HP PRIVACY ADVISOR (HPPA) TOOL

HP Privacy Office

2014

HPPA OVERVIEW

What does it do?

- The tool forms a critical basis of implementation
- Assesses activities that handle personal data
- Provides privacy design guidance
- Initiates a dialog between staff and the Privacy Office
- Maintains a record of activities
- Dynamic interface – to minimize unnecessary questions
- Output Reports

HPPA OVERVIEW

– Functional Overview

User

Questionnaire

- Project/activity profile
- Detailed compliance questions
- Transborder flows
- Indicators of potential harms

Rules Engine

Knowledgebase

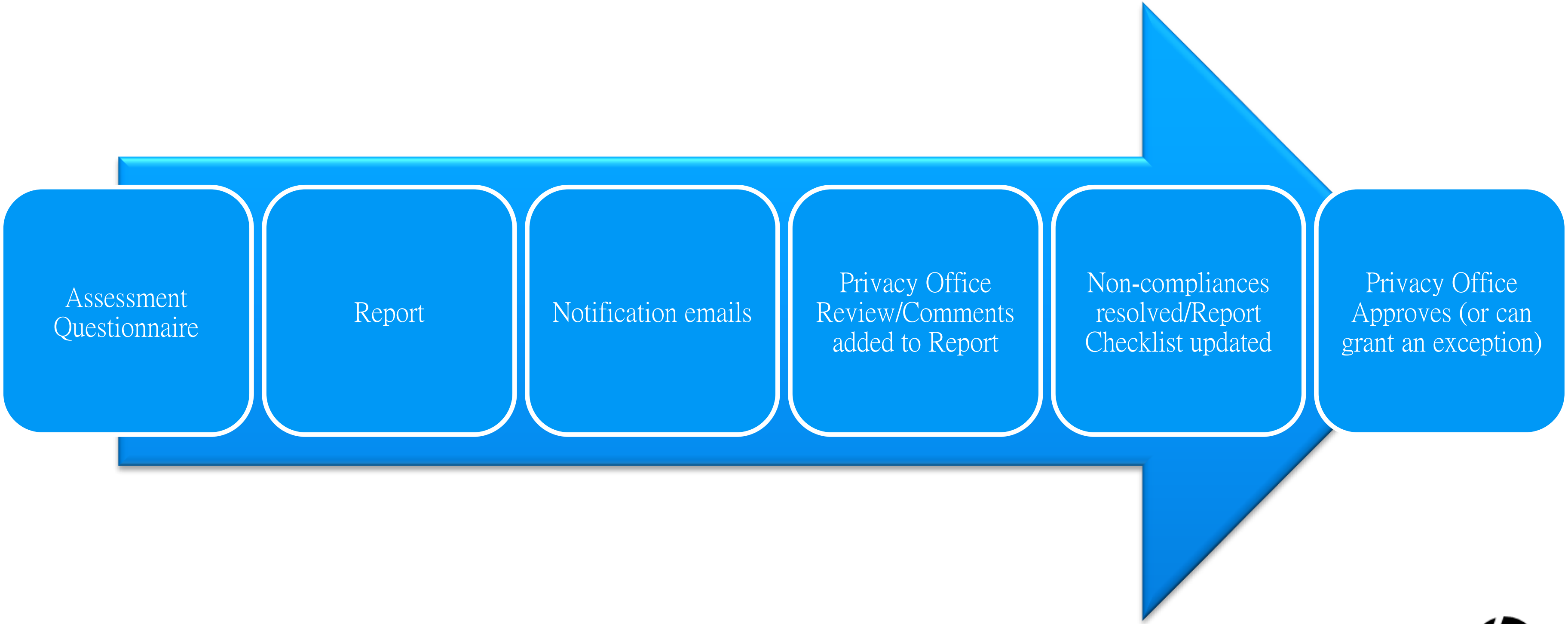
- Rules – HP Policies
- Rules – HP Privacy standards & Specifications
- Rules – Country requirements
- Rules – Guidance

Feedback

- Assessment against; HP Policies, Standards, Specifications, country requirements, etc.
- Checklists
- Means to seek help

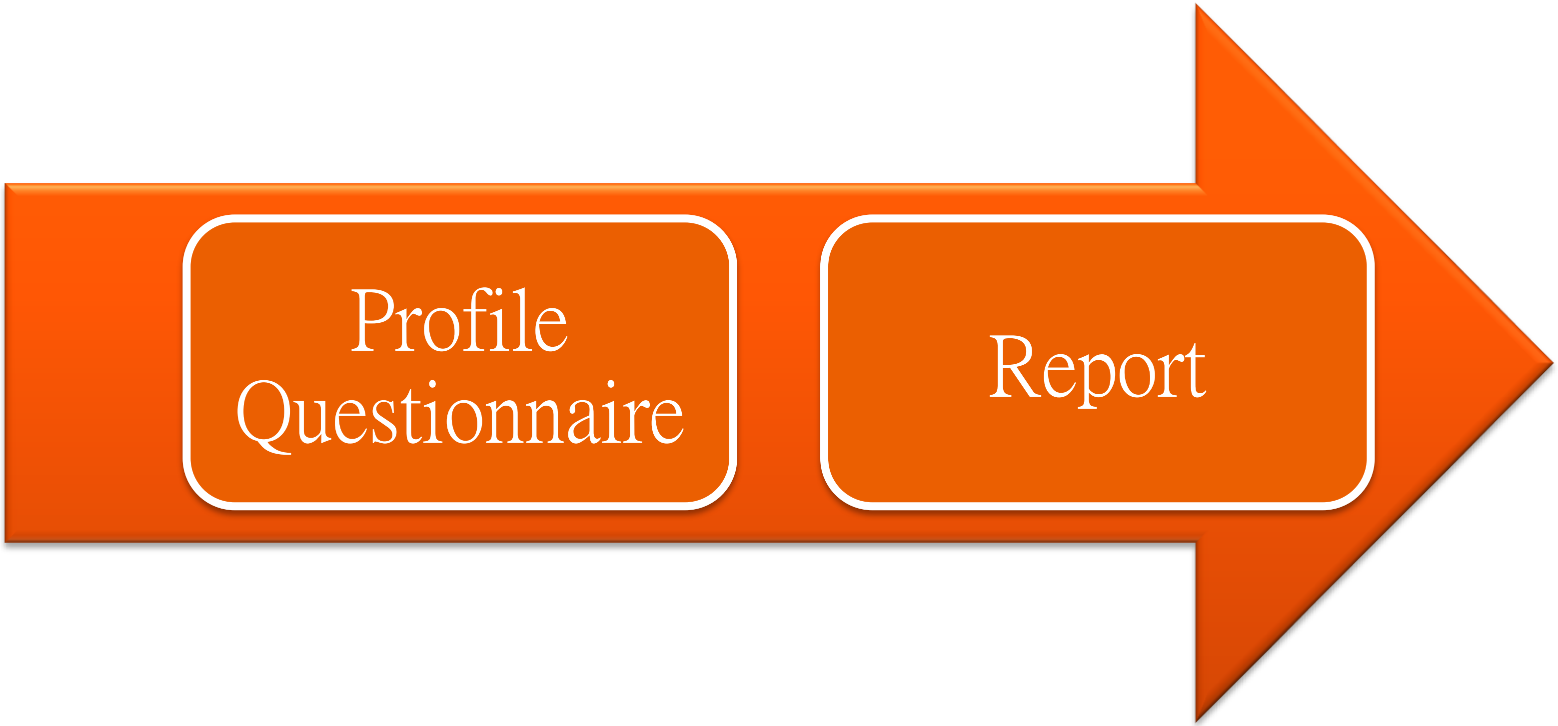
HPPA OVERVIEW

Privacy Assessment lifecycle



HPPA OVERVIEW

Privacy Guidance



ASSESSING A PROJECT

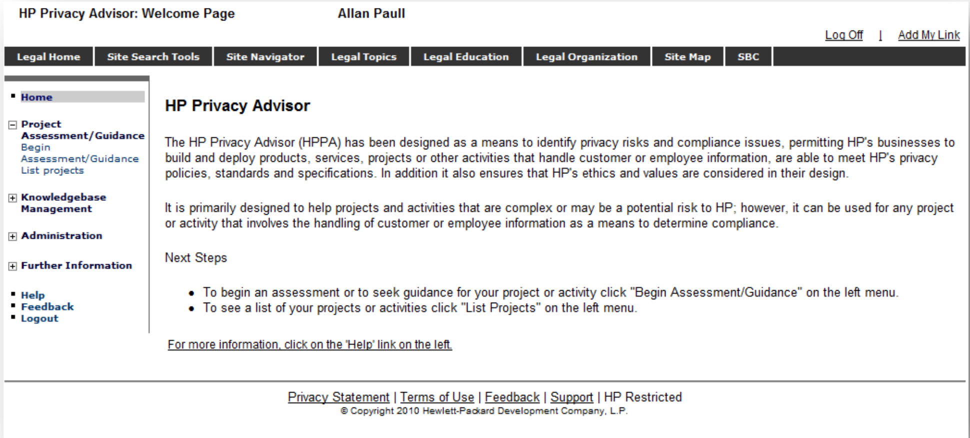
ASSESSING A PROJECT

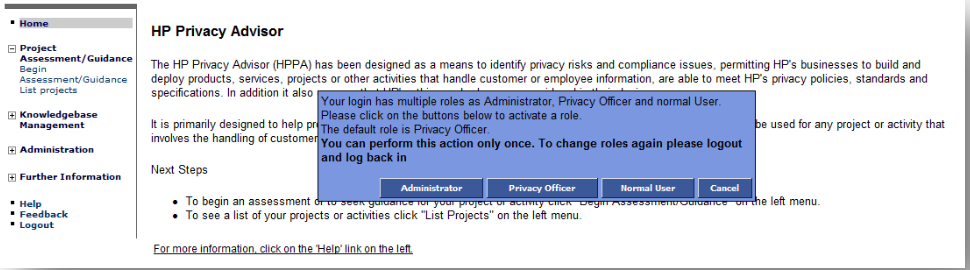
HPPA home page

Privacy Staff may see the 2nd screen when logging in.

