



JW Michaels & Co.

Privacy (Legal) Market Compensation 2024

Data Collection & Privacy

Data Collection

The data appearing in this compensation report were collected by comparing invoiced placements made by JW Michaels in 2024 as well as anonymous market participant submissions.

Privacy

The purpose of this survey, and they summary report, is to better understand privacy (legal) compensation trends to better support you with your career and hiring goals. Responses are kept strictly anonymous. Data will be aggregated to form a summary report. Data will NOT be reviewed on a 1:1 basis.

Questions:

If you have any questions, please contact Lawrence Brown at (832) 819-3580 or Lawrence@JWMichaels.com.

Summary

The 2024 Privacy Legal Market Compensation Survey reveals several key insights about the evolving privacy legal landscape. The key recurring themes from this year's survey are:

- Demand for privacy lawyers continues to grow;
- Compensation (both base & total) continue to rise;
- Competition for talent is robust
- Position geographic location impact on compensation is minimalized;
- Hybrid work normalized

Demand for privacy legal talent remains high, driving increased base and total compensation across all positions. Technology companies lead in total compensation and equity grants, while financial services firms offer the highest cash bonuses. Healthcare and biotech companies show consistent but more conservative compensation structures.

Geographic location's influence on compensation is diminishing. While traditional hiring hubs like California, NYC, Seattle, Austin, and Atlanta still command some premium, remote work compensation is approaching parity. International responsibilities typically warrant higher compensation than US-focused roles. Work arrangements show clear patterns: hybrid roles (2-3 office days) represent the majority and command slightly higher compensation, while fully remote roles remain competitive but trend lower. Full-time office requirements are rare, appearing in less than 5% of positions.

The organizational structure shows Chief Privacy Officers typically reporting to General Counsel, with smaller organizations often combining these roles. This reflects the continuing evolution of privacy within corporate legal departments, balancing modern workplace trends with traditional hierarchies.

Strategic Use Guide

This market compensation survey serves as a crucial strategic planning tool, not a simple salary calculator. The data presented reflects the current competitive landscape for privacy legal talent and should be interpreted as a window into three key insights:

- Understanding what compensation levels your target candidates are likely already earning in their current roles, as this forms their baseline expectations;
- Identifying the minimum competitive compensation threshold you'll need to exceed to make a compelling offer that motivates candidate movement; and
- Recognizing what your direct competition for talent is likely offering to these same candidates, as you're often competing against multiple simultaneous offers in this market.

By viewing the survey through this strategic lens rather than as a "what to pay" guide, organizations can better position themselves to attract and secure top privacy legal talent in a highly competitive market where candidates often have multiple options and where merely matching current compensation rarely proves sufficient to secure preferred candidates.



Position Descriptions:

Chief Privacy Officer: This is the top position for privacy and is an executive role expected to operate across legal, compliance and regulatory, program, etc. This position will have direct Board level responsibilities and is ultimately responsible for the privacy legal department.

Deputy Chief Privacy Officer: A position reporting to the Chief Privacy officer, may be a regional/business unit CPO and decision maker and often referred to with titles such as "Head of US Privacy" and will manage privacy for the CPO within a region/business unit.

AGC or Director, Privacy: An elevated position within the department. Will manage a larger team of privacy attorneys and have a larger sphere of autonomy and responsibility. May be a 'mini cpo' for a region or business unit and will manage a larger team.

Lead or Senior Privacy Counsel: A more senior role within the department. May be an individual contributor or manage a small number of other attorneys. A point of escalation for privacy counsel.

Privacy Counsel: This role is focused on privacy counseling around legal responsibilities of data use, development of policy and process, advising on 'privacy by design', etc.

Counsel: Any role that includes some privacy work but might also be product counsel, business unit counsel, etc.

