

Privacy + Security Forum

Session:

How to Help Your Company (or Client) Pivot to Privacy: From Startups to Big Companies that Don't Yet Realize They Have Privacy Issues

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What Does it Mean to “Pivot to Privacy”?

Reactive

- Putting out fires after breaches and complaints
- Addressing risk only when something is brought to your attention
- Saying “no” to teams because the company hasn’t aligned on risk tolerance (so you always take the most conservative approach)



Proactive

- Get to know your marketing, vendor onboarding, and product teams – understand how you can help them to embed privacy considerations into their processes
- Talk to stakeholders about privacy and what that means to the organization and regulators
- Align privacy program recommendations with the company’s risk tolerance

The Regulatory Landscape is Driving the Need to Focus on Privacy

US State Privacy Laws Patchwork

- 20+ states have enacted comprehensive privacy statutes; new laws continue to take effect each year
- Varying thresholds, consumer rights, and opt-out requirements create operational complexity

FTC Enforcement Trends

- Heightened scrutiny of deceptive data practices, dark patterns, and children's privacy
- Consent orders increasingly mandate comprehensive privacy programs and third-party audits

CPPA Enforcement Trends

- California Privacy Protection Agency ramping up formal investigations and public enforcement actions
Focus on data-broker registration, opt-out compliance, and privacy-notice accuracy

GDPR And Us-based Companies

- Extraterritorial reach catches any company offering goods or services to EU residents
Recent cross-border data-transfer developments (EU-US Data Privacy Framework) require ongoing monitoring

Organizations Don't Know What They Don't Know

Whether it's a start up or a large, established enterprise, organizations often don't realize they have privacy issues



Common Blind Spots



Data collection points that aren't accounted for Employee-facing tools, IoT devices, and customer-support platforms quietly ingesting personal data



Rapid product launches lacking privacy review Features ship before legal or privacy teams can assess data flows and consent mechanisms



Vendor management gaps SaaS providers processing personal data without adequate DPAs or audit rights



Marketing data use evolving faster than privacy reviews keep up Pixel tracking, ad-tech partnerships, and lookalike-audience building outpace notice-and-consent updates

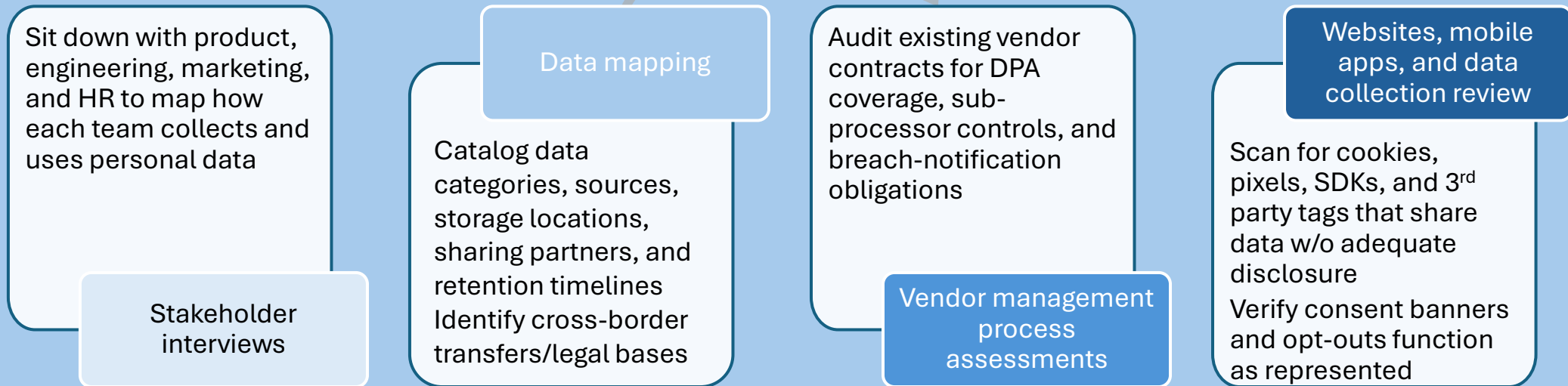


Legacy systems with retained data Old databases, backups, and archived platforms holding data well past any defensible retention period



Misalignment between privacy-notice content and actual underlying practices Says one thing in the notice, does another in production — a top FTC enforcement concern

Uncover Risks in Your Organization to Pivot Effectively



Achieve Buy-in and Strengthen the Privacy Program Effectively

Frame privacy as a business enabler to get decision-maker buy in

- Quantify risk: potential fines, litigation costs, and reputational impact of non-compliance
- Highlight competitive advantage: customers and partners increasingly favor privacy-mature organizations

Build in flexibility for the privacy program to evolve with legislative developments

- Design controls that can scale across jurisdictions rather than building state-by-state solutions

Implement meaningful privacy training for employees

- Tailor content to role-specific data handling (e.g., marketing vs. engineering vs. HR) Move beyond annual click-through modules to scenario-based exercises

Draft or refresh core program artifacts

- Internal and external privacy policies
- Privacy impact assessments (PIAs)
- Consumer/employee privacy-rights request processes
- Data processing agreement (DPA) templates
- Vendor management and due-diligence workflows

Key Takeaways Effectively

To keep up with evolving legislation and enforcement trends, organizations must build a proactive and flexible privacy program

A static program becomes outdated the moment the next state law takes effects

Start with the common blind spots in assessing the state of the privacy program

Low-hanging fruit — data mapping, vendor contracts, and notice accuracy — often reveals the biggest gaps

Frame privacy as a business enabler

Speak in terms of revenue protection, customer trust, and deal velocity, not just legal risk

Establish regular privacy program reviews for core areas

Set a cadence (quarterly or semi-annually) to reassess data flows, vendor relationships, training, and policy alignment

Questions?



Stay in touch: Continue the conversation with us

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