

PII Prevention Control Plan and Per-Tutorial Worksheet

For iorad content creation, review, and publishing

Purpose: Give the client a practical control package they can show Infosec and maintain for each tutorial to reduce the risk of PII or sensitive data being captured, published, or shared.

What this package covers: Two primary controls: (1) create tutorials in test, staging, sandbox, or otherwise sanitized environments whenever possible; and (2) require a second-person review before publish or share.

How to use it: Adopt the control statements, assign owners, and require the worksheet at the end of this document to be completed and retained for every tutorial.

Evidence to retain: Completed worksheet, reviewer sign-off, exception approvals, and any remediation notes if issues were found before publication.

1. Control framework

- Control objective: Prevent real client information or other sensitive data from appearing in iorad tutorials or related content.
- Scope: Applies to all employees, contractors, creators, reviewers, approvers, and administrators involved in creating, editing, approving, publishing, exporting, or sharing tutorials.
- Default principle: Internal-only and sanitized by default. If a safe non-production environment exists, it should be used.

2. Control A - non-production content creation

- All tutorial creation should be performed in a test, staging, training, demo, sandbox, or otherwise sanitized environment whenever available.
- Production environments containing live customer data should not be used unless there is a documented business need and an approved exception.
- Where demonstration data is needed, teams should use fictional, masked, tokenized, or scrubbed data that cannot identify a real person or account.

Required operating procedure

- Before recording, the creator confirms the environment and whether any live PII could appear on screen.
- If using a non-production environment, the creator verifies that visible names, account numbers, balances, messages, documents, and contact details are fictional or sanitized.
- If production must be used, the creator documents the reason, limits screen exposure to the minimum necessary, and routes the tutorial through the exception and enhanced review path.

- Any tutorial with visible live client data must be remade or remediated before it can be published or shared.

Minimum evidence

- Tutorial title or identifier
- Environment used
- Creator name and date
- Exception approval if production was used
- Completed per-tutorial worksheet

3. Control B - second-person review before publish or share

- No tutorial may be published, externally shared, or distributed until it has been reviewed by at least one second person independent of the original creator.
- The reviewer confirms that no PII, confidential client information, credentials, or internal-only sensitive information is visible in screenshots, annotations, transcript text, titles, links, or downloadable assets.
- If issues are found, the tutorial is rejected, corrected, and re-reviewed before release.

Reviewer checklist focus

- Names, account numbers, balances, transactions, addresses, phone numbers, email addresses, dates of birth, SSNs, tax identifiers, or other customer-specific data are not visible.
- No credentials, tokens, session details, browser tabs, bookmarks, internal URLs, or hidden panels expose sensitive information.
- The sharing level is appropriate for the intended audience and the content is safe for publication.

4. Roles and responsibilities

Role	Responsibility	Minimum Evidence / Action
Creator	Creates content in a sanitized environment when available; performs self-check before submission.	Completes worksheet sections 1 and 2.
Reviewer	Performs independent review and approves or rejects before publish/share.	Completes worksheet section 3 and signs off.
Manager / control owner	Maintains process compliance and handles exceptions or escalations.	Retains records and monitors adherence.
Infosec / risk / compliance	Reviews exceptions or higher-	Approves exceptions where

	risk use cases as defined by the client.	required.
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5. Exception path

- Use only when a suitable non-production environment is unavailable and a business need exists.
- Document why production use is necessary, what data may appear, and what compensating controls will be used.
- Require enhanced review before publish or share; do not release content until all issues are cleared.

6. Per-tutorial worksheet and retention form

Complete this worksheet for each tutorial and retain it with the tutorial record or the client team's evidence repository.

Tutorial identification

Tutorial title / ID	
Business unit / team	
Creator name	
Date created	
Intended audience	
Planned publish / share destination	

Section 1 - environment and data source check

Check item	Response	Notes / evidence
Environment used (test / staging / sandbox / demo / production)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
If non-production, is the data	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Check item	Response	Notes / evidence
fictional, masked, or sanitized?		
If production, is there an approved exception?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Could any visible screen element expose real customer information?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Were browser tabs, bookmarks, notifications, side panels, and hidden panes checked?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Were files, links, transcripts, and annotations checked for sensitive information?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Creator self-check completed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Section 2 - prohibited data scan

Check item	Response	Notes / evidence
Real customer names	<input type="checkbox"/> Not present <input type="checkbox"/> Present	
Account numbers or card numbers	<input type="checkbox"/> Not present <input type="checkbox"/> Present	
Financial balances or transaction history	<input type="checkbox"/> Not present <input type="checkbox"/> Present	
Email addresses or phone numbers	<input type="checkbox"/> Not present <input type="checkbox"/> Present	
Home or mailing addresses	<input type="checkbox"/> Not present <input type="checkbox"/> Present	
Date of birth, SSN, tax ID, or similar identifiers	<input type="checkbox"/> Not present <input type="checkbox"/> Present	
Credentials, tokens, API keys, or session details	<input type="checkbox"/> Not present <input type="checkbox"/> Present	
Internal-only confidential business data	<input type="checkbox"/> Not present <input type="checkbox"/> Present	

Section 3 - independent reviewer sign-off

Reviewer name	
Date reviewed	
Outcome	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Rejected / Rework
PII visible?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Rejected / Rework
Sensitive internal information visible?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Rejected / Rework
Approved for publish / share?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Rejected / Rework
Comments / remediation required	

Section 4 - exception approval (complete only if production was used)

Why production was necessary	
Compensating controls applied	
Approver name	
Approval date	
Final disposition	<input type="checkbox"/> Approved <input type="checkbox"/> Rejected <input type="checkbox"/> Remediation required

Retention guidance

- Retain the completed worksheet, reviewer sign-off, exception approvals, and remediation notes with the tutorial record.
- Recommended retention period: follow the client's standard evidence-retention policy for operational and security controls.