NIST Privacy Workforce Public Working Group

Meeting #31
Wednesday, January 10, 2024

NIST | NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY
U.S. DEPARTMENT OF COMMERCE

INTRODUCTION

PWWG Co-Chairs

Dylan Gilbert
Privacy Policy
Advisor
*National Institute
of Standards and
Technology*

Doug Forman
Certification
Director
*International
Association of
Privacy
Professionals*

**Mary N. Chaney,
Esq., CISSP, CIPP/US**
Managing Attorney
*The Law Offices of
Mary N. Chaney,
PLLC*

Melanie Ensign
Founder & CEO
Discernable, Inc

PWWG UPDATES

PWWG Updates
Timeline to Completion

December, 2023 – March, 2024

PT9: Data Processing Awareness (CM.AW-P) - 8 Subcategories

PT10: Monitoring and Review (GV.MT-P) - 7 subcategories

PT11: Disassociated Processing (CT.DP-P) - 5 Subcategories

PWWG Updates
Timeline to Completion

Spring, 2024

- Release Privacy Workforce Taxonomy Public Draft
- Public comment period for Public Draft

Summer, 2024

- Publish Privacy Workforce Taxonomy, Version 1.0

PROJECT TEAM UPDATES

Project Team 6: Risk Management Strategy (GV.RM-P)
Co-Leads

Dana Garbo
Chief Privacy Officer,
Medline Industries

James Koons
Founding Partner, Data Privacy
& Security Advisors

Project Team 6:
Work Assignment

Function: GOVERN-P (GV-P)
Develop and implement the organizational governance structure to enable an ongoing understanding of the organization's risk management priorities that are informed by privacy risk.

Category: Risk Management Strategy (GV.RM-P): The organization's priorities, constraints, risk tolerances, and assumptions are established and used to support operational risk decisions.

Subcategory	Description
GV.RM-P1	Risk management processes are established, managed, and agreed to by organizational stakeholders.
GV.RM-P2	Organizational risk tolerance is determined and clearly expressed.
GV.RM-P3	The organization's determination of risk tolerance is informed by its role(s) in the data processing ecosystem.

Project Team 6: Risk Management Strategy (GV.RM-P)
Progress Update

- **Current Status**
  - Completed review of Co-Chair feedback for TKS Statements in GV.RM-P1 and P2.

- **Goal for this work period:**
  - Complete review of Co-Chair feedback for GV.RM-P3.

PT6: Risk Management Strategy (GV.RM-P)
Meeting Schedule

Next Meeting:
As needed

Project Team 8: Data Processing Management (CT.DM-P)

Abhinav (Abby) Palia,
Sr. Research Scientist,
AWS

Ridwan Badmus,
Legal Associate & CTO,
Oguntoye & Oguntoye LP

Nikita Samarin,
Digital Safety and Privacy
Researcher, UC Berkeley

Project Team 8:
Work Assignment

Privacy Framework Function: CONTROL-P (CT-P): Develop and implement appropriate activities to enable organizations or individuals to manage data with sufficient granularity to manage privacy risks.

Privacy Framework Category – Data Processing Management (CT.DM-P): Data are managed consistent with the organization's risk strategy to protect individuals' privacy, increase manageability, and enable the implementation of privacy principles (e.g., individual participation, data quality, data minimization).

Subcategory	Description
CT.DM-P1	Data elements can be accessed for review.
CT.DM-P2	Data elements can be accessed for transmission or disclosure.
CT.DM-P3	Data elements can be accessed for alteration.
CT.DM-P4	Data elements can be accessed for deletion.
CT.DM-P5	Data are destroyed according to policy.
CT.DM-P6	Data are transmitted using standardized formats.
CT.DM-P7	Mechanisms for transmitting processing permissions and related data values with data elements are established and in place.
CT.DM-P8	Audit/log records are determined, documented, implemented, and reviewed in accordance with policy and incorporating the principle of data minimization.
CT.DM-P9	Technical measures implemented to manage data processing are tested and assessed.
CT.DM-P10	Stakeholder privacy preferences are included in algorithmic design objectives and outputs are evaluated against these preferences.

Project Team 8: Data Processing Management (CT.DM-P)
Progress Update

- **Current Status**
  - PT8 completed the Skill and Knowledge Statements for CT.DM-P9, and CT.DM-P10. Completed Statements were sent to the PWWG Co-Chairs for review.

