A Message from the Chairman

Dear Data Protection Professional,

I am thrilled to present you with the IAPP's very first survey of our European membership.

This report recognizes the significant data protection expertise that has long been established across Europe and which is now represented in a diverse and growing IAPP member community. Our study will provide insights into what your peer professionals in data protection are doing, how they are doing it and what they are earning for it. This valuable marketplace insight is one of several benefits you enjoy as an IAPP Europe member.

Europe continues to be a leading influence in how data protection challenges are managed around the world. The IAPP is both proud and honoured to support and grow our membership across the region and to provide useful information to help European data protection professionals meet many different issues and challenges. I trust you will find this report a valuable addition to your present work and future success.

Kind Regards,

Nuala O’Connor Kelly, CIPP, CIPP/G
Senior Counsel, Information Governance and Chief Privacy Leader
General Electric Company
Chairman, IAPP
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I. Executive Summary

The 2010 IAPP Europe Data Protection Professional’s Role, Function and Salary Survey provides the first comprehensive profile of IAPP membership across the European region. The study examines working professionals within organisations in both the private and public sectors and across multiple industries.

The final report has revealed notable trends among data protection professionals in the functions they serve, the expertise they provide and the compensation they earn.

Among the key findings of this inaugural survey:

• Privacy in Europe is a global job. Respondents’ organisations represent a truly global reach, with the large majority having employees not just in another continent, but across the world.

• Legal compliance drives the placement of the European privacy office. More than half of all respondents cited a primary reporting line to their organisation’s compliance/ethics officer or general counsel, and nearly a half maintain a secondary or dotted reporting line to these functions.

• Large European firms harbour the most data protection professionals. The majority of IAPP members responding to the survey work within large organisations; nearly half of these organisations employ more than 75,000.

• Privacy as one of many hats. Many European data protection professionals are juggling multiple roles, most commonly including information security and regulatory compliance. Respondents spend, on average, 71 percent of their work weeks devoted to privacy-related responsibilities.

• Highly mature privacy programmes. The majority of respondents self-report that their organisation’s privacy programme is in the latter stages of maturity, with over a third claiming their programme is in maintenance mode focusing on program evaluation and refinement.

• Telecommunication, professional services and technology/software are the largest industries in the European data protection marketplace. These industries—which intensively collect and process personal data—together accounted for 58 percent of survey respondents.

• Career paths for European data protection professionals are in a formative phase. The plurality of European data protection professionals either do not know what their next career step is or know that a new position will have to be created for their next promotion. For enterprising individuals, this appears to be an unprecedented opportunity to define a rewarding livelihood.

• Healthy compensation. About half of European data protection professionals receive a base salary between 50,001 and 100,000 euros. Of the 12 who volunteered their actual salary amount, the average was 73,000 euros, with a low of 38,000 and a high of 103,000. Most receive bonuses, with 40 percent anticipating 10 percent or more of their base salaries.
II. Survey Findings

We describe on the following pages the results of the 2010 European Data Protection Professional’s Role, Function and Salary Survey. The findings are grouped into sections that are intended to provide a narrative about the state of the European privacy profession today. We start with sections that describe the nature of the respondent organisations— their sector, size, location and programme maturity levels. We follow with sections that address the respondents themselves—their organisational placement, reporting channels, responsibilities and compensation. In each section, we try to draw meaning from the results with a focus on how to assist the European data protection professional in becoming more successful.

Industry Sector

Which sectors in Europe are employing data protection professionals? The technology and software, professional services and telecommunications industries together accounted for 58 percent of survey respondents. These three sectors also ranked in the top seven in the IAPP’s 2010 Privacy Professional’s Role, Function and Salary Survey released earlier this year. Ninety-three percent of that survey’s 889 respondents hailed from North America, so for the purposes of this survey, it can provide a useful benchmark of findings.

Why do these sectors appear to employ a high share of all data protection professionals? It could be that the products and services of these sectors most intensively collect and process personal data, causing them to require more staff to deal with the resulting compliance obligations. In the case of professional services—particularly those companies who provide their services to other companies—client contracts containing data protection provisions may be generating additional demand for privacy staff. European data protection professionals wishing to build a successful career may be advised to “follow the data” in choosing a sector in which to flourish.

