

JW Michaels & Co.

# Privacy (Legal) Market Compensation

FOR THE YEAR  
**2025**

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## Executive Summary

The 2025 Privacy Legal Market Compensation Survey reveals a maturing and increasingly differentiated privacy legal landscape. Demand for experienced privacy counsel and leadership remains robust, with compensation continuing to rise across most seniority levels, though the pace of growth has moderated from prior years. Chief Privacy Officers (CPOs) continue to command the highest total compensation, with median packages exceeding \$540,000, driven by equity and long-term incentive growth. Mid-tier positions such as AGC or Director of Privacy and Senior Privacy Counsel saw steady gains, reflecting sustained competition for skilled privacy professionals. Counsel-level roles, particularly those with hybrid privacy and AI governance responsibilities, experienced the most significant year-over-year increases, as organizations expand compliance capabilities beyond traditional data protection.

Technology and financial services organizations remain compensation leaders. Technology firms continue to provide the strongest equity components, while financial and insurance companies offer higher cash bonuses tied to performance and retention. Healthcare, life sciences, and consumer-facing industries maintain competitive but more conservative structures, emphasizing stability over variable pay.

Work arrangement trends have evolved but not reversed. Hybrid work, typically two to three days in-office, remains the dominant model and commands the most competitive compensation. Fully remote roles represent a distinct minority of the market, but employers increasingly treat remote status as part of the total rewards package, effectively trading cash compensation for perceived flexibility and lifestyle value. As a result, many remote roles are posted and initially offered at a discount to comparable hybrid positions, even where market-clearing outcomes later narrow the gap. Five-day onsite requirements remain rare, but the 2025 market reflects a clear shift toward at least partial return-to-office (RTO) expectations to support collaboration and alignment across legal, compliance, and technical teams.

Geographic location continues to have a limited influence on pay, as compensation parity across regions solidifies. Traditional hubs such as California, New York, and Washington still edge slightly higher, but remote and hybrid parity has effectively minimized regional pay gaps. Roles with global or cross-regional oversight continue to earn a premium, particularly those managing multi-jurisdictional privacy, AI, and data ethics portfolios.

Organizationally, reporting structures have stabilized. Most CPOs continue to report to General Counsel or Chief Compliance Officers, though a growing number of smaller and mid-sized companies have combined these roles to elevate privacy leadership within the executive suite. The market's evolution reflects a shift from rapid growth toward strategic integration: privacy, AI governance, and data ethics are increasingly interlinked, creating new opportunities for senior legal talent and reinforcing privacy as a core component of enterprise risk management.

# 2025 Privacy Legal Market Summary & Comparative Trends

The 2025 compensation data confirms that the privacy legal market remains resilient, competitive, and increasingly sophisticated. Compensation continued to rise across most experience levels, although the pace of growth moderated compared to 2024 as the market absorbed prior-year increases. The demand for skilled privacy counsel remains strong, particularly for lawyers capable of bridging traditional privacy compliance with emerging areas such as **AI governance, data ethics, and responsible innovation**.

## Compensation Overview

Across all roles, **median total compensation increased between 3–7%** year-over-year.

- **Chief Privacy Officers** lead the market with top-tier packages reaching **\$2.8 million** in large public companies.
- **Deputy Chief Privacy Officers** saw rising differentiation at the upper end, with elite deputies in large-cap environments approaching **\$1.5 million** total compensation.
- **AGC/Director of Privacy** and **Senior Privacy Counsel** roles showed steady growth (4–8%), reflecting continued investment in mid-senior privacy talent.
- **Privacy Counsel** and **Counsel** roles saw the fastest pay growth in 2025, with smaller pay gaps between Privacy Counsel and more senior counsel roles.

The resulting structure reflects a maturing market in which base salaries have largely stabilized while **equity, retention incentives, and performance-based bonuses** now drive differentiation.

## Market Forces Shaping 2025

The 2025 privacy landscape reflects the convergence of privacy, AI, and data governance as an integrated risk domain. Demand for counsel with cross-disciplinary expertise in **AI model governance, algorithmic transparency, and data risk management** continues to accelerate, commanding measurable premiums at nearly every level.

