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A Blueprint for Efficient SRRs: Mastering Your Subject Rights Workflow

Thursday, 27 March

10:00–11:00 PST

13:00–14:00 EST

19:00–20:00 CET



Meet Your Hosts



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Agenda

- Poll
- Why Worry About Your SRR Workflow?
- An Overview of the SRR Workflow
- How We Approach SRRs
- Q&A

Poll

How has your organization's SRR volume changed compared to last year?

01

It's increased by a lot

02

It's increased by a little

03

No change

04

It's decreased

05

Not sure

Why Worry About Your SRR Workflow?



Why Worry About SRRs?

Compliance

In the EU, 32 DPAs announced in early March that they would spend 2025 focusing on businesses' compliance with the right to erasure.

In the US, Honda just received a \$632,500 fine primarily because of poorly designed SRR process, violating the CCPA

144

Countries with data privacy laws

130M

Americans will have data privacy rights by the end of 2025.

\$7.5k

Per violation in the US

€20m

Or 4% of global revenue for GDPR violations



Why Worry About SRRs?

Get Time Back in Your Day



Most of us are
privacy pros +

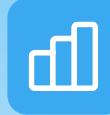
+ GRC

+ Security

+ AI Governance

Etc.

In 2024, 80% of privacy
professionals acquired more
non-privacy responsibilities



SRRs are on the
rise. Manual
processing isn't
going to cut it.

- In 2024, 36% of internet users submitted a an SRR, up from 24% in 2022.
- Manually processing a single SRR costs \$1,524
- 50% of privacy pros still manage SRRs manually



Putting it all
together

- Inefficient SRRs cost more time and money than you may realize.
- They're a low-hanging fruit for automation
- Between more responsibilities and more subject rights, your time is limited.



Visible Privacy

Why Worry About SRRs?

Demonstrate Visible Privacy

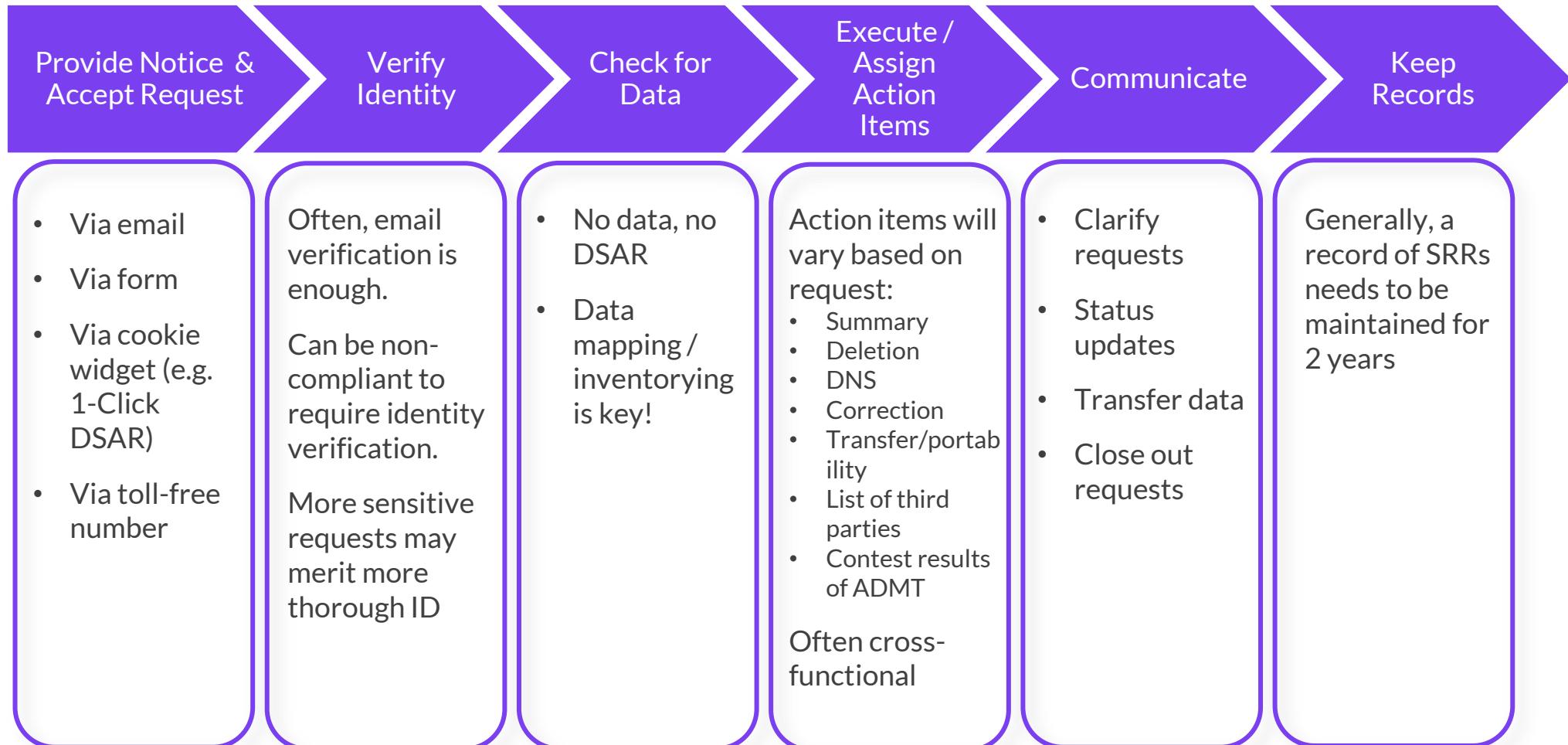
A set of activities that serve as a marker for your overall compliance to leaders, customers, and regulators. Visible privacy is about making privacy visible.

