

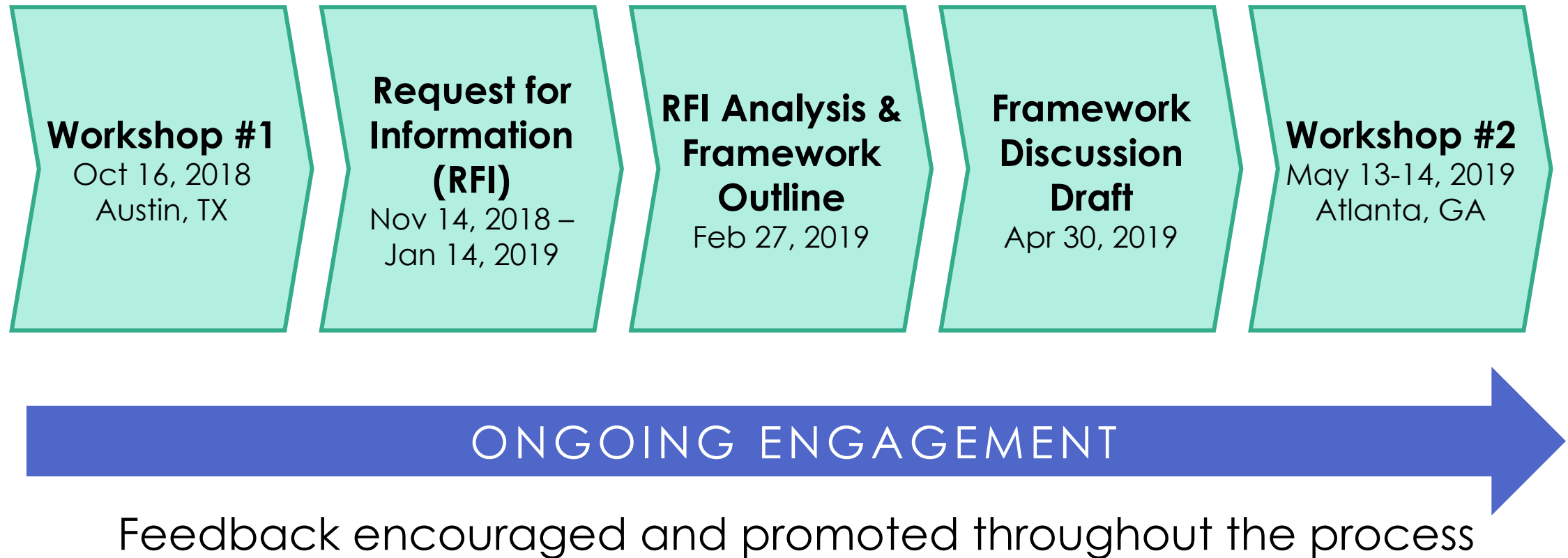
**WEBINAR**  
**NIST Privacy Framework**  
**Discussion Draft**  
*May 28, 2019*

# Why NIST?

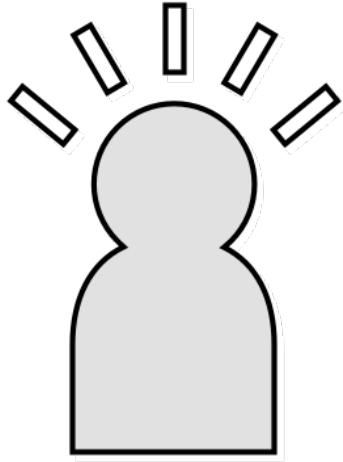
- Long track record of successfully, collaboratively working with public and private sectors
- Experience developing the Cybersecurity Framework
- Extensive privacy expertise



# Process to Date

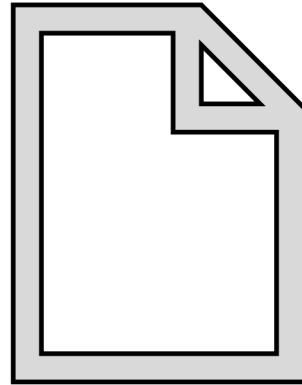
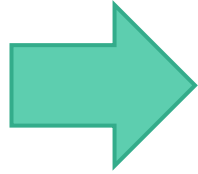


# NIST Privacy Framework: What is it?

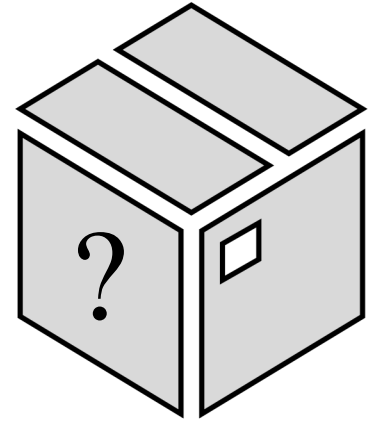
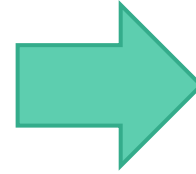


## Attributes:

- voluntary
- risk- & outcome-based
- non-prescriptive
- accessible language
- adaptable
- compatible with legal regimes



Enterprise risk management tool to help organizations answer the fundamental question: "How are we considering the privacy impacts to individuals as we develop our systems, products, and services?"