**Hybrid work** has become the enduring norm, with two to three in-office days per week remaining the most common model across industries. Fully remote roles, while still a minority of the market, are increasingly priced at a discount to comparable hybrid positions as employers trade cash compensation for perceived flexibility and lifestyle value. Employers most often cite collaboration, mentorship, and team culture as drivers of limited return-to-office (RTO) expectations.

**Geographic parity** in compensation has now largely taken hold. Pay differentials between traditional hubs (California, New York, Washington) and secondary markets have narrowed further. Global and multi-jurisdictional roles continue to command premiums tied to oversight complexity rather than location.

## Organizational Trends

Corporate privacy functions have become increasingly institutionalized within legal and risk departments.

- Most **Chief Privacy Officers** still report to the **General Counsel**, though more are gaining **dual-line reporting** into Compliance or Risk.
- **Deputy** and **Director-level** roles continue to expand as large companies formalize multi-layered privacy organizations.
- **Equity participation**, long established at senior levels, is appearing more frequently among Privacy Counsel roles as a retention tool

The evolving structure underscores privacy's continuing rise as a **strategic enterprise function**, not merely a compliance discipline.

## The Outlook Ahead

Heading into 2026, compensation growth is expected to remain steady but moderate, reflecting a normalized market cycle. The highest pay acceleration will likely occur in roles intersecting **AI governance, data ethics, security collaboration, and business enablement** as organizations build unified data-responsibility frameworks.

Hybrid flexibility will remain a key expectation for candidates, and employers who maintain transparent, mission-aligned privacy functions will continue to attract top-tier talent. The long-term trajectory of the privacy legal market remains upward, supported by expanding global regulation, technological innovation, and sustained organizational investment in data trust.



# 2025 Privacy Legal Market at a Glance

## Total Compensation by Role

ROLE	2025 TOTAL COMP RANGE	YoY CHANGE VS. 2024
Chief Privacy Officer	\$400K - \$2.8M	↑ ~5%
Deputy Chief Privacy Officer	\$300K - \$1.5M	↑ ~3% / up to 20% top tier
AGC / Director, Privacy	\$300K - \$1.2M	↑ ~5%
Lead / Senior Privacy Counsel	\$250K - \$750K	↑ ~3-4%
Privacy Counsel	\$190K - \$525K	↑ ~7%
Counsel (Mixed Privacy/Generalist)	\$275K - \$525K	↑ ~6%

## Work Arrangement Impact

WORK MODEL	COMPENSATION TREND	MARKET SHARE OF ROLES
Hybrid (2–3 days in office)	Benchmark – Full Market Rate	65 – 70%
Fully Remote	5–10% below hybrid peers	15 – 25%
Full Time Onsite (4–5 days)	Parity to hybrid only in high-visibility roles	5 - 15%

Hybrid work remains the dominant structure across industries, balancing flexibility with collaboration expectations.

## Industry Highlights

SECTOR	KEY CHARACTERISTICS
Technology & Digital Platforms	Highest equity participation + AI governance premiums (10–15%)
Financial Services & Fintech	Leading cash bonus structures (35–45% of base)
Healthcare & Biotech	Conservative growth but stable base salaries
Consumer & Retail	Expanding privacy teams with cross-functional data ethics focus

## Regional Dynamics

- **Geographic parity** continues - pay differentials between traditional hubs and secondary markets have nearly vanished.
- **Global oversight** still commands a premium (+10–15%) when roles manage multi-region or regulatory frameworks.
- **RTO normalization** is visible across U.S. and EMEA, with similar hybrid expectations regardless of HQ location.

## 2025 Emerging Themes

### 1. Privacy + AI Governance Integration

Organizations are combining privacy, AI risk, and data ethics into unified data-responsibility functions, driving new compensation premiums.

### 2. Succession Pipeline Pressure

Mid-senior counsel and deputy roles are being developed as CPO successors, tightening market competition for ready-now leaders.

### 3. Incentive Diversification

Equity participation and long-term performance plans now extend beyond the C-suite, reshaping total compensation structures.

### 4. Hybrid Normalization and Remote Discounting

Remote-work compensation gaps have re-emerged, solidifying hybrid as the sustained equilibrium model.