– The HPPA have several levels of access:

- Administrators – have full access to the HPPA.
- Privacy Officer – is able to assess and approve projects, may have access to add KB content (this is the option that you should select).
- Normal User – HP Employees. They only have access to "Project Assessment…", "Further Information", "Help", & "Feedback".

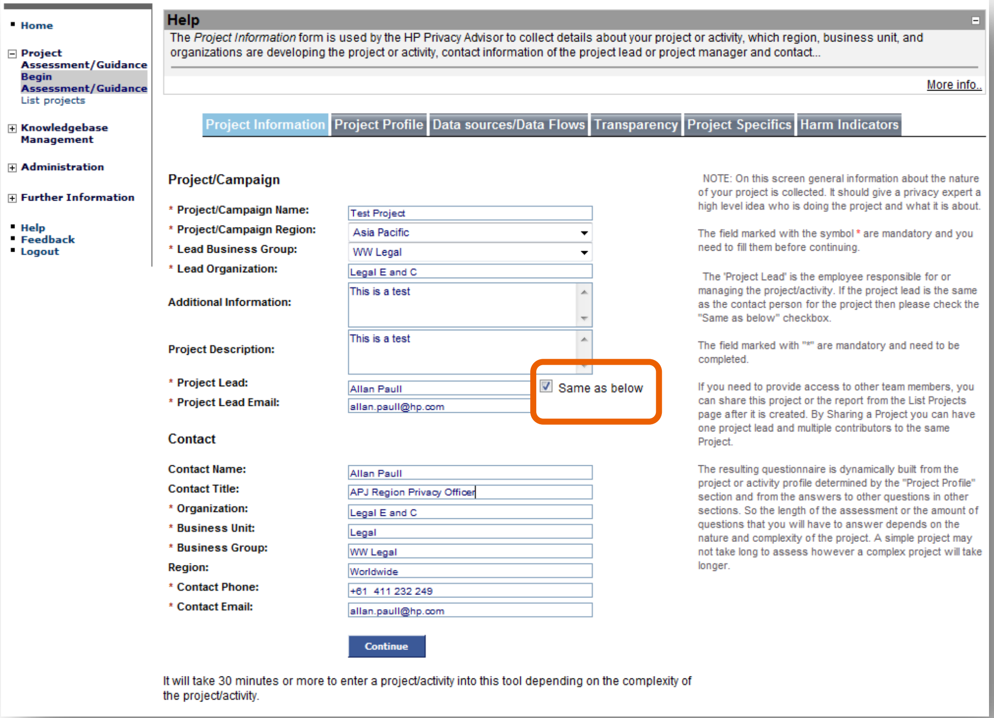




USING THE HPPA

Project Information

- *Project/campaign name*.
- *Region* and *Business Unit* that will be developing/delivering the project.
- The *Lead Organization* field is pre-populated – Change this if necessary.
- *Same as below* checkbox if the Project Lead and Contact are the same.

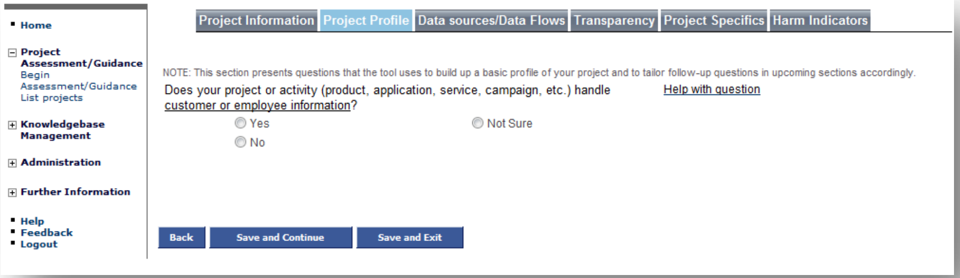


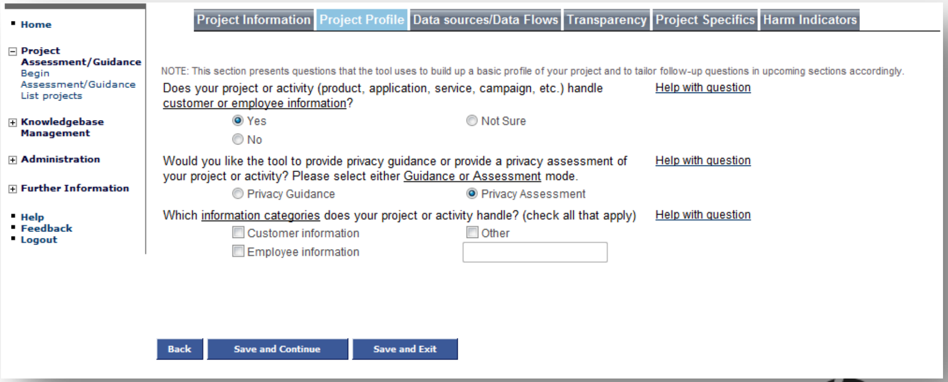
USING THE HPPA

Project Profile

The Project Profile section is used to gather a "profile" of the project. It is used by the HPPA to "build" the remainder of the questionnaire.

- The 1st question is a gating question used to determine if the questionnaire needs to be answered.
- The questionnaire will continually be built as you answer each question.
- **Tool-Tips:** Move the mouse over underlined text to display a definition of that term.
- The 2nd question determines whether a privacy assessment or privacy guidance is being sought.
- **Privacy Guidance** if developing a project and need information on how to ensure it will meet privacy requirements.
- **Privacy Assessment** if about to deploy (or have already deployed) the project and need to determine if it complies with privacy requirements.