Sectors Represented

[Pie chart showing the distribution of sectors represented in the survey]

- Technology and Software: 24%
- Professional Services: 18%
- Telecommunications: 16%
- Manufacturing: 12%
- Services: 8%
- Financial Services: 6%
- Pharmaceuticals: 6%
- Healthcare: 4%
- Other: 8%
Which sectors are noticeably underrepresented? There was no response from the public sector. By comparison, 17 percent of respondents to the North American-focused survey were government employees. Whilst it is not possible to interpret whether this is due to a lack of representation for privacy and data protection issues within European government bodies or a need for IAPP to reach out to public servants, clearly the key issue of personal data management within the public sector requires greater investigation. Additionally, the financial services and healthcare sectors in the European survey ranked relatively lower than they did in the North American-focused survey, where these two sectors accounted for 35 percent. While the U.S. sectoral laws in healthcare and finance may explain part of the divergence, these two sectors in Europe clearly process significant amounts of sensitive personal data. This is a question deserving to be explored further in future surveys.
Organisation Size

Does the number of employees in an organisation factor in its employment of data protection professionals?

Large firms harbour data protection professionals. As might be expected, the majority of IAPP members responding to the survey come from major organisations, with nearly half employing more than 75,000. Why is this the case? It could be that the very largest companies can best afford the expense of a privacy staff. They are likely to also maintain valuable brands that require the attention of a full-time privacy staff.

![Organisation Headcount Chart](chart2.jpg)

<table>
<thead>
<tr>
<th>Organisation Size</th>
<th>Share of Respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fewer than 500 employees</td>
<td>13%</td>
</tr>
<tr>
<td>500 to 1,000 employees</td>
<td>6%</td>
</tr>
<tr>
<td>1,001 to 5,000 employees</td>
<td>2%</td>
</tr>
<tr>
<td>5,001 to 25,000 employees</td>
<td>19%</td>
</tr>
<tr>
<td>25,001 to 75,000 employees</td>
<td>9%</td>
</tr>
<tr>
<td>More than 75,000 employees</td>
<td>49%</td>
</tr>
<tr>
<td>n/a</td>
<td>2%</td>
</tr>
</tbody>
</table>

N=47

What’s next for privacy at small firms? Are there underrepresented organisation sizes? The respondents working for the smallest organisations make up only 13 percent of the survey sample, which is probably smaller than the share of small- and medium-sized businesses in the European economy. Whilst many of the unrepresented smaller businesses and charitable organisations probably can’t afford a full-time data protection professional, it leaves open the question of how are they receiving support to meet their data protection compliance obligations. The reach of the European privacy profession into smaller organisations is a topic that should be explored in more detail in future surveys.
**Geographic Reach**

**Privacy is a global job.** Does the global complexity of an organisation have a bearing on its employment of privacy staff? The answer for European data protection professionals appears to be “yes.” Respondents’ organisations represent a truly global reach, with the large majority having employees not just in another continent but across the world. Indeed, the three quarters of respondent organisations employing staff in the United States and Asia-Pacific registered as a much higher index of globalisation than was found in the North American-focused survey. In that sample, just under half of respondents reported working for organisations with employees in Europe and Asia-Pacific.

![Operating Territories](chart3.png)

**Chart 3: Operating Territories of Respondent Organisations**

<table>
<thead>
<tr>
<th>Region</th>
<th>#</th>
<th>% of Organisations in the Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Europe</td>
<td>46</td>
<td>100%</td>
</tr>
<tr>
<td>United States</td>
<td>36</td>
<td>78%</td>
</tr>
<tr>
<td>Canada</td>
<td>31</td>
<td>67%</td>
</tr>
<tr>
<td>Asia-Pacific (including Australia/New Zealand)</td>
<td>35</td>
<td>76%</td>
</tr>
<tr>
<td>Africa</td>
<td>29</td>
<td>63%</td>
</tr>
<tr>
<td>Latin America (including Mexico)</td>
<td>33</td>
<td>72%</td>
</tr>
<tr>
<td>Other*</td>
<td>4</td>
<td>9%</td>
</tr>
</tbody>
</table>

N=46

*Most choosing this category treated the Middle East as a separate operating territory for their organisation.