### 5. Global Maturity and Board-Level Visibility

Privacy functions increasingly report into risk and compliance structures, reinforcing enterprise governance importance and elevating CPOs to board-visible positions.

## The 2025 Outlook

The privacy legal market enters 2026 in a position of **steady strength and specialization**.

Compensation growth is stabilizing, but roles that merge **privacy, AI, and risk governance** will continue to command premium valuation.

Hybrid work will remain the norm, equity participation will broaden, and the global demand for experienced privacy counsel will keep the talent market competitive through the coming year.

# Chief Privacy Officers (2025)

COMPANY SIZE	BASE COMPENSATION	TOTAL COMPENSATION RANGE
Private Companies	\$240,000 – \$370,000	\$300,000 – \$800,000
Small Public Companies	\$260,000 – \$375,000	\$400,000 – \$800,000
Lower Mid-Sized Public Companies	\$310,000 – \$375,000	\$475,000 – \$775,000
Upper Mid-Sized Public Companies	\$340,000 – \$475,000	\$625,000 – \$1,250,000
Large Public Companies	\$360,000 – \$600,000	\$725,000 – \$2,800,000

## Key Observations (2025)

- The Chief Privacy Officer role continues to report most commonly to the **General Counsel**, though a small but increasing number now report dually to the **Chief Compliance Officer** or **Chief Risk Officer**, reflecting expanded enterprise data governance mandates.
- **Hybrid work models** remain standard, typically requiring **two to three days in-office per week**. Fully remote roles have declined and generally carry a **5–10% compensation discount** relative to hybrid or on-site positions.
- Compensation remains strongly correlated with **company size, scope of responsibilities, and international oversight**, with additional premiums for **AI governance, data ethics, and cybersecurity collaboration experience**.
- **Data driven Technology and large public companies** continue to offer the most lucrative equity packages, while financial services firms lead in **cash bonuses**.
- **Cash bonus opportunities** average **30–40% of base salary**, scaling upward in larger organizations.
- **Equity participation** has expanded beyond technology companies into **PE-backed and data-centric private enterprises**, signaling a maturing incentive structure for privacy leadership.
- Managing **teams of five or more** continues to command a **compensation premium** (often exceeding 10%), especially in organizations with multinational privacy programs.
- **International experience** and **Board-level visibility** remain defining factors for upper-quartile compensation outcomes, often pushing total packages above \$2M in large-cap environments.
- **Compensation dispersion** widened slightly in 2025, driven by outlier equity values in technology and AI sectors rather than cash pay inflation.



# Deputy Chief Privacy Officers (2025)

COMPANY SIZE	BASE COMPENSATION	TOTAL COMPENSATION RANGE
Private Companies	\$200,000 – \$280,000	\$250,000 – \$425,000
Small Public Companies	\$230,000 – \$300,000	\$300,000 – \$500,000
Lower Mid-Sized Public Companies	\$250,000 – \$325,000	\$325,000 – \$575,000
Upper Mid-Sized Public Companies	\$275,000 – \$350,000	\$375,000 – \$650,000
Large Public Companies	\$300,000 – \$425,000	\$475,000 – \$1,500,000

## Key Observations (2025)

- The Deputy Chief Privacy Officer role continues to expand in strategic importance, particularly within large-cap technology, financial, and healthcare organizations where the position now often functions as a co-head of privacy and AI governance.
- Base compensation rose modestly in 2025, but top-quartile total compensation increased significantly due to equity and performance-based incentives in the largest companies.
- At global organizations with multiple data regimes and high regulatory complexity, total packages of \$900K–\$1.5M are increasingly observed for senior deputies leading enterprise-level programs or global privacy operations.
- Compensation remains primarily influenced by company size, scope of authority, and degree of global oversight, with AI, cybersecurity, and responsible-innovation integration serving as major differentiators.
- Hybrid work remains the norm (two to three in-office days per week), while fully remote DCPOs continue to receive a compensation discount.
- Bonus targets typically range from 25–40% of base, and equity grants are now appearing in more deputy-level roles, particularly within public technology firms and PE-backed platforms.
- Deputies overseeing regional or divisional teams consistently command a 10–15% pay premium, reflecting leadership span and complexity.
- The gap between CPO and DCPO compensation widened mainly because of increasing long-term incentive values at the senior tier rather than stagnation at the deputy level.
- The most competitive DCPO candidates now combine privacy, AI governance, and operational risk management expertise, positioning them as the natural successors in next-generation CPO succession pipelines.