Definitions:

Total Compensation: This represents the approximate sum of annualized base salary, target end-of-year bonus, and the cash value of any equity vesting within that year - “The W2 number”. Specifically NOT considered is the value of equity grants NOT vesting within that tax year. E.G., an equity grant of RSUs having a total cash value of \$100,000 that vests equally over 4 years would add \$25,000 to total compensation - NOT \$100,000. Other items such as benefits, PTO, health care benefits, employee purchasing discounts, license/CLE cost reimbursement, etc, are NOT considered.

Private Company: Companies of any revenue size that are not publicly traded.

Small Public Company: Publicly traded companies with annual revenues under \$2B.

Lower Mid-Sized Public Company: Publicly traded companies with annual revenues \$2B - \$10B.

Upper Mid-Sized Public Company: Publicly traded companies with annual revenues \$10B - \$30B.

Upper Mid-Sized Public Company: Publicly traded companies with annual revenues of \$30B+

PQE: Post-qualification experience. Typically, hiring managers are counting full years of PQE. Example: In 2024, a 2020 JD would have 3 full years of PQE. This is different from BigLaw, where the same person would be said to be a 4th year Associate.

Chief Privacy Officers

Company Size	Base Compensation Range	Total Compensation Range
Private Companies	\$225,000 - \$350,000	\$275,000 - \$750,000
Small Public Companies	\$250,000 - \$350,000	\$375,000 - \$750,000
Lower Mid-Sized Public Companies	\$300,000 - \$350,000	\$450,000 - \$725,000
Upper Mid-Sized Public Companies	\$325,000 - \$450,000	\$600,000 - \$1,200,000
Large Public Companies	\$350,000 - \$575,000	\$700,000 - \$2,200,000

Key Observations

- CPO position typically reports to the General Counsel;
- Typical RTO policy for a Chief Privacy Officer is at least 3 days in office;
- Most significant compensation determinants are company size, location, and the scope of responsibilities, with additional premiums for technical expertise and prior privacy leadership experience;
- Cash Bonus size tends to increase with company size;
- Managing a team of 5+ tends to correlate with a material compensation premium (10%+);
- Small and Lower Mid-Sized public companies showed much more variety in compensation structure;
- International experience, direct Board experience correlate with high compensation;
- Cash bonus targets typically exceed 35% of base salary.

Deputy Chief Privacy Officers

Company Size	Base Compensation Range	Total Compensation Range
Private Companies	\$225,000 - \$300,000	\$275,000 - \$500,000
Small Public Companies	\$250,000 - \$350,000	\$300,000 - \$550,000
Lower Mid-Sized Public Companies	\$275,000 - \$350,000	\$400,000 - \$650,000
Upper Mid-Sized Public Companies	\$300,000 - \$450,000	\$450,000 - \$1,100,000
Large Public Companies	\$325,000 - \$475,000	\$550,000 - \$1,300,000

Key Observations

- Private and Lower Mid-Sized Public Companies show more variety in compensation structures where as Upper Mid and Large companies had more formalized programs;
- Material (10%+) compensation premiums noted for larger geographic scope of responsibilities, DPO duties, management of multiple attorneys;
- Typical RTO policy for a Deputy Chief Privacy Officer is at least 3 days in office.
- Deputy CPOs typically report having 12+ years of experience at Upper Mid or Large companies and 8-12 years at lower mid-sized companies;
- Cash bonus targets typically exceed 25-35% of base salary.

AGC / Director, Privacy

Company Size	Base Compensation Range	Total Compensation Range
Private Companies	\$200,000 - \$275,000	\$225,000 - \$650,000
Small Public Companies	\$225,000 - \$300,000	\$275,000 - \$425,000
Lower Mid-Sized Public Companies	\$250,000 - \$300,000	\$325,000 - \$450,000
Upper Mid-Sized Public Companies	\$275,000 - \$325,000	\$400,000 - \$600,000
Large Public Companies	\$275,000 - \$350,000	\$450,000 - \$850,000