Although the respondent organisations reported a broad global distribution of employees, the geographic jurisdiction of their privacy offices was less global. While all respondent organisations operated in Europe, for example, just 63 percent had Europe-wide responsibility for privacy. This may be the case because European organisations handle privacy on a country-by-country or regional basis within Europe due to the divergent ways EU member states have implemented the Directive on Personal Data Protection. Similarly, while 78 percent of respondent organisations operate in the United States, just 11 percent of their privacy offices are responsible for the U.S. The root cause of this regional approach to privacy offices is worthy of further analysis in future surveys.
### Chart 4: Jurisdiction of the Privacy Office

<table>
<thead>
<tr>
<th>Region</th>
<th>#</th>
<th>% of Offices Responsible for the Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Global</td>
<td>18</td>
<td>39%</td>
</tr>
<tr>
<td>Europe</td>
<td>29</td>
<td>63%</td>
</tr>
<tr>
<td>United States</td>
<td>5</td>
<td>11%</td>
</tr>
<tr>
<td>Asia-Pacific (including Australia and New Zealand)</td>
<td>5</td>
<td>11%</td>
</tr>
<tr>
<td>Canada</td>
<td>4</td>
<td>9%</td>
</tr>
<tr>
<td>Latin America (including Mexico)</td>
<td>4</td>
<td>9%</td>
</tr>
<tr>
<td>Other**</td>
<td>7</td>
<td>15%</td>
</tr>
</tbody>
</table>

N=46

*respondents could choose more than one sector

**four of the seven reporting “other” cited a specific European country, while two cited the Middle East region
**Role**

Data protection professional as managerial operative. Are European data protection professionals primarily senior executives in a position of influence? Or, are they staff-level soldiers making incremental changes on a daily basis? The respondents to this first survey fall roughly between these two extremes, although a high portion of those answering “Other” lends some degree of ambiguity to the results. What could be an explanation for this outcome? The survey was issued without the title “Director” as an option. In Europe, the “Director” title is widely used and has a specific meaning. Indeed, 55 percent of those answering “Other” have the title of “Director” or “Partner.” Taking these as managerial roles, two-thirds of all respondents occupy a managerial position. We will add the “Director/Partner” option in next year’s survey to further improve these initial baselines.
Privacy and the law. The privacy office in Europe appears to be primarily a legal and compliance function. With more than half of all respondents having a primary reporting line to their organisation’s compliance/ethics officer or general counsel and nearly a half having that as a secondary or dotted reporting line, it is clear that compliance drives the agenda for privacy management within respondents’ organisations. No clear pattern emerges when considering the job titles provided by respondents whose reporting line is ‘Other,’ except that the reporting line is generally to a senior-level position.

![Reporting Relationships](chart.png)

**Chart 6: Reporting Lines**

<table>
<thead>
<tr>
<th>Data Protection Professional Reports to:</th>
<th>Primary</th>
<th>Secondary</th>
<th>Dotted Line</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compliance/Ethics Officer</td>
<td>29%</td>
<td>17%</td>
<td>18%</td>
</tr>
<tr>
<td>General Counsel</td>
<td>22%</td>
<td>25%</td>
<td>15%</td>
</tr>
<tr>
<td>CEO/Executive Committee</td>
<td>7%</td>
<td>8%</td>
<td>5%</td>
</tr>
<tr>
<td>Chief Risk Officer</td>
<td>7%</td>
<td>4%</td>
<td>0%</td>
</tr>
<tr>
<td>Chief Information Officer</td>
<td>4%</td>
<td>4%</td>
<td>15%</td>
</tr>
<tr>
<td>Chief Marketing Officer</td>
<td>2%</td>
<td>4%</td>
<td>3%</td>
</tr>
<tr>
<td>Human Resources Officer</td>
<td>2%</td>
<td>4%</td>
<td>10%</td>
</tr>
<tr>
<td>Chief Financial Officer</td>
<td>0%</td>
<td>0%</td>
<td>5%</td>
</tr>
<tr>
<td>Chief Security Officer</td>
<td>0%</td>
<td>0%</td>
<td>13%</td>
</tr>
<tr>
<td>Other</td>
<td>27%</td>
<td>33%</td>
<td>18%</td>
</tr>
</tbody>
</table>

N=47
**Formative time for privacy career paths.** With many European privacy positions placed within the legal and compliance functions, is the head of the legal or compliance department the next promotion for European data protection professionals? The answer to that question appears to be “no.” In fact, the bulk of European data protection professionals either do not know what their next career step is or know that a new position would have to be created. The diversity of reporting lines is reflected in the diversity of career opportunities reported by respondents, with career paths varying across organisations. Career paths and career aspirations are largely in step, with most respondents seeing a suitable promotion opportunity in law, compliance, or security and privacy. These results compare similarly with those of the IAPP’s global membership survey (“The 2010 IAPP Privacy Professional Role, Function and Salary Survey”), suggesting the privacy function in Western economies does not follow a standard career path. This suggests that this is an unprecedented time for European data protection professionals to chart their own course toward a rewarding and fulfilling livelihood.

