

# APRA's Impact on Privacy Leadership

Navigating Privacy Officer  
Responsibility & Talent Dynamics



Privacy, Ediscovery, & Cybersecurity Staffing

# Meet the Speakers



## Jared Coseglia

Founder & CEO  
TRU Staffing Partners

- Placed 4,000+ professionals in Fortune 1000, Am Law 200, and global consultancy, service, and software provider sectors
- Expert in staffing solutions, career guidance, and talent management
- Specialties:
  - Talent identification, delivery, mentorship, and retention
  - Vast network of relationships
  - Expertise in privacy, ediscovery, legal and cybersecurity staffing



## Sam Castic

Partner  
Hintze Law

- 15 years in global privacy and cybersecurity
- Specialties:
  - Privacy & data protection for e-commerce, fintech, tech, telecom, social media, retail, & advertising
  - Building, maturing, and maintaining privacy programs
  - Privacy compliance, data breach response, and regulatory inquiries
  - Supporting product, service, and technology launches with privacy compliance



## Brian Boetig

Senior Managing Director, Partner  
FTI Consulting

- 33+ years in national security, public safety, and consulting
- Specialties:
  - Cybersecurity and regulatory challenges
  - Forensic analysis in data privacy and regulation
  - Intellectual property diversions
  - Complex investigations and threat resolution



# Summary of APRA Requirements

- Data minimization
- Consents if sensitive data transferred to 3rd parties
- Consents for biometric and genetic data
- Privacy by design
- Privacy notices & content requirements; short form notices and publishing prior notices for large data holders
- Individual rights: access, correction, deletion, portability
- Opt-out rights for: targeted advertising, transfers to third parties, use of algorithms to facilitate consequential decisions
- Information security
- Data retention and deletion
- Service provider and 3rd party obligations, and contractual requirements
- Data brokers
- Algorithmic design evaluations, and algorithmic impact assessments for large data holders
- Audits and privacy impact assessments
- COPPA revisions
- CEO, Privacy and security officer obligations and FTC certifications

# Company Obligations for Privacy Officers

## Privacy and Security Officers

- **Covered entities** and **service providers** must appoint 1 or more qualified employees to serve as privacy or security officers.
- **Large data holders** must appoint 1 qualified employee to serve as privacy officer, and 1 qualified employee to serve as data security officer.

## Privacy Impact Assessments

- **Large data holders** must do biennial privacy impact assessments for all of entity's covered data processing practices. Must be:
  - Documented in writing; and
  - Approved by the privacy officer

# Privacy Officer Obligations

At **covered entities** and **service providers** privacy and security officers must:

- Implement **data privacy program** and **data security program** to safeguard privacy and security of covered data in line with the Act; and
- **Facilitate** covered entity or service provider's **ongoing compliance** with the Act.

**At large data holders:**

- CEO, Privacy & Security Officers must **annually certify to FTC** that: (i) **controls are designed to comply** with Act; and (ii) internal reporting structures assure **these officers are involved in and responsible for decisions** that impact compliance.
- Must be based on recent (within 90 days) reviews of controls and reporting structures

**Privacy or security officer must directly or through supervised designee:**

- **Set processes** for reviews to privacy & security policies & practices
- **Conduct biennial comprehensive audits** to assure compliance with Act and turn over to FTC on request
- **Develop training** and education program for employees
- **Maintain updated & clear records** of all material privacy and security practices
- **Serve as point of contact** with FTC and other enforcement authorities
- Privacy officer must **approve** biennial **privacy impact assessment.**