- An efficient, transparent SRR workflow is a prime example of visible privacy
- SRRs are an important touchpoint for consumers
- Regulators can easily assess SRRs for compliance
- SRRs are easy to report on to leadership, providing greater insight into the organization's overall privacy posture and the value of your work.

An Overview of the SRR Workflow



The SRR Workflow



Dos & Don'ts

✗ Don't

Rely on manual email intake

- Results in ambiguity
- Lots of back and forth
- Spreads PI across more channels
- Can be hard to find

✗ Don't

Forget about your vendors

- You are required to notify vendors of relevant SRRs.
- You may be liable for their non-compliance depending on the law

✗ Don't

Assume all jurisdictions have the same rights or requirements

- Employee SRRs
- Request a list of third parties
- Contest results of ADMT/profiling

✓ Do

Centralize request intake

- Ask for required information upfront

Make it easy to find

- E.G., in cookie banner, on prominently displayed DSAR page

✓ Do

- Meet with your vendors' privacy personnel regularly

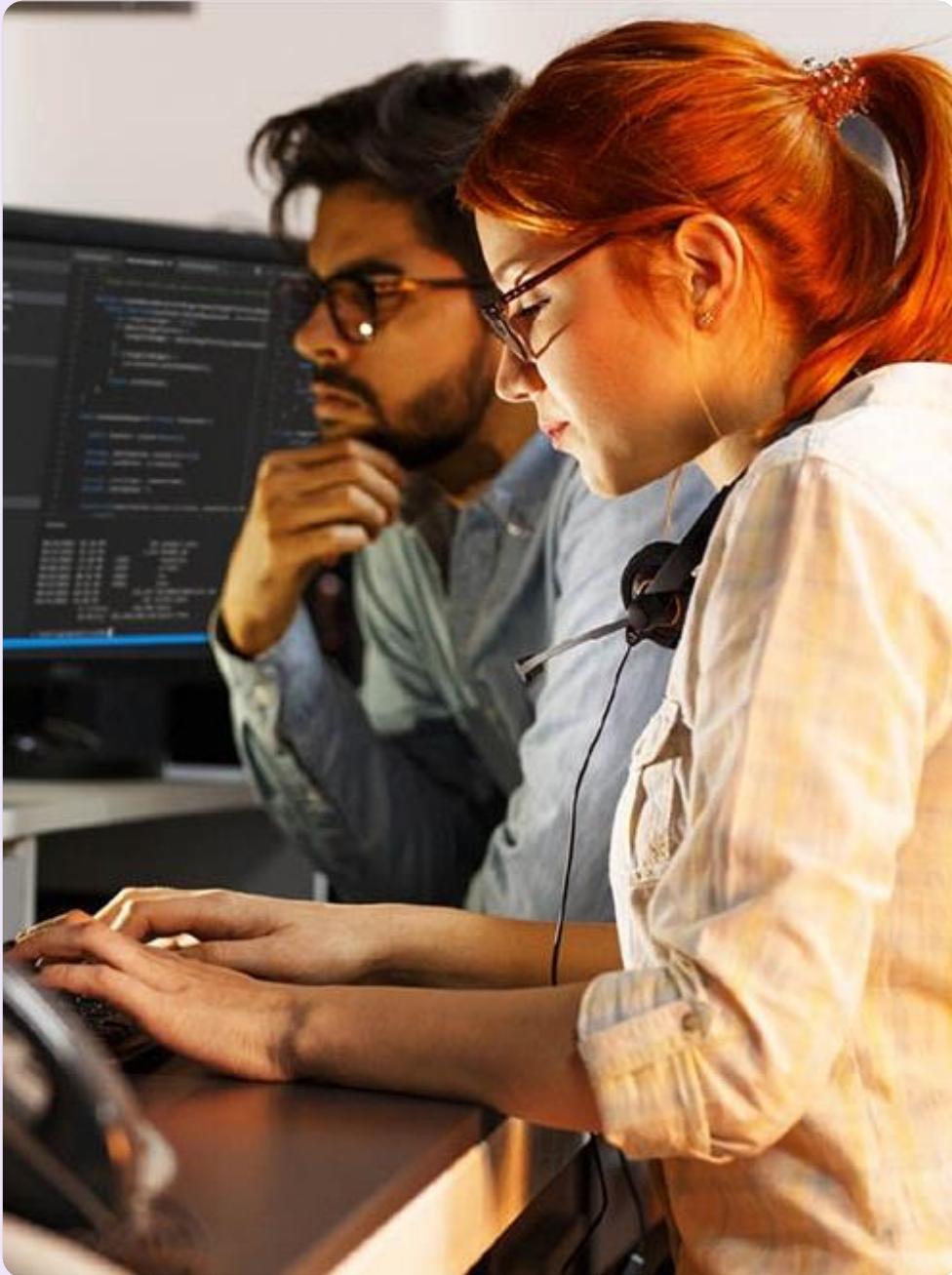
- Alert vendors to upcoming SRR deadlines

- Factor in privacy in vendor evaluations and onboarding

✓ Do

- Conduct threshold assessments to ID laws to comply with, laws that you may soon need to comply with, etc.

- Set aside 30m a day to review regulatory updates, current best practices/requirements, etc.



Factors to Consider in Your SRR Workflow

- Jurisdictional strategy
- Employee data
- Third-party data transfers
- B2B vs. B2C
- Size
- Data subject sentiment