![Chart 7: Promotion Paths](chart.png)

<table>
<thead>
<tr>
<th>Next Career Steps</th>
<th>Most Likely Promotion</th>
<th>Desired Promotion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not sure/there would need to be a new role created</td>
<td>31%</td>
<td>19%</td>
</tr>
<tr>
<td>Head of security and privacy</td>
<td>18%</td>
<td>21%</td>
</tr>
<tr>
<td>Senior lawyer</td>
<td>18%</td>
<td>19%</td>
</tr>
<tr>
<td>Senior compliance professional</td>
<td>18%</td>
<td>19%</td>
</tr>
<tr>
<td>Other</td>
<td>16%</td>
<td>23%</td>
</tr>
</tbody>
</table>

N=45
In spite of these diverse and undefined career paths, European data protection professionals share common ideas about what skills and experiences they need to obtain their career aspirations. About two-fifths see a need for additional legal skills, while nearly a third require broader international experience. The desire for more global experience is interesting, considering the previous results in Chart 4 showing an identical percentage, 39, of the privacy offices of respondent organisations as having global jurisdiction.

![Skills & Experience Needed for the Next Promotion](image)

**Chart 8: Skills Required to Fulfill Career Aspirations**

<table>
<thead>
<tr>
<th>Additional Skills</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legal</td>
<td>38%</td>
</tr>
<tr>
<td>International privacy</td>
<td>31%</td>
</tr>
<tr>
<td>Management</td>
<td>13%</td>
</tr>
<tr>
<td>General experience</td>
<td>6%</td>
</tr>
<tr>
<td>Other</td>
<td>13%</td>
</tr>
</tbody>
</table>

N=17

**Initial standardisation of privacy job titles.** Are the words “data protection” and “privacy” finding their way into the formal job titles of European data protection professionals? In practice, many European data protection professionals equate these two terms. That said, “privacy” is more commonly used–48 percent of respondents bear titles only with this term, compared to 24 percent who have only the “data protection” nomenclature. Interestingly, two percent include both terms, and a full 26 percent include neither. This latter category is worthy of further exploration in future surveys. These diverse results are one more indicator that the data protection professional in Europe is new and still in a formative, dynamic stage.

**Privacy as one of many hats.** Many European data protection professionals are juggling multiple roles. Whilst 89 percent are employed full time, most also have responsibilities other than privacy. Information security and regulatory compliance dominate these other duties, with more general legal, consultancy and IT roles also making demands on members’ time. Respondents spend, on average, 71 percent of their working week devoted to privacy-related responsibilities.
Other Hats

![Bar chart showing roles in addition to privacy]

Chart 9: Job Responsibilities Beyond Privacy

<table>
<thead>
<tr>
<th>Roles in Addition to Privacy*</th>
<th>#</th>
<th>% with this Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information security</td>
<td>12</td>
<td>17%</td>
</tr>
<tr>
<td>Regulatory compliance</td>
<td>12</td>
<td>17%</td>
</tr>
<tr>
<td>Corporate law</td>
<td>6</td>
<td>9%</td>
</tr>
<tr>
<td>General consulting</td>
<td>6</td>
<td>9%</td>
</tr>
<tr>
<td>Information technology</td>
<td>6</td>
<td>9%</td>
</tr>
<tr>
<td>Internal auditing</td>
<td>5</td>
<td>7%</td>
</tr>
<tr>
<td>Corporate ethics</td>
<td>4</td>
<td>6%</td>
</tr>
<tr>
<td>General management</td>
<td>4</td>
<td>6%</td>
</tr>
<tr>
<td>Records management</td>
<td>3</td>
<td>4%</td>
</tr>
<tr>
<td>Corporate marketing/CRM</td>
<td>2</td>
<td>3%</td>
</tr>
<tr>
<td>Public relations</td>
<td>2</td>
<td>3%</td>
</tr>
<tr>
<td>Government relations</td>
<td>1</td>
<td>1%</td>
</tr>
<tr>
<td>Human resources</td>
<td>1</td>
<td>1%</td>
</tr>
<tr>
<td>Other</td>
<td>6</td>
<td>9%</td>
</tr>
</tbody>
</table>

N=27
*Respondents could choose more than one role
**Function**

**Desire to change daily tasks.** European data protection professionals appear to want a different allocation of time to the tasks that typically comprise a privacy role. While 60 percent desire to be developing privacy strategies among those tasks they spend the most time on, many wish to spend less time performing such strategic tasks as analysing regulations and advising and consulting to the organisation. Within the category of tasks we classify as process-oriented, 30 percent of respondents wish they spent more time on monitoring and enforcement, while 15 percent seek to spend less time responding to incidents. Among the tasks we classify as foundational to a privacy program, respondents were more content with their current allocation of time. Whether this desire to alter daily tasks originates from a dissatisfaction with current responsibilities or an opportunistic view toward what more needs to be accomplished is not clear from the results. There appear to be several interesting undercurrents to explore on this question in the next round of this survey.