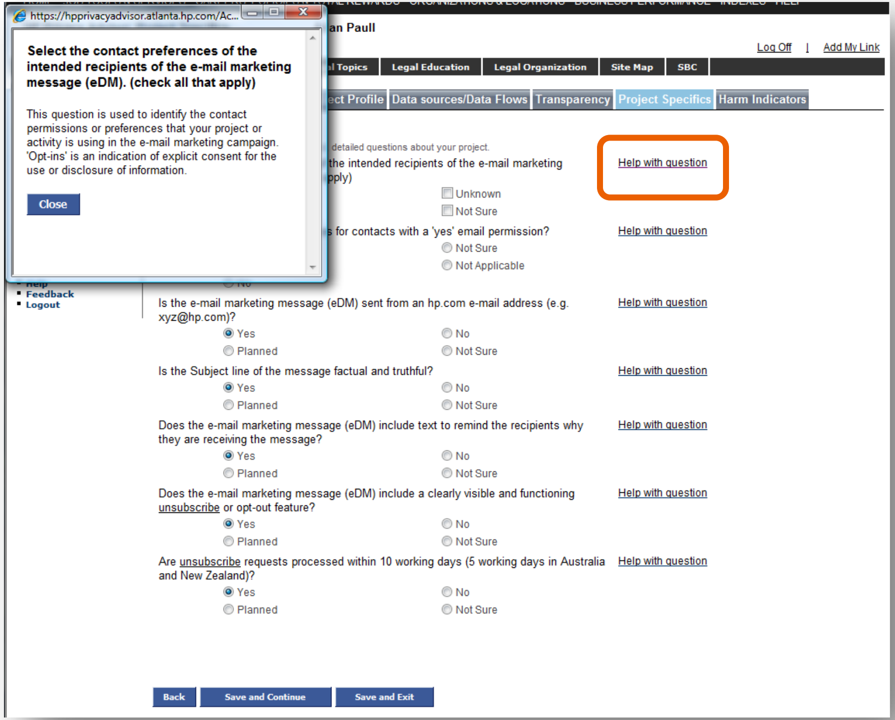




USING THE HPPA

Help on any question

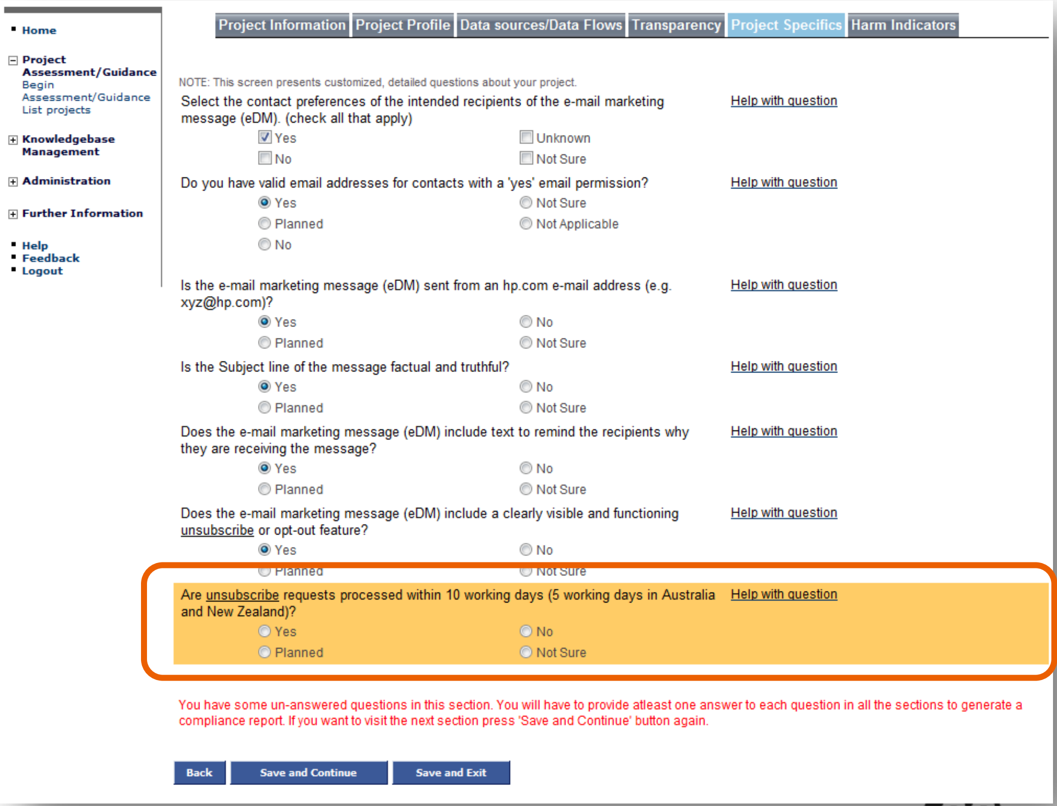
– *Help with question* to display the purpose or meaning of any question.



USING THE HPPA

Unanswered questions

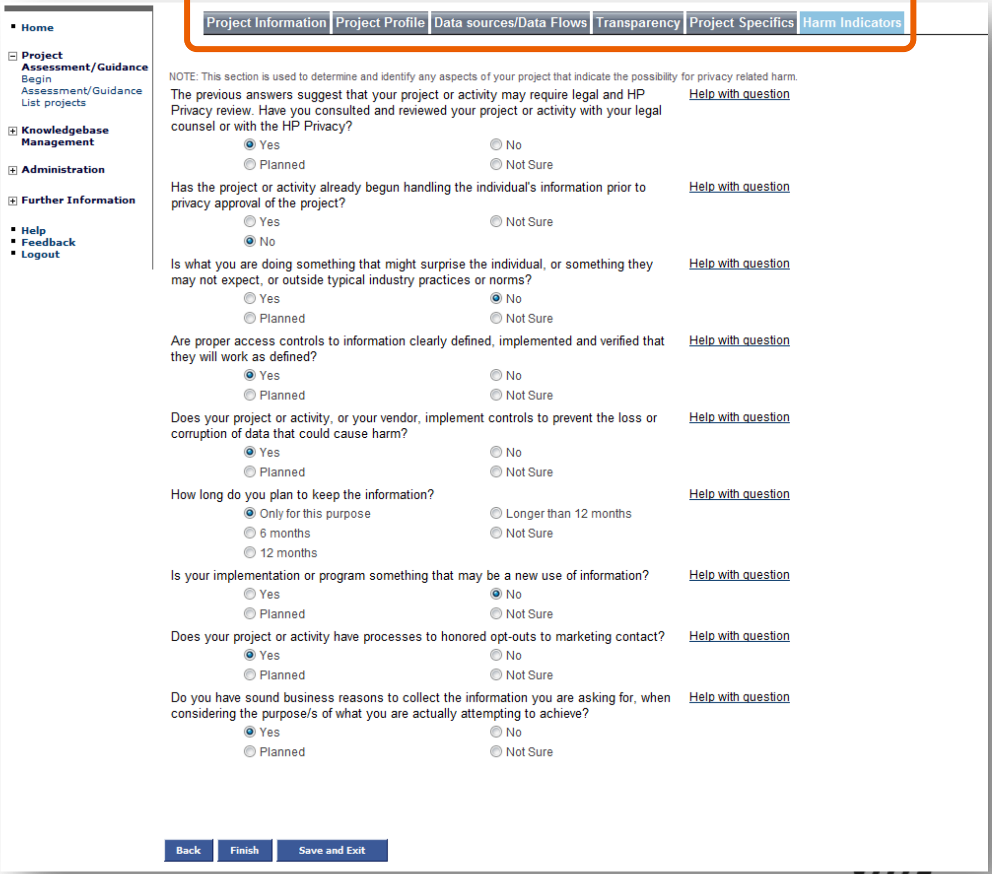
- Unanswered questions are highlighted.



USING THE HPPA

Finishing the questionnaire

– *Section Tabs* allow the user to navigate to any part of the questionnaire.

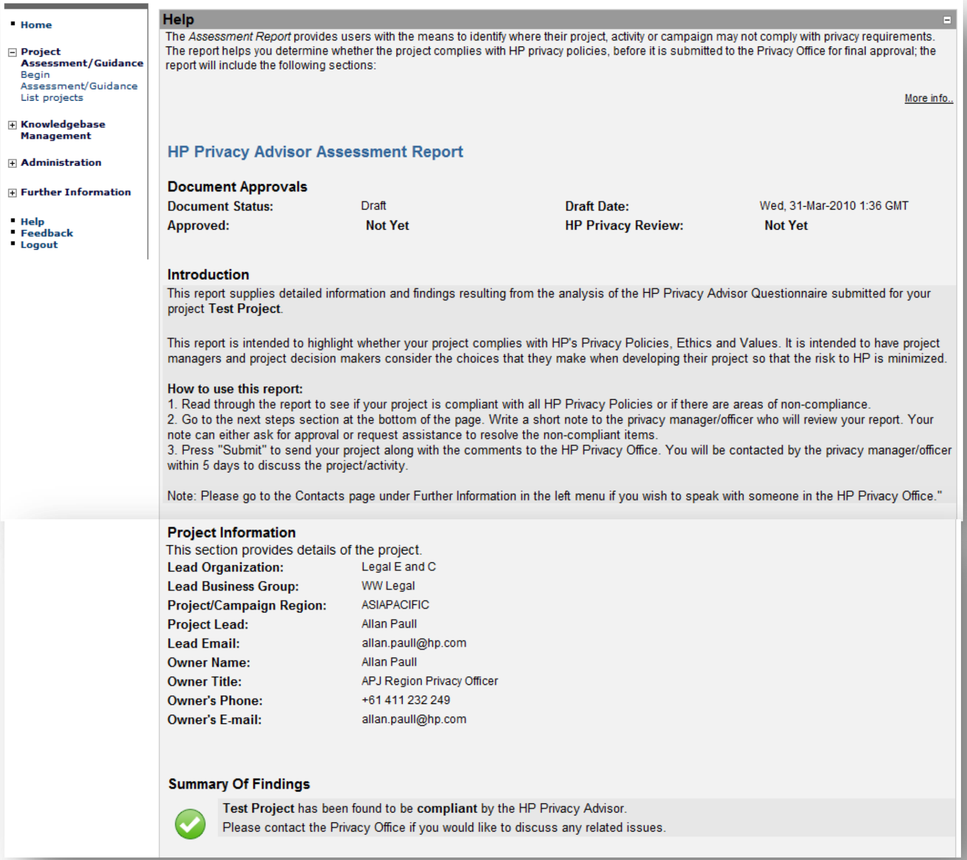


USING THE HPPA

Assessment Report

The Report contains several sections that:

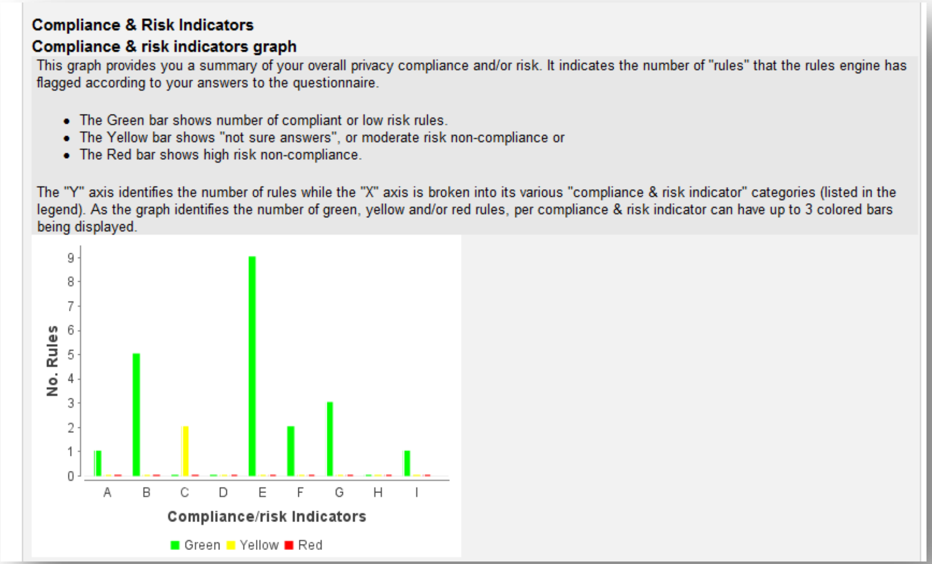
- **Document Approvals:** Displays the status of your report.
- **Introduction:** Displays instructions on how to use the report.
- **Project Information:** Displays the Project Information.
- **Summary of Findings:** Provides an assessment summary.