Our Approach to SRRs



Our Approach

Provide Notice & Accept Request

Verify Identity

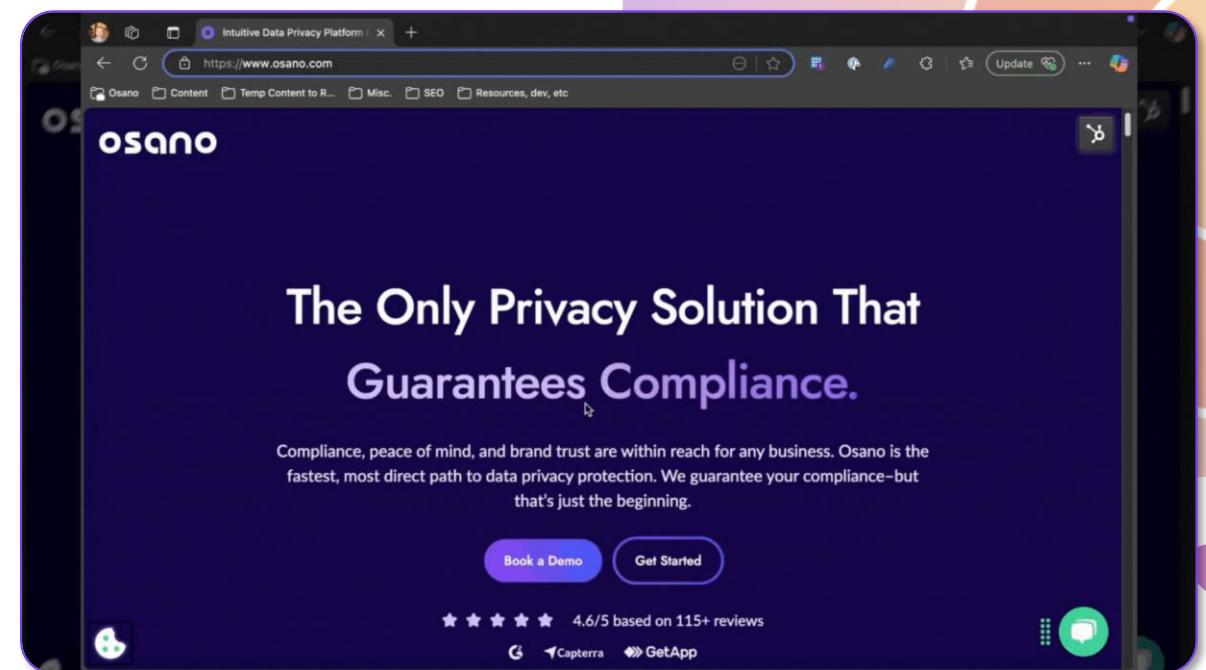
Check for Data

Execute/ Assign Action Items

Communicate

Keep Records

- We accept SRRs through multiple methods.
- The most common avenue is through an embedded form, accessible via:
 - Our One-Click DSAR link in our cookie drawer
 - A link in our privacy policy
- We recommend using forms to ensure you get the information you need to action an SRR.
- You can use data privacy software like Osano, but it's also possible to build similar forms with HubSpot, Jira, or other tools



