

Road to PIPA 2024

A quarterly guide to readiness for the implementation of PIPA (2016) which comes into full effect 1 January 2025 from The Office of the Privacy Commissioner (PrivCom)



Organisational Committment Ground Work

Inventory

Risk Assessment Policy & Procedure

Training

Service Providers Incident Response PIPA Rights Requests External Comms

PIPA

Inventory
Review use of personal information at What is personal information? PrivComBermuda (privacy.bm) and discuss in the context of your business
Create a map to track collection, storage, and dissemination of personal information
Review the reasons data is collected and determine if this aligns with use of information
Identify the PIPA Conditions for using personal information and note sensitive personal information for more analysis later

Risk Assessment*
Review the risks and harms of personal data misuse and present these concepts to internal stakeholders
Identify potential risks of unauthorised use or access to personal information at each stage of the cycle identified during data mapping
Work with the Privacy Committee to identify controls to mitigate risks and set realistic timelines for implementation of these controls
Identify common scenarios where security might be breached and discuss how this might affect individuals and the business

Policy & Procedure
Create a general policy regarding commitment to privacy compliance and expectation that staff act in accordance with PIPA
Create a data retention and destruction schedule and share expectations with staff regarding collection of personal information, including how to provide notice of the purpose and, if needed, gain consent
Update your employee handbook to reflect how you want staff to perform actions associated with various tasks that include personal information