

Section 11 continuum

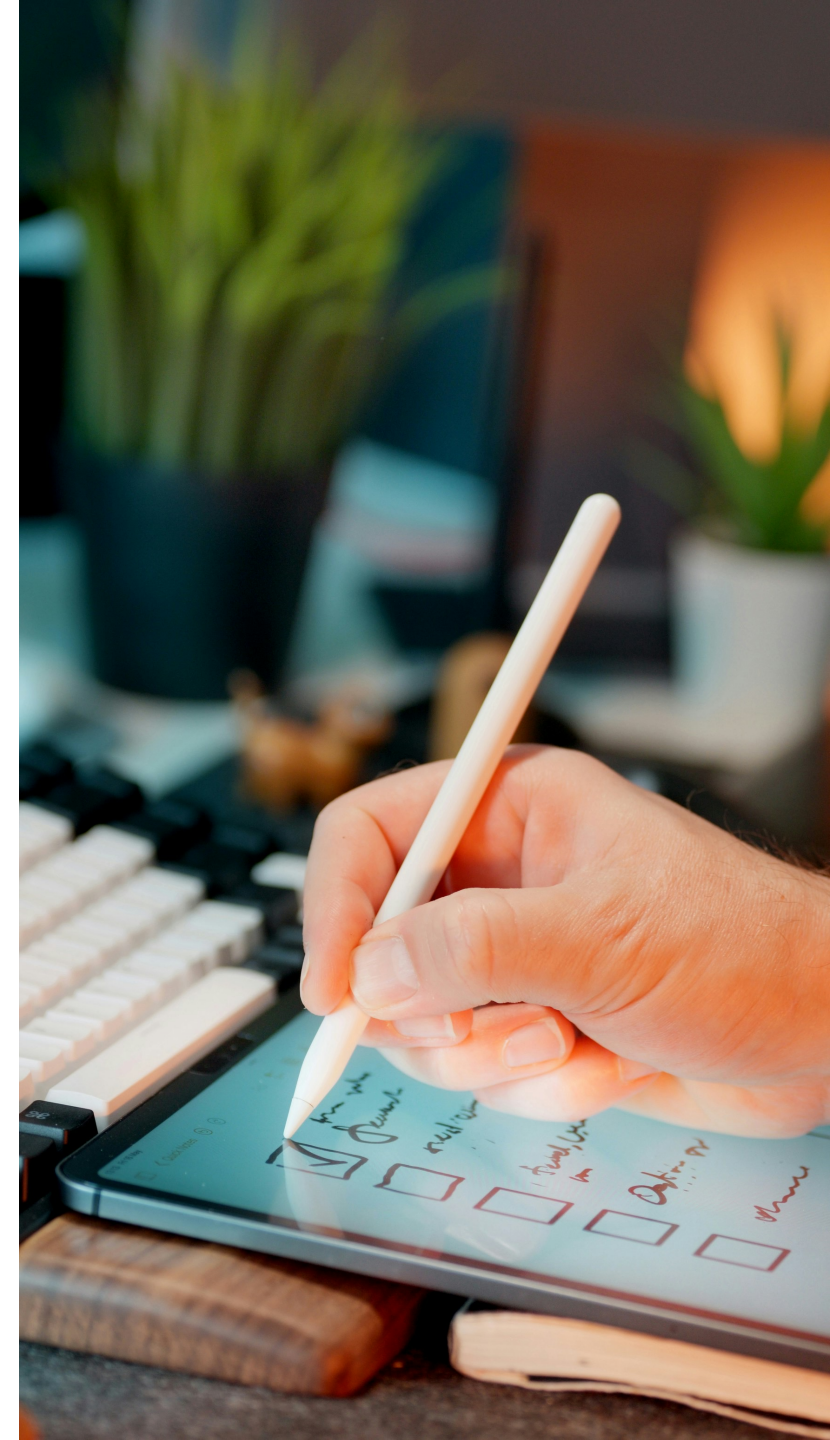


Processor

Controller

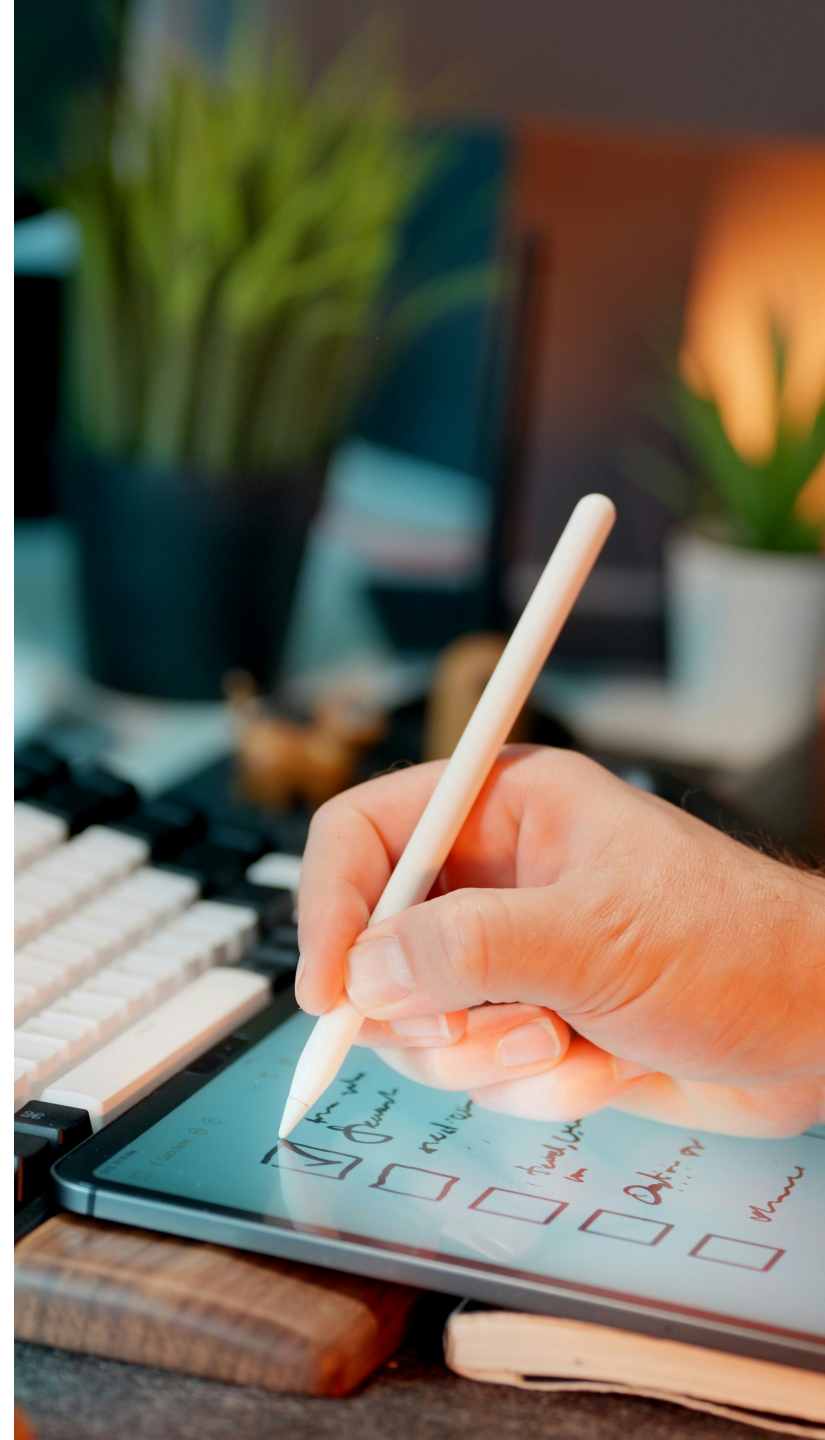
Practical implications for controllers

- Understand what's happening to your data
- Due diligence, contract, oversight
- Location of data storage
- You're liable for compliance with the IPPs
- IPP 3A, IPP 11 and IPP 12 don't apply to sharing data
- Access and correction requests
- Breach reporting



Practical implications for processors

- Don't use the data for your own purposes
- Product and system design
- Default settings
- Configuration choices
- Accurate transparency that explains who does what
- Breach reporting
- Think about overseas laws



Key takeaways

You can outsource functions, not responsibility

Critical question –
Is a processor using information for its own purposes?

Contracts don't determine this – the facts do

Processors still materially influence compliance