

Dear Ms MacFarland,

Kaspersky Security Awareness (<https://www.kaspersky.com/enterprise-security/security-awareness>) is a subdivision of Kaspersky Lab which is responsible for development of security awareness training for commercial and not-for-profit organisations. We have previously participated in the hearings related to the establishment of NIST Cybersecurity Framework.

We share the view expressed in the NIST Privacy Framework RFI, that the topic of privacy protection is inextricably linked to the subject cybersecurity awareness, and wish to offer our subject-matter expertise as a contribution to the development the NIST Privacy Framework.

In particular, we would like to share and discuss with NIST forums, the learning methodology, which has been developed by us in response to challenges in the security awareness field.

In late 2018 we have launched a new on-line training platform entitled Kaspersky Automated Security Awareness Platform (Kaspersky ASAP), which represents a very different (from other online training providers) approach to learning.

The key principles underpinning ASAP (in comparison with traditional approaches) are:

| | ASAP | Traditionalonline platforms |
|--|---|--|
| Methodology: how people learn? | “Pattern recognition”: employees are capable to behave safely even with completely new threats | “Drills”: specific skills on predefined situations |
| Education schedule | Interval learning with constant reinforcement, micro-learning using different media | Manual learning assignments based on best practices |
| Program management | Fully automated. Training takes 15 minutes to set up and is low-maintenance. Simple “as-needed” reporting. | Manual assignment of training content, significant set-up and maintenance effort |
| Content/ knowledge base structure | Risk-based predefined learning path; rich expert content over 4 levels | Library with recommended “reading list”, unconnected learning modules |
| Assessment | Simulated phishing/ tests checking every particular skill (350 skills) | Random simulated phishing/ tests |

We believe that ASAP offers a number of key advantages to organizations, primarily due to ease-of-use and automation. For end users it offers a comprehensive learning curriculum based on interval training principles, which enables pattern-recognition and sustainable behavior change.

In addition to ASAP-style approach to awareness training (which is aimed at all categories of students), we also developed a number of gamified strategy and motivation programs for senior and middle management. We have recently published, for a European Commission – sponsored project, gamified training, which includes significant GDPR content.

In summary, we would like to participate in the NIST Privacy Framework initiative, both to share our experience and expertise in the creation of comprehensive training solutions in the adjoining field of cybersecurity, as well as to learn from the experience of other participants in the field of privacy protection.

Sincerely,

Adam Filler

Kaspersky Security Awareness