



**In Response to RFI:**

NIST Privacy Framework: *An Enterprise Risk Management Tool*

Jan. 14, 2019

Dtex Systems appreciates the opportunity to provide input to the National Institute of Standards and Technology effort to develop the Privacy Framework: An Enterprise Risk Management Tool (“Privacy Framework”). Dtex is a leader in advanced user behavior intelligence, privacy protection and insider threat detection. We are committed to providing organizations with visibility into user behaviors and activities in order to protect commercially sensitive data and information systems while maintaining and respecting the privacy of all users, which include employees, customers and authorized third-parties.

In today's world, organizations need to be proactive about managing cybersecurity risks. This often means taking measures to protect data from misuse by employees. Employees are now taking a more active role in understanding how data about themselves is being collected and stored, and where invasions of their personal privacy might exist. There is a growing understanding and comfort level with the need for employers to monitor digital behaviors and activities to prevent security incidents and data breaches. There's also an increasing intolerance for unnecessary or unwarranted invasions of privacy. This shift in mindset is having widespread effects across public and private sector organizations — from human resources and company culture to security, and perhaps most notably, employee monitoring.

**Accordingly, Dtex recommends that the Privacy Framework include a section on User Activity Monitoring that addresses practices for balancing an organization's need to monitor its employees with its need to protect and respect employee privacy.**

Dtex achieves a symbiotic balance between privacy and cybersecurity in the insider threat detection space by building in privacy by default and “privacy by design.” First, rather than collecting user content (like the content of documents and emails), Dtex gathers contextual, behavioral meta-data which ensures the least impact on an employee’s right to privacy. Second, Dtex does not generally incorporate invasive, data-heavy monitoring techniques like keystroke logging, video surveillance or screenshot captures of user content into its product lines, as these are not always needed to detect the insider threat. Third, Dtex applies advanced analytics and machine-learning to determine if an event or behavior is normal or abnormal, generating better anomaly detection and early warnings of Insider Threat risk. This allows organizations to quickly pinpoint where suspicious behavior or activity is taking place and allows security teams to focus on risks rather than individuals. Fourth, Dtex leverages patented data anonymization techniques and features, which can keep users’ identities protected until suspicious activity is detected. An anonymized meta data approach not only helps alleviate privacy concerns (especially in global organizations), but also helps remove bias and false positives from the insider threat or security operations teams, allowing them to focus on risks rather than individuals.



Leaders in Advanced User Behavior Intelligence, Privacy Protection and Insider Threat Detection

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**About Dtex**

Dtex turns employees, executives, contractors and partners into [trusted insiders](#). The award-winning [Dtex Advanced User Behavior Intelligence Platform](#) reduces insider threat risk by providing intelligence about behaviors and activities across massive numbers of distributed users. Dtex combines the largest library of known malicious and negligent behaviors, [machine learning](#) and advanced analytics. This gives the platform the power to detect insider threats in near real time, reduce false positives, and free security and risk professionals from having to spend time analyzing overwhelming volumes of data and logs. Dtex is scalable and deploys quickly. It only collects light-weight meta data data needed to identify risky behaviors, which never slows network, endpoint or user performance. Patented [anonymization](#) capabilities protect privacy and ensure compliance. Investors include Wing Venture Capital and Norwest Venture partners. Customers include the world's leading banks, manufacturers, healthcare organizations, government agencies, and law firms. The Defense Information Systems Agency (DISA), Williams Formula 1 Racing, and Freshfields Bruckhaus Deringer are among customers using Dtex to reduce [insider threat](#) risk. <https://www.dtexsystems.com/>

**Reference:**

EVERYONE AS A TRUSTED INSIDER: AN INTELLIGENT REPLACEMENT FOR EMPLOYEE MONITORING:  
<https://dtexsystems.com/resources/white-papers/everyone-as-a-trusted-insider/>