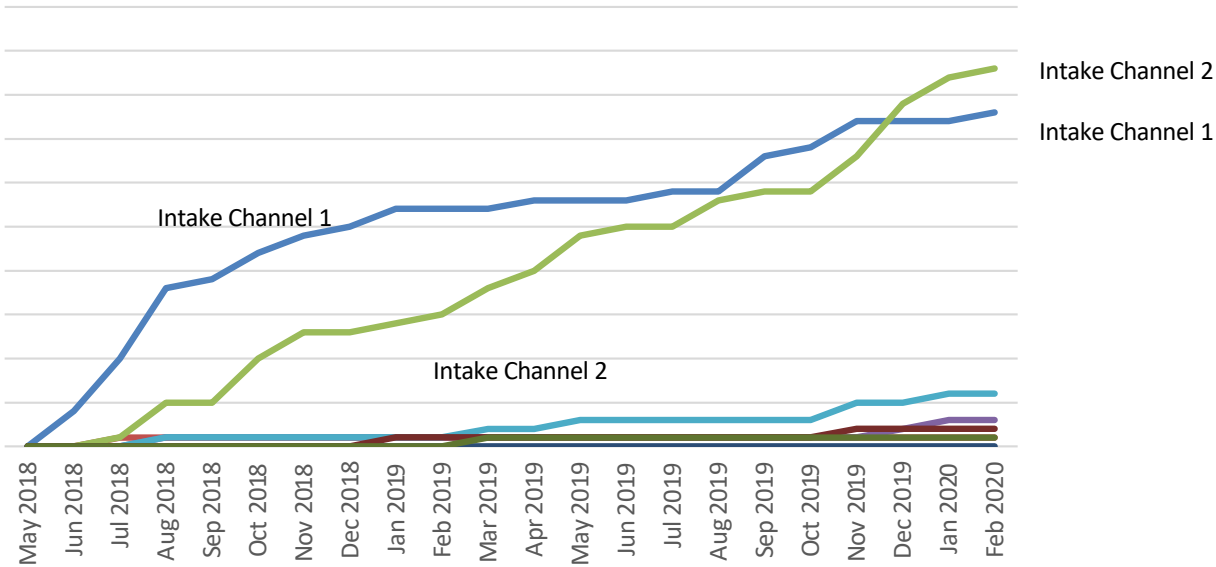
EXAMPLE 2: USER INQUIRIES

Complaints by Business Unit

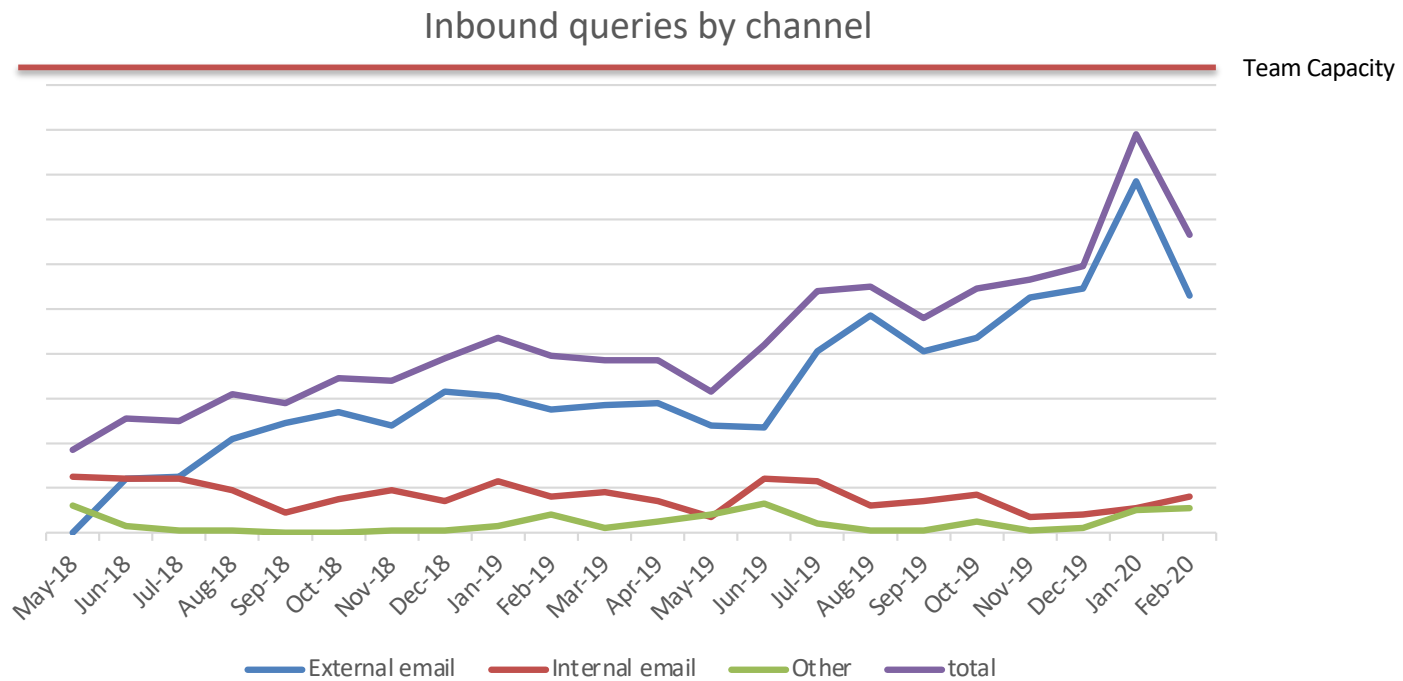




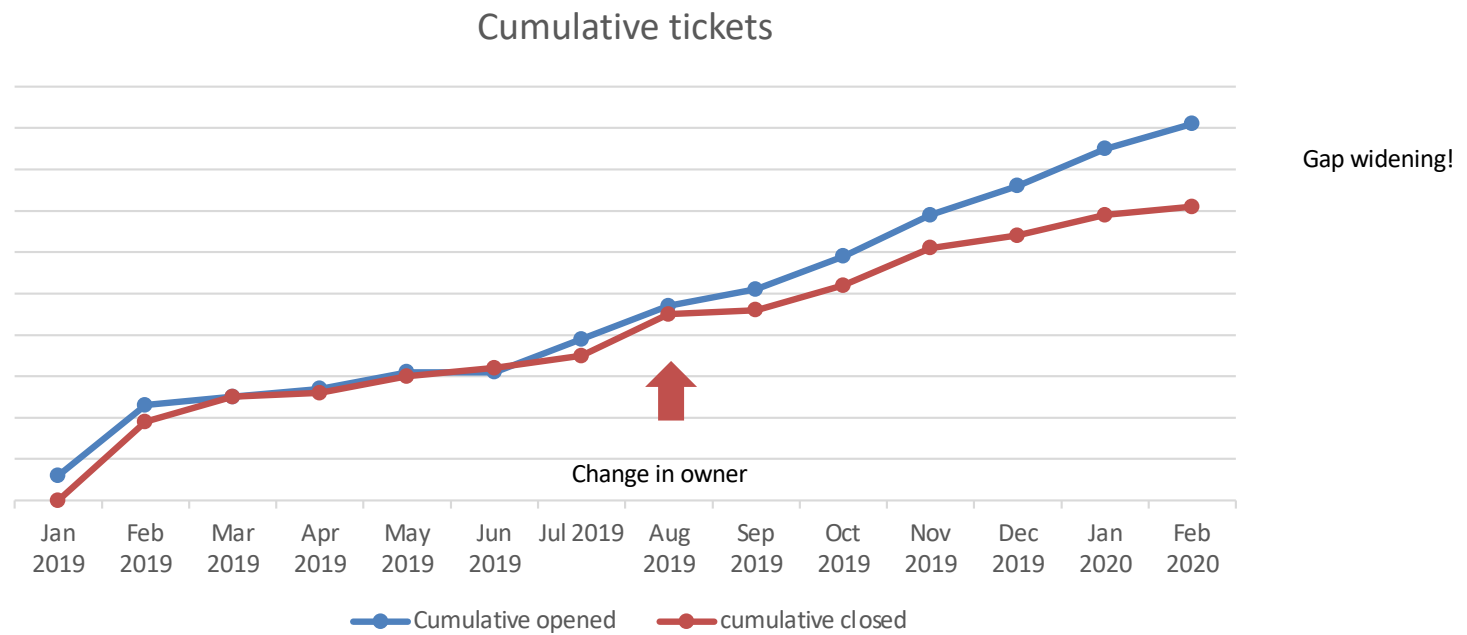
EXAMPLE 3: REGULATOR INQUIRIES



EXAMPLE 4: TEAM CAPACITY



EXAMPLE 5: RESOURCE PLANNING





DISCUSSION

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