

## **Inside 1to1 Privacy**

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### **How GE Coordinates a Large Privacy Team**

What would you do if you were appointed chief privacy officer (CPO) of a multinational corporation with 52 privacy leaders and more than 200 employees working on privacy scattered across 39 business units? You might start updating your resume again, or if you're a seasoned privacy leader like Nuala O'Connor Kelly, you might try something new -- like holding a series of privacy "workouts."

That's what O'Connor Kelly spearheaded during her second year as Chief Privacy Leader of the company that Thomas Edison started in 1890. Last month, 70 of General Electric's privacy professionals met at the company's world headquarters in Fairfield, Conn., for the "Americas Privacy Workout." Similar gatherings will take place in Europe and Asia later this year, according to O'Connor Kelly, CIPP/G, who serves as a board member for the International Association of Privacy Professionals, the world's largest association for privacy professionals. O'Connor Kelly also is the former CPO of the U.S. Department of Homeland Security.

"Our biggest number of privacy practitioners is, not surprisingly, in Europe," said O'Connor Kelly, "so we'll likely see at least 70 there, and a smaller, but growing number at our Asia workout."

The need for regional privacy conclaves has been developing at the company since the formation of its privacy function in 2001. According to Orrie Dinstein, Chief Privacy Leader & Senior Counsel for Privacy and IT at GE Commercial Finance, GE's internal privacy meetings have evolved in two ways since then.

"The number of attendees keeps growing as we expand our team size and our geographic reach, first from Europe, to around the globe," he said. "The topics we cover have also shifted as we moved from basic tutorials to more detailed issue-driven topics, sharing of best practices, and the use of tools and automation to address our needs. We're a much more mature team than we were six years ago."

General Electric's \$160 billion in annual revenues -- generated by 330,000 employees -- make it the 11th-largest company in the world. Its massive amounts of employee data prompted GE to become the first company in the world, under O'Connor Kelly's predecessors Ivan Fong and Jim Jordan, to seek EU approval for its "binding corporate

rules (BCRs)." BCRs are essentially a company's privacy policy and procedures approved by country data-protection authorities allowing it to transmit personal data anywhere in the world.

From Thomas Edison's first light bulb, GE has grown into 39 business units organized into six segments. Most sell their products and services to other businesses that expect privacy compliance: GE Infrastructure (\$47 billion in annual revenue), which sells aviation, energy, rail and water products; GE Industrial (\$34 billion), which provides appliances, lighting, plastics and silicon products; GE Healthcare (\$17 billion), which sells diagnostic equipment to physicians; GE Commercial Finance (\$24 billion), which helps businesses finance their purchases; and NBC Universal (\$16 billion), the famous media and entertainment provider.

GE also operates several businesses that sell to end consumers and must incorporate privacy as part of their brands. Among those are GE Industrial and GE Money (\$22 billion in annual revenues), which offers credit services to consumers, retailers and automotive dealers. It's hard to imagine a privacy law anywhere that doesn't somehow affect one of General Electric's businesses.

With so much privacy activity occurring under one roof, the risks of redundancy and inconsistency are heightened -- and the need for privacy workouts that much more pressing.

What was unique about the Americas Workout?

First, it wasn't a top-down push of O'Connor Kelly's agenda onto the rest of the organization. She has instead taken the approach of bringing all of the company's privacy talent together in one place to pool their innovations from the previous year. Several of them are accomplished CPOs in their own right who bring deep experience to the table.

"It's really energizing to get together with your privacy peers to share best practices and problem solve," said Jennifer Garone, Privacy and Security Leader of GE Money. "We leave the workout ready to share the wisdom with our business, so that we aren't just talking to ourselves."

Second, the invite list was broader than the privacy team. Among those attending were GE's General Counsel, CIO, Chief Security Officer, and Chief Information Security Officer. O'Connor Kelly also included outside counsel in the discussions to enable her team to tap into their expertise.

"Having these annual workouts is a great way for us to put all our top experts in a room, and have a detailed discussion about several select topics -- see how each of us is handling it and what solutions we can leverage across our businesses," Dinstein said. "The odds are that somewhere someone has a fix for the issue you're facing."

Third, the topics spanned the privacy spectrum. Privacy leaders outside GE might have found the agenda items to be the same as those on their plates: privacy auditing, incident response, electronic health records, e-discovery, and privacy and the brand. But they also would have found niche topics, such as the exchange of employee information during M&A transactions, and a debate on the merits of BCRs for employee data versus customer and supplier data.

The participants left the sessions with a shared understanding of GE's privacy program's goals for the upcoming year.

"The 'Back to the Sheet Music' theme of our workouts this year reflects our desire to make sure we're world class in the basics of our privacy program -- our compliance stance, our legal analysis, and our understanding of the expectations of our employees, customers and vendors," O'Connor Kelly said. "We want to make sure we've built a program on a solid foundation and that it will be sustainable and scalable over time. We want to make sure that all our employees and businesses are 'singing off the same sheet of music' when it comes to privacy practices."