USING THE HPPA

Assessment Report

- **Compliance & risk indicators graph:** Displays a graphical representation of the assessment:
  - No's of compliant or low risk (green) responses;
  - No's of "Not Sure" answers or moderate risk responses;
  - No's of non-compliant or high risk responses.

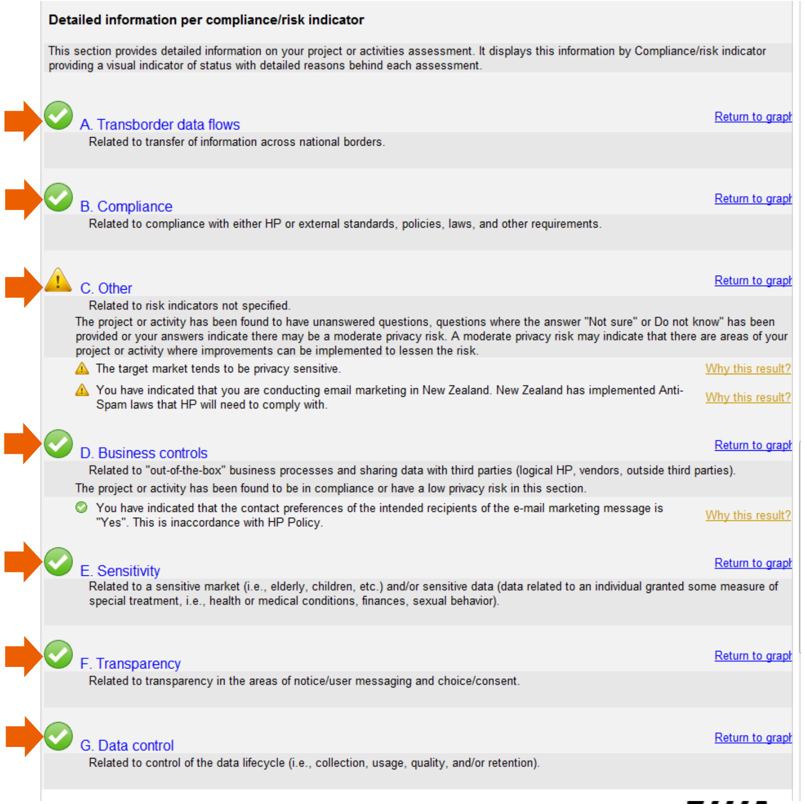


USING THE HPPA

Assessment Report

Detailed information per compliance/risk indicator:

- **Business controls;** related to "out-of-the-box" business processes and sharing data with third parties.
- **Compliance;** related to compliance with either HP or external standards, policies, laws, etc.
- **Data control;** related to control of the data lifecycle (i.e., collection, usage, quality, and/or retention).
- **Sensitivity;** related to a sensitive market (i.e., elderly, children, etc.) and/or sensitive data (i.e., health or medical conditions, finances, sexual behavior).
- **Security;** related to the security of data and data flows.
- **Transborder data flows;** related to transfer of information across national borders.
- **Transparency;** related to transparency in the areas of notice/user messaging and choice/consent.
- **Other;** related to risk indicators not specified.
- **Missing information;** unable to determine risk because of missing or inadequate answers. May also be flagged because of free-text answers.



Detailed information per compliance/risk indicator

This section provides detailed information on your project or activities assessment. It displays this information by Compliance/risk indicator providing a visual indicator of status with detailed reasons behind each assessment.

A. Transborder data flows — Return to graph
Related to transfer of information across national borders.

B. Compliance — Return to graph
Related to compliance with either HP or external standards, policies, laws, and other requirements.

C. Other — Return to graph
Related to risk indicators not specified.
The project or activity has been found to have unanswered questions, questions where the answer "Not sure" or Do not know" has been provided or your answers indicate there may be a moderate privacy risk. A moderate privacy risk may indicate that there are areas of your project or activity where improvements can be implemented to lessen the risk.
The target market tends to be privacy sensitive. — Why this result?
You have indicated that you are conducting email marketing in New Zealand. New Zealand has implemented Anti-Spam laws that HP will need to comply with. — Why this result?

D. Business controls — Return to graph
Related to "out-of-the-box" business processes and sharing data with third parties (logical HP, vendors, outside third parties).
The project or activity has been found to be in compliance or have a low privacy risk in this section.
You have indicated that the contact preferences of the intended recipients of the e-mail marketing message is "Yes". This is inaccordance with HP Policy. — Why this result?

E. Sensitivity — Return to graph
Related to a sensitive market (i.e., elderly, children, etc.) and/or sensitive data (data related to an individual granted some measure of special treatment, i.e., health or medical conditions, finances, sexual behavior).

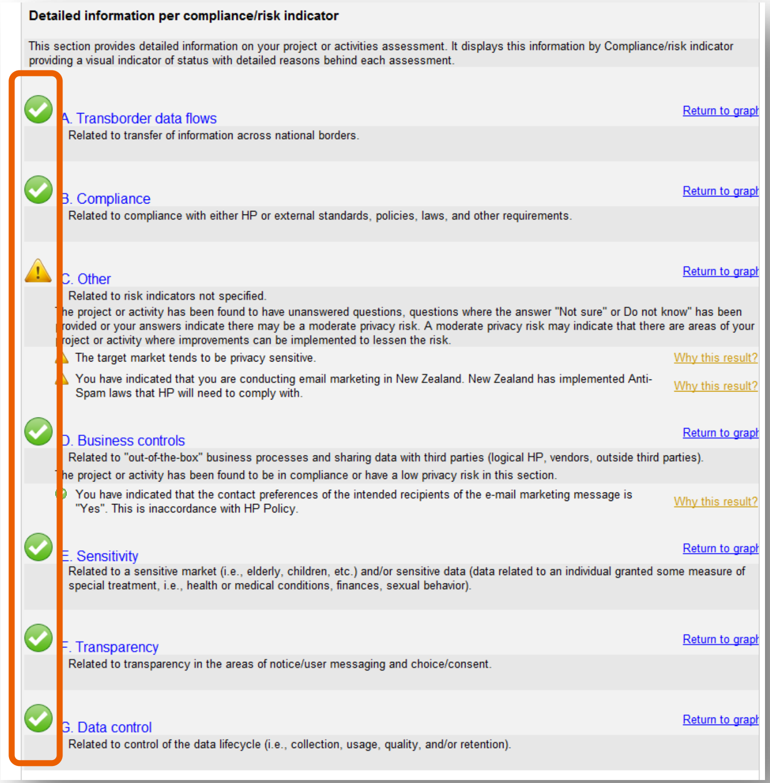
F. Transparency — Return to graph
Related to transparency in the areas of notice/user messaging and choice/consent.

G. Data control — Return to graph
Related to control of the data lifecycle (i.e., collection, usage, quality, and/or retention).

USING THE HPPA

Assessment Report

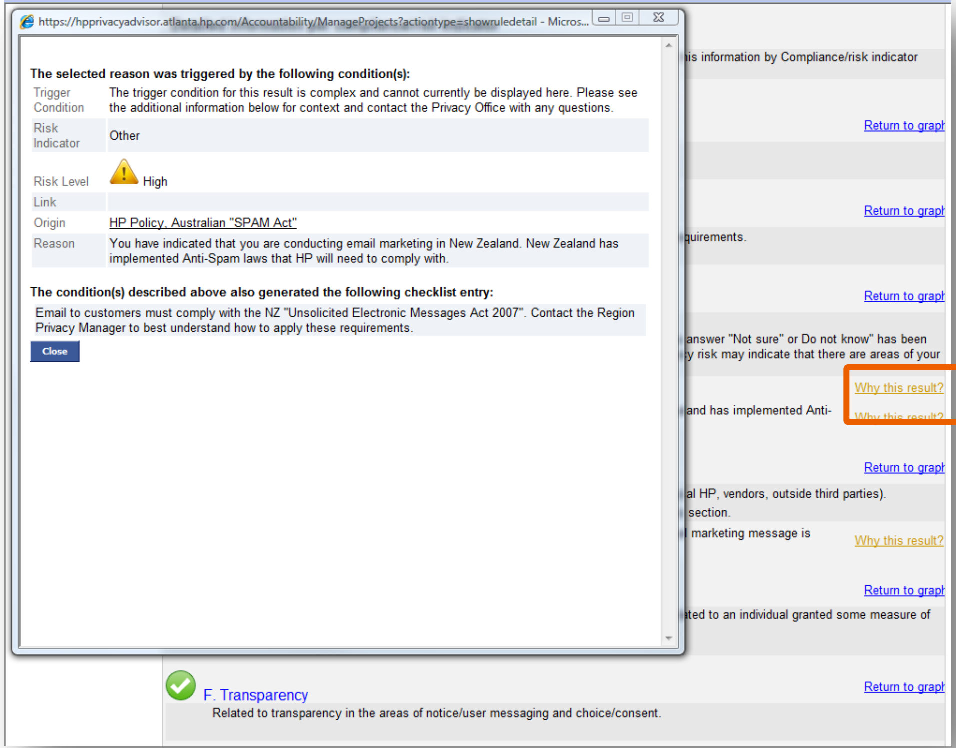
- The report will further break down the assessment into:
  - Green tick indicates whether the project complies with the requirements or is a low privacy risk. No further information will be provided.
  - Yellow exclamation indicates that either there may be moderate risk or there may be missing information or the employee has answered "Not Sure" to questions. A reason will be provided as to why the HPPA returned this result.
  - Red cross indicates non-compliance or high risk. A reason will also be provided here as to why the HPPA returned this result.



