www.privacy.bm

PEOPLE FIRST

Supporting Vulnerable with Privacy



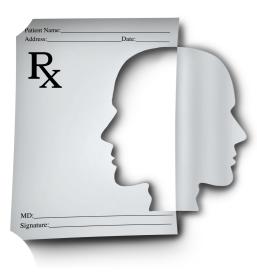
DEFINING VULNERABLE INDIVIDUALS

Some global data privacy/protection regulations have extraterritorial scope beyond their shores so residents are protected by the regulation in their jurisdiction even when the personal information is being used in another country. Think global when identifying categories of vulnerable individuals as there may be differences across jurisdictions.

SENSITIVE INFORMATION (PIPA PART 2 SECTION 7)

Categories of sensitive information include place of origin, race, colour, national or ethnic origin, sex, sexual orientation, sexual life, marital status, physical or mental disability, physical or mental health, family status, religious beliefs, political opinions, trade union membership, biometric information or genetic information,





MANAGING PRIVACY RISKS (VIDEO ACTIVITY RECAP)

1.Discard, delete, or return personal information to owner if it is no longer fit for purpose.

2.Triple (not double) check details when using ℰ sharing sensitive information.

3. The use of fax and memory sticks are high risk activities. Consider encrypting mobile devices and avoid sending sensitive information via memory sticks.



KEY POINTS IN PIPA

Explore topics we covered during the training:

- Conditions: Part 2, Sec 6
- Sensitive Information: Part 2, Sec 7
- Third Party Management: Part 2, Sec 15
- Children: Part 2, Sec 16

RIGHTS OF INDIVIDUALS

Explicit Rights (PIPA Part 3): Access, Rectification, Blocking ど Erasure/Destruction

Implicit Rights (not so obvious in PIPA): Informed, Data Portability, Automated Decision-making & Profiling





CREATE A CULTURE OF PRIVACY (3 HACKS)

- Review job descriptions & identify privacy **responsibility levels** across your team.
- Schedule regular training on **holistic** data protection.
- Consider a privacy pledge for employees and take the **LEAD** with a privacy charter!