USC Gould School of Law
Law 692 – Information Management and Risk
Units: 2
Spring 2025 | Thursday 3:30-5:20 p.m.

Instructor: Timothy Fox
Office Hours: before & after class and by appointment
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Course Description
Through this course, students will learn a holistic approach to corporate information governance that covers the data lifecycle, including collection, use, disclosure, disposal, and the potential impact of artificial intelligence on the future of data management as well as the associated policies necessary to implement a robust corporate privacy management process.

We will take a deep dive into subjects like data classification, data retention, data disposal, data subject rights, privacy-by-design, information security, data breach response, vendor management, and drafting external privacy notices. We will also take a hands-on approach to better understand how data is actually used in the real world.

This course is both an exploration of the "why" of information management (that is, complying with global privacy laws and managing the myriad of risks inherent in data collection) as well as the "how" (for example, developing and implementing corporate policies and processes data mapping, obtaining buy-in from senior management).

Learning Objectives
At the completion of this course, students will have a comprehensive understanding of the relevant regulatory framework related to data and will be able to complete at least the following:

- Identify common privacy and information security risks that may impact corporate information management.
- Conduct a risk assessment of a corporate client to determine its information management needs.
- Identify the standard types of policy documents that form a comprehensive corporate information management program.
- Create a project plan for implementing a corporate information management program.
- Draft corporate information management policy documents by tailoring standard templates to a corporate clients' unique needs.

Learning objectives will be achieved through various means, including but not limited to:

- Readings to be completed before class sessions
- Lectures with corresponding PowerPoint presentations

- Small peer discussions and in-class activities
- Viewing online resources and downloading materials from specified websites
- Regular homework assignments
- Midterm examination
- Final project

Course Notes

Class will be conducted in person. To the extent that class will be conducted via Zoom, the necessary Zoom information will provided before class. This course will rely on Brightspace for circulating relevant documents and assignments as well as for students to turn in their assignments. Students are expected to regularly check Brightspace. Students are required to complete all assignments for each class session prior to the start of class for which the assignment is due. Assignments will be submitted via Brightspace, unless otherwise specified. Participation is required. Students who are not able to participate fully because they have not completed assignments will have points deducted from their participation grades.

Required Readings and Supplementary Materials

Densmore, R. (Ed.) (2022). *Privacy Program Management: Tools for Managing Privacy within your Organization* (3rd Edition). International Association of Privacy Professionals.

Note: this book is only available via the IAPP Store. There is a digital and print version of this book. Either will work for this course, but make sure you purchase the third edition. If you have an issue ordering or locating this book, let Prof. Fox know.

Additional online materials will be provided throughout the semester.

Description and Assessment of Assignments

Assignments will consist of regular homework assignments, a midterm examination, and a final project. Homework assignments will consist of projects related to materials that are covered that week in class and will vary in length and difficulty. Accordingly, the points for each homework assignment will vary based on the anticipated difficulty of the assignment. A midterm will be given in the course as well as a final project. Both will be discussed in detail early in the semester.

Assignment	Points	% of Grade
Homework	350	35%
Midterm	200	20%
Final	350	35%
Participation	100	10%
Total:	1,000	100%

Grading Scale

Course final grades will be determined using the following scale:

Letter grade	Corresponding numerical point range
A	95-100
A-	90-94
B+	87-89
B	83-86
B-	80-82
C+	77-79
C	73-76
C-	70-72
D+	67-69
D	63-66
D-	60-62
F	59 and below

Assignment Submission Policy

Unless otherwise stated, assignments are to be submitted via Blackboard. Unless otherwise stated, assignments are due before the start of the class immediately following the class when the assignment was made. See the schedule below for more details.

Late assignments will not be accepted unless prior approval is obtained from Professor Fox.

Final Project

The final exam for this course will consist of an in-person presentation. You will receive more details on the Final Project in the first few weeks of the course.

Use of Generative AI in this Course

Use of generative AI (e.g., ChatGPT) is encouraged for this class. In this class we will go over how to best use these AI tools to assist with your assignments and how generative AI can impact data privacy. However, keep in mind the following before using any generative AI tool:

- Other courses may prohibit the use of generative AI tools. Before using ChatGPT or other generative AI tools in *any* other course, ensure that you have the instructor's permission. Misuse or prohibited use of generative AI in a course will subject you to potential discipline under the school's academic integrity policy.
- We will cover the permitted use of AI tools during the course. Generative AI tools like ChatGPT should not be used in this course outside of the permitted uses discussed.
- If you provide minimum-effort prompts to generative AI, you will get low-quality results. Crafting a well-defined prompt is crucial to derive quality results from AI. We will explore this process in-depth during our session on prompt engineering.