**Chart 10: Time Allocation**

<table>
<thead>
<tr>
<th>Privacy Tasks</th>
<th>% who currently spend most of their time on this</th>
<th>% who say they should spend most of their time on this</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>STRATEGIC</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Developing privacy strategy</td>
<td>53%</td>
<td>60%</td>
<td>7%</td>
</tr>
<tr>
<td>Analysing regulations</td>
<td>49%</td>
<td>38%</td>
<td>-11%</td>
</tr>
<tr>
<td>Advising/consulting to the organisation</td>
<td>89%</td>
<td>62%</td>
<td>-27%</td>
</tr>
<tr>
<td><strong>PROCESS</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Developing and performing training and communications</td>
<td>53%</td>
<td>62%</td>
<td>9%</td>
</tr>
<tr>
<td>Monitoring and measuring compliance (enforcement)</td>
<td>34%</td>
<td>64%</td>
<td>30%</td>
</tr>
<tr>
<td>Responding to incidents</td>
<td>36%</td>
<td>21%</td>
<td>-15%</td>
</tr>
<tr>
<td>Reporting to management</td>
<td>38%</td>
<td>32%</td>
<td>-6%</td>
</tr>
<tr>
<td><strong>FOUNDATIONAL</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Performing risk assessments and data inventories</td>
<td>47%</td>
<td>49%</td>
<td>2%</td>
</tr>
<tr>
<td>Developing and implementing policies and guidance</td>
<td>60%</td>
<td>62%</td>
<td>2%</td>
</tr>
<tr>
<td>Administration (personnel and budget)</td>
<td>19%</td>
<td>4%</td>
<td>-15%</td>
</tr>
<tr>
<td>Other</td>
<td>6%</td>
<td>2%</td>
<td>-4%</td>
</tr>
</tbody>
</table>

N=46
Responsibilities are changing. As another indicator of flux in the European privacy profession, almost half of the respondents anticipate that their responsibilities will change in the next year or two. Specifically, they believe they will be spending more time dealing with compliance and information risk or governance, both areas being core to protecting organisational interests.

Chart 11: Areas in Which Respondents Will Spend More Time in the Coming Year

<table>
<thead>
<tr>
<th>Areas Beyond Privacy</th>
<th>#</th>
<th>% who will spend more time here next year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compliance</td>
<td>14</td>
<td>40%</td>
</tr>
<tr>
<td>Information risk or governance</td>
<td>12</td>
<td>34%</td>
</tr>
<tr>
<td>Security</td>
<td>4</td>
<td>11%</td>
</tr>
<tr>
<td>General legal</td>
<td>4</td>
<td>11%</td>
</tr>
<tr>
<td>Other</td>
<td>1</td>
<td>3%</td>
</tr>
</tbody>
</table>

N=20

Highly mature privacy programmes. Encouragingly, the majority of respondents report that their organisation’s privacy programme is in the latter stages of maturity, with over one third claiming their programme is in maintenance mode, focusing on program evaluation and refinement. These results are consistent with the broader IAPP membership survey and suggest that European data protection professionals are confident that they are meeting and beating their objectives. To further differentiate results, in future surveys we may elaborate on the criteria required at each maturity level.
Chart 12: Privacy Programme Maturity

<table>
<thead>
<tr>
<th>Self-assessed Maturity Levels</th>
<th>European #</th>
<th>European %</th>
<th>All IAPP %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-stage: Privacy programme has not been established as a unit within the company</td>
<td>3</td>
<td>7%</td>
<td>6%</td>
</tr>
<tr>
<td>Early stage: Privacy programme is just starting to become staffed and organised</td>
<td>5</td>
<td>11%</td>
<td>8%</td>
</tr>
<tr>
<td>Middle stage: Privacy programme is in existence and is starting to launch key initiatives</td>
<td>12</td>
<td>26%</td>
<td>28%</td>
</tr>
<tr>
<td>Late middle stage: Privacy programme is starting to evaluate the effectiveness of key initiatives</td>
<td>7</td>
<td>15%</td>
<td>21%</td>
</tr>
<tr>
<td>Mature stage: Privacy programme is in maintenance mode, focusing on program evaluation and refinement</td>
<td>16</td>
<td>35%</td>
<td>34%</td>
</tr>
</tbody>
</table>