Our Approach

Provide Notice & Accept Request

Verify Identity

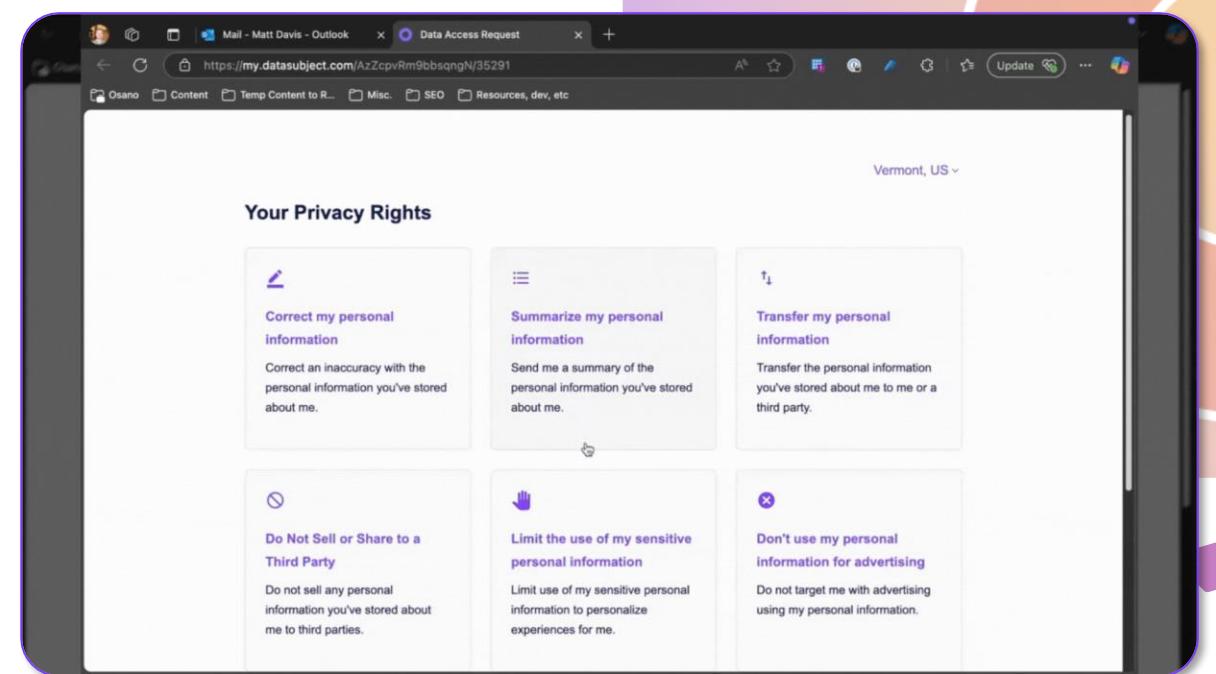
Check for Data

Execute/
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Action
Items

Communicate

Keep
Records

- We verify using the data subject's email address
- Osano sends a magic link to the data subject's email address, which brings the requestor to a secure messaging portal
- Third-party magic link providers can handle identity verification, too.



Our Approach

Provide Notice & Accept Request

Verify Identity

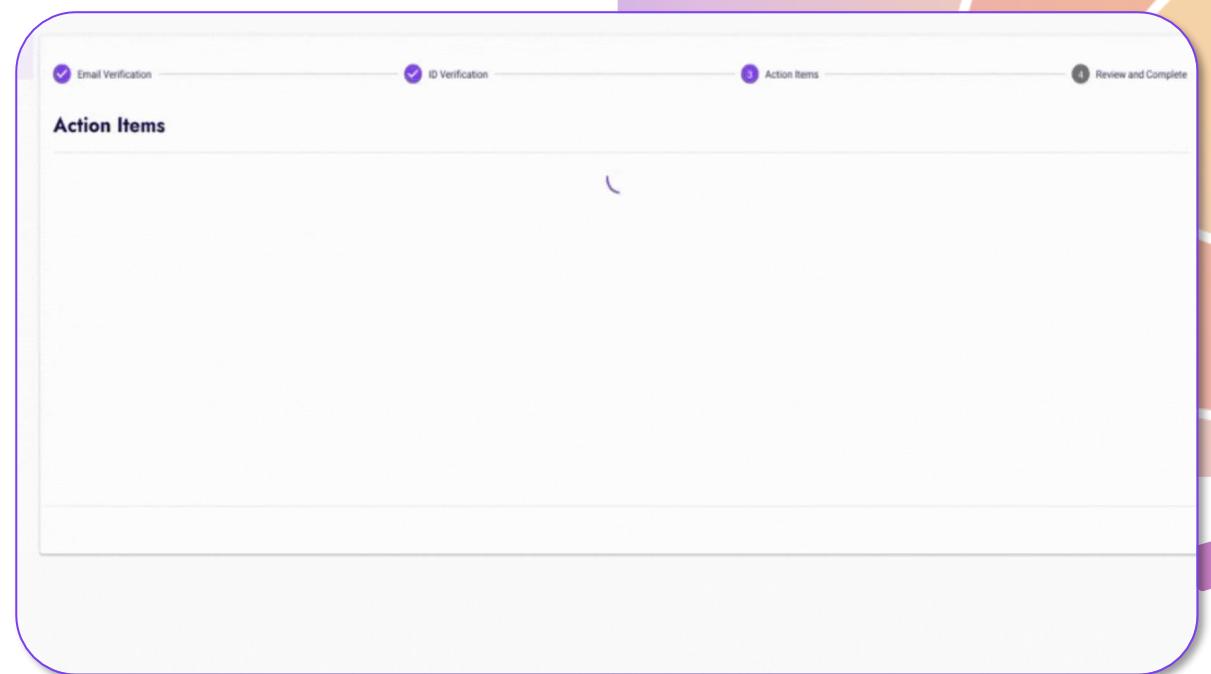
Check for Data

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Communicate

Keep Records

- We use an Osano data map to check for relevant data in connected data stores.
- Osano discovers data stores connected via SSOs, CDPs, and cloud databases. Individual data stores can also be manually added to the data map.
- You can build your own data map/inventory using spreadsheets
 - Time-consuming, but worth the effort if you don't have a software tool
- eDiscovery software is another option but requires dedicated expertise to master