- Proceed with caution when using AI tools and never assume the information provided is accurate or trustworthy. Assume everything provided is incorrect until you verify its accuracy with a trusted source. You are solely accountable for any inaccuracies or oversight stemming from AI generated content.
- AI is a tool, but one that you need to acknowledge using. As part of every assignment where you use generative AI you will provide a detailed account of your AI interaction – from your initial prompt to any refinement steps, and your verification process. This account should be precise enough for replication.
- The use of AI tools requires attribution. You are expected to clearly attribute any material generated by the AI tool used. Failure to attribute your work is a violation of the school's academic integrity policies.

Course Content Distribution and Synchronous Session Recordings Policies
USC has policies that prohibit the recording and distribution of any synchronous and asynchronous course content outside of the learning environment.

Recording a university class without the express permission of the instructor and announcement to the class, or unless conducted pursuant to an Office of Student Accessibility Services (OSAS) accommodation. Recording can inhibit free discussion in the future, and thus infringe on the academic freedom of other students as well as the instructor. (Living our Unifying Values: The USC Student Handbook, page 13).

Distribution or use of notes, recordings, exams, or other intellectual property, based on university classes or lectures without the express permission of the instructor for purposes other than individual or group study. This includes but is not limited to providing materials for distribution by services publishing course materials. This restriction on unauthorized use also applies to all information, which had been distributed to students or in any way had been displayed for use in relationship to the class, whether obtained in class, via email, on the internet, or via any other media. (Living our Unifying Values: The USC Student Handbook, page 13).

Statement on Academic Conduct and Support Systems

Academic Integrity:
The University of Southern California is a learning community committed to developing successful scholars and researchers dedicated to the pursuit of knowledge and the dissemination of ideas. Academic misconduct, which includes any act of dishonesty in the production or submission of academic work, compromises the integrity of the person who commits the act and can impugn the perceived integrity of the entire university community. It stands in opposition to the university's mission to research, educate, and contribute productively to our community and the world.

All students are expected to submit assignments that represent their own original work, and that have been prepared specifically for the course or section for which they have been submitted. You may not submit work written by others or "recycle" work prepared for other courses without obtaining written permission from the instructor(s).

Other violations of academic integrity include, but are not limited to, cheating, plagiarism, fabrication (e.g., falsifying data), collusion, knowingly assisting others in acts of academic dishonesty, and any act that gains or is intended to gain an unfair academic advantage.

The impact of academic dishonesty is far-reaching and is considered a serious offense against the university. All incidences of academic misconduct will be reported to the Office of Academic Integrity and could result in outcomes such as failure on the assignment, failure in the course, suspension, or even expulsion from the university.

For more information about academic integrity see the student handbook or the Office of Academic Integrity's website, and university policies on Research and Scholarship Misconduct.

Please ask your instructor if you are unsure what constitutes unauthorized assistance on an exam or assignment, or what information requires citation and/or attribution.

Students and Disability Accommodations:
USC welcomes students with disabilities into all of the University's educational programs. The Office of Student Accessibility Services (OSAS) is responsible for the determination of appropriate accommodations for students who encounter disability-related barriers. Once a student has completed the OSAS process (registration, initial appointment, and submitted documentation) and accommodations are determined to be reasonable and appropriate, a Letter of Accommodation (LOA) will be available to generate for each course. The LOA must be given to each course instructor by the student and followed up with a discussion. This should be done as early in the semester as possible as accommodations are not retroactive. More information can be found at osas.usc.edu. You may contact OSAS at (213) 740-0776 or via email at osasfrontdesk@usc.edu.

Support Systems:
Counseling and Mental Health - *(213) 740-9355 – 24/7 on call*
Free and confidential mental health treatment for students, including short-term psychotherapy, group counseling, stress fitness workshops, and crisis intervention.

988 Suicide and Crisis Lifeline - *988 for both calls and text messages – 24/7 on call*
The 988 Suicide and Crisis Lifeline (formerly known as the National Suicide Prevention Lifeline) provides free and confidential emotional support to people in suicidal crisis or emotional distress 24 hours a day, 7 days a week, across the United States. The Lifeline is comprised of a national network of over 200 local crisis centers, combining custom local care and resources with national standards and best practices. The new, shorter phone number makes it easier for people to remember and access mental health crisis services (though the previous 1 (800) 273-8255 number will continue to function indefinitely) and represents a continued commitment to those in crisis.

