<u> 2011</u>

Data Protection Professionals Role, Function and Salary Survey

International Association of Privacy Professionals





2011 Data Protection Professionals Role, Function and Salary Survey

Executive Summary and Findings

International Association of Privacy Professionals

A Message from the Chairman

Dear Data Protection Professional,

I am delighted to present you with the IAPP's second survey of our European membership.

Building on the information garnered in our inaugural *Data Protection Professionals Role,* Function and Salary Survey in 2010, this report not only recognises the significant data protection expertise within our IAPP member community, but spotlights the progress seen in the careers of European data protection professionals in the past year.

This year's survey report also includes features spotlighting two of the first recipients of our newest certification credential, the CIPP/E, with their insights on ongoing efforts to develop the profession.

With two years of benchmarking now in place, we hope this report will provide you with greater insights into the work of your peers that will prove useful and informative for your own career development.

Kind Regards,

Bojana Bellamy, LLM

IAPP Chairman

Director of Data Privacy

B. Bellamy

Accenture London, UK

Table of Contents

I. Executive Summary	5
II. Survey Findings	6
Industry Sector	6
Organisation Size	7
Geographic Location	8
The Data Protection Professional's Role	9
Profiles in Privacy: Giles Watkins, CIPP/E	12
Responsibilities	14
Privacy Programme Maturity	16
Profiles in Privacy: Pascale Gelly, CIPP/E	17
Salary	18
III. Survey Methodology	20
Appendix: Survey Questions	21

Executive Summary

The 2011 Data Protection Professionals Role, Function and Salary Survey builds on the first year of benchmarking in 2010 to reveal developments in the profession in Europe over the past year.

Among the key findings:

- IAPP's reach into Europe is dominated by the technology and software, professional services and
 financial services markets. Representation from finance has overtaken telecommunications since 2010. There
 were no survey respondents from the public sector, suggesting a need for greater engagement with privacy
 professionals working for central and local government authorities.
- Most data protection professionals continue to be employed by large companies, with those who employ 75,000 or more accounting for nearly half of all survey respondents.
- **Data protection is an international issue,** with the majority of respondents' organisations having a global reach.
- The seniority of the privacy role within organisations appears to be substantially on the rise, although in Europe it still lags behind equivalent roles in North America.
- Data protection continues to be driven by compliance and legal requirements, with nearly half of all respondents reporting in those areas of their organisations.
- Privacy is still settling in as a profession, and whilst respondents report an increasing focus upon their
 core privacy duties without the distraction of other areas of responsibility, many are also expected to deliver
 regulatory compliance or information security or perform IT roles in addition to their privacy work.
- Many European privacy professionals remain frustrated by a lack of clarity over their potential
 career paths within the organization and are either uncertain about the next role they might take or anticipate
 not achieving the executive management positions that they desire.
- **Despite the economic downturn, salaries have remained steady,** but over one-third of respondents feel that their salary levels are lower than those of comparable individuals within their organisations.
- Respondents continue to report a steady maturity of privacy programmes, with the majority assessing their activities as being in the higher levels of maturity.

II. Survey Findings

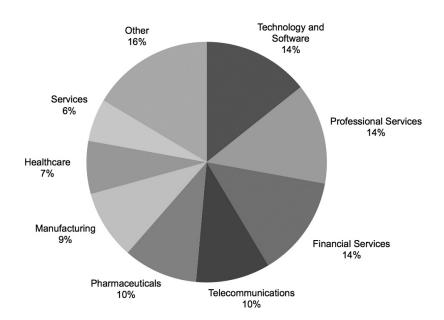
The findings are grouped into sections that are intended to provide a narrative about the state of the European privacy profession today. We start with sections that describe the nature of the respondent organisations: which sector they are in, how big they are, where they are located and the maturity of their privacy programmes. We follow with sections that address the respondents themselves: where they are placed in the organisation, to whom they report, how they spend their time and what their level of compensation is. In each section, we try to draw meaning from the results, with a focus on how to assist European privacy professionals achieve career success.

Industry Sector

In which sectors are European privacy professionals best represented? Technology and software, together with the professional services and financial services each received 14 percent of response for a total of 52 percent. In the IAPP's 2011 Privacy Professional's Role, Function and Salary Survey released earlier this year, in which 95 percent of respondents were from North America, financial services ranked first, followed by government and a shrinking healthcare cohort. The biggest difference is the lack of public-sector IAPP members in Europe compared to North America.

What does this mean? There is a more even distribution of European privacy professionals across different sectors than there has been in the past, although the responses indicate that several important European sectors, such as government, remain largely unrepresented within IAPP. Outside of government, the highest concentrations remain in sectors that process sensitive personal data.

