

How Greenlight does privacy at scale

Greenlight



Industry: Fintech



Product: Investment platform, savings tools,



Headquarters: Atlanta, Georgia



Founded: 2014



Customers: 6 million



Size: 300 employees



Privacy team: 2

Cristin Morneau

Cristin Morneau is CPO and SVP for privacy at Greenlight. Before that, she worked as senior director and assistant general counsel at Groupon.



Launched in 2014, Greenlight Financial is a software company aiming to promote financial literacy. It built a family-focused app, helping parents to teach their children about budgeting, saving, and investing with a debit card for kids and teens.

Through the app, parents can grant their kids use of a Greenlight debit card. Obviously, that means Greenlight necessarily collects a significant amount of financial and children's data.

Cristin Morneau is chief privacy officer and senior vice president. She joined Greenlight in 2022, and before that she took Groupon through the GDPR's inception. Morneau walked into a blank canvass at Greenlight, with more priorities to tackle than people to tackle them.



The problems

- **Privacy program** needed to be built from ground zero
- **Privacy function** needed to scale to keep pace with business needs
- **Product teams** didn't yet have clear parameters on data uses
- **Privacy by design** wasn't widely understood

Because Greenlight is a financial app geared towards families and kids, Morneau had built-in support from the top on doing the right thing with data. Leadership understood the risks involved in collecting children's data, especially. With that wind in her sails, Morneau had to figure out what systems Greenlight used, the data stored within them, who has access to them, and the controls in place.

"And then it was also like, what's in flight?" Morneau said. She needed a place to capture everything in one place if she was going to strategize her program, develop policies, and build her team.

"So it was literally from ground zero. **Like, how am I going to build a team? What do I need to focus on? What needs to be done? What have people said has been done but actually hasn't been done?**" Morneau said. So it was a full spectrum of figuring things out and figuring them out on the go. So it was like, **what tools can help me get there?** Especially with a start-up, because i don't have a big team. I don't have the budget for it."



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Key priorities

- **Map and document children's data** collection, storage, and third-party contracts
- **Map and document financial data** policies, collection, storage
- **Build retention and deletion** policies
- **Gain visibility** on marketing's initiatives

The solution

- **Find technology** that could help scale privacy's functionality.
- **Gain holistic visibility** on data collection, storage, retention, sharing.
- **Integrate privacy reviews** with product & eng, security, vendor management in Jira.
- **Make reviews efficient** .
- **Automate** where possible.
- **Educate the teams** on privacy requirements and what constitutes personal data.

Though Morneau went through the requisite RFP process, she decided to use TerraTrue to build her privacy by design platform. She'd used the software during her tenure at Groupon, building its GDPR program, so she was already familiar with what it unlocked for her.

Implementing automation to help scale

Between mapping new state privacy laws, assessments, data subject access requests, and more, Morneau realized “one person just can't handle this. A lot needs to be automated, and I need records for everything as well.”

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Now, with five of her teams working in TerraTrue, everything starts there.

“If you're going to onboard a new vendor, if you want to do a new project, if you are changing a significant project, if you're doing anything with personal data, and you're making changes, then TerraTrue is where we want it to start,” Morneau said.

“It's helped a lot, especially with our Jira integration because we can just go back to that ticket and see where things are, and then also see the other tickets that it links to as well,” Morneau said of TerraTrue. “You also have the data mapping functionality, so you can be like, ‘Hey, this is the data we're pulling. This is where it's going. This vendor we need to identify. This is where the service sits. So it's really helpful, especially when you want to go back and do audits.”

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The results

- **Holistic visibility** on data uses, storage, sharing
- One-stop-shop for **capturing reviews**
- More than **2,000 launch assessments** in just over a year
- Metrics to indicate **privacy's strategic business impact**



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Integrating with Jira made adoption easy product & eng

Knowing how difficult it can be to get teams to effectively use privacy tooling, Greenlight built a Jira integration within TerraTrue to ease rollout and expedite adoption. Using custom workflows, Morneau added a screener question to eliminate unnecessary reviews: Is personal information going to be used?

“Engineering lives in Jira. Anything they do, they're going to create an epic,” Morneau said. “So how we set it up was anytime an epic is created, it'll automatically ask our question around whether or not Pi is being used. And if they say yes or no, it's going to create a launch on our end.

That gives Morneau the ability to go back and confirm whether the launch involves personal data or not.

“They love anything that means they don't have to have a meeting with you,” Morneau said of product teams. With TerraTrue, “they can just click a few things. On their side, if the intake form says ‘Yes, we're using PII, it'll automatically create a link to Terratrue in the Jira ticket. Then it goes to a launch.”

From there, teams are prompted to fill out a data spec for review. “So it's really easy for them,” Morneau said.

Custom workflows to trigger risks

Morneau and her team built in custom workflows based on its specific business model and data flows. “It's about what core things matter to you,” she said, and how your particular business evaluates risk. For data certain data uses, TerraTrue triggers a “high risk” warning, which allows privacy to take a closer look and decide whether to push forward or push back.



“It's 100 times better than it was when I started,” Morneau said. On her ongoing work, Morneau said she's focusing on educating the company. “I think the biggest thing is don't let people forget that privacy is here, that it matters. I think we have, in just over a year, over 2000 launch assessments.

*Keep records of your metrics. And that's easy to do as well. **All that is there within TerraTrue.** So report that up to your C team: This is what's going on. This is what we've looked at, this is what we're doing. These are the changes we've seen.”*