# Potential Job Market Outcomes

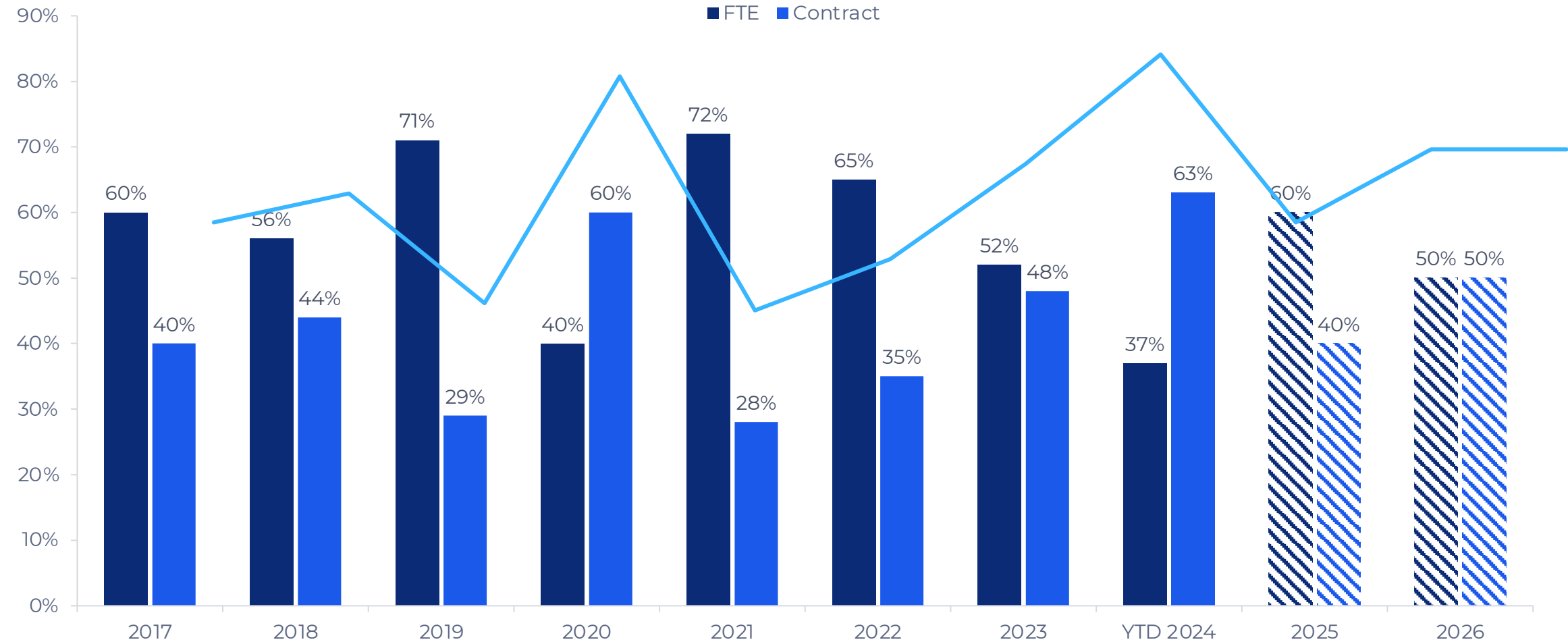
- **A GDPR-like scenario:**
  - Massive increase in direct hire jobs but salary commoditization of those jobs (aka EU DPOs)
  - Massive increase in contract augmentation leading up to and the quarters following an APRA deadline (2018 GDPR)
  - Momentary corporate shift in focus to pure privacy compliance for many
- **CCPA-like scenario:**
  - Increased valuation of existing privacy talent
  - Meaningful increase in contract talent augmentation
  - Compliance skills required but leveraging privacy to impact business outcomes desired
- **SOX-like scenario:**
  - Compliance requirements pushed to internal stakeholders with incremental growth for existing privacy programs