Sectors Represented

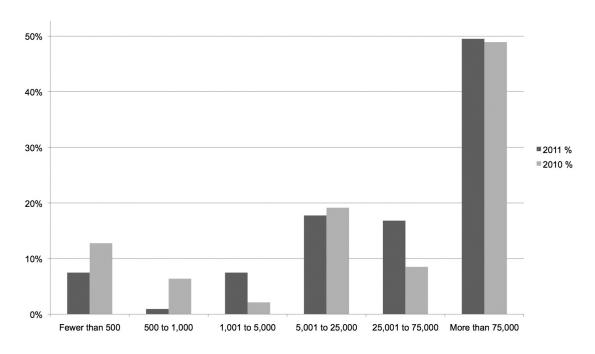


Organisation Size

European data protection professionals are mostly based in large organisations. In 2010, organisations with more than 25,000 employees accounted for 58 percent of survey respondents. This share increased in 2011, hitting two-thirds of all respondents. Whilst it is possible that only the largest European organisations believe they can afford the overhead of a privacy function—and that smaller organisations are therefore exposed to regulatory-compliance gaps and information risk vulnerabilities—it is as likely that many data protection and compliance officers do not see themselves as privacy professionals or have yet to engage with IAPP membership.

The strong representation of professional services organisations may indicate an increased willingness of European organisations to outsource privacy governance expertise to third-party providers, and this would merit further investigation in future surveys.

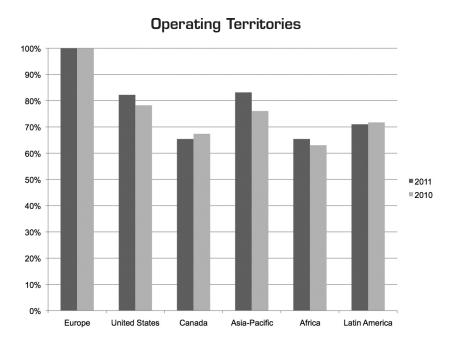
Organisation Headcount



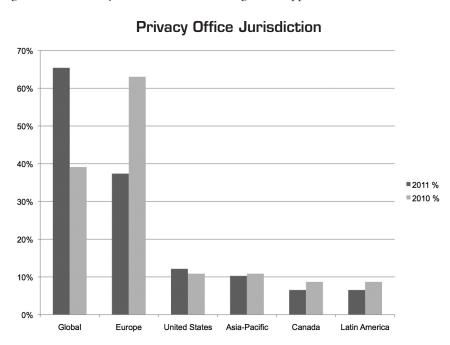
Worldwide headcount	2010 %	2011 %	Change since last year
Fewer than 500 employees	13%	7%	-6%
500 to 1,000 employees	6%	1%	-5%
1,001 to 5,000 employees	2%	7%	5%
5,001 to 25,000 employees	19%	18%	-1%
25,001 to 75,000 employees	9%	17%	8%
More than 75,000 employees	49%	50%	1%
n/a	2%	0%	-2%

Geographic Location

The survey indicates a growing globalisation of data protection responsibilities, with the number of privacy offices reporting having global responsibility jumping 26 percentage points to two-thirds of all respondents. Of the remaining 35 percent without global reach, just one-third of them had responsibility for the United States or Asia-Pacific regions.



This is likely to be the case when European privacy professionals are working for companies headquartered outside Europe, and so there is no reason for their offices to have broader geographic responsibility. Divergent global approaches to privacy regulation may also be a contributing factor, with their organisations choosing not to integrate the privacy function between regions that take very different cultural and legislative approaches to the issue.



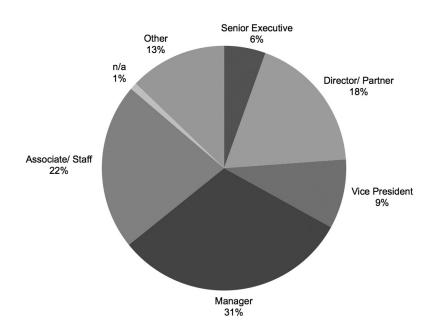
The Data Protection Professional's Role

European privacy professionals do indeed appear to be increasing their seniority. Last year, just 13 percent reported occupying a vice president or senior executive position that would be most able to wield organisational influence. This year, fully one-third reported having a senior position. This may be a one-time statistical anomaly resulting from a change in survey options. Respondents who checked "other" last year may have selected the new choice this year of "director/partner."

However, in spite of this good news, the European region lags behind its peers. In the 2011 IAPP global member survey, where 95 percent of respondents hailed from North America, just over half reported occupying the top three managerial positions.

As European organisations increasingly globalise and face a more complex privacy equation, continued growth in the ratio of privacy professional levels will be critical for their success.

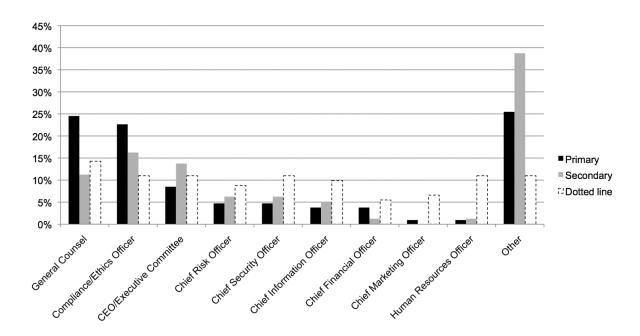
Level Within the Organisation



Position	2010 %	2011 %	Change since last year
Senior Executive	4%	6%	2%
Director/Partner		18%	
Vice President	9%	9%	0%
Manager	38%	31%	-7%
Associate/Staff	19%	22%	3%
n/a		1%	
Other	30%	13%	-17%

Which departments take the privacy lead? European privacy professionals are situated in a number of different departments, but two stand out from the rest: Legal and Compliance. In 2011, nearly half of all respondents reported in to these departments.