USING THE HPPA

Assessment Report – Why this result?

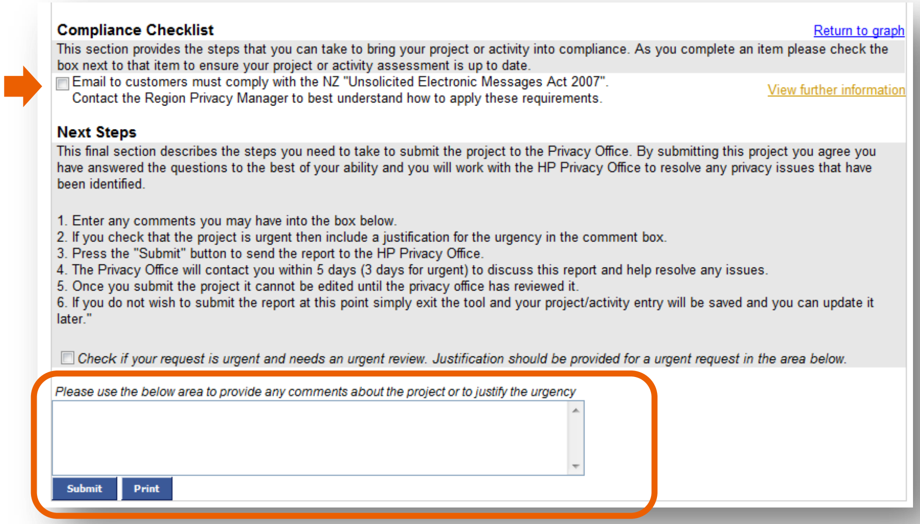
– *Why this result?* to display details or the reason for the assessment.



USING THE HPPA

Assessment Report

- **Compliance Checklist;** actions the user can take to bring their project into compliance.
- **Next Steps;** A user can enter a message for the Privacy Office Approver and can indicate if their project is urgent or not.

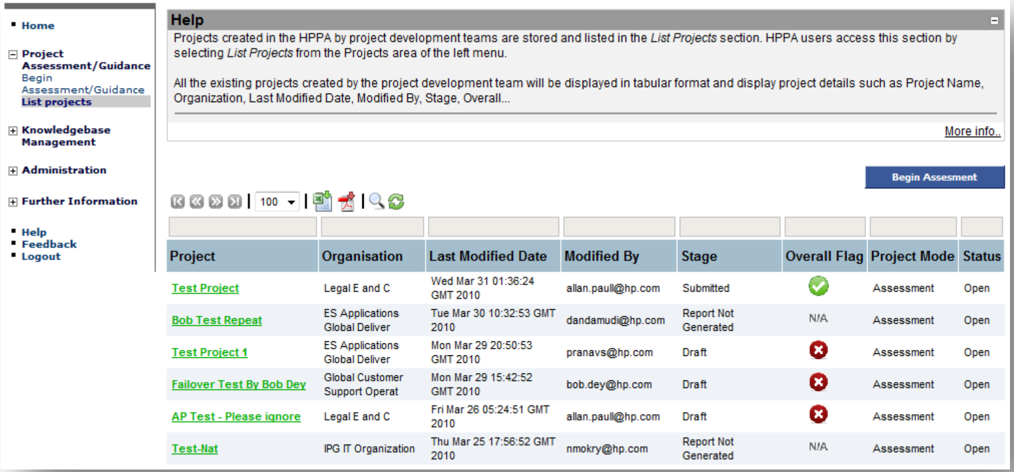


LIST PROJECTS & THE CONTROL PANEL

LIST PROJECT

Accessing your project

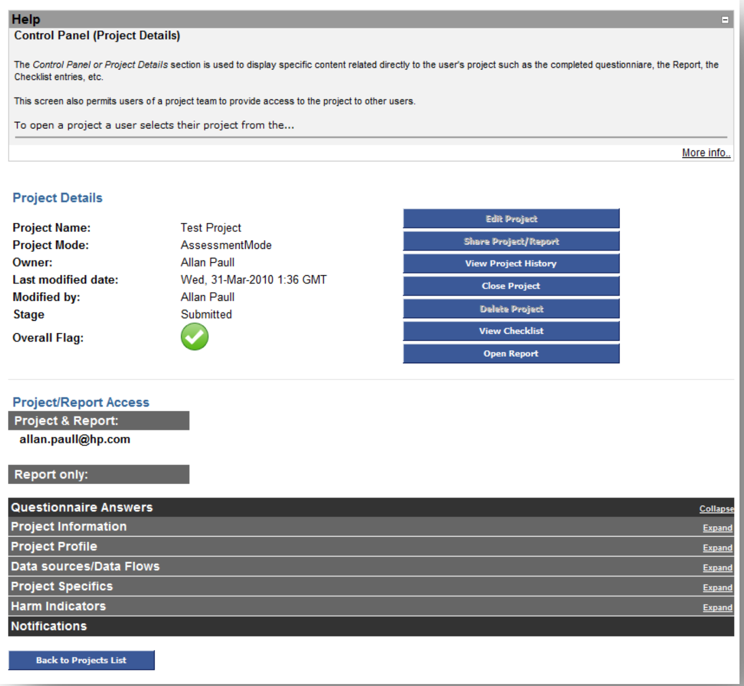
- Projects will be listed under List Projects.
- Provides a summary of project information.
- *Project name* link to go to the Project Control Panel.



CONTROL PANEL

Introduction

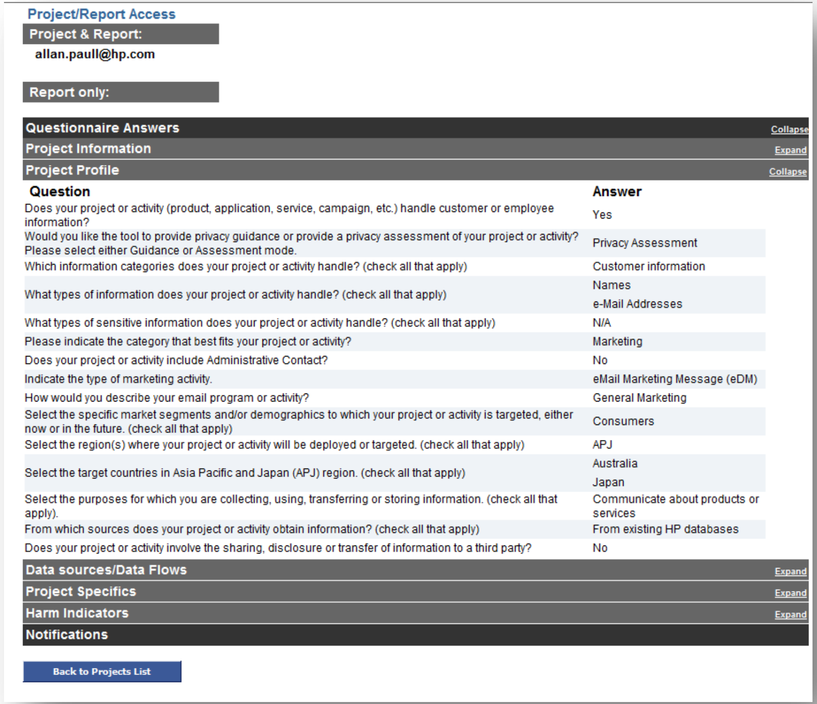
- **Edit Project** – Available to the Project user if the project has yet to be submitted or re-opened.
- **Share Project/Report** – Available to the Project user and permits them to give other employees access to the project.
- **View Project History** – Allows employees with access to the project to view each version of the project.
- **Close Project** – Is used to close a project.
- **Delete Project** – Available only to Privacy Office Staff.
- **View Checklist** – Permits employees to view the checklist.
- **Open Report** – Permits employees to view the report.
- If a selection is not available, the button text is blurred.



CONTROL PANEL

Viewing the Questionnaire

– Displays the completed questionnaire.



Project/Report Access

Project & Report:

allan.paull@hp.com

Report only:

Questionnaire Answers Collapse

Project Information Expand

Project Profile Collapse

Question	Answer
Does your project or activity (product, application, service, campaign, etc.) handle customer or employee information?	Yes
Would you like the tool to provide privacy guidance or provide a privacy assessment of your project or activity? Please select either Guidance or Assessment mode.	Privacy Assessment
Which information categories does your project or activity handle? (check all that apply)	Customer information
What types of information does your project or activity handle? (check all that apply)	Names e-Mail Addresses
What types of sensitive information does your project or activity handle? (check all that apply)	N/A
Please indicate the category that best fits your project or activity?	Marketing
Does your project or activity include Administrative Contact?	No
Indicate the type of marketing activity.	eMail Marketing Message (eDM)
How would you describe your email program or activity?	General Marketing
Select the specific market segments and/or demographics to which your project or activity is targeted, either now or in the future. (check all that apply)	Consumers
Select the region(s) where your project or activity will be deployed or targeted. (check all that apply)	APJ
Select the target countries in Asia Pacific and Japan (APJ) region. (check all that apply)	Australia Japan
Select the purposes for which you are collecting, using, transferring or storing information. (check all that apply).	Communicate about products or services
From which sources does your project or activity obtain information? (check all that apply)	From existing HP databases
Does your project or activity involve the sharing, disclosure or transfer of information to a third party?	No