N=43

Salary

Rewarding compensation. What is the reasonable compensation level of a European data protection professional? We asked respondents to choose a salary range instead of a specific amount. About half receive a base salary between 50,001 and 100,000 euros. Of the twelve who volunteered their actual salary amount, the average was 73,000 euros, with a low of 38,000 and a high of 103,000. The North American-focused survey revealed a similar distribution, with the midpoint occurring at one range higher.
In addition to base salaries, many European data protection professionals receive additional compensation. Thirty percent receive stock options, and 60 percent receive bonuses. Of those who receive bonuses, fully 40 percent earn bonuses totaling more than 10 percent of their base salary.

Do European data protection professionals believe their compensation is fair? The answer appears to be no. While roughly three-fifths think their compensation is equal to their peers inside their own organisation, and one-third believes this is true relative to their peers in other sectors, more European data protection professionals believe they are underpaid than overpaid relative to both sets of peers. What leads them to that conclusion? This wasn’t asked in the survey but could be worthy of future consideration.

On a final note, respondents were reasonably evenly split between men (55 percent) and women (45 percent). The survey respondents were also experienced individuals who came to privacy and data protection roles from other backgrounds. The average length of business experience is 19 years, of which eight have been spent working in privacy, and four in the respondent’s current role. As the number of respondents grows over time, it will allow us to draw statistically meaningful conclusions about the relationship of compensation level to some of these other factors.
This first survey of the IAPP’s European membership was conducted in October 2010 to generate the results detailed in this report. This section explains the survey objectives, questions, delivery and sample and outlines some limitations inherent in the process.

Survey Objectives
This study seeks to build a baseline set of data to better understand the characteristics of the IAPP’s European members and to provide an initial dataset for comparison with IAPP members elsewhere in the world. The research goals were defined through the following lines of questioning:

• What promotions are data protection professionals aspiring to and likely to advance into?
• How do data protection professionals spend their time fulfilling their responsibilities?
• Are there significant gaps between how data protection professionals are required to allocate their time versus how they would prefer to allocate their time?
• What is the compensation level of data protection professionals?
• How does compensation vary for individuals with different titles?
• Do organisational reporting relationships affect compensation?
• Do compensation levels vary by other key factors such as industry, organisation size and experience?

Survey Questions
The IAPP developed this survey with the goal of collecting information from privacy practitioners in a convenient fashion. It is the IAPP’s experience that a survey must be brief to maximise completion rates, and for that reason the questions were designed to be completed in 10 minutes or less.

The survey questions are derived from those used in the IAPP’s global survey, which has been running since 2005. In total, the survey contained 29 items, including multiple-choice, tick-box and “open” questions, to elicit responses in a number of different ways.

To maintain confidentiality, the survey did not request individual or company-specific information.

Survey Limitations
This is the first European survey of its kind conducted by the IAPP, and for that reason it is not possible to describe trends in the findings. There are inherent limitations to survey research that need to be carefully considered before drawing conclusions from sample findings:

• The current findings are based on a sample of survey returns. It is always possible that individuals who did not participate are substantially different in terms of compensation and other job-related functions from those who completed the instrument.
• Financial services, government and healthcare are the largest industry groups is within the IAPP today, due perhaps to the influence of sectoral privacy regulation. Hence, while other industry concentrations are represented, the IAPP membership list is skewed toward highly regulated organisations.
• Salary information is very sensitive. Therefore, the instrument allowed individuals to choose between a salary range and a salary amount to disclose current compensation. The extrapolation of salary from a range should be considered as a potential limitation when interpreting results.
• To keep the survey concise and focused, the IAPP decided to omit other normatively important variables from our analyses. The extent to which omitted variables might explain salary cannot be estimated at this time.
• The quality of survey research is based on the integrity of confidential responses received from subjects. While certain checks and balances can be incorporated into the survey process, there is always the possibility that a subject did not provide a truthful response.

Survey Delivery and Sample
The IAPP fielded the survey to approximately 410 members via e-mails in October 2010. The survey was closed to responses on 19 October 2010. The e-mails included a link to the survey questions displayed via an online survey tool. Once closed, the IAPP analysed the collected survey data via a Web-based tool to produce the report results.