# AGC / Director, Privacy (2025)

COMPANY SIZE	BASE COMPENSATION	TOTAL COMPENSATION RANGE
Private Companies	\$215,000 – \$300,000	\$275,000 – \$550,000
Small Public Companies	\$240,000 – \$325,000	\$325,000 – \$625,000
Lower Mid-Sized Public Companies	\$260,000 – \$350,000	\$375,000 – \$675,000
Upper Mid-Sized Public Companies	\$275,000 – \$375,000	\$425,000 – \$825,000
Large Public Companies	\$300,000 – \$425,000	\$500,000 – \$1,200,000

## Key Observations (2025)

- The Assistant General Counsel / Director, Privacy role remains one of the most in-demand categories in the market. Demand continues to outpace supply, particularly for lawyers with 5–10 years of post-qualification experience and proven experience implementing global privacy programs.
- Base compensation increased modestly year over year (approximately 4–6 %), with higher growth concentrated in technology and financial services organizations.
- Compensation continues to correlate strongly with company size and technical scope, especially where the role includes ownership of AI governance, privacy engineering, or incident response functions.
- Hybrid work is the prevailing model. Positions requiring two to three in-office days per week typically command the most competitive offers. Fully remote roles remain available but are generally compensated 5–10 % lower than hybrid equivalents.
- Bonuses typically range from 20–30 % of base, with larger public companies offering higher variable pay tied to corporate performance metrics.
- Equity participation has broadened at this level, especially within public companies and growth-stage private employers using RSUs as retention tools for mid-senior counsel.
- International exposure and cross-functional collaboration with compliance, product, and security teams often yield a 10 % premium, reflecting the cross-disciplinary nature of modern privacy leadership.
- The compensation gap between AGC / Director and Deputy CPO roles narrowed slightly in 2025, driven by heightened competition for talent ready to step into enterprise-level leadership roles.
- Titles and responsibilities continue to vary widely: some AGC/Director roles serve as functional deputies to the CPO, while others operate as stand-alone privacy leads within divisional legal departments.



# Lead / Senior Privacy Counsel (2025)

COMPANY SIZE	BASE COMPENSATION	TOTAL COMPENSATION RANGE
Private Companies	\$185,000 – \$250,000	\$225,000 – \$425,000
Small Public Companies	\$200,000 – \$265,000	\$250,000 – \$475,000
Lower Mid-Sized Public Companies	\$215,000 – \$285,000	\$275,000 – \$525,000
Upper Mid-Sized Public Companies	\$225,000 – \$310,000	\$300,000 – \$600,000
Large Public Companies	\$240,000 – \$340,000	\$350,000 – \$725,000

## Key Observations (2025)

- The Lead or Senior Privacy Counsel role continues to represent a critical leadership tier within in-house privacy legal structures, serving as either the most senior individual contributor or manager of a small privacy legal team.
- Base compensation rose modestly in 2025, with the overall increase averaging 4–5% year-over-year, reflecting stable demand amid an increasingly competitive mid-senior talent market.
- The most significant growth occurred at large public companies, where total compensation packages now often exceed \$700,000, particularly for lawyers managing regional or cross-functional teams.
- Hybrid work has become the clear standard for this level, with two to three in-office days typical. Fully remote roles remain available but continue to carry a compensation discount of approximately 5–10%.
- Bonus targets generally range from 15–25% of base, with higher variability in financial services and healthcare sectors.
- Equity awards are now more common at this level, especially in technology and PE-backed companies, signaling broader adoption of long-term incentives below the officer level.
- Technical acumen - including experience advising on AI risk, privacy engineering, or digital advertising frameworks - commands a measurable premium within both tech and consumer data-driven industries.
- Senior Privacy Counsel roles supporting international data transfer programs or global product launches often realize compensation at or above the upper quartile for this category.
- The overall market dynamic for senior counsel has shifted from pure compliance execution to strategic enablement, with increasing emphasis on collaboration across legal, engineering, and data science functions.
- Many high-performing Senior Privacy Counsel roles now act as natural feeders into Director or Deputy CPO positions, and employers are beginning to tailor compensation to retain this talent longer within mid-senior bands.

