# NIST Privacy Workforce Public Working Group

Meeting #11 Wednesday, March 9, 2022



# INTRODUCTION

# **PWWG UPDATES**

# **PWWG Updates** Project Team 2: Inventory and Mapping

# Through the finish line!\*



\*Basically...

### **PWWG Updates** Project Team 3: Policies, Processes, and Procedures

• Off to the races!

 TKS Statements under development



### **PWWG Updates** Project Team 4: Data Processing Ecosystem Risk Management

 Co-Leads selected (introductions after Project Team updates)

• First meeting, March 10 (3:00PM – 4:00PM ET)



# **PWWG Updates** Privacy Framework >< PWWG TKS Mapping

- Mapping of completed TKS Statements to Privacy Framework Core Subcategories
- Read-only document, accessible to PWWG members via shared Google Drive
- Targeting week of March 21<sup>st</sup> for release



# **PWWG Updates** Co-Chairs TKS Statement Review Update

- Reviewing Project Team 1 TKS Statements for ID.RA-P1, P2, P3 and P4
- Next Co-Chairs TKS Review: March 24, 2022
- Implemented new policy of open invitation for Project Team Leads to join review sessions

# **PROJECT TEAM UPDATES**

PROJECT TEAM 1: Risk Assessment (ID.RA-P)

### Project Team 1: Risk Assessment (ID.RA-P) Team Co-Leads





Lauren Jones Privacy Counsel, Surescripts, LLC **Dr. Lisa McKee** Senior Manager Security and Data Privacy, Protiviti

# Project Team 1: Risk Assessment (ID.RA-P) Task, Knowledge, Skill Statements (TKS)

# Project Team 1:

- Task, Knowledge, and Skill (TKS) Statements
  - Subcategories

| Subcategory | Description  |  |
|-------------|--|--|
| ID.RA-P1    | Contextual factors related to the systems/products/services and the data actions are identified (e.g., individuals' demographics and privacy interests or perceptions, data sensitivity and/or types, visibility of data processing to individuals and third parties). |  |
| ID.RA-P2    | Data analytic inputs and outputs are identified and evaluated for bias.  |  |
| ID.RA-P3    | Potential problematic data actions and associated problems are identified.   |  |
| ID.RA-P4    | Problematic data actions, likelihoods, and impacts are used to determine and prioritize risk.  |  |
| ID.RA-P5    | Risk responses are identified, prioritized, and implemented.   |  |

# Project Team 1: Risk Assessment (ID.RA-P) Progress Update

- Project Team's goals for the March work period
  - The team is currently working on last Subcategory ID.RA-P5
- Accomplishments
  - Completed Subcategory ID.RA-P4 and is in Co-Chair review
- Challenges/lessons learned

# Project Team 1: Risk Assessment (ID.RA-P) Recurring Meetings

- Every 1st Thursday of the month | 11:00AM 12:00 PM ET
- Every 3rd Wednesday of the month | 5:00PM 6:00PM ET

Next meeting: Wednesday, March 16, 2022, | 5:00PM – 6:00PM ET

# Project Team 1: Risk Assessment (ID.RA-P) Mailing List Sign-Up



PrivacyWorkforcePT1+subscribe@list.nist.gov

# **PROJECT TEAM UPDATES**

PROJECT TEAM 2: Inventory and Mapping (ID.IM-P)

### Project Team 2: Inventory and Mapping (ID.IM-P) Team Co-Leads



**Dr. Sarah Lewis Cortes** Privacy Engineering, Netflix



Mary Potter Director of Privacy and Research Data Protections, Virginia Tech

# Project Team 2: Inventory and Mapping (ID.IM-P) Task, Knowledge, Skill Statements (TKS)

- Project Team 2:
  - Task, Knowledge, and Skill (TKS) Statements

| Subcategory | Description   |  |
|-------------|---|--|
| ID.IM-P1:   | Systems/products/services that process data are inventoried.  |  |
| ID.IM-P2:   | Owners or operators (e.g., the organization or third parties such as service providers, partners, customers, and developers) and their roles with respect to the systems/products/services and components (e.g., internal or external) that process data are inventoried. |  |
| ID.IM-P3:   | Categories of individuals (e.g., customers, employees or prospective employees, consumers) whose data are being processed are inventoried.  |  |
| ID.IM-P4:   | Data actions of the systems/products/services are inventoried.  |  |
| ID.IM-P5:   | The purposes for the data actions are inventoried.  |  |
| ID.IM-P6:   | Data elements within the data actions are inventoried.  |  |
| ID.IM-P7:   | The data processing environment is identified (e.g., geographic location, internal, cloud, third parties).  |  |
| ID.IM-P8:   | Data processing is mapped, illustrating the data actions and associated data elements for systems/products/services, including components; roles of the component owners/operators; and interactions of individuals or third parties with the systems/products/services   |  |

