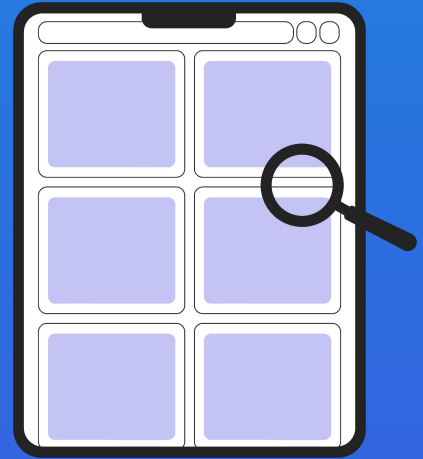


Fireside chat with OfferUp:

How to scale privacy with a small team



01



Challenge

02



Solution

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Outcome

OfferUp®

OfferUp is the largest local consumer-to-consumer marketplace. Founded in 2011, the mobile app-based marketplace connects buyers to sellers in their area.

OfferUp differentiates itself from other online marketplaces by its focus on building trust, and its modern, user-friendly interface. Each user has a user profile with reviews, badges, and more to let users enter transactions with confidence. The app also uses in-app messaging, a simple workflow, and a database of Community MeetUp Spots to ensure users can trade conveniently, safely, and securely.



Headquarters

Bellevue, Washington



Employees

300



Industry

Online marketplace

Challenge

OfferUp needed to establish a baseline privacy program, and it tapped the legal team's Shannon Doniere to lead that initiative. The Seattle-based startup had some privacy functions in place when Doniere arrived, but the wave of U.S. state privacy laws that began proliferating after the CCPA nudged OfferUp to appoint responsibility for privacy writ large. As such, Doniere's number one priority for 2023 would be to build a comprehensive program that could cope with the uncertain landscape moving forward.

"CCPA had already obviously been around for a couple of years at that point. So there was a baseline program, but it was very reactionary," Doniere said. "It was kind of like, 'Okay, this law exists. We need to build something around that.' That's pretty much the platform that I had. There was no automation."

In addition, OfferUp depends on the app-based marketplace to engage with consumers. Because of that, it must answer regular assessments from apps like Facebook, for example. Without a single source of truth mapping OfferUp's data flows, uses, and partners, each engineering group and product group would manually answer these questions over and over again each time a review was due.

"Facebook's been doing a data privacy assessment for a couple of years now," Doniere said. "There was a cycle before I arrived, and what I walked into is everybody has to kind of go pencils down, look at the questions that they're asking, and get the answers in a very manual way."

Plus, before Doniere had approval on tooling that could help, OfferUp suffered a setback. An app store erroneously rejected an iteration of OfferUp's app, citing discrepancies between OfferUp's practices and its privacy policy. While it turned out that the app store reviewer had made a mistake, roll-out was delayed and investigating the issue took up a sprint.

"We couldn't launch the newest version of our app," Doniere recalled. "And that's a huge blocker for a team to not be able to get that out. So that was a big derail."

Since Doniere would be serving as the head of privacy compliance without support staff (with some adhoc help within the business here and there), she knew she needed to find a tool to help her scale, to establish a single source of truth for data flows, and to automate the processes that she could.



Each group, each engineering group, and product group has to answer the questions for themselves and go through our list of vendors. Who are we sharing with? Are we doing this, are we doing that?

And it's a lot of time on our teams that would otherwise be used towards whatever they planned for that sprint to get done. So that was one of the things that I pointed to when lobbying for a tool when we went with Terratrue was: Wouldn't it be nice if we could just hit run report' and this is done?

Shannon Doniere
Associate General Counsel
at OfferUp



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Solution

OfferUp needed a solution that could:

- Enable OfferUp’s legal team to work seamlessly across multiple roles.
- Empower cross-functional collaboration between privacy, engineering, and product teams.
- Serve as a single source of truth for privacy policies and regulatory compliance.

Why OfferUp chose TerraTrue

OfferUp is an engineering-forward company focused on building product. So Doniere recognized privacy, as a entire function, had to shift from being an afterthought to working alongside product teams pro-actively.

“I really liked the idea of getting privacy in front of the folks building the products that we’re putting out and getting that thinking in early as an automated, time-saving piece,” Doniere said. “Being able to just aggregate that information that we have in there to spit out assessments — it’s brilliant! We have a single source of truth for infosec, privacy, and vendors.

There are a lot of products out there. And I talked to other counsel and privacy professionals who had implemented privacy tools, and TerraTrue really fit the product that we have and what we’re doing.”

Using TerraTrue, Doniere now has the ability to create a holistic catalog of OfferUp’s data entering the organization and exiting the organization.

“We all understand that it is a living document,” Doniere said. “Because the privacy landscape continues to change, and we don’t know today what it’s going to look like in October, December, or 2024 ,because a bunch of other states are working on privacy.”



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Associate General Counsel
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Outcomes

OfferUp now streamlines reviews with a single source of truth

Answering questionnaires for third parties has historically been difficult and time-consuming without a central source of truth. As noted earlier, OfferUp’s app even got erroneously denied from an app store once based on confusion about how the company makes disclosures in its privacy policy.

With TerraTrue, OfferUp can now resolve privacy questions with a simple query. Instead of digging through code or documentation, the company can immediately report on data practices and policies.

OfferUp embeds privacy in product and engineering

Doniere’s entire legal department and product counsel sit in on weekly cross-functional syncs with product teams. Now, TerraTrue allows OfferUp’s teams to work more seamlessly cross-functionally, and the platform embeds Doniere with product and engineering, granting her early visibility on all product or feature blueprints.

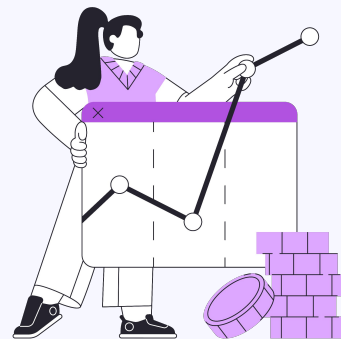
“Nothing should come as surprise if you’re sitting in on a sprint demo,” Doniere said. With TerraTrue’s cross-functional workflows, Doniere said she can give early guidance, ask questions, and provide feedback.

“Nobody wants to be in the seat of holding up a new product launch. Because in the 24 hours before a launch, somebody thinks to run it by legal or privacy, or, worse, rolls it out and then finds out, ‘Oh, we have to retool.’ The sooner you can get into that loop, the better,” Doniere said.

OfferUp feels even more confident as a leader in the space

Using TerraTrue “gives us more confidence for our product. It gives more confidence in the use of the product as well,” Doniere said. “It will become a differentiator in how we decide to signal that out in the marketplace.”

To hear more about how OfferUp scales its small privacy team, [access the full fireside chat here.](#)



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