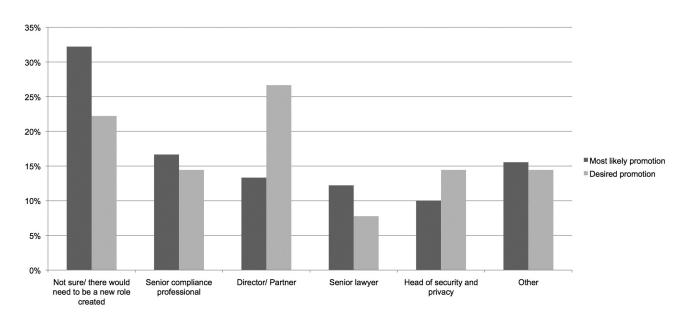
Reporting Relationships



Primary	Secondary	Dotted line
25%	11%	14%
23%	16%	11%
8%	14%	11%
5%	6%	9%
5%	6%	11%
4%	5%	10%
4%	1%	5%
1%	0%	7%
1%	1%	11%
25%	39%	11%
	25% 23% 8% 5% 5% 4% 4% 1%	25% 11% 23% 16% 8% 14% 5% 6% 5% 6% 4% 5% 4% 1% 1% 0% 1% 1%

What is the next move for European privacy professionals? Like last year, about one-third of respondents believe they are in a career cul-de-sac with no obvious next role in front of them. They say their next likely promotion will be a new role to be created for them, even though only 22 percent desire this outcome. Another 27 percent of respondents desire to become a director or partner on their next promotion, but only 13 percent believe this will come to fruition. As a result, it appears that roughly one-quarter of European privacy professionals believe their next promotion will differ from their desired promotion.





What skills and experiences do European privacy professionals believe they need to attain their desired promotion? The answers to this question showed more variance from 2010 to 2011 than any other question. While gaining legal skills remained the single highest aspiration of those responding to this question, this count was down 20 points from last year. What saw the biggest increase? The "general experience" category, which included a number of respondents who said they needed to obtain a CIPP certification.

Skills Required To Fulfill Career Aspirations

Additional skills	2010 %	2011 %	Change since last year
Legal	38%	18%	-20%
International privacy	31%	10%	-21%
Management	13%	3%	-10%
General experience	6%	51%	45%
Other	12%	18%	6%

Profiles in Privacy: Giles Watkins, CIPP/E By Jedidiah Bracy, CIPP



Giles Watkins, CIPP/E

Editor's Note: Two IAPP Europe members who were among the first recipients of the CIPP/E designation discuss their work in the privacy field. Here, Giles Watkins of Concentium shares his insights, and on page 18, hear from Pascale Gelly of Cabinet Gelly.

Businesses and organisations around the world are grappling with a multitude of challenges to ensure their brand name, reputation and infrastructure run successfully. Privacy compliance and data protection obligations are quickly becoming necessary operational functions across all departments within an organisation—from IT to human resources.

"It is important to embed privacy practices into 'business as usual," says Giles Watkins, CIPP/E. "To do this requires bringing legal, business process, technology and human resources together to analyse specific issues and develop commercial solutions and then implement them effectively."

Watkins is the founder of Concentium, an advisory firm that he says helps organisations "close the chasm" between business and technology to "govern and leverage their investments more effectively for measurable value."

In addition to helping organisations embed privacy into fundamental business operations, Watkins and his team work with their clients' legal departments to address the varying requirements businesses face within multiple legal frameworks. As a pertinent example, he cites crossborder data transfers as being a current challenge for many organisations.

As part of the inaugural class of CIPP/E designates, Watkins says it's "a must for anyone wishing to demonstrate their

capabilities in this field" adding he has "no doubt that it will become the preeminent marquee for professionalism and quality in the field of European privacy."

Watkins cautions potential certification candidates of the complexity of the European privacy landscape, noting the examination is challenging. "Study hard," he says, "and make sure you have a thorough understanding, not only of European legislation but also fundamental privacy principles and real-world privacy issues."

He adds, "You will need all of this to be successful."

Before Watkins entered the privacy arena, he was an IT risk and assurance consultant. Privacy made its way onto Watkins' radar in 1995 with the implementation of the European Data Protection Directive. "As a partner at Ernst & Young, I led the IT Due Diligence and Post Merger Integration practice," he says, "and I came across privacy issues so frequently that I decided to set up a dedicated privacy practice."