Relationship and Sexual Violence Prevention Services (RSVP) - *(213) 740-9355(WELL) – 24/7 on call*

Free and confidential therapy services, workshops, and training for situations related to gender- and power-based harm (including sexual assault, intimate partner violence, and stalking).

Office for Equity, Equal Opportunity, and Title IX (EEO-TIX) - *(213) 740-5086*
Information about how to get help or help someone affected by harassment or discrimination, rights of protected classes, reporting options, and additional resources for students, faculty, staff, visitors, and applicants.

Reporting Incidents of Bias or Harassment - *(213) 740-5086 or (213) 821-8298*
Avenue to report incidents of bias, hate crimes, and microaggressions to the Office for Equity, Equal Opportunity, and Title for appropriate investigation, supportive measures, and response.

The Office of Student Accessibility Services (OSAS) - *(213) 740-0776*
OSAS ensures equal access for students with disabilities through providing academic accommodations and auxiliary aids in accordance with federal laws and university policy.

USC Campus Support and Intervention - *(213) 740-0411*
Assists students and families in resolving complex personal, financial, and academic issues adversely affecting their success as a student.

Diversity, Equity and Inclusion - *(213) 740-2101*
Information on events, programs and training, the Provost's Diversity and Inclusion Council, Diversity Liaisons for each academic school, chronology, participation, and various resources for students.

USC Emergency - *UPC: (213) 740-4321, HSC: (323) 442-1000 – 24/7 on call*
Emergency assistance and avenue to report a crime. Latest updates regarding safety, including ways in which instruction will be continued if an officially declared emergency makes travel to campus infeasible.

USC Department of Public Safety - *UPC: (213) 740-6000, HSC: (323) 442-1200 – 24/7 on call*
Non-emergency assistance or information.

Office of the Ombuds - *(213) 821-9556 (UPC) / (323-442-0382 (HSC)*
A safe and confidential place to share your USC-related issues with a University Ombuds who will work with you to explore options or paths to manage your concern.

Occupational Therapy Faculty Practice - *(323) 442-2850 or* otfp@med.usc.edu
Confidential Lifestyle Redesign services for USC students to support health promoting habits and routines that enhance quality of life and academic performance.

Course Schedule: Weekly Breakdown

	Topics/Class Activities	Readings and Homework	Deliverable/ Due Dates
Week 1 1/16/24	• Introduction • Course Overview • Risky Business: discussion of real-world risks related to data	• Read Chapter 1 of Privacy Program Management course book and other readings	Complete reading by next class
Week 2 1/23/24	• Overview of relevant privacy laws	• Assignment: Review of company privacy policy • Read Chapter 3 of Privacy Program Management course book	Complete assignment by next class
Week 3 1/30/24	• Overview of relevant privacy laws cont. • Mission statements • Overview of midterm and final	• Assignment: Draft a corporate privacy program mission statement and code of conduct	Complete assignment next class
Week 4 2/6/24	• Data code of conduct • Fact gathering and data mapping	• Assignment: Work on data questionnaire	Complete assignment by next class
Week 5 2/13/24	• Review completed questionnaires • Privacy Program Project Plan • Data inventories	• Assignment: Populate data inventory • Complete ICO self-assessment	Complete assignment by next class
Week 6 2/20/24	• Data classification and Handling	• Assignment: Draft a data classification, handling, and records management policy • Update data inventory	Complete assignment by next class
Week 7 2/27/24	• Data classification and Handling Cont. • Data retention	• Assignment: Draft data classification, handling, and records management policy • Update data inventory	Complete assignment by next class

Week 8 3/6/24	• EU AI Act and state AI laws • Data subject rights	• Complete Case Study • Assignment: Request data from provider	Complete assignment by next class
Week 9 3/13/24	• Midterm	• Enjoy Spring Break!!	
Week 10 3/20/24	**No Class – Spring Break**	• Enjoy Spring Break!!	
Week 11 3/27/24	• Privacy by Design • Privacy assessments • Final project discussion	• Assignment: PIA review • Read *Lookout* FTC Complaint • Start on Final Project	Complete reading and assignment by next class
Week 12 4/3/24	• Information and data security • Vendor management	• Continue work on final project	
Week 13 4/10/24	• Security incidents, data breaches, and notification requirements	• Assigned readings • Continue work on final project	Complete reading by next class
Week 14 4/17/24	• Notice and consent • Prep for final presentations and project	• Continue work on final project	Final presentation due next class
Week 15 4/24/24	• Final Presentations	• Enjoy summer break!	