- **Goals for this work period:**
  - Co-Leads will review Co-Chair comments for the completed Subcategories.

PT8: Data Processing Management (CT.DM-P)
Meeting Schedule

Next Meeting:
As needed

PT8 (CT.DM-P): PrivacyWorkforcePT8+subscribe@list.nist.gov

Project Team 9 (PT9): Data Processing Awareness (CM.AW-P)

Stuart Lee
Chief Privacy Officer,
VMware, Inc

Paul Lanois
Partner, Fieldfisher

Shoshana Rosenberg
Founder and General Counsel,
SafePorter

Project Team 9: Scope of Work
Data Processing Awareness (CM.AW-P)

Privacy Framework Function: COMMUNICATE-P (CM-P): Develop and implement appropriate activities to enable organizations and individuals to have a reliable understanding and engage in a dialogue about how data are processed and associated privacy risks.

Privacy Framework Category – Data Processing Awareness (CM.AW-P): Individuals and organizations have reliable knowledge about data processing practices and associated privacy risks, and effective mechanisms are used and maintained to increase predictability consistent with the organization's risk strategy to protect individuals' privacy.

Subcategory	Description
CM.AW-P1	Mechanisms (e.g., notices, internal or public reports) for communicating data processing purposes, practices, associated privacy risks, and options for enabling individuals' data processing preferences and requests are established and in place.
CM.AW-P2	Mechanisms for obtaining feedback from individuals (e.g., surveys or focus groups) about data processing and associated privacy risks are established and in place.
CM.AW-P3	System/product/service design enables data processing visibility.
CM.AW-P4	Records of data disclosures and sharing are maintained and can be accessed for review or transmission/disclosure.
CM.AW-P5	Data corrections or deletions can be communicated to individuals or organizations (e.g., data sources) in the data processing ecosystem.
CM.AW-P6	Data provenance and lineage are maintained and can be accessed for review or transmission/disclosure.
CM.AW-P7	Impacted individuals and organizations are notified about a privacy breach or event.
CM.AW-P8	Individuals are provided with mitigation mechanisms (e.g., credit monitoring, consent withdrawal, data alteration or deletion) to address impacts of problematic data actions.

Project Team 9: Data Processing Awareness (CM.AW-P)
Progress Update

Current Status

- PT9 held two project team meetings in December.
- Co-Leads drafted TKS Statements for Subcategory CM.AW-P1 for team review.
- PT9 began reviewing TKS Statements for CM-AW-P1.

Goals for this work period:

- PT9 will continue to pre-draft TKS Statements for the remaining Subcategories in CM.AW-P.
- PT9 will complete TKS Statements for CM-AW-P2.
- PT9 will review and discuss TKS Statements for CM.AW-P2 and CM-AW-P3.

The Co-Leads encourage all members to continue to leave comments on the TKS Statements in the TKS Workbook between meetings.

Project Team 9: Data Processing Awareness (CM.AW-P) Meeting Schedule
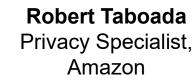
PT9 meets biweekly on Thursdays.

Next Meeting:
Thursday, January 11, 2024 | 2:00 – 3:00 p.m. ET

PT9 (CM.AW-P): PrivacyWorkforcePT9+subscribe@list.nist.gov

Project Team 10 (PT10): Monitoring and Review (GV.MT-P)

Catherine Tomasi
Director and CPO,
Con Edison

Robert Taboada
Privacy Specialist,
Amazon

Phil Lowry
Senior Counsel,
Remitly

Project Team 10: Monitoring and Review (GV.MT-P) Scope of Work

Privacy Framework Function: GOVERN-P (GV-P): Develop and implement the organizational governance structure to enable an ongoing understanding of the organization's risk management priorities that are informed by privacy risk.

Privacy Framework Category – Monitoring and Review (GV.MT-P): The policies, processes, and procedures for ongoing review of the organization's privacy posture are understood and inform the management of privacy risk.