Our Approach

Provide Notice & Accept Request

Verify Identity

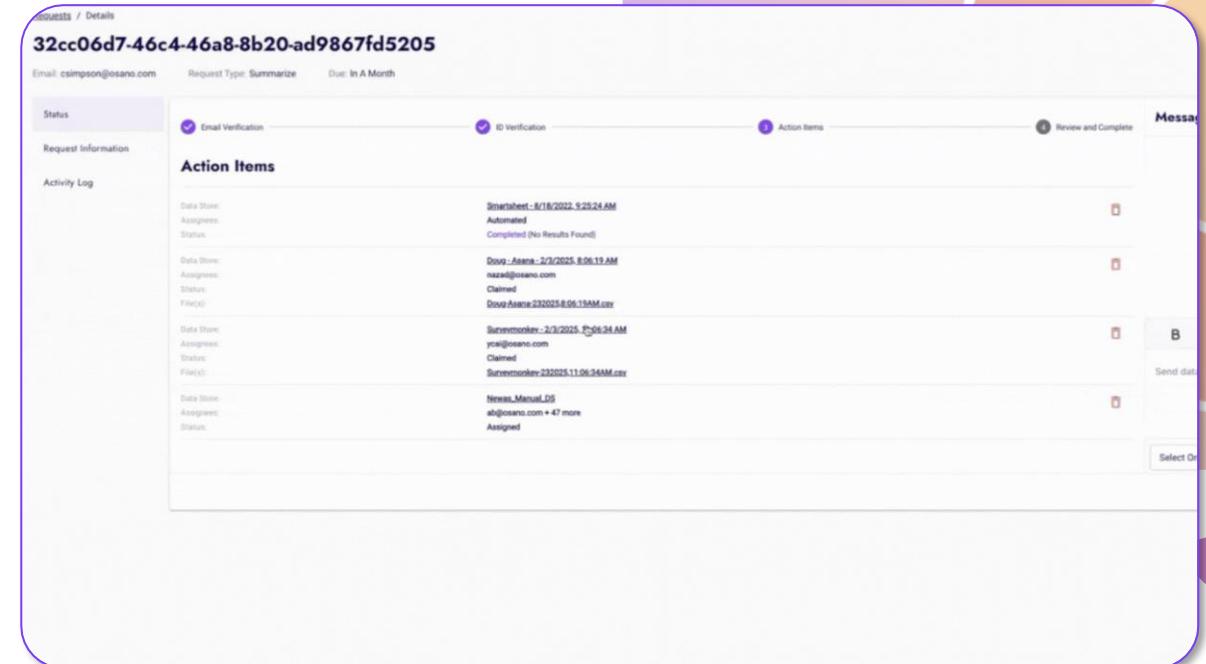
Check for Data

Execute/ Assign Action Items

Communicate

Keep Records

- Osano assigns different action items depending on the request type and involved data.
 - The workflow for **summaries, deletions, and transfers/portability requests** is managed automatically
 - **Corrections** alert relevant data store owners to make the requisite change.
 - **Other request types** are met on an ad-hoc basis.
- Manual execution is possible, but takes time.
- If you've developed a data map/inventory as described in the previous step, manual execution will be a lot easier.



