

Privacy Performance Action Guide

Check this list to maximize the maturity and business value of your privacy program.

Based on findings from 1,844 privacy professionals worldwide, the 2026 Global Privacy Benchmarks identify the specific practices

that separate high-performing privacy programs from those falling behind. Organizations with integrated technology, governance frameworks, and a strategic orientation achieve Global Privacy Index scores nearly four times higher than fragmented programs. This guide translates those findings into concrete actions.

1 Build the organizational foundation.

Establish dedicated privacy leadership.

Create a dedicated Privacy Office or team with a defined mandate.

→ **94% of companies over \$50M already have one.**

Assign clear ownership of privacy accountability across the enterprise.

Ensure the privacy function has board-level visibility and regular engagement.

Plan for growing privacy headcount — demand for privacy roles is at an all-time high.

→ **62% expect hiring to increase in 2026.**

Treat privacy as a strategic priority.

Position privacy as a business enabler, not just a compliance function.

Secure dedicated budget and resources for privacy initiatives.

→ **Top priority for 38% of organizations.**

Ensure privacy considerations are embedded in day-to-day business decisions.

Communicate privacy policies and procedures clearly across the organization.

2 Adopt a governance-led approach.

Move beyond rules-based compliance.

Shift from a rules-only regulatory approach toward principles-based or hybrid governance.

Build programs that are adaptable across jurisdictions, not just compliant in one.

→ **Organizations with a principles-based approach score 69% on the Global Privacy Index — 16 points above the global average. Rules-based programs average just 45%.**

Adopt recognized governance frameworks and certifications.

Align your program with a governance and accountability architecture framework (e.g., AICPA/CICA, Nymity PMAF).

Pursue formal certifications that reinforce enterprise governance — ISO/IEC 27701, Europrivacy, ISO/IEC 29100.

Consider Global CBPR participation if operating across multiple regions.

Use governance frameworks as anchors for broader certification strategy, not standalone badges.

→ **Organizations aligned with governance and accountability frameworks score 70 – 76% on the Global Privacy Index — roughly 20 points above the global average. Those with no certifications and siloed systems score as low as -12%.**

3 Operationalize privacy at scale.

Implement six or more privacy initiatives.

Data inventory and mapping

Cookie consent and website tracker governance

Consent and preference management (omnichannel)

Data Subject Request (DSR) management

Breach notification processes

Privacy Impact Assessments (PIAs) through the supply chain

Third-party and vendor privacy risk management

Trust Center (public-facing compliance transparency)

Strategic and reportable privacy program

Automated data discovery

→ *Global Privacy Index scores rise from 18% to 85% as organizations move from zero to full implementation of key privacy initiatives. Six or more initiatives – combined with integrated technology – average 75%.*

Measure what matters.

Formally measure the effectiveness of your privacy program.

→ *Organizations that measure score 65% vs. 21% for those that don't.*

Track activity-based KPIs: DSR response times, PIA completion rates, training completion.

Use compliance with applicable laws and internal privacy frameworks as baseline measurement methods.

Conduct regular independent audits and risk assessments.

Expand accountability through automated privacy controls and monitoring.

4 Integrate your privacy technology.

Deploy purpose-built privacy management software.

Replace or supplement GRC tools with dedicated privacy management platforms.

→ *Purpose-built software users score 75% on the GPI vs. 64% for GRC.*

Ensure your primary privacy platform supports data inventory, DSR management, consent, vendor risk, and reporting.

Aim for a fully integrated, interoperable tech stack – not a fragmented multi-vendor environment.

Evaluate vendors on their ability to share data seamlessly across systems.

→ *Integrated leaders – with purpose-built platforms, fully connected tech stacks, and 6+ initiatives – achieve ~75% on the GPI. Fragmented programs average ~21%. That is a 4x difference in privacy competence.*

Build toward full interoperability.

Audit your current privacy technology stack for integration gaps.

Reduce manual workarounds between systems wherever possible.

Align technology investments with governance frameworks.

→ *Nymity PMAF adopters are 3x more likely to operate fully integrated stacks.*

5 Govern AI responsibly.

Establish AI governance infrastructure now.

Develop and enforce an organizational AI use policy.
 Conduct AI risk assessments before deploying new AI systems.
 Maintain an AI inventory and monitor AI tool usage for privacy and security compliance.