# Impacts to Privacy Functions

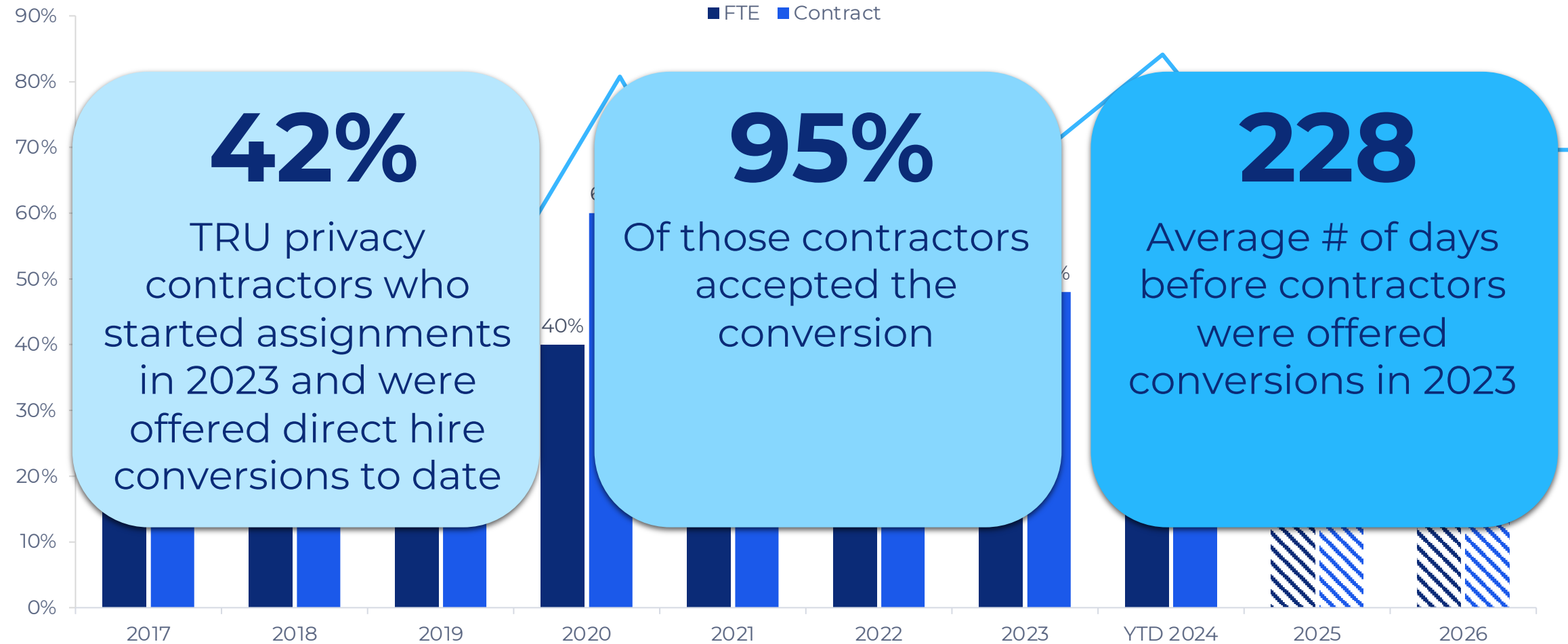
- More human capital needed to support less sophisticated tasks
- Opportunity for privacy technology to automate more meaningfully throughout the business
- Tenured privacy stakeholders leverage APRA for bigger seat at the table (coupling AI governance into push for role redefinition)
- Veteran privacy leaders become audited by entry-level DPOs



