



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

Ground
Work

Inventory

Risk
Assessment

Policy &
Procedure

Training

Service
Providers

Incident
Response

PIPA Rights
Requests

External
Comms

PIPA

Incident Response

- ☐ Review the section regarding breach notification in the 'Guide to PIPA'
- ☐ Prepare an incident response plan with your leadership team and other stakeholders, such as the Privacy Committee, that includes step by step instruction for managing a data breach (i.e. who can make public statements; how is harm analysed; what documentation is required)
- ☐ Draft generic template letters, in line with your organisation's communication strategy, that can be used to notify PrivCom and individuals about a data breach
- ☐ Break up the elements of the incident response plan into sections and schedule time for further review and completion – remember to involve staff and include testing

PIPA Rights Requests

- ☐ Define what a PIPA Rights Request means for your organisation and identify uses of information that might be exempt under PIPA
- ☐ Create a workflow for how PIPA Rights Requests are received and access to information is granted – take into account compliance with statutory timelines and the need for documentation
- ☐ Notify and train staff about the procedure for general awareness and so that they are prepared to direct individuals appropriately

External Communications

- ☐ Create a Privacy Notice to post on your website and at your place of business
- ☐ Privacy Officers should set reminders to re-evaluate the Privacy Programme annually and advise stakeholders accordingly of any changes
- ☐ Celebrate your organisation's commitment to Privacy and readiness for PIPA Implementation – 1st January 2025