When asked about the changes he's seen in privacy since entering the field, Watkins notes that today, organisations have a more mature approach to managing privacy requirements. "Our clients have now recognised the direct impact privacy can have on brand, reputations and the trust the customers have in them," he says. "These factors directly impact revenue and, hence, earnings."

Going beyond businesses, Watkins believes privacy is making its way into the public consciousness. He says he senses "an increasing awareness amongst the general public—as consumers, citizens and parents—of the value of their personal information. I think it is this 'enlightenment' of the general public that will drive the next big step changes in privacy."

With a rapidly evolving global playing field, Watkins notes that "our world is shrinking and expanding at the same time." Individuals can communicate and gain access to information more efficiently than ever before, while businesses and governments can collect and analyse data with ease.

"To me," he says, "this creates some incredibly interesting dichotomies between the value of giving up our privacy and the value of retaining it. Privacy laws will need to remain relevant and meaningful against this constantly evolving landscape."

He sees these dichotomies as significant challenges to regulators—who will need to exercise "more agility and insight"—and to businesses as they struggle to balance legal compliance with consumer demand, technological innovation and profits. "My biggest fear," he opines, "would be that society comes to view privacy as 'irrelevant and too difficult' and gives up on it. We must not let that happen, as it is a fundamental human right that we should value and protect."

Watkins sees the need for striking a balance between technological innovation and accountability. Effective laws and regulations will provide benefits to society but create consequences for violations. Past impacts from data breaches have been "relatively minor" for organisations. "If this continues," he adds, "then privacy risks may always struggle to gain sufficient attention and funding within organisations."

However, if the pendulum were to swing too far in the opposite direction, excessive penalties and enforcement actions "would limit the development of value-adding services and products" that could be beneficial to everyone.

Navigating our complex world of regulations, technological development, legal jurisdictions and business operations to find workable solutions is part of what draws Watkins to love privacy work. "For me, you have to be able to understand the law, technology, business process and people in order to be successful in privacy."

Responsibilities

When European privacy professionals are able to focus their time on the data protection agenda, which tasks are taking up most of their time? The top line item in 2011, as in 2010, was advising and consulting to the organisation, at 80 percent. The number two spot in both years was developing and implementing policies and guidance, and both years saw developing and performing training and communications rank third. These results suggest the duties of European privacy professionals have changed little over the past year.

That said, fully one-fifth of respondents would like to reduce their time advising and consulting to the organisation and spend more time developing privacy strategy and monitoring and measuring compliance. Interestingly, European privacy professionals believe they are spending just the right amount of time analysing regulations and performing risk assessments.

Time Allocation

Time allocation	Currently spend most of their time on this	Should spend most of their time on this
STRATEGIC		
Developing privacy strategy	51%	64%
Analysing regulations	50%	48%
Advising/consulting to the organisation	80%	61%
PROCESS		
Developing and performing training and communications	61%	52%
Monitoring and measuring compliance (enforcement)	42%	53%
Responding to incidents	37%	20%
Reporting to management	36%	31%
FOUNDATIONAL		
Performing risk assessments and data inventories	47%	47%
Developing and implementing policies and guidance	68%	50%
Administration (personnel and budget)	21%	5%
Other	3%	2%

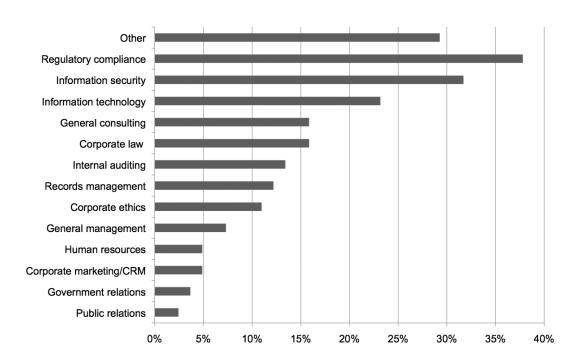
How will privacy professionals' desire for change shake out in the coming year? Compliance is once again the core theme for European privacy professionals. About two-thirds—the same as last year—believe they will spend more time on this responsibility in 2012. As the reform of the European Data Protection Directive winds its way through Brussels and EU member states, we expect to see this theme increase further in importance.

Areas in which Respondents Will Spend More Time in the Coming Year

Other working areas	2010 %	2011 %	Change since last year
Compliance	64%	64%	0%
Information risk or governance	55%	44%	-11%
Security	18%	22%	4%
General legal	18%	21%	3%
Other	5%	5%	0%

European privacy professionals continue to wear other hats besides data protection and privacy. Regulatory compliance and information security—two natural fits for an "information governance" role—were the two most common areas of additional responsibility outside of privacy. Those roles were down seven percent and 13 percentage points, respectively, from 2010, as were most other areas. This move away from wearing multiple hats may indicate that European data protection professionals are having more success focusing their efforts on the privacy agenda.

Other Responsibilities



Privacy Programme Maturity

Are European data protection professionals having an impact? We've been asking European privacy professionals and the broader IAPP membership to self-assess the maturity of their organisations' privacy programmes. While this isn't an exact science, it has provided us a good baseline over the years.