Our Approach

Provide Notice & Accept Request

Verify Identity

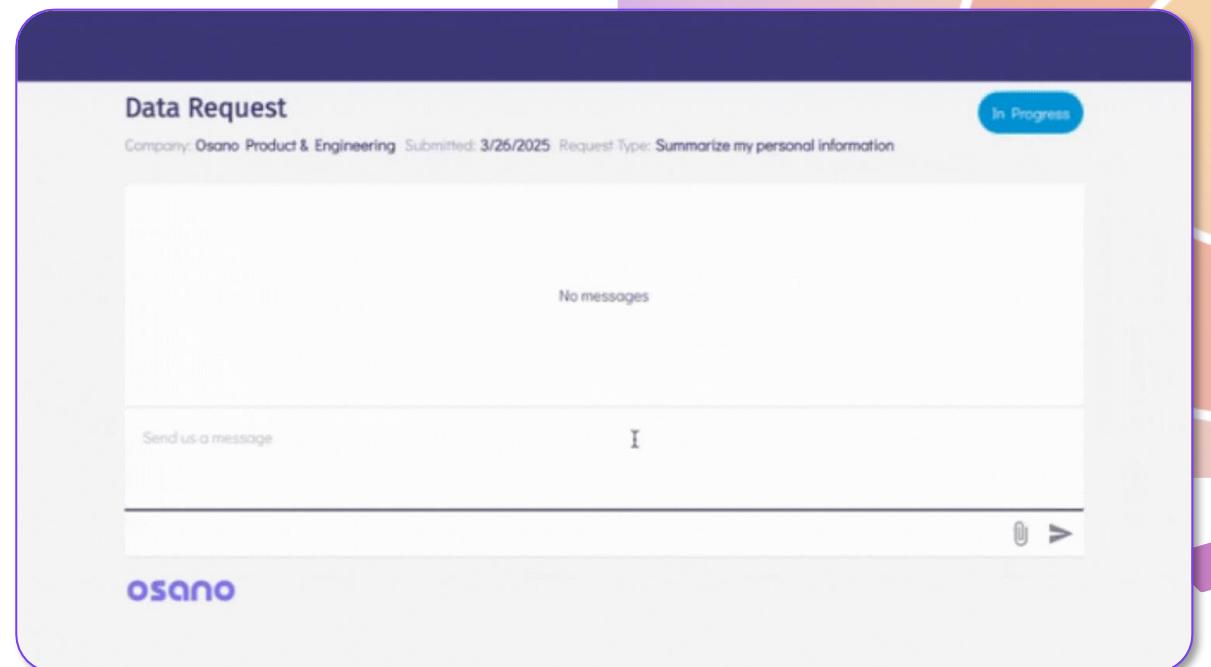
Check for Data

Execute/
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Items

Communicate

Keep
Records

- We communicate with data subjects through an Osano-powered messaging portal.
- We also use templates to communicate with data subjects. It may not seem like much, but it's a lot easier than having to write bespoke messages each time, especially as your SRR volume ramps up.
- You can always communicate with your data subjects via email; if you choose to do so, we recommend keeping a designated inbox for SRRs to centralize comms and simplify record-keeping and cleanup.



Our Approach

Provide Notice & Accept Request

Verify Identity

Check for Data

Execute/ Assign Action Items

Communicate

Keep Records

- Don't delete records of your SRR immediately; best practice is to retain them for two years to comply with any audits or investigations.
- Osano creates records of all of our SRRs and deletes them after a certain time period.
- If you manage SRRs without a data privacy solution, you can always set a recurring schedule to clear out associated email inboxes and spreadsheets.

Requester	Form	Jurisdiction	Request Type
cs@osano.com	Clay - Sept 23	Iowa, US	Correct
dm@osano.com	DougTestForm731	Washington, US	Correct
px@osano.com	PX Test	Utah, US	Delete
Retention Period Expired	My new DSAR form	—	—
Retention Period Expired	My new DSAR form	—	—
Retention Period Expired	My new DSAR form	—	—

Overarching SRR Best Practices



Automate the Workflow

- It can be difficult to automate execution (e.g., finding, packaging relevant data)
- But the overall workflow (e.g., alerting data store owners of tasks, using forms to kickoff the SRR process, etc.) is easier to automate.
- In a manual workflow, steps get skipped or forgotten about, creating extra risk.



Communicate with Stakeholders

- You can't complete SRRs on your own
- Communicate internally and externally
- Make sure stakeholders understand why they need to help, and why time and accuracy is of the essence.



Be Proactive

- Some businesses have low request volume today.
- That is not expected to continue—growth in laws, awareness, and your business will increase volume
- Don't wait for something to go wrong before acting.



Q&A

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Thank You!



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Survival Summit



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