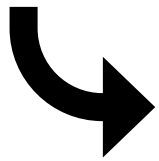


*future state:*  
NIST Privacy  
Framework version  
1.0

# Framework Development Stages



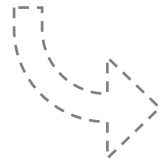
Working Outline – February 2019



Discussion Draft – April 2019



Preliminary Draft – Anticipated  
July/August 2019



Version 1.0 – Anticipated  
October 2019

# Upcoming Opportunities to Engage

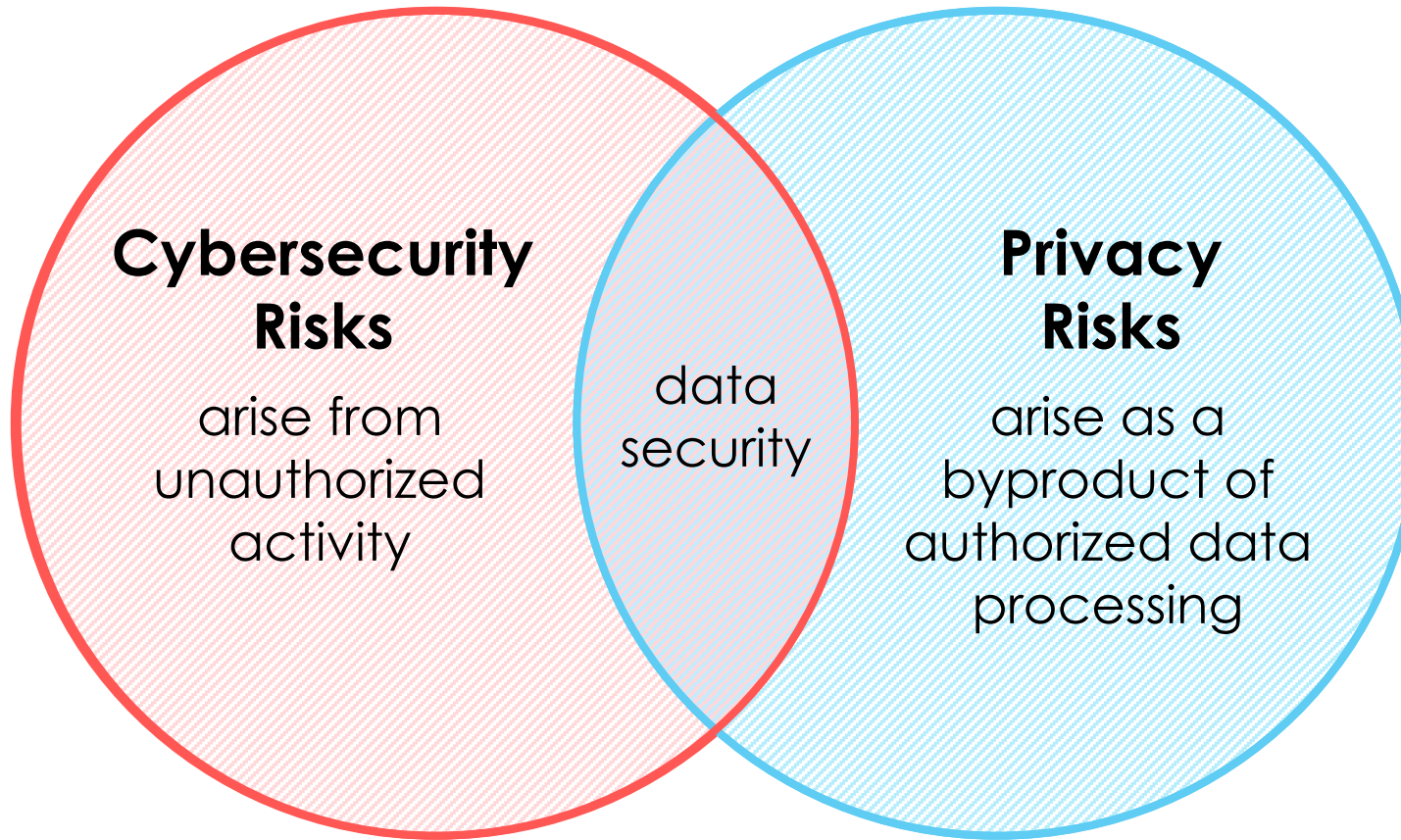


## **Getting to V1.0 of the NIST Privacy Framework: Workshop #3**

July 8-9, 2019 | Boise, Idaho

# **Review of NIST Privacy Framework Discussion Draft**

# Relationship Between Cybersecurity and Privacy Risk



- There is a clear recognition that security of data plays an important role in the protection of privacy
- Individual privacy cannot be achieved solely by securing data
- Authorized processing: system operations that handle data (collection – disposal) to enable the system to achieve mission/business objectives



# Key Definitions

**For the purposes of the Privacy Framework:**

## **Data**

A representation of information with the potential for adverse consequences for individuals when processed

## **Data Processing**

Complete data life cycle, including but not limited to: collection, retention, logging, generation, transformation, use, disclosure, transfer, and disposal

## **Privacy Risk**

The likelihood that individuals will experience problems resulting from data processing, and the impact should they occur

# Relationship between Privacy Risk Management and Risk Assessment

Privacy risk assessments:

“...can help organizations make ethical decisions and avoid losses of trust that damage their reputations or slow adoption or cause abandonment of products and services.”

# Appendix D: Key Privacy Risk Management Practices



Organizing  
Preparatory  
Resources



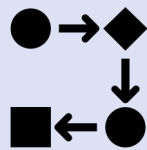
Determining Privacy  
Capabilities



Defining Privacy  
Requirements



Conducting Privacy  
Risk Assessments