Data sources/Data Flows Expand

Project Specifics Expand

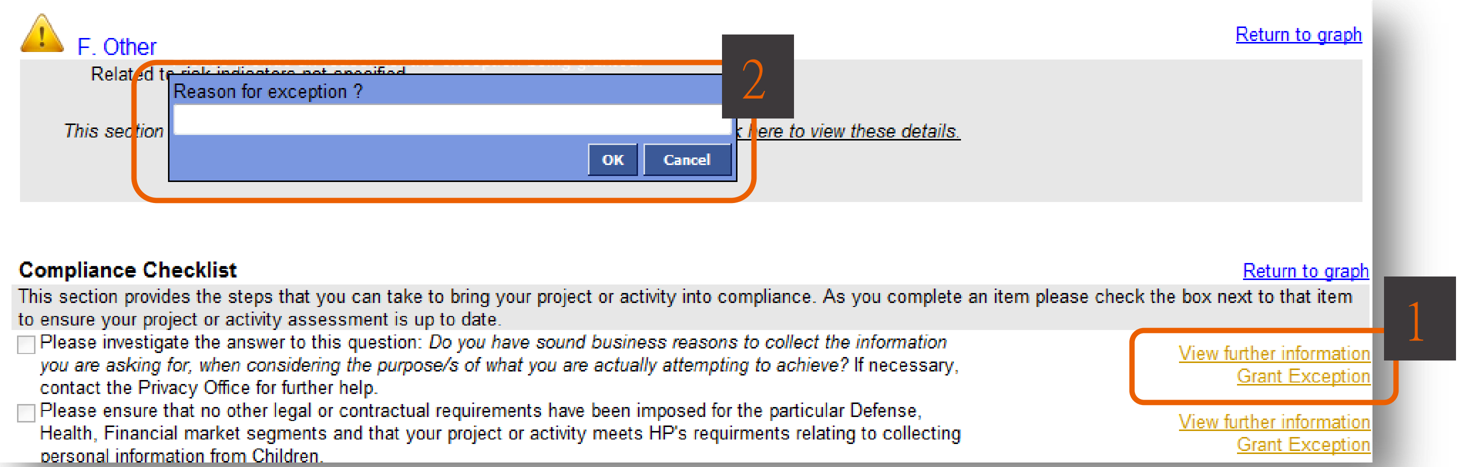
Harm Indicators Expand

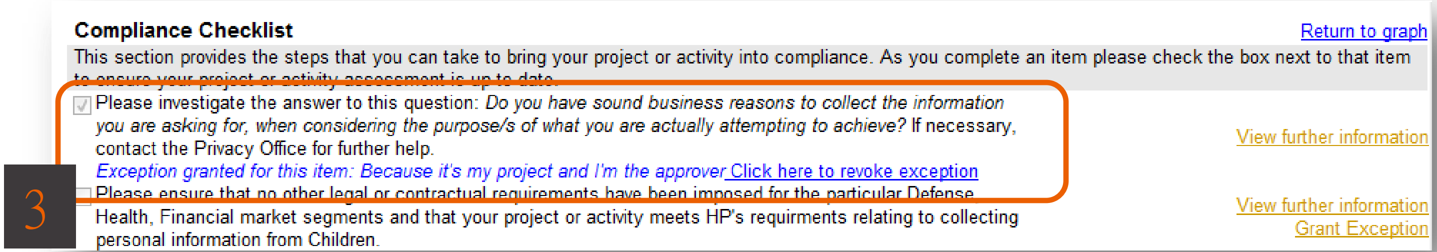
Notifications

Back to Projects List

PO APPROVER

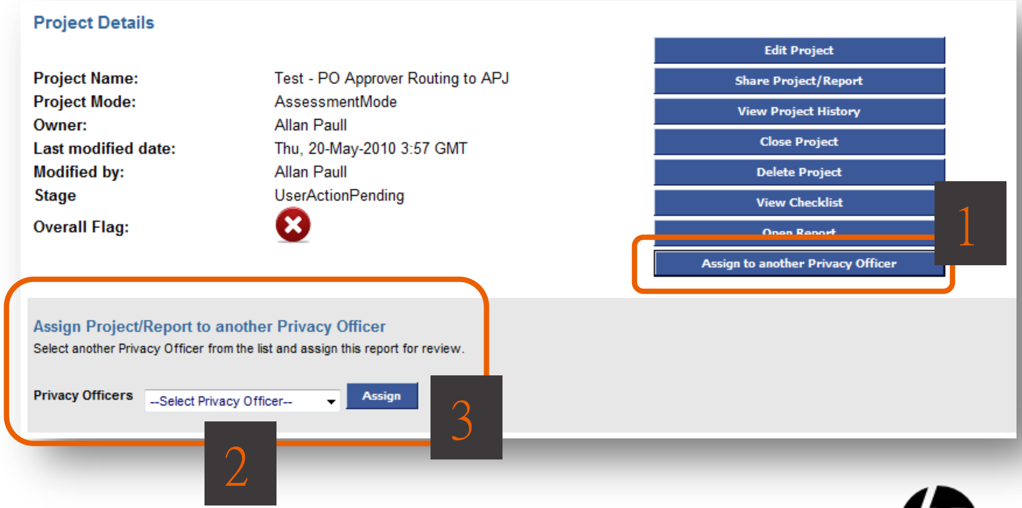
Granting Exceptions





REASSIGNING A PROJECT TO ANOTHER PRIVACY OFFICER APPROVER

Reassign a project to another Privacy Office staff member.



KNOWLEDGEBASE

KNOWLEDGEBASE

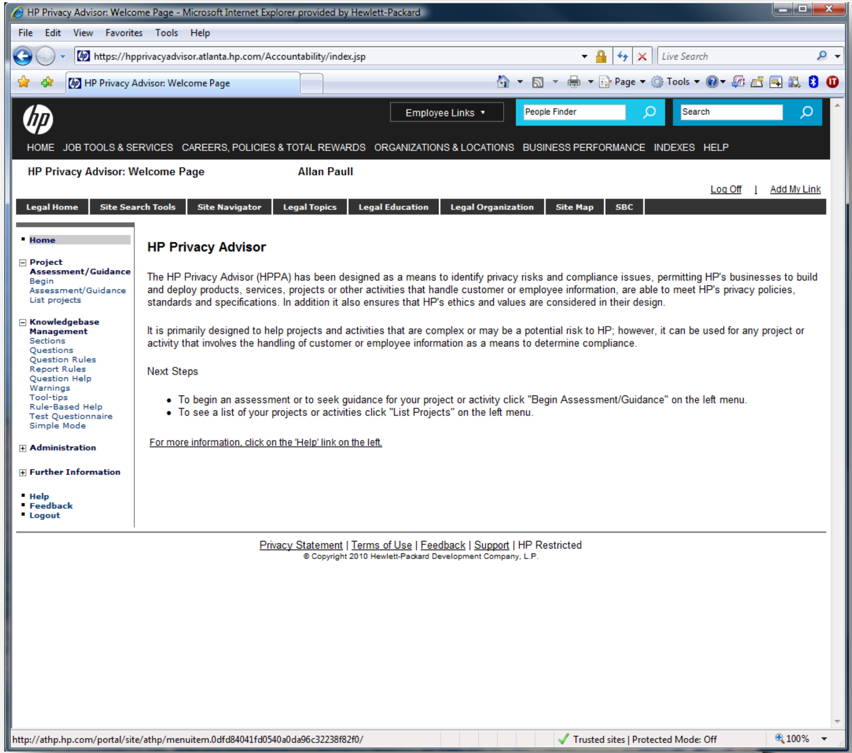
Development lifecycle

- Plan Question Structure
- Create Questions
- Create Question Rules
- Create Report Rules
- Preview Questionnaire
- Add Question Help, Tool-Tips
- Obtain KB Approval

ADDING KB CONTENT

2 Modes: Expert Mode & Simple Mode

- **Expert Mode:**
  - **Sections** – Add/edit/delete Section Tabs in the Questionnaire.
  - **Questions** – Add/edit/delete Question text, Answers or Question Help.
  - **Question Rules** – Add/edit/delete rules that determine when questions are displayed.
  - **Report Rules** – Add/edit/delete rules that determine the information displayed in end-user assessment or guidance reports.
  - **Question Help** – Add/edit/delete Question and rule-based question help.
  - **Warnings** – Add/edit/delete warnings that can be displayed in the questionnaire if a user answers a question in a manner that may require a warning message to be displayed.
  - **Tool-tips** – Add/edit/delete pop-up question definitions and keywords.
  - **Rule-based Help** – Add/edit/delete question or warnings rule-based help.
- **Test Questionnaire** to test new "live" KB content.
- **Preview Questionnaire** to test new draft KB content.
- **Simple Mode** last menu item under the Knowledgebase Management.