Key Observations

- Role is often positioned as the key privacy leader in smaller organizations;
- Frequently reports to a CPO;
- Growing focus on specific business unit expertise;
- Operational privacy knowledge is in high demand and commands a compensation premium.
- Compensation not highly location dependent;
- Role typically requires at least 7-10 years of PQE;
- Management experience, international coverage command compensation premiums;
- Cash bonus targets tend to be 25-30% of base salary

Lead or Senior Privacy Counsel

Company Size	Base Compensation Range	Total Compensation Range
Private Companies	\$175,000 - \$250,000	\$200,000 - \$475,000
Small Public Companies	\$175,000 - \$250,000	\$200,000 - \$325,000
Lower Mid-Sized Public Companies	\$225,000 - \$275,000	\$250,000 - \$350,000
Upper Mid-Sized Public Companies	\$225,000 - \$325,000	\$325,000 - \$500,000
Large Public Companies	\$250,000 - \$375,000	\$375,000 - \$700,000

Key Observations

- Role is often positioned as a key individual contributor
- Typically role has clear progression path to Director/AGC roles;
- Very high market demand at this level;
- Frequently reports to a CPO;
- RTO policy of 3 days in office is common;
- Growing focus on specific business unit expertise;
- Operational privacy knowledge is in high demand and commands a compensation premium.
- Practical implementation knowledge commands a compensation premium;
- Compensation not highly location dependent;
- Geographic location premium less pronounced than more senior roles;
- Role typically requires 8+ years PQE;
- Cash bonus targets tend to be 15-25% of base salary

Privacy Counsel

Company Size	Base Compensation Range	Total Compensation Range
Private Companies	\$125,000 - \$200,000	\$150,000 - \$250,000
Small Public Companies	\$150,000 - \$200,000	\$175,000 - \$250,000
Lower Mid-Sized Public Companies	\$175,000 - \$225,000	\$200,000 - \$300,000
Upper Mid-Sized Public Companies	\$200,000 - \$250,000	\$225,000 - \$450,000
Large Public Companies	\$200,000 - \$325,000	\$275,000 - \$575,000

Key Observations

- Role is often positioned entry to mid level;
- Strong market demand at this level;
- Frequently reports to a CPO;
- Typical RTO policy for Privacy Counsel is 3+ days in office;
- Smaller company size with lower compensation tends to correlate with more common hybrid or remote structures;
- Geographic location premium less pronounced than more senior roles;
- Role typically requires 2 to 8 years PQE;
- Cash bonus targets vary widely depending upon company size, maturity and years PQE;
- Cash bonus total range extended 5-25% of base salary

Counsel

Company Size	Base Compensation Range	Total Compensation Range
Private Companies	\$125,000 - \$200,000	\$150,000 - \$250,000
Small Public Companies	\$150,000 - \$200,000	\$175,000 - \$250,000
Lower Mid-Sized Public Companies	\$175,000 - \$225,000	\$200,000 - \$300,000
Upper Mid-Sized Public Companies	\$200,000 - \$250,000	\$225,000 - \$400,000
Large Public Companies	\$200,000 - \$325,000	\$250,000 - \$575,000

Key Observations

- Role is often positioned entry to mid level;
- Strong market demand at this level;
- Frequently reports to a CPO;
- Typical RTO policy for Privacy Counsel is 3+ days in office;
- Smaller company size with lower compensation tends to correlate with more common hybrid or remote structures;
- Geographic location premium less pronounced than more senior roles;
- Role typically requires 2 to 8 years PQE;
- Cash bonus targets vary widely depending upon company size, maturity and years PQE;
- Cash bonus total range extended 5-25% with with ranges extending 5-25% tend to be 10-25% of base salary

JW Michaels & Co.

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The scope of our services is always tailored to our client's individual needs. With nearly 50 years of professional recruiting experience, our commitment to excellence has allowed us to act as a trusted advisor and partner to help our clients meet their hiring needs by sourcing the best in professional talent. No matter the role, our recruiting process is as accurately targeted as possible – exactly what you need from an executive search agency.

For more information about JW Michaels & Co., privacy searches, or this survey, please contact **Lawrence Brown at (832) 819-3580.**