# Privacy Contract vs. Direct Hire Staffing Trends (Last 7 Years) Based on Offers Accepted

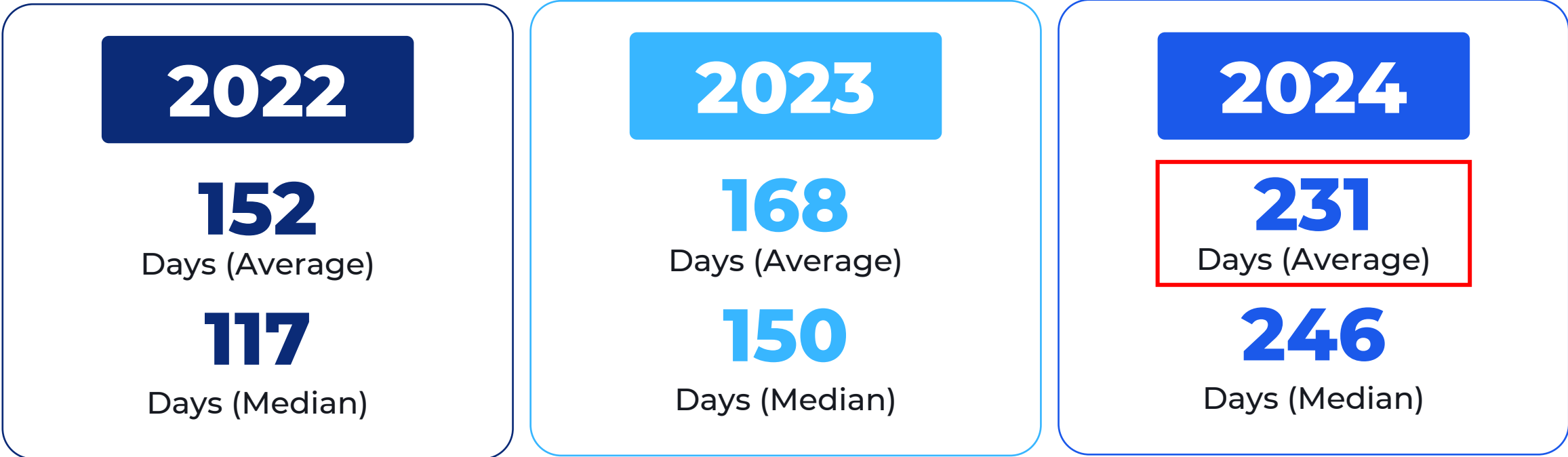


# Privacy Contract vs. Direct Hire Staffing Trends (Last 7 Years) Based on Offers Accepted



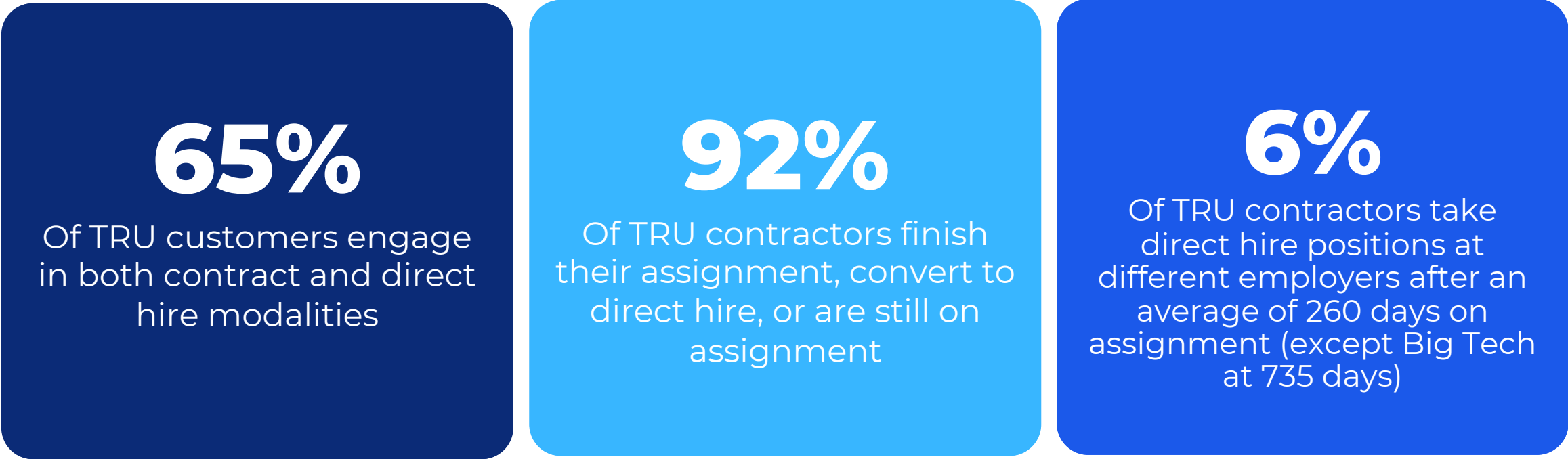
# Contractor Length of Assignment

Length of assignment for contractors ending their assignment:



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Length of assignment for contractors ending their assignment:



# Considerations for Privacy Leaders

Leverage high-caliber privacy pros to prepare for APRA, then phase them out.

Staffing contract-to-hire currently has an incredibly high success rate (95% acceptance) and is potentially the best way to grow a program in a down economy.

Make contract augmentation an ongoing part of evolving your program.

Be prepared for contract hiring to continue accelerating until late 2024, but also be prepared for contractor availability to begin decelerating in 2025. Get them now!

Fractional, specialized data privacy contract talent IS available.

Salary growth has slowed in 2023 motivating job seekers to seek employment elsewhere for reasons other than money.

# Industry Break Down 2023

## TRU Jobs Report VS. IAPP Survey Current Comp (In Base Salary)

	Big Tech	Financial/ Healthcare /Healthcare Tech	Telecom/ Retail/ Entertainment	IAPP Mean (US & EU)
Privacy Analyst	\$90K-140K	\$90K-140K	\$90K-130K	\$89.0
Privacy Program/Project Manager (Privacy Manager)	\$140K-180K	\$130K-160K	\$130K-160K	\$115.2
Privacy Sr. Manager/Consultant (Privacy Office Risk and Compliance Manager)	\$175K-200K	\$140K-170K	\$140K-160K	\$119.4
Privacy Director/SMEs (Regional Privacy Officer)	\$225K-300K	\$200K-260K	\$200K-250K	\$137.5
Privacy Engineer	\$175K-300K	\$150K-235K	\$150K-205K	\$135.6
Privacy Counsel (Internal Privacy Lawyer)	\$225K-325K	\$200K-300K	\$175K-320K	\$174.7
CPOs/Business Unit Privacy Leads (Chief Global Privacy Officer)	\$265-465K	\$235K-425K)	\$225K-315K	\$206.0

