# The Osano Privacy Maturity Model

Building, scaling, and operationalizing your organization's privacy program is no small feat. Not only is there a multitude of regulatory and operational factors to take into consideration, but there is little information available to help guide your privacy program's growth.

Using the following five maturity levels, you can benchmark your privacy program's operational effectiveness and begin identifying ways to improve.
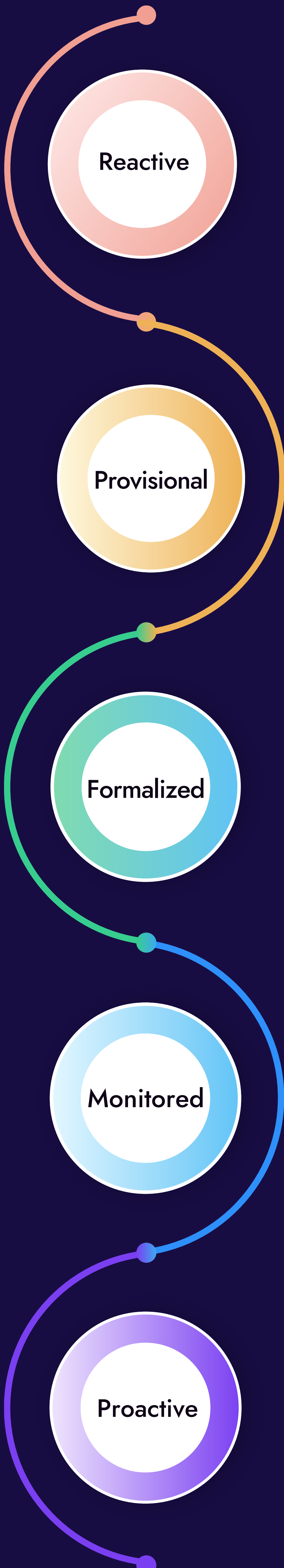
Reactive

Privacy-related activities are reactive and one-off, perhaps in response to a breach, major headline, notice of noncompliance from authorities, or as a"band-aid" effort to comply with a new regulation.

Consistency and Standardization
There is no consistency or standardization.

Resources, Roles, and Responsibilities
There are no dedicated resources or budget. Other departments or role carry out the task when needed.

Monitoring and Improvement
Compliance activities are only measured in terms of whether they've been completed, if at all. Other business activities take priority over compliance, and there is no plan to improve them.

Understanding of Data Privacy
The organization treats data privacy as an obstacle to be overcome or circumvented and then quickly forgotten.

Provisional

Some basic mechanisms for managing data privacy and compliance needs are in place.

Consistency and Standardization
Some standardization and consistency exists, though the privacy program may not be formalized or defined in a detailed fashion.

Resources, Roles, and Responsibilities
Privacy and compliance are semi-permanent, ancillary responsibilities held by non-privacy professionals.

Monitoring and Improvement
Program monitoring and measurement only occur in response to an issue or sudden development that brings privacy to the fore.

Understanding of Data Privacy
The privacy program is understood to be an important function but is still perceived as a blocker.

Formalized

The program exists in the organization, and basic practices and procedures are well documented.

Consistency and Standardization
The organization has a formal privacy program with defined policies, procedures, and standards that are integrated into overall operations.

Resources, Roles, and Responsibilities
Privacy-dedicated personnel have clear roles and responsibilities; other functions' privacy responsibilities are not well understood.

Monitoring and Improvement
The privacy program is semi-regularly reviewed. The review findings are not always translated into improvement and adaptation.

Understanding of Data Privacy
Data privacy is considered at the outset of new initiatives, but only at the prompting of any data privacy personnel.

Monitored

An organization with a monitored privacy program is actively managing and assessing its privacy program.

Consistency and Standardization
Policies and procedures are documented and applied, though non-privacy teams inconsistently carry out compliance activities.

Resources, Roles, and Responsibilities
The program is adequately resourced, and there are enough privacy personnel to address most of the organization's compliance needs.

Monitoring and Improvement
Processes and procedures are reviewed to assess their efficacy and identify gaps on a regular cadence.

Understanding of Data Privacy
Senior management keeps up with privacy-related activities, and data privacy may contribute to overall objectives and goals.

Proactive

The privacy program is a central part of the organization's operations and strategic roadmap.

Consistency and Standardization
Different teams understand compliance procedures and carry them out correspondingly, rarely if ever deviating from best practice.

Resources, Roles, and Responsibilities
The privacy program has adequate budget, staffing, and authority to carry out compliance activities and provide education and training.

Monitoring and Improvement
The program is continuously monitored to anticipate gaps and needs before they arise.

Understanding of Data Privacy
Privacy may be considered a key differentiator for the organization, and senior leadership is aware of and involved in compliance.

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