NumeRITA Initiation Request for CCPA

This is to outline the high level requirements of NumeRITA Reporting for Compliance, Detail Analysis Dashboard and Data Quality in CCPA (North America) Privacy Program Privacy data.

# Structure

The envisioned NumeRITA is a new section of Dashboards that will be added to the existent sets (IT Service Analytics, IT Assets Management, GDPR) with the name of CCPA. The acronym stands for California Consumer Protection Act, but this is commonly recognized as the program that will cover in general Privacy for the whole of North America.



The new section will be very similar (although not identical) to the GDPR section, as it will contain a set of pages with customized views about Privacy data. Those views will be substantially identical, but with different filters providing view over different chunks of the data. The R&D section should be quite similar to the GDPR one, while the other groupings will differ, although we cannot yet articulate exactly how. The organization of CCPA *operationalization* is still WIP; while GDPR landed with 20 Owning organizations, CCPA is currently dealing with >150. Still this does not change the validity of the general approach.

Within the sections we will see the same pages that are currently under GDPR, plus one new that we are piloting in CCPA and will probably soon reapply to GDPR too. The final pages of each section will therefore be:

|  |  |
| --- | --- |
| 1. **CCPA Compliance cockpit:** will contain the compliance status of CCPA privacy; it will be organized by Owning Organization’s and various filters will contribute to reduce the scope of specific pages; as per GDPR the development of a general page (all scope) will start first, |  |
| 1. **CCPA Dashboard**: this will contain the low details data for detailed analyses, downloads etc. as per GDPR |  |
| 1. **Application Tracker:** this will contain, as per GDPR, detailed information on applications that are relevant for CCPA with their Infosecurity and iRisk assessment information |  |
| 1. **Quality Dashboard:** this dashboard does not exist for GDPR and it is an innovation by CCPA. It will include quality data dashboard for Records that build the CCPA inventory | C:\Users\gatti.a\AppData\Local\Microsoft\Windows\Temporary Internet Files\Content.MSO\49522D7A.tmp |

# Data source and technical requirements

The main data source for Compliance Cockpit (1), CCPA Dashboard (2), and Quality Dashboard (4) will be Sharepoint Lists that will be manually created on a daily basis and made available to Numerify via methods to be defined (most probably SFTP, with a manually initiated process on P&G side). The structure of 1 and 2 will be the same (sample in Attachment 1), wile a new structure will be made available for #4 and design efforts need to be allocated to create the only logic that does not currently exist for GDPR; the degree of complexity of Quality, compared to the source of 1 and 2 is about 1:20, so extremely simpler than 1 & 2. The source and logic of Application Tracker (3) is very similar to GDPR logic.

# Timings

We would like to stick to have the first page of the CCPA Dashboard (all scope) in production and available to CCPA team by September 1st 2019. This is the time where the CCPA team will switch attention from Inventory building to Compliance assessment, and having an easy to read, well shared tool to boost visibility will contribute to the team effectiveness.

The sequence for developments/roll out should be:

* Compliance Dashboard General (all Ownign Organization’s): September 1st 2019
* Quality Dashboard General: October 1st 2019
* CCPA Dashboard (general): November 1st 2019
* Application Tracker (general): December 1st 2019
* Creation of additional Dashboard (with business indication on how to sub-divide) for all dashboards: February 1st 2020
* Swap data input (from Sharepoint to the final target technology) to the new platform for Compliance, CCPA Dashboard, Quality Dashboard: timing to be defined

# Next Steps

As agreed in preliminary meeting of July 26th, Andrea will check availability with Numerify resources to organize a requirement gathering meeting to be held in the American morning of August 1st 2019, with the attendance of Barbara Hayden, CCPA Project Manager, Andrea Elizondo, NumeRITA program manager, a PM from Numerify and Alessio, Legal IT Privacy Expert.

# **Attachment 1**: sample data for Compliance and Dashboard