TRU Staffing Partners & IAPP Salary Survey Data

# Salary Increases at Point of Hire

2021, 2022, 2023 (TRU Data)

**98%**

Percentage of placements who received increases in compensation when changing jobs

**23%**

The average increase in base salary at the point of hire in 2021

**99%**

Percentage of placements who received increases in compensation when changing jobs

**35%**

The average increase in base salary at the point of hire in 2022

**65%**

Percentage of placements who received increases in compensation when changing jobs

**18%**

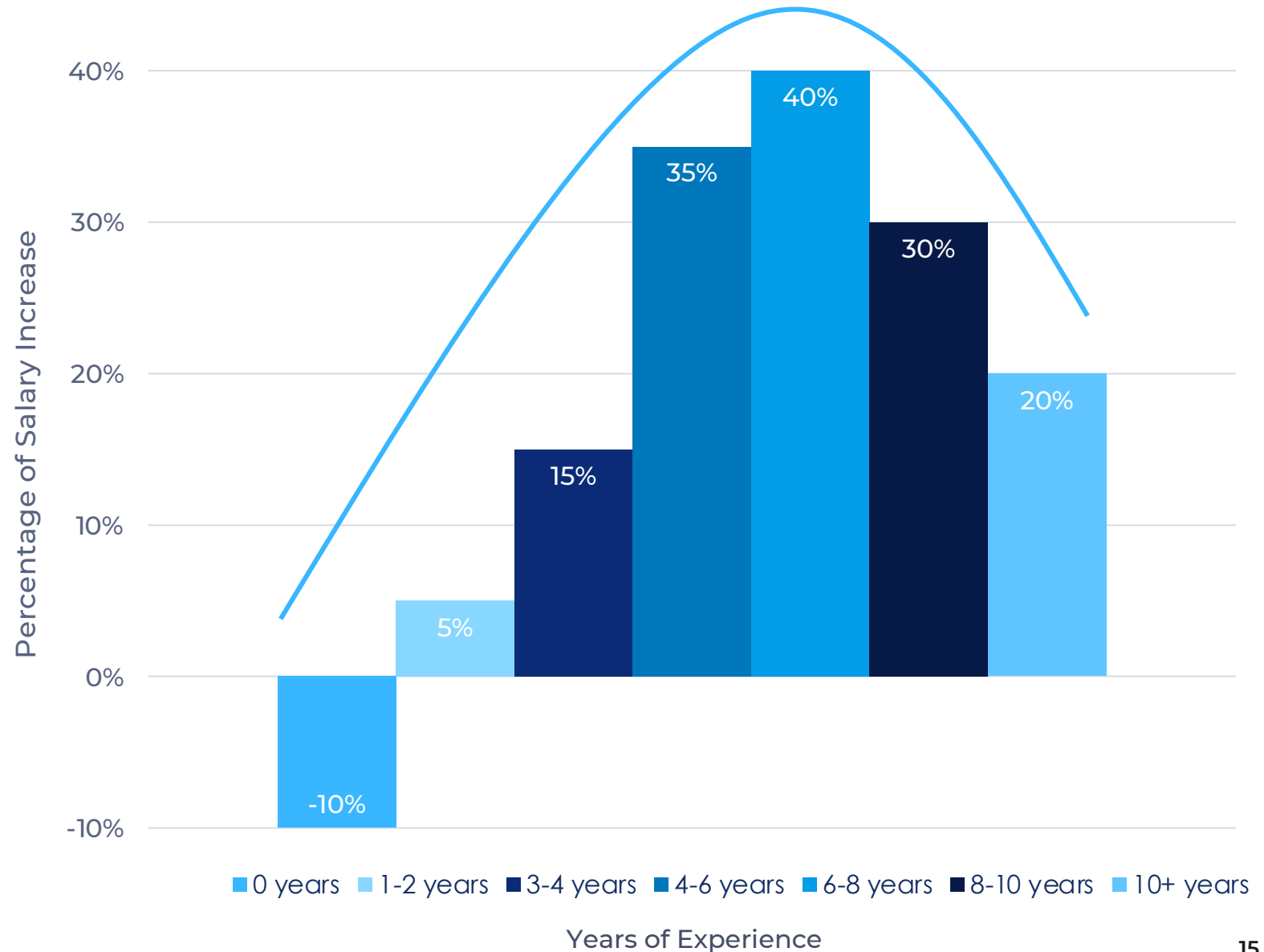
The average increase in base salary at the point of hire in 2023