We received 47 completed surveys, translating to a response rate of 11.5 percent. Note that findings have been rounded to the nearest percentage point, which may, on some occasions, result in minor discrepancies in totals.
PART I: YOUR ROLE

1. What organisational level best describes your current position?
   a. Senior Executive
   b. Vice President
   c. Manager
   d. Associate/Staff
   e. n/a
   f. Other

2. Is this a full-time position?
   a. Yes
   b. No
   c. n/a

3. Check the primary person within your organisation to whom you or your privacy leader reports.
   a. CEO/Executive Committee
   b. Chief Financial Officer
   c. General Counsel
   d. Chief Information Officer
   e. Compliance/Ethics Officer
   f. Chief Marketing Officer
   g. Human Resources Officer
   h. Chief Security Officer
   i. Chief Risk Officer
   j. n/a
   k. Other

4. Check the secondary person within your organisation to whom you or your privacy leader reports. (Leave blank if you do not have a secondary reporting relationship.)
   a. CEO/Executive Committee
   b. Chief Financial Officer
   c. General Counsel
   d. Chief Information Officer
   e. Compliance/Ethics Officer
   f. Chief Marketing Officer
   g. Human Resources Officer
   h. Chief Security Officer
   i. Chief Risk Officer
   j. n/a
   k. Other

5. Please indicate any other formal or informal (dotted-line) reporting relationships you have within your organisation. Please check all that apply.
   a. CEO/Executive Committee
   b. Chief Financial Officer
   c. General Counsel
   d. Chief Information Officer
   e. Compliance/Ethics Officer
   f. Chief Marketing Officer
   g. Human Resources Officer
   h. Chief Security Officer
   i. Chief Risk Officer
   j. Other

6. Total years of business experience:

7. Total years of privacy experience:

8. Total years in current position:

9. Gender
   a. Female
   b. Male
   c. n/a

10. In addition to privacy-related responsibilities, what other job functions do you perform in your organisation? Please check all that apply.
    a. Corporate ethics
    b. Corporate law
    c. Corporate marketing/CRM
    d. General consulting
    e. General management
    f. Government relations
    g. Human resources
    h. Information security
    i. Information technology
    j. Internal auditing
    k. Public relations
    l. Regulatory compliance
    m. Records management
    n. Webmaster (Web site management)
    o. Other
11. Your organisation has employees located in (check all that apply):
   a. Europe
   b. United States
   c. Canada
   d. Asia-Pacific (including Australia/New Zealand)
   e. Africa
   f. Latin America (including Mexico)
   g. Other

12. What is the worldwide headcount of your organisation?
   a. Fewer than 500 employees
   b. 500 to 1,000 employees
   c. 1,001 to 5,000 employees
   d. 5,001 to 25,000 employees
   e. 25,001 to 75,000 employees
   f. More than 75,000 employees
   g. n/a

13. What is the jurisdiction of your privacy office?
    Please check all that apply.
    a. Global
    b. Europe
    c. United States
    d. Canada
    e. Asia-Pacific (including Australia and New Zealand)
    f. Latin America (including Mexico)
    g. Other

14. Please indicate the maturity stage of your company's privacy program. Select the option that, in your opinion, best describes the activities associated with your company's privacy office or initiatives.
    a. Pre-stage: Privacy program has not been established as a unit within the company.
    b. Early stage: Privacy program is just starting to become staffed and organised.
    c. Middle stage: Privacy program is in existence and is starting to launch key initiatives.
    d. Late middle-stage: Privacy program is starting to evaluate the effectiveness of key initiatives.
    e. Mature stage: Privacy program is in maintenance mode focusing on program evaluation and refinement.
    f. n/a

15. If you were to advance within your own organisation, which role would you most likely be promoted to?
    a. Senior Lawyer
    b. Senior Compliance Professional
    c. Head of Security and Privacy
    d. Not sure/there would need to be a new role created
    e. n/a
    f. Other

16. If you were to advance within your own organisation, which role would you most likely aspire to?
    a. Senior Lawyer
    b. Senior Compliance Professional
    c. Head of Security and Privacy
    d. Not sure/there would need to be a new role created
    e. n/a
    f. Other

17. What skills or knowledge gaps currently exist that you would need to fill in order to achieve the aspirations stated above?