# Privacy Counsel (2025)

COMPANY SIZE	BASE COMPENSATION	TOTAL COMPENSATION RANGE
Private Companies	\$160,000 – \$210,000	\$190,000 – \$325,000
Small Public Companies	\$175,000 – \$225,000	\$200,000 – \$375,000
Lower Mid-Sized Public Companies	\$185,000 – \$245,000	\$225,000 – \$400,000
Upper Mid-Sized Public Companies	\$200,000 – \$260,000	\$250,000 – \$450,000
Large Public Companies	\$210,000 – \$280,000	\$275,000 – \$525,000

## Key Observations (2025)

- The Privacy Counsel role remains the most consistently in-demand position across industries, particularly for organizations scaling privacy operations to meet expanding regulatory and AI-driven risk landscapes.
- Base salaries increased modestly year-over-year, but total compensation growth was more pronounced, driven by expanding bonus and retention structures. The median total compensation for Privacy Counsel now approaches \$385,000, reflecting the highest compression between mid-level and senior counsel seen to date.
- The market exhibits compensation convergence between senior and mid-level privacy counsel, particularly in industries with lean legal structures or limited vertical progression opportunities.
- Hybrid work remains dominant, with two to three in-office days per week as the new baseline. Fully remote roles remain common, especially among tech employers, but are now associated with a 5–10% compensation discount relative to hybrid peers.
- Bonus targets typically range from 10–20% of base, while equity participation - once rare at this level - is increasingly offered in technology and PE-backed environments as retention compensation.
- Geographic parity continues to strengthen: regional pay differentials have narrowed substantially, with only marginal premiums (5–8%) persisting for legacy hubs such as California, New York, and Washington.
- Employers continue to value cross-functional agility, with privacy counsel increasingly expected to interface with product, security, and compliance teams on a daily basis.
- The most competitive candidates at this level demonstrate strong fluency in AI governance, international data transfers, vendor risk management, and incident response frameworks - skills that now distinguish top-quartile compensation.
- Many organizations are formalizing career pathways from Privacy Counsel to Lead or Senior Counsel, offering expanded scope and modest equity opportunities rather than immediate title advancement as a retention lever.

# Counsel (2025)

COMPANY SIZE	BASE COMPENSATION	TOTAL COMPENSATION RANGE
Private Companies	\$150,000 – \$200,000	\$175,000 – \$325,000
Small Public Companies	\$165,000 – \$215,000	\$200,000 – \$350,000
Lower Mid-Sized Public Companies	\$175,000 – \$230,000	\$225,000 – \$400,000
Upper Mid-Sized Public Companies	\$190,000 – \$250,000	\$250,000 – \$450,000
Large Public Companies	\$200,000 – \$275,000	\$275,000 – \$525,000

## Key Observations (2025)

- The Counsel level continues to encompass hybrid roles that include privacy as part of a broader legal or commercial practice. These lawyers often serve as product or commercial counsel with significant privacy responsibility.
- Compensation at this level has risen steadily, with total compensation up roughly 6 % year over year, driven largely by market competition for versatile attorneys able to handle both regulatory and product advisory work.
- The gap between Privacy Counsel and generalist Counsel has nearly closed at many organizations, a reflection of privacy’s integration into mainstream legal functions.
- Hybrid work models dominate, with two to three office days per week most common. Fully remote positions are prevalent but continue to carry a 5–10 % discount.
- Bonuses typically fall between 10–20 % of base, and equity awards, while still limited, appear more frequently in technology and growth-stage private companies.
- Technical and regulatory literacy - especially familiarity with AI governance frameworks and cross-border data compliance - now materially affects compensation competitiveness.
- Regional pay differentials have narrowed further, with geographic parity nearly achieved outside of ultra-high-cost markets.
- Counsel who manage multiple practice areas (for example, commercial + privacy + compliance) are now common, and their blended skill sets command stronger retention bonuses and upward mobility into Lead or Senior Privacy Counsel roles.
- In large enterprises, the Counsel tier has effectively become the feeder pipeline for future privacy leadership, and compensation structures increasingly reflect this career path orientation.



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