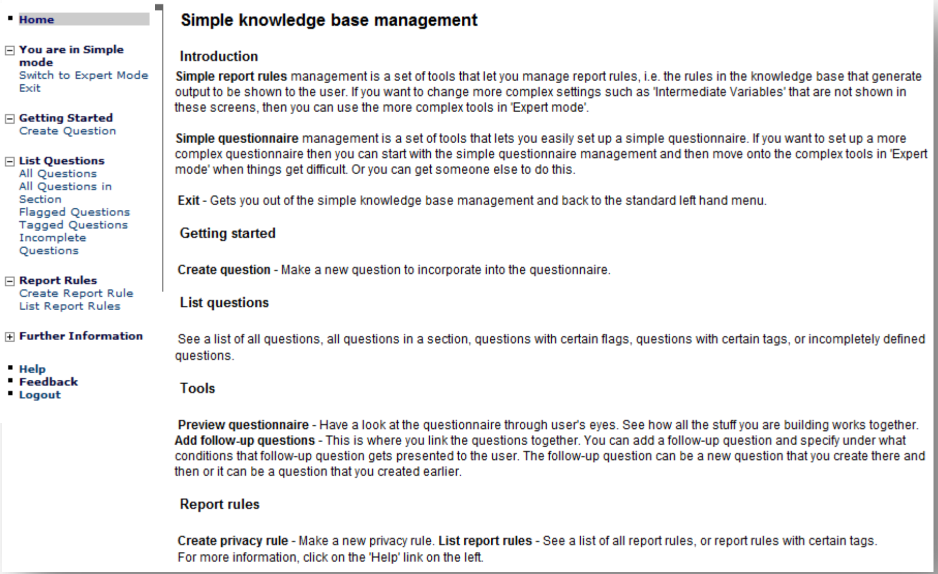


SIMPLE MODE

Simple Mode Home page

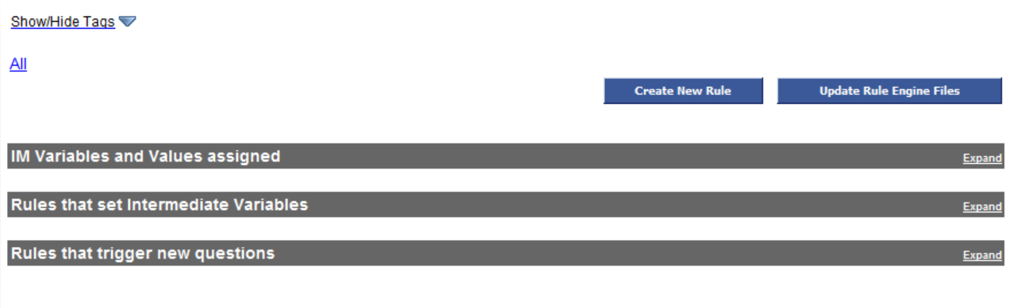
– Clicking *Simple Mode* opens this screen with options to:

- Switch to Expert Mode
- Getting Started
  - Create Question – Add questions.
- List Questions
  - All Questions – List/edit/delete questions.
  - All Questions in Section – List/edit/delete questions by section.
  - Flagged Questions – List/edit/delete flagged questions.
  - Tagged Questions – List/edit/delete tagged questions.
  - Incomplete Questions – List/edit/delete incomplete questions.
- Report Rules
  - Create Report Rule – Add Report Rules.
  - List Report Rules – List/edit/delete Report Rules.



EXPERT MODE

Rules

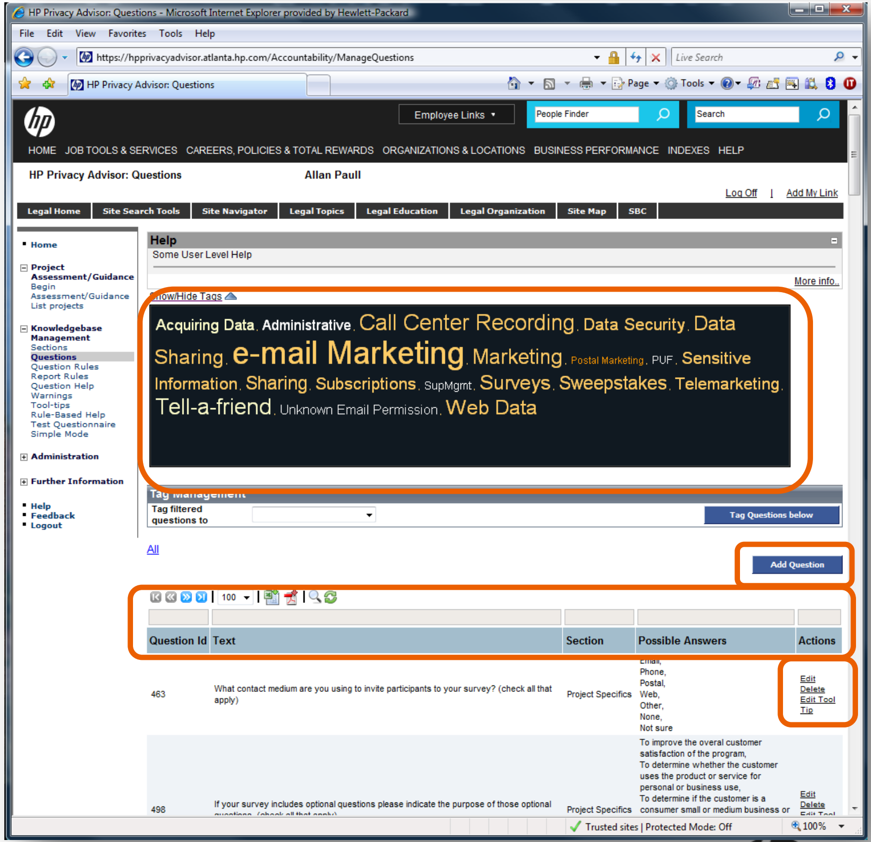


- **IM Variables:** Are reusable variables for use in IM Rules.
- **IM Rules:** Are rules that cause a question or combination of questions to be displayed in the questionnaire.
- **Question Rules:** Are rules that determine how questions are displayed.
- **Report Rules:** Report Content is created using Report Rules.

EXPERT MODE

The Question table

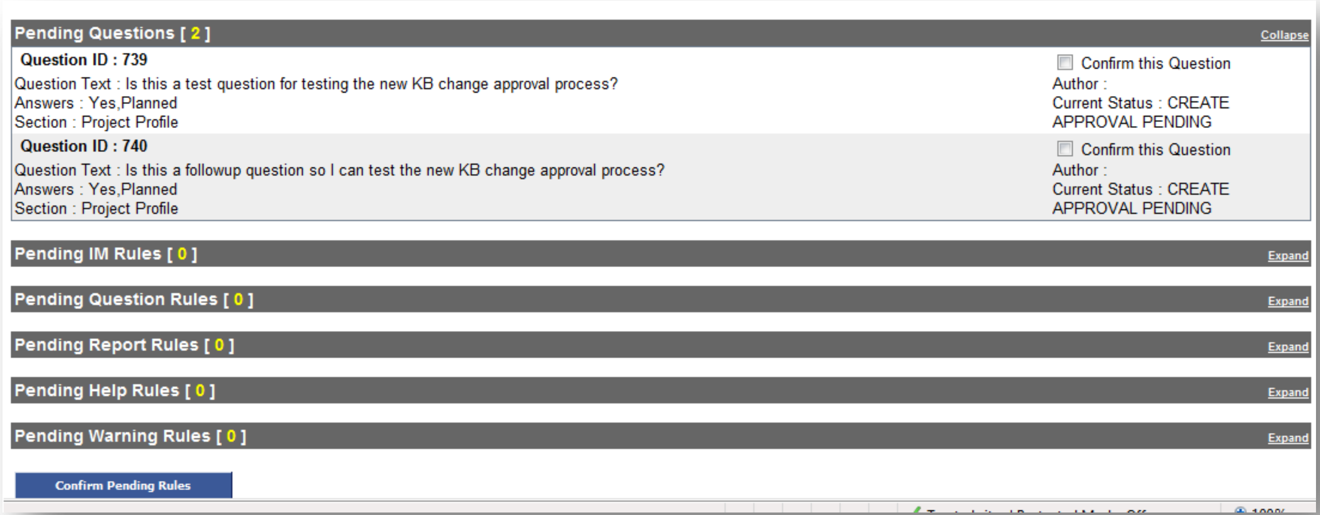
- Questions table:
  - New questions can be created, existing questions edited or deleted.
  - Question Tool-tips can be edited.
  - Tags can be added.
    - Clicking a Tag in the Tag Cloud will filter the table.
  - Content also searched, filtered, and sorted.
  - Search fields above column headings
  - Clicking a column heading will sort the table.