The European profession appears to be divided in this regard. Instead of reflecting a standard bell-curve distribution, the European results show peaks in the middle and high end of the maturity scale. Interestingly, four percent fewer organisations reported themselves at the highest maturity level, and eight percent more said they were in the middle.

This suggests there could be two broadly different career experiences for the European data protection professional, depending on the organisation. On the one hand, about half find themselves in the creative phase of building and improving pre-stage to middle-stage privacy programmes; on the other hand, about half are in maintenance mode, overseeing late-middle to mature programmes.

European privacy professional career satisfaction may hinge on finding an organisation whose privacy maturity level best reflects their own talents and personality.

Privacy Programme Maturity

Self-assessed maturity levels	2010 %	2011 %	Change since last year
Pre-stage: Privacy programme has not been established as a unit within the company	7%	4%	-3%
Early stage: Privacy programme is just starting to become staffed and organised	12%	10%	-1%
Middle stage: Privacy programme is in existence and is starting to launch key initiatives	28%	35%	8%
Late middle stage: Privacy programme is starting to evaluate the effectiveness of key initiatives	16%	17%	1%
Mature stage: Privacy programme is in maintenance mode focusing on program evaluation and refinement	37%	34%	-4%

Profiles in Privacy: Pascale Gelly, CIPP/E By Jedidiah Bracy, CIPP



Pascale Gelly, CIPP/E

Data protection is a constantly evolving challenge for organisations and governments around the world. Binding corporate rules (BCRs) and international data transfers engender a complexity requiring the help of experienced professionals.

For more than 18 years, Pascale Gelly, CIPP/E, has worked as a leader in solving emerging and international data protection issues. Managing her own practice in Paris, Gelly works with a wide array of challenges in Europe—from crafting BCRs and creating data transfer schemes to lobbying on behalf of data protection concerns.

"I actually fell in the privacy pot by chance," Gelly explains. "It was back in 1992. At the time I was a young French intellectual property and information technology lawyer, freshly graduated from Columbia Law School. The law firm I worked with referred me all the clients' requests in English...most enquiries on data protection came from U.S. clients who were very compliance-driven. I was immediately attracted by the intellectual and cultural challenges of the topic. This is how I built an expertise, little by little."

By 2004, Gelly had co-written model clauses for data transfers to third countries, which were approved by the European Commission, as well as the BCRs for General Electric.

In addition to writing for a number of publications, including The Privacy Advisor and for Data Guidance, Gelly also lobbies for a variety of issues, such as e-mail marketing, whistle-blowing lines and the simplification of notifications.

Gelly says she enjoys her profession because it is varied. "There is, of course, the everyday work: privacy notices, DPA notifications, company policies and audits, but frequently, businesses come up with a complex international data transfers situation to solve." Also, Cabinet Gelly, her Paris-based law firm, is often consulted on emerging issues "which have not been answered yet, like the introduction of a new tool."

As a leader in the data protection and data transfers field, Gelly notes that "it is important to be able to present oneself as having a good level of knowledge in the European privacy field. That's what you can do once you pass the CIPP/E."

Gelly has seen a change in privacy since first entering the profession. "What strikes me," she explains, "is that in our society, at all levels, more people start realising that privacy matters; they understand the challenges and ask for solutions." She also says that data protection authorities "work more efficiently; they look for results and issue more opinions and sanctions."

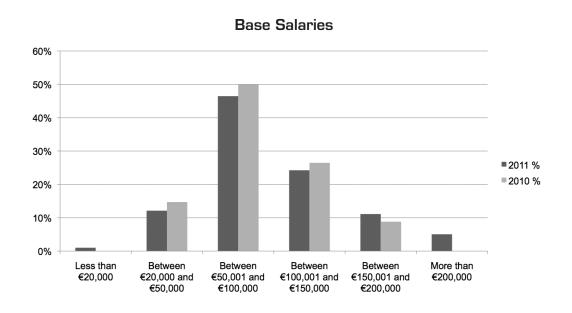
These changes, she says, generate more work, "which is a good thing for the profession," but, she adds, this additional workload can be "difficult to absorb...especially for people who have been assigned privacy as one among many other tasks."

Gelly thinks that businesses and institutions in Europe "should rethink the way they organise their privacy compliance" structure.

When asked what she believes will be the biggest concern for the future of privacy protection, Gelly replies, "The devil is in the details. This caution-warning should be taken into consideration by EU institutions while building the future data protection framework in Europe but also by data protection authorities in their enforcement approach."

Salary

Are European privacy professionals improving their compensation levels? Our survey wasn't conclusive on overall trends. There does appear to be an increase in the share of European privacy professionals earning at the highest levels. The share of professionals earning more than €150,000 rose from nine percent in 2010 to 16 percent in 2011, including the first to report salaries over €200,000. This is good news in an era of economic uncertainty.



