



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 Commitment

- Start the process by asking the CEO to sign the intent statement on www.privacy.bm and then circulate a letter to all staff endorsing PIPA Compliance
- Designate a Privacy Officer (PO) and set a timetable for progress reports
- Conduct all-staff training re Privacy Basics and discuss organisational Privacy Programme

Groundwork

- Create a list of all of the different areas of your business (i.e. sales, HR, accounting, etc.) and identify employees who could join your privacy committee
- Meet with each member of your privacy committee to create a plan for setting up your Privacy Programme
- Review the PIPA legislation and determine how the law affects each area of your business – consider requirements of other jurisdictions if needed

Inventory*

- Review use of personal information on www.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

*Larger organisations with many business units may need to devote extra time to building a multi-layer inventory. This process can continue as the organisation moves through the next steps identified for Q2.