EXPERT MODE

KB Approver – Approving new content

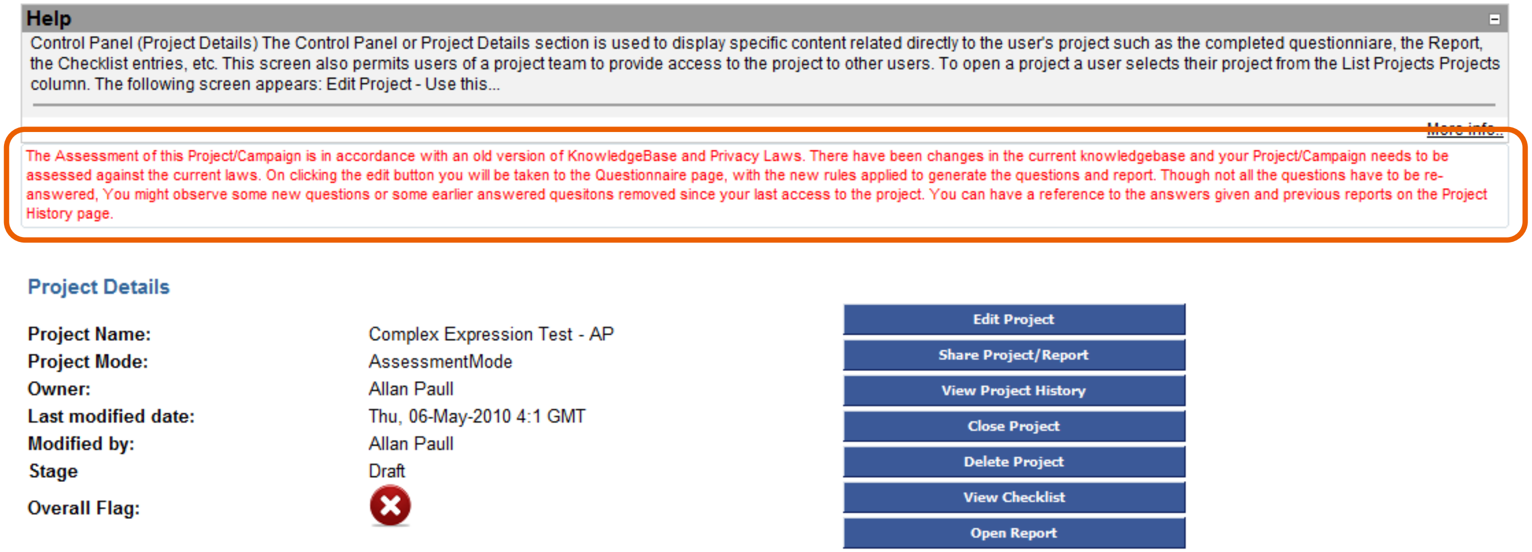
- New, edited, or deleted content, has to be reviewed & approved before it “goes live”.
- Content that is deleted remains in the knowledgebase and is marked as “Deprecated”,
  - So it can still be used by old projects. It can’t be used by the KB team in new content.
- Content that has been approved is marked as “Confirmed” and is available for use by the KB team when developing content.



EXPERT MODE

Messages User receives if content has changed

– If a user creates a project and doesn’t submit it, and then knowledgebase content is changed they receive this message.



ADMIN SECTION

PRIVACY OFFICE APPROVER

Lead PO Approver

- When the user enters one of these Business Units for their project these Privacy Staff will be set as the "Lead approver" for the project.

Add BusinessGroup

Region Privacy Officers — Expand

Business Group Privacy Officers — Collapse

BusinessGroup	BusinessGroup PO Email	Actions
Corp Admin and Shared Services	cherri.gillmore@hp.com	Edit Delete
EDS Business	peter.j.reid@hp.com	Edit Delete
Executive Office	cherri.gillmore@hp.com	Edit Delete
Global IT	bob.dey@hp.com	Edit Delete
Human Resources	koert.dubois@hp.com	Edit Delete
Imaging & Printing Group	bob.dey@hp.com	Edit Delete
Office of Corp Strategy & Tech	debbie.morey@hp.com	Edit Delete
Personal Systems Group-PSG	debbie.morey@hp.com	Edit Delete
Technology Solutions Group	peter.j.reid@hp.com	Edit Delete
WW Finance	cherri.gillmore@hp.com	Edit Delete
WW Legal	cherri.gillmore@hp.com	Edit Delete
Test BG	nandeesh.c@hp.com	Edit Delete

Routing Rules — Collapse

PRIVACY OFFICE APPROVER

Who gets copied

- When the user enters one of these Regions for their project these Privacy Staff will be copied on the project.

Add BusinessGroup

Region Privacy Officers Collapse

Region	Region PO Email	Actions
AMERICAS	ssmith@hp.com	Edit
ASIAPACIFIC	allan.paull@hp.com	Edit
EMEA	daniel.pradelles@hp.com	Edit
WORLDWIDE	ssmith@hp.com;allan.paull@hp.com;daniel.pradelles@hp.com	Edit

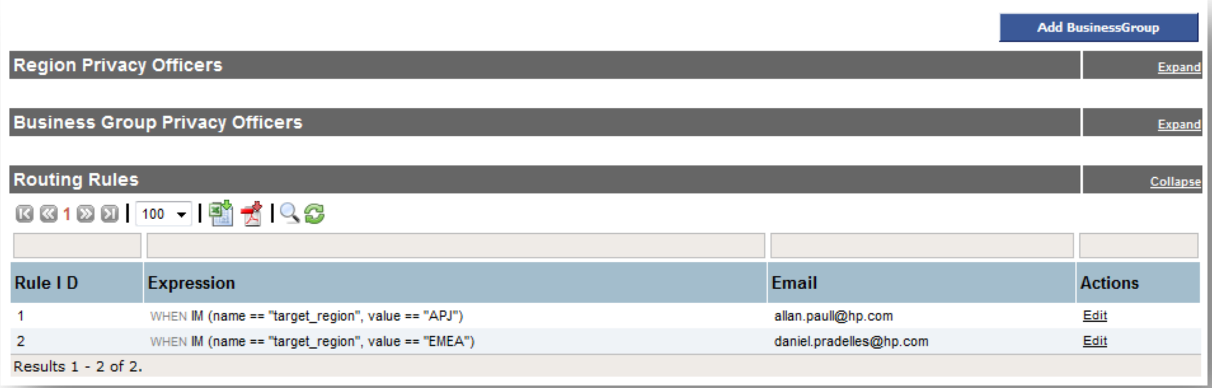
Business Group Privacy Officers Expand

Routing Rules Expand

PRIVACY OFFICE APPROVER

Routing Rules – will take precedence

- We can create a "Routing Rule" that will override this setting.
  - E.g. we can set Susan, Allan, Daniel as the Lead Approvers for projects targeted to their regions.



Add BusinessGroup

Region Privacy Officers Expand

Business Group Privacy Officers Expand

Routing Rules Collapse

1 | 100

Rule I D	Expression	Email	Actions
1	WHEN IM (name == "target_region", value == "APJ")	allan.paull@hp.com	Edit
2	WHEN IM (name == "target_region", value == "EMEA")	daniel.pradelles@hp.com	Edit

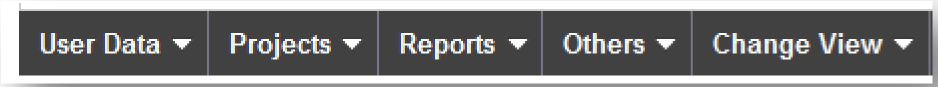
Results 1 - 2 of 2.

DASHBOARD

– The Dashboard is available to only PO Staff and Administrators and can be accessed under the Administration section of the left menu.

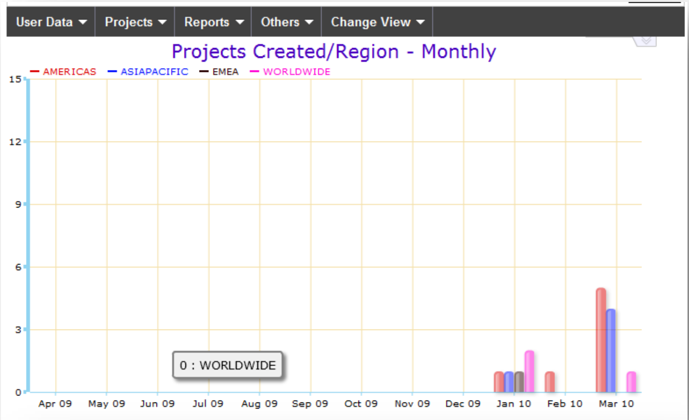
– It is used to provide both graphical and tabular metrics on the HPPA, on numbers of users, on projects submitted, reports, etc.

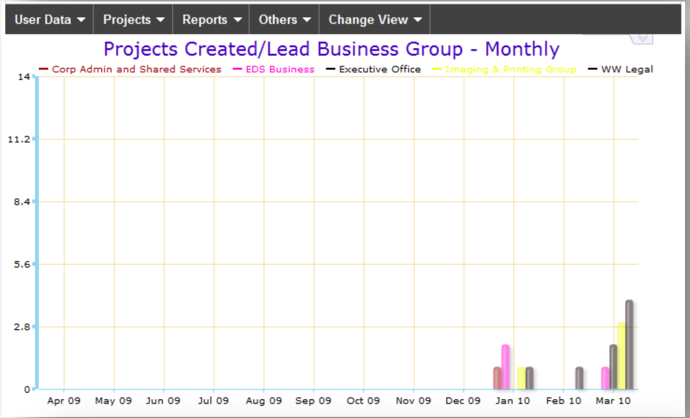
– This is the Dashboard menu. Each topic includes subheadings listed on the next page.



DASHBOARD

- Information available from the Dashboard includes:
  - Number of users accessing the HPPA
    - Monthly, Quarterly and Yearly
  - Number of Projects created by Region or BU
  - Number of Projects in Progress by Region or BU
  - Number of Projects Submitted by Region or BU
    - All Monthly, Quarterly and Yearly
  - Number of Reports by Region or BU :
    - Not yet submitted
    - Submitted
    - Approved
    - Not Approved
    - Greed
    - Yellow
    - Red
    - All by Month, Quarter and Year
  - A snapshot of the Knowledgebase to display numbers of questions and Rules.
  - And the ability to switch between Graph and Tabular views (Change View).
  - Moving your mouse over the columns in the graphs will display the column value.





Unique Users/Region - Monthly

	May 09	Jun 09	Jul 09	Aug 09	Sep 09	Oct 09	Nov 09	Dec 09	Jan 10	Feb 10	Mar 10	Apr 10
AMERICAS	0	0	7	0	4	0	0	8	2	0	2	0
ASIAPACIFIC	0	0	3	0	1	0	0	2	2	0	5	0
EMEA	0	0	2	0	1	0	1	1	0	0	1	2

END