PART II: HOW YOU SPEND YOUR TIME

18. How many hours each week, on average, do you devote to privacy-related responsibilities?

19. What is the percent of time that the total hours represent during your average work week?

20. The following list contains 10 core activities that typically are conducted by data protection professionals within an organisation. Please check those that you currently spend most of your time on.
    a. Developing privacy strategy
    b. Analysing regulations
    c. Performing risk assessments and data inventories
    d. Developing and implementing policies and guidance
    e. Developing and performing training and communications
    f. Monitoring and measuring compliance (enforcement)
    g. Reporting to management
    h. Administration (personal and budget)
    i. Advising/consulting to the organisation
    j. Responding to incidents
    k. Other
21. From the following list of 10 core activities that typically are conducted by data protection professionals within an organisation, please check those that you believe you should be spending most of your time on.
   a. Developing privacy strategy
   b. Analysing regulations
   c. Performing risk assessments and data inventories
   d. Developing and implementing policies and guidance
   e. Developing and performing training and communications
   f. Monitoring and measuring compliance (enforcement)
   g. Reporting to management
   h. Administration (personnel and budget)
   i. Advising/consulting to the organisation
   j. Responding to incidents
   k. Other

22. Do you envision your responsibilities changing in the next year or two?
   a. Yes
   b. No
   c. n/a

23. In which of these areas will you be spending more time in the coming year? Please check all that apply.
   a. Compliance
   b. Security
   c. Information risk or governance
   d. General legal
   e. Other

PART III: YOUR COMPENSATION

Please complete either one of the following questions (24A or 24B) about your current salary:

24A. My current salary (base pay) expressed in euros is:

24B. My current salary (base pay) is within the following range (check only one):
   a. Less than €20,000
   b. Between €20,000 and €50,000
   c. Between €50,001 and €100,000
   d. Between €100,001 and €150,000
   e. Between €150,001 and €200,000
   f. Between €200,001 and €300,000
   g. More than €300,000
   h. n/a

25. Do you expect to receive stock options, warrants or shares in 2010?
   a. Yes
   b. No
   c. Unsure
   d. n/a

26. If you expect to receive a bonus as part of your annual compensation in 2010, what percentage of your annual income would this typically represent?
   a. 1–3%
   b. 4–5%
   c. 6–10%
   d. more than 10%
   e. I do not expect to receive a bonus as part of my annual compensation
   f. Unsure
   g. n/a

27. If you responded “yes” to the previous question, indicate what will most likely determine your bonus in 2010. Please check all that apply.
   a. Overall company performance
   b. Performance of your business unit
   c. Meeting your specific objectives
   d. Other

28. Please express your belief about your compensation relative to others within your company. My compensation is:
   a. Above others with similar experience, education and training within my company
   b. About equal to others with similar experience, education and training within the company
   c. Below others with similar experience, education and training within my company
   d. I do not want to express my opinion
   e. n/a

29. How do you feel your income level compares with your peers in other sectors?
   a. Similar
   b. Higher than my peers in other sectors
   c. Lower than my peers in other sectors
   d. n/a
   e. Other
About IAPP Europe

IAPP Europe is a unique community for European data protection and privacy professionals. IAPP Europe was created to provide education, networking, conferences and professional development resources tailored to the unique needs of the European data protection community and has been guided by an esteemed group of European privacy and data protection experts.

About the IAPP

The International Association of Privacy Professionals (IAPP) is the world’s largest organisation of privacy professionals, representing more than 7,400 members from businesses, governments and academic institutions across 50 countries.

The IAPP was founded in 2000 with a mission to define, support and improve the privacy profession globally through networking, education and certification. We are committed to providing a forum for privacy professionals to share best practices, track trends, advance privacy management issues, standardise the designations for privacy professionals and provide education and guidance on opportunities in the field of information privacy.

The IAPP is responsible for developing and launching the first broad-based credentialing program in information privacy, the Certified Information Privacy Professional (CIPP). The CIPP remains the leading privacy certification for thousands of professionals around the world who serve the data protection, information auditing, information security, legal compliance and/or risk management needs of their organisations.

In addition, the IAPP offers a full suite of educational and professional development services and holds annual conferences that are recognised internationally as the leading forums for the discussion and debate of issues related to privacy policy and practice.

About the Enterprise Privacy Group (EPG)

The Enterprise Privacy Group is a centre of expertise in privacy, data protection and identity-related issues. EPG works with central and local government, leading private companies and research organisations to resolve privacy and identity issues and to develop innovative and efficient privacy management solutions.