

Checklist of Key Considerations for Data Stewardship

- ✔ Make data stewards essential members of the compliance team.
- ✔ Nurture a data-driven corporate data culture.
- ✔ Make data policies transparent.
- ✔ Define roles and responsibilities using RACI (responsible, accountable, consulted, and informed) framework.
- ✔ Ensure data security by using appropriate tools, training, policies and procedures.
- ✔ Identify and review existing laws, norms, policies and standards for data management.
- ✔ Define data stewardship values that are reduced to guiding principles and then translate it into organizational policies and processes for ethical data processing.
- ✔ Define a reasonable time frame for the retention of data.
- ✔ Use an “ethics by design” process to integrate data stewardship principles into data analytics.
- ✔ Use design decisions so that society, groups of people, or people themselves, rather than just the organization, benefit from the use of data processing technologies like artificial intelligence or machine learning.
- ✔ Require ethical data impact assessments (EDIAs) when advanced data analytics may have a significant negative impact on people and/or when data-enabled decisions are being made.
- ✔ Use an internal review procedures to determine whether:
 - EDIAs have been carried out competently and with integrity.
 - The problems brought up during the EDIA have been remedied.
 - Whether the data processing activities are carried out as intended.

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