			Change since
Salary range	2010 %	2011 %	last year
Less than €20,000	0%	1%	1%
Between €20,000 and €50,000	15%	12%	-3%
Between €50,001 and €100,000	50%	47%	-4%
Between €100,001 and €150,000	26%	24%	-2%
Between €150,001 and €200,000	9%	11%	2%
More than €200,000	0%	5%	5%

Do European privacy professionals feel they are compensated fairly? Most do. In 2011, 60 percent believe they are making as much or more than others in their company with similar qualifications, the same figure as last year.

Just under half, however, believe they make as much or more than their peers in other sectors, down a few points from last year. In addition to survey results reflecting discontent among some respondents regarding their likely next promotions and time allocation, there does appear to be a significant proportion of respondents who believe they are underpaid.

These data points could reflect a creative tension or a risk for organisations that depend on these professionals to protect their most valuable assets: information and brand.

Compensation Perception

My perceived compensation level is	Relative to others in my organisation with similar experience, education, and training	Relative to my peers in other sectors
Higher	8%	15%
About equal	52%	34%
Lower	40%	51%

Salary Level Comparison

Compared with salary information provided by privacy professionals from around the world, overall data indicates that a greater number of European privacy professionals earn €100,000 or more than their non-European colleagues. Responses to the IAPP Europe 2011 Data Protection Professionals Role, Function and Salary Survey indicated that nearly 35 percent of European privacy professionals earn more than €100,000. That is 17 percent higher than number of their international peers earning more than €100,000 who responded to the 2011 Privacy Professional's Role, Function and Salary Survey, which queried privacy professionals worldwide.

Additionally, the IAPP Canada 2011 Privacy Professional's Role, Function and Salary Survey, indicates that the number of Canadian privacy professionals earning more than €100,000 trends slightly higher than the global average but less than the European. However, the Canadian statistics bear some explanation. The Canadian survey broke down salaries into public- and private-sector earners. Private-sector professionals earning more than €100,000 weighed in at 23 percent, which is five percent higher than the global average. Public-sector privacy professionals earning more than €100,000 trended four percent lower than the global average.

More European respondents earn over €200,000 annually, based on the comparison of the three surveys. Nearly five percent of European respondents earn more than €200,000. That is significantly higher than the Canadian and global averages. Only one percent of respondents to the global survey earn more than €200,000.

Editor's Note: Salary data was presented as ranges and gathered over the course of several months for each of these surveys, which may have some impact on the data. Additionally, because monetary conversion rates were calculated in August, they may not reflect current exchange rates.

III. Survey Methodology

This second survey of the IAPP's European membership was conducted in June and July 2011 to generate the results detailed in this report. This section explains the survey objectives, questions, delivery and sample and outlines some limitations inherent in the process.

Survey Objectives

The study seeks to build upon the 2010 baseline data to better understand the characteristics of the IAPP's European members and to show development of the European privacy profession both over the past year and against IAPP members elsewhere in the world. The research goals were defined through lines of questioning that include:

- What promotions are privacy professionals aspiring to and likely to receive?
- How do privacy professionals spend their time fulfilling their responsibilities?
- Are there significant gaps between how privacy professionals are required to allocate their time versus how they would prefer to allocate it?
- What is the compensation level of privacy professionals?

Survey Questions

The IAPP developed this survey with the goal of collecting information from privacy professionals. It is the IAPP's experience that a survey must be brief to maximise completion rates, and for that reason, the survey was intentionally kept brief.

The survey questions mirror those used in the 2010 European survey and are derived from those used in the IAPP's global survey, which has been running since 2005. In total, the survey contained 31 items, including multiple-choice, tick-box and "open" questions to elicit responses in a number of different ways.

To maintain confidentiality, the survey did not request individual or company-specific information, and salary information was requested in pay ranges rather than specific figures.

Survey Limitations

There are inherent limitations to the survey research that need to be carefully considered before drawing conclusions from sample findings:

- The current findings are derived from the returned surveys. It is always possible that individuals who did not participate are substantially different in terms of compensation and other job-related functions from those who completed the survey.
- Financial services, government and healthcare are the largest industry group within the IAPP today, due perhaps to the influence of sectorial privacy regulation. Hence, while other industry concentrations are represented, the IAPP membership list is skewed toward highly regulated organisations.
- Salary information is very sensitive. Therefore, the survey allowed individuals to choose a salary range in disclosing current compensation. The extrapolation of salary from a range should be considered as a potential limitation when interpreting results.
 Furthermore, to keep the survey concise and focused, the IAPP decided to omit other normatively important variables from the analysis. The extent to which omitted variables might explain salary cannot be estimated at this time.
- The quality of survey research is based on the integrity of confidential responses received from subjects. While certain checks and balances can be incorporated into the survey process, there is always the possibility that a subject did not provide a truthful response.

Survey Delivery and Sample

The IAPP fielded the survey to 654 members via e-mail in June 2011. The e-mails included a link to the survey questions displayed via an online survey tool. The survey was closed to responses on 20 July 2011. Once closed, the IAPP analysed the collected survey data via a Web-based tool to produce the report results.