Subcategory	Description
GV.MT-P1:	Privacy risk is re-evaluated on an ongoing basis and as key factors, including the organization's business environment (e.g., introduction of new technologies), governance (e.g., legal obligations, risk tolerance), data processing, and systems/products/services change.
GV.MT-P2	Privacy values, policies, and training are reviewed and any updates are communicated.
GV.MT-P3	Policies, processes, and procedures for assessing compliance with legal requirements and privacy policies are established and in place.
GV.MT-P4	Policies, processes, and procedures for communicating progress on managing privacy risks are established and in place.
GV.MT-P5	Policies, processes, and procedures are established and in place to receive, analyze, and respond to problematic data actions disclosed to the organization from internal and external sources (e.g., internal discovery, privacy researchers, professional events).
GV.MT-P6	Policies, processes, and procedures incorporate lessons learned from problematic data actions.
GV.MT-P7	Policies, processes, and procedures for receiving, tracking, and responding to complaints, concerns, and questions from individuals about organizational privacy practices are established and in place.

Sign up for PT10 (GV.MT-P): PrivacyWorkforcePT10+subscribe@list.nist.gov

Project Team 10: Monitoring and Review (GV.MT-P)
Meeting Schedule

PT10 meets **weekly** on Wednesdays.

Kick-off Meeting:
Wednesday, January 10, 2024 | 2:00 – 3:00 p.m. ET

PT10 (GV.MT-P): PrivacyWorkforcePT10+subscribe@list.nist.gov

Project Team 11 (PT11): Disassociated Processing (CT.DP-P)

Dr. Sarah Lewis Cortes
Privacy Engineering
Netflix

Hank Roser
Privacy Engineer
Technology & Innovation
CFPB

Sri Maddipati
Senior Privacy Engineer
Google

Project Team 11: Disassociated Processing (CT.DP-P)
Scope of Work

Privacy Framework Function: CONTROL-P (CT-P): Develop and implement appropriate activities to enable organizations or individuals to manage data with sufficient granularity to manage privacy risks.

Privacy Framework Category – Disassociated Processing (CT.DP-P): Data processing solutions increase disassociability consistent with the organization's risk strategy to protect individuals' privacy and enable implementation of privacy principles (e.g., data minimization).

Subcategory	Description
CT.DP-P1	Data are processed to limit observability and linkability (e.g., data actions take place on local devices, privacy-preserving cryptography).
CT.DP-P2	Data are processed to limit the identification of individuals (e.g., de-identification privacy techniques, tokenization).
CT.DP-P3	Data are processed to limit the formulation of inferences about individuals' behavior or activities (e.g., data processing is decentralized, distributed architectures).
CT.DP-P4	System or device configurations permit selective collection or disclosure of data elements.
CT.DP-P5	Attribute references are substituted for attribute values.

Sign up for PT11 (CT.DP-P): PrivacyWorkforcePT11+subscribe@list.nist.gov

Project Team 11: Disassociated Processing (CT.DP-P)
Meeting Schedule

PT11 meets biweekly on Tuesdays.

Next Meeting:
Tuesday, January 23, 2024 | 2:00 – 3:00 p.m. ET

PT11 (CT.DP-P): PrivacyWorkforcePT11+subscribe@list.nist.gov

Q&A

NEXT STEPS

Next Steps
Upcoming Meetings

Project Team 8: Data Processing Management (CT.DM-P)
  Next Meeting: **As needed**

Project Team 9: Data Processing Awareness (CM.AW-P)
  Next Meeting: **Thursday, January 11, 2024 |2:00 - 3:00 p.m. ET**

Project Team 10: Monitoring and Review (GV.MT-P)
  Kick off Meeting: **January 10, 2024 | 2:00 – 3:00 p.m. ET**

Project Team 11: Disassociated Processing (CT.DP-P)
  Next Meeting: **Tuesday, January 23, 2024 | 1:00 – 2:00 p.m. ET**

NIST Privacy Workforce Public Working Group
  Wednesday, February 14, 2024 |1:00 – 2:00 p.m. ET

* For updated meeting schedules see the [Privacy Workforce Public Working Group | NIST](#) web page.

Next Steps
Mailing List Sign-up

- Privacy Workforce Working Group (PWWG): PrivacyWorkforceWG+subscribe@list.nist.gov

- PT9 (CM.AW-P): PrivacyWorkforcePT9+subscribe@list.nist.gov
- PT10 (GV.MT-P): PrivacyWorkforcePT10+subscribe@list.nist.gov
- PT11 (CT.DP-P): PrivacyWorkforcePT11+subscribe@list.nist.gov

- **All mailing lists are moderated**

Next Steps
Troubleshooting

- Email questions to pwwg@nist.gov