→ *Only 43% of organizations currently do this.*

Designate cross-functional oversight for AI governance.

Prepare your workforce and regulatory posture.

Provide comprehensive training on AI use and privacy considerations.

→ *45% offer comprehensive training; another 35% offer basic guidance.*

Assess readiness for EU AI Act enforcement.

→ *72% say they are prepared, up from 61% in 2025.*

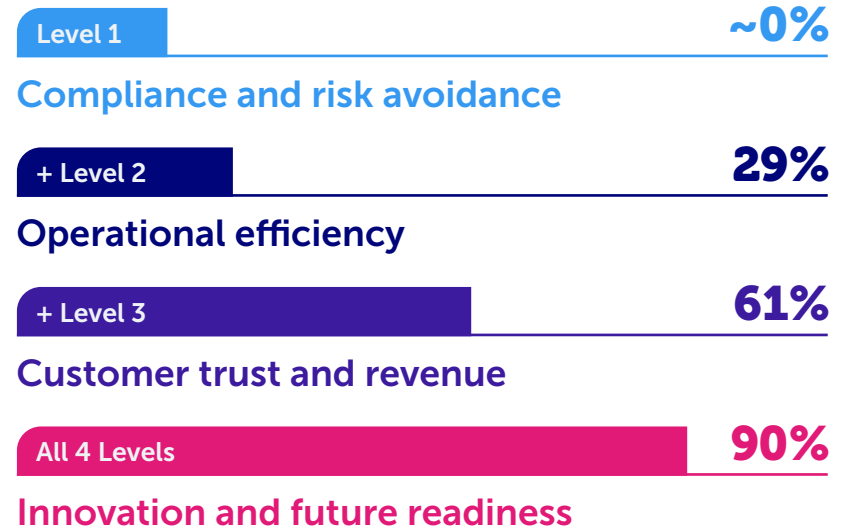
Assess readiness for Colorado AI Act enforcement.

→ *66% say they are prepared, up from 57% in 2025.*

Build adaptable governance practices that can respond to emerging AI regulations across jurisdictions.

6 Realize strategic business value.

Privacy ROI compounds as programs move beyond compliance. Statistical modeling from the 2026 Benchmarks shows that predicted Global Privacy Index scores rise progressively as programs deliver value across more layers:



To unlock full ROI:

Document and communicate the business value of privacy beyond regulatory compliance.

Track operational efficiency gains from privacy programs (reduced breach costs, streamlined processes).

Connect privacy program performance to customer trust, retention, and revenue metrics.

Position privacy as an enabler of AI adoption, international expansion, and product innovation.

Ensure leadership treats privacy as a strategic priority, not a cost center.

→ *49% of organizations strongly agree privacy is a strategic priority.*

7 Embed privacy into culture.

Activate the 7 Keys to Privacy Competency.

Strategic Integration: make privacy a core part of business strategy.

Privacy Mindfulness: build organization-wide awareness of privacy as a business value.

Employee Empowerment: ensure every employee can formally raise privacy issues without fear of reprisal.

Privacy as a Differentiator: position privacy practices as a source of competitive distinction.

Board-Level Engagement: ensure the board regularly reviews and discusses privacy matters.

Training and Awareness: sufficiently train all employees in privacy matters.

Decision-Making Integration: embed privacy considerations into everyday business decisions — not just compliance reviews.

Where Does Your Program Stand?

The 2026 Global Privacy Benchmarks show that the gap between privacy leaders and everyone else is widening — but it is not a mystery. Organizations that implement structured initiatives, integrate their technology, adopt governance frameworks, and treat privacy as a strategic driver consistently achieve dramatically stronger outcomes. This checklist reflects the practices that make the difference.

To benchmark your program against the full findings, read the 2026 TrustArc Global Privacy Benchmarks Report.

[Download the Report](#)

About TrustArc

As the leader in data privacy, TrustArc automates and simplifies the creation of end-to-end privacy management programs for global organizations. TrustArc is the only company to deliver the depth of privacy intelligence, coupled with the complete platform automation, that is essential for the growing number of privacy regulations in an ever-changing digital world. Headquartered in San Francisco, and backed by a global team across the Americas, Europe, and Asia, TrustArc helps customers worldwide demonstrate compliance, minimize risk, and build trust. For additional information visit [TrustArc.com](https://www.TrustArc.com).



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