We received 103 completed surveys (a significant rise from 47 in 2010), translating to a response rate of 15.7 percent. Note that findings have been rounded to the nearest percentage point, which may on some occasions result in minor discrepancies in totals.

Appendix: Survey Questions

PART I: YOUR ROLE

- 1. What is your job title?
 - a. Female
 - b. Male
 - c. I prefer not to answer this question
- 2. What organisational level best describes your current position?
 - a. Senior Executive
 - b. Director/Partner
 - c. Vice President
 - d. Manager
 - e. Associate/Staff
 - f. n/a
 - g. Other
- 3. Is this a full-time position?
 - a. Yes
 - b. No
 - c. n/a
- 4. Are you a staff member of the company/ organisation you provide data protection oversight for, or are you a contractor/consultant?
 - a. Staff member
 - b. Contractor/consultant
- 5. Check the primary person within your organisation to whom you or your privacy leader reports.
 - a. CEO/Executive Committee
 - b. Chief Financial Officer
 - c. General Counsel
 - d. Chief Information Officer
 - e. Compliance/Ethics Officer
 - f. Chief Marketing Officer
 - g. Human Resources Officer
 - h. Chief Security Officer
 - i. Chief Risk Officer
 - j. n/a
 - k. Other
- Check the secondary person within your organisation to whom you or your privacy leader reports. (Leave blank if you do not have a secondary reporting relationship.)
 - a. CEO/Executive Committee
 - b. Chief Financial Officer
 - c. General Counsel
 - d. Chief Information Officer
 - e. Compliance/Ethics Officer
 - f. Chief Marketing Officer

- g. Human Resources Officer
- h. Chief Security Officer
- i. Chief Risk Officer
- j. n/a
- k. Other
- 7. Please indicate any other formal or informal (dotted-line) reporting relationships you have within your organisation. Please check all that apply.
 - a. CEO/Executive Committee
 - b. Chief Financial Officer
 - c. General Counsel
 - d. Chief Information Officer
 - e. Compliance/Ethics Officer
 - f. Chief Marketing Officer
 - g. Human Resources Officer
 - h. Chief Security Officer
 - i. Chief Risk Officer
 - j. Other
- 8. Total years of business experience:
- 9. Total years of privacy experience:
- 10. Total years in current position:
- II. Gender:
 - a. Female
 - h Male
- 12. In addition to privacy-related responsibilities, what other job functions do you perform in your organisation? Please check all that apply.
 - a. Corporate ethics
 - b. Corporate law
 - c. Corporate marketing/CRM
 - d. General consulting
 - e. General management
 - f. Government relations
 - g. Human resources
 - h. Information security
 - i. Information technology
 - i. Internal auditing
 - k. Public relations
 - 1. Regulatory compliance
 - m. Records management
 - n. Webmaster (Web site management)
 - o. Other

21

13. What industry or business groups best define your organisation? Please check all that apply.

- a. Automotive
- b. Education
- c. Financial Services
- d. Government
- e. Healthcare
- f. Hospitality and Leisure
- g. Manufacturing
- h. Pharmaceuticals
- i. Professional Services
- j. Retailing
- k. Services
- 1. Telecommunications
- m. Technology and Software
- n. Web Merchant
- o. Other

14. Your organisation has employees located in (check all that apply):

- a. Europe
- b. United States
- c. Canada
- d. Asia-Pacific (including Australia/New Zealand)
- e. Africa
- f. Latin America (including Mexico)
- g. Other

15. What is the worldwide headcount of your organisation?

- a. Fewer than 500 employees
- b. 500 to 1,000 employees
- c. 1,001 to 5,000 employees
- d. 5,001 to 25,000 employees
- e. 25,001 to 75,000 employees
- f. More than 75,000 employees

16. What is the jurisdiction of your privacy office? Please check all that apply.

- a. Global
- b. Europe
- c. United States
- d. Canada
- e. Asia-Pacific (including Australia and New Zealand)
- f. Latin America (including Mexico)
- g. Other

- 17. Please indicate the maturity stage of your company's privacy program. Select the option that in your opinion best describes the activities associated with your company's privacy office or initiatives.
 - a. Pre-stage: Privacy program has not been established as a unit within the company.
 - b. Early stage: Privacy program is just starting to become staffed and organised.
 - c. Middle stage: Privacy program is in existence and is starting to launch key initiatives.
 - d. Late middle stage: Privacy program is starting to evaluate the effectiveness of key initiatives.
 - e. Mature stage: Privacy program is in maintenance mode, focusing on program evaluation and refinement.

18. If you were to advance within your own organisation, which role would you most likely be promoted to?

- a. Senior lawyer
- b. Senior compliance professional
- c. Director/Partner
- d. Head of security and privacy
- e. Not sure/there would need to be a new role created
- f. n/a
- g. Other

19. If you were to advance within your own organisation, which role would you most likely aspire to?

- a. Senior lawyer
- b. Senior compliance professional
- c. Director/Partner
- d. Head of security and privacy
- e. Not sure/there would need to be a new role created
- f. n/a
- g. Other

20. What skills or knowledge gaps currently exist that you would need to fill in order to achieve the aspirations stated above?