# 2022

6-10+ years' experience  
in highest demand but  
lowest relative supply

20-40% base  
compensation increase  
for midmarket  
professionals at point  
of hire in 2022

### Percentage of Salary Increase Based on Years of Experience at Point of Hire (2022)

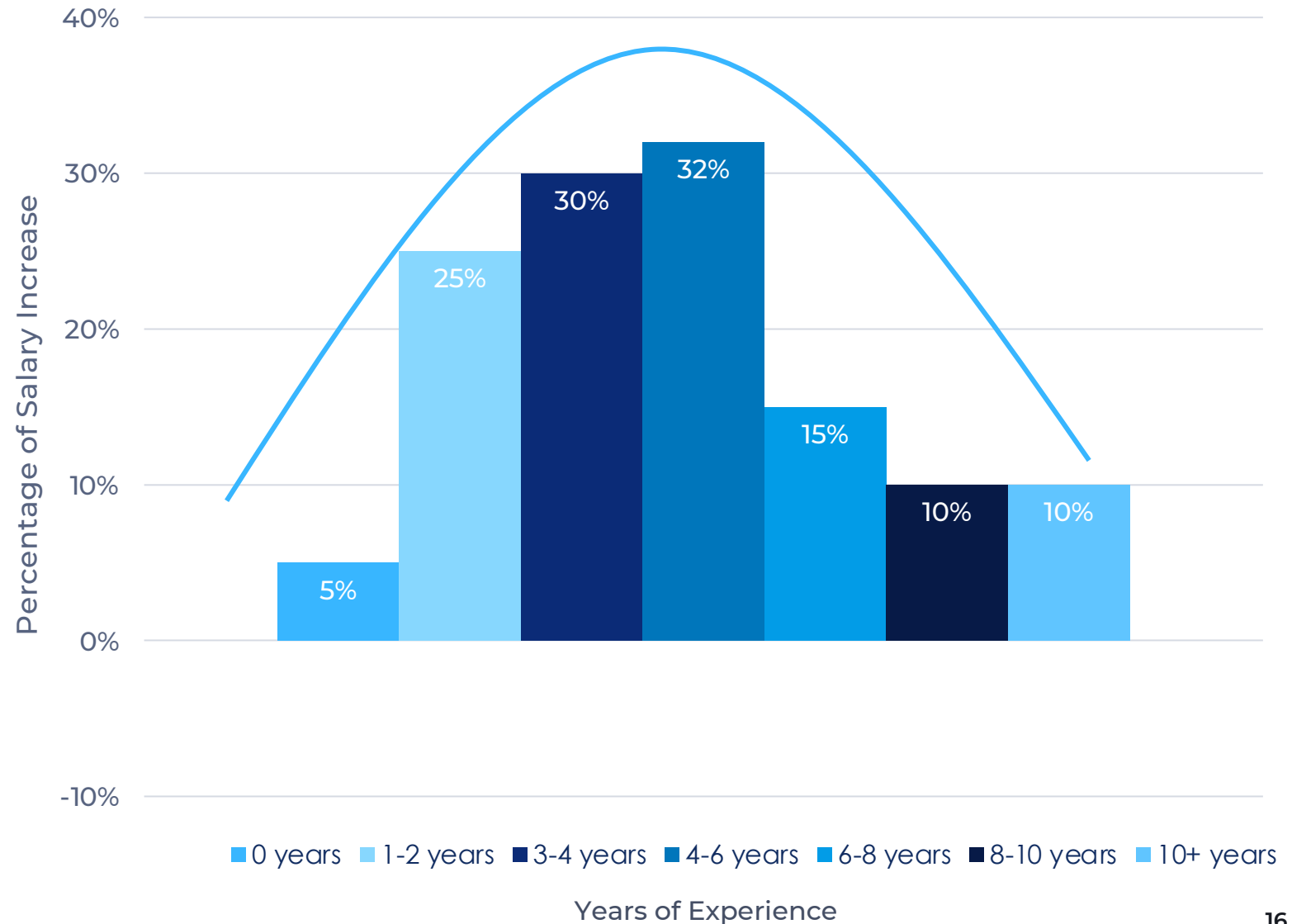


# 2023

1-6+ years' experience  
in highest demand but  
lowest relative supply

25-32% base  
compensation increase  
for early career  
professionals at point  
of hire in 2023

Percentage of Salary Increase Based on Years  
of Experience at Point of Hire (2023)





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# Thank You!

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