# Project Team 2: Inventory and Mapping (ID.IM-P) Progress Update -1

Goals for March work period

Closeout Team 2

February 2022 Accomplishments

- Review of final comments from the PWWG co-chairs
- Incorporated changes and updates from co-chairs and team members

# Project Team 2: Inventory and Mapping (ID.IM-P) Progress Update -2

Acknowledgements

- Thank you to all Team 2 participants for your thoughtful contributions and thought-provoking comments.
- Thank you to our PWWG Co-chairs for your guidance and oversight.
- Thank you to our coordinators who kept us organized and on track.
- You were amazing to work with.

# **PROJECT TEAM UPDATES**

# PROJECT TEAM 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)

#### Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Team Co-Leads



Amin Ali GRC Program Manager & Cybersecurity PMO Lead Motorola Solutions







Nandita Rao Narla Senior Privacy Program Manager Door Dash

### Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Scope of Work

- NIST PWWG Project Team 3: Policies, Processes, and Procedures
  - Project Team Abbreviation: (PT3)

### 1) Function: GOVERN-P (GV-P):

- Category (GV.PO-P): Governance Policies, Processes, and Procedures
- Subcategories (6): GV.PO-P1 through GV.PO-P6

### 2) Function: CONTROL-P (CT-P):

- Category (CT.PO-P): Data Processing Policies, Processes, and Procedures
- Subcategories (4): CT.PO-P1 through CT.PO-P4

### 3) Function: COMMUNICATE-P (CM-P):

- Category (CM.PO-P): Communication Policies, Processes, and Procedures
- Subcategories (2): CM.PO-P1 and CM.PO-P2

### Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Scope of Work: Privacy Framework

| PROJECT TEAM 3 CATEGORIES  |  |   |  |  |
|--|--|---|--|--|
| Inction  | Category   | Subcategory   |  |  |
| <b>GOVERN-P (GV-P):</b> Develop and<br>implement the organizational<br>governance structure to enable an<br>ongoing understanding of the<br>organization's risk management<br>priorities that are informed by privacy<br>risk. | Governance Policies, Processes, and Procedures (GV.PO-<br>P): The policies, processes, and procedures to manage<br>and monitor the organization's regulatory, legal, risk,<br>environmental, and operational requirements are<br>understood and inform the management of privacy risk. | <ul> <li>GV.PO-P1: Organizational privacy values and policies (e.g., conditions on data processing such as data uses or retention periods, individuals' prerogatives with respect to data processing) are established and communicated.</li> <li>GV.PO-P2: Processes to instill organizational privacy values within system/product/service development and operations are established and in place.</li> </ul> |  |  |
|  |  | <b>GV.PO-P3:</b> Roles and responsibilities for the workforce are established with respect to privacy.  |  |  |
|  |  | <b>GV.PO-P4:</b> Privacy roles and responsibilities are coordinated and aligned with third-party stakeholders (e.g., service providers, customers, partners).   |  |  |
|  |  | GV.PO-P5: Legal, regulatory, and contractual requirements regarding privacy are<br>understood and managed.  |  |  |
|  |  | <b>GV.PO-P6:</b> Governance and risk management policies, processes, and procedures address privacy risks.  |  |  |
| <b>CONTROL-P (CT-P):</b> Develop and<br>implement appropriate activities to<br>enable organizations or individuals to  | Data Processing Policies, Processes, and Procedures<br>(CT.PO-P): Policies, processes, and procedures are<br>maintained and used to manage data processing (e.g.,  | <b>CT.PO-P1:</b> Policies, processes, and procedures for authorizing data processing (e.g., organizational decisions, individual consent), revoking authorizations, and maintaining authorizations are established and in place.  |  |  |
| manage data with sufficient granularity to manage privacy risks.   | purpose, scope, roles and responsibilities in the data<br>processing ecosystem, and management commitment)<br>consistent with the organization's risk strategy to protect  | <b>CT.PO-P2:</b> Policies, processes, and procedures for enabling data review, transfer, sharing or disclosure, alteration, and deletion are established and in place (e.g., to maintain data quality, manage data retention).  |  |  |
|  | individuals' privacy.  | <b>CT.PO-P3:</b> Policies, processes, and procedures for enabling individuals' data processing preferences and requests are established and in place.   |  |  |
|  |  | <b>CT.PO-P4:</b> A data life cycle to manage data is aligned and implemented with the system development life cycle to manage systems.  |  |  |
| <b>COMMUNICATE-P (CM-P):</b> Develop<br>and implement appropriate activities<br>to enable organizations and<br>individuals to have a reliable  | Communication Policies, Processes, and Procedures<br>(CM.PO-P): Policies, processes, and procedures are<br>maintained and used to increase transparency of the<br>organization's data processing practices (e.g., purpose,   | <b>CM.PO-P1:</b> Transparency policies, processes, and procedures for communicating data processing purposes, practices, and associated privacy risks are established and in place.   |  |  |
| understanding and engage in a<br>dialogue about how data are<br>processed and associated privacy<br>risks.   | scope, roles and responsibilities in the data processing<br>ecosystem, and management commitment) and<br>associated privacy risks.   | <b>CM.PO-P2:</b> Roles and responsibilities (e.g., public relations) for communicating data processing purposes, practices, and associated privacy risks are established.   |  |  |

### Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Progress Update

Working on drafting TKS statements for :

- GV.PO-P1: Organizational privacy values and policies (e.g., conditions on data processing such as data uses or retention periods, individuals' prerogatives with respect to data processing) are established and communicated.
- All meeting minutes can be accessed on the <u>Project Team 3 -</u> <u>Google Drive</u>.

### Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Next Steps

• PT3 will continue brainstorming TKS Statements at the next meeting.

#### Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Recurring Meetings

Biweekly on Thursdays from 1:00 PM ET to 2:00 PM ET

Next meeting: Thursday, March 17, 2022

#### **Project Team 3: Policies, Processes, and Procedures** (GV.PO-P, CT.PO-P, CM.PO-P) Mailing List Sign-Up



PrivacyWorkforcePT3+subscribe@list.nist.gov

# PROJECT TEAM 4 CO-LEADS INTRODUCTION

### Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P) Team Co-Leads



Tahir LatifHead of Practice - Data Protection,Artificial Intelligence and Analytics(APAC & EMEA) CognizantWorldwide



**Paul Lanois** Director, FieldFisher



**Anne Connell** Senior Cybersecurity Engineer, Carnegie Mellon University

# NEXT STEPS & UPCOMING MEETINGS

# **Privacy Workforce Public Working Group** Next Steps

- Project Team 1 works with Co-Chairs to finalize TKS Statements
- PT3 continues to develop TKS Statements
- PT4 begins
- NIST finalizes PF/TKS mapping

# Privacy Workforce Public Working Group Upcoming Meetings

Project Team 1: Risk Assessment (ID.RA-P) Wednesday, March 16, 2022 | 5:00pm - 6:00pm ET

Project Team 2: Inventory and Mapping (ID.IM-P) Completed

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CM.PO-P, CT.PO-P) Thursday, March 17, 2022 | 1:00pm ET – 2:00pm ET

Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P) Thursday, March 10, 2022 | 3:00pm ET – 4:00pm ET

NIST Privacy Workforce Public Working Group Wednesday, April 13, 2022 | 1:00pm ET – 2:00pm ET

\* For updated meeting schedules see the <u>PWWG web page</u>.

# **Privacy Workforce Public Working Group** Mailing Lists

- PWWG (<u>PrivacyWorkforceWG@list.nist.gov</u>)
- Project Team (PT1) (<u>PrivacyWorkforcePT1@list.nist.gov</u>)
- Project Team 2 (PT2) (<u>PrivacyWorkforcePT2@list.nist.gov</u>)
- Project Team 3 (PT3) (<u>PrivacyWorkforcePT3@list.nist.gov</u>)
- Project Team 4 (PT4) (PrivacyWorkforcePT4@list.nist.gov)
- All mailing lists are moderated

# **Privacy Workforce Public Working Group** Troubleshooting

• Email questions to <a href="mailto:pwwg@nist.gov">pwwg@nist.gov</a>