PART II: HOW YOU SPEND YOUR TIME

- 21. How many hours each week, on average, do you devote to privacy-related responsibilities?
 - a. Zero to 10
 - b. 1 to 15
 - c. 16 to 25
 - d. 26 to 35
 - e. 36 or more
- 22. What percentage of your average work week do those hours represent?

- 23. The following list contains 10 core activities that typically are conducted by privacy professionals within an organisation. Please check those that you currently spend most of your time on.
 - a. Developing privacy strategy
 - b. Analysing regulations
 - c. Performing risk assessments and data inventories
 - d. Developing and implementing policies and guidance
 - e. Developing and performing training and communications
 - f. Monitoring and measuring compliance (enforcement)
 - g. Reporting to management
 - h. Administration (personal and budget)
 - i. Advising/consulting to the organisation
 - j. Responding to incidents
 - k. Other
- 24. From the following list of 10 core activities that typically are conducted by privacy professionals within an organisation, please check those that you believe you should be spending most of your time on.
 - a. Developing privacy strategy
 - b. Analysing regulations
 - c. Performing risk assessments and data inventories
 - d. Developing and implementing policies and guidance
 - e. Developing and performing training and communications
 - f. Monitoring and measuring compliance (enforcement)
 - g. Reporting to management
 - h. Administration (personal and budget)
 - i. Advising/consulting to the organisation
 - j. Responding to incidents
 - k. Other
- 25. Do you envision your responsibilities changing in the next year or two?
 - a. Yes
 - b. No
- 26. In which of these areas will you be spending more time in the coming year? Please check all that apply.
 - a. Compliance
 - b. Security
 - c. Information risk or governance
 - d. General legal
 - e. Other

PART III: YOUR COMPENSATION

- 27. My current salary (base pay) is within the following range (check only one):
 - a. Less than €20,000
 - b. Between €20,000 and €50,000
 - c. Between €50,001 and €100,000
 - d. Between €100,001 and €150,000
 - e. Between €150,001 and €200,000
 - f. Between €200,001 and €300,000
 - g. More than €300,000
- 28. Do you expect to receive stock options, warrants or shares in 2011?
 - a. Yes
 - b. No
 - c. Unsure
- 29. If you expect to receive a bonus as part of your annual compensation in 2011, what percentage of your annual income would this typically represent?
 - a. I to 3%
 - b. 4 to 5%
 - c. 6 to 10%
 - d. more than 10%
 - e. I do not expect to receive a bonus as part of my annual compensation.
 - f. Unsure
 - g. n/a
- 30. If you responded yes to the previous question, indicate what will most likely determine your bonus this year. Please check all that apply.
 - a. Overall company performance
 - b. Performance of your business unit
 - c. Meeting your specific objectives
 - d. Other
- 31. Please express your belief about your compensation relative to others within your company. My compensation is:
 - a. Above others with similar experience, education and training within my company
 - b. About equal to others with similar experience, education and training within the company
 - c. Below others with similar experience, education and training within my company
 - d. I do not want to express my opinion
- 32. How do you feel your income level is compared with your peers in other sectors?
 - a. Similar
 - b. Higher than my peers in other sectors
 - c. Lower than my peers in other sectors
 - d. Other

About IAPP Europe

IAPP Europe is a community for European data protection and privacy professionals. IAPP Europe was created to provide education, networking, conferences and professional development resources tailored to the unique European data protection community and has been guided by an esteemed group of European privacy and data protection experts.

About the IAPP

The International Association of Privacy Professionals (IAPP) is the world's largest organization of privacy professionals, representing more than 8,000 members from businesses, governments and academic institutions across 70 countries.

The IAPP was founded in 2000 with a mission to define, support and improve the privacy profession through networking, education and certification. We are committed to providing a forum for privacy professionals to share best practices, track trends, advance privacy management issues, standardize the designations for privacy professionals and provide education and guidance on opportunities in the field of information privacy.

The IAPP is responsible for developing and launching the first broad-based credentialing program in information privacy, the Certified Information Privacy Professional (CIPP). The CIPP remains the leading privacy certification for thousands of professionals around the world who serve the data protection, information auditing, information security, legal compliance and/or risk management needs of their organizations.

In addition, the IAPP offers a full suite of educational and professional development services and holds annual conferences that are recognized internationally as the leading forums for the discussion and debate of issues related to privacy policy and practice.

The 2011 Data Protection Professionals Role, Function and Salary Survey analysis was executed by Jay Cline, CIPP, and Minnesota Privacy Consultants and written by Toby Stevens of Enterprise Privacy Group Limited. Additional content was contributed by IAPP Publications Manager Jennifer Saunders, CIPP, and Staff Writer Jedidiah Bracy, CIPP.

To participate in future IAPP research efforts please contact us at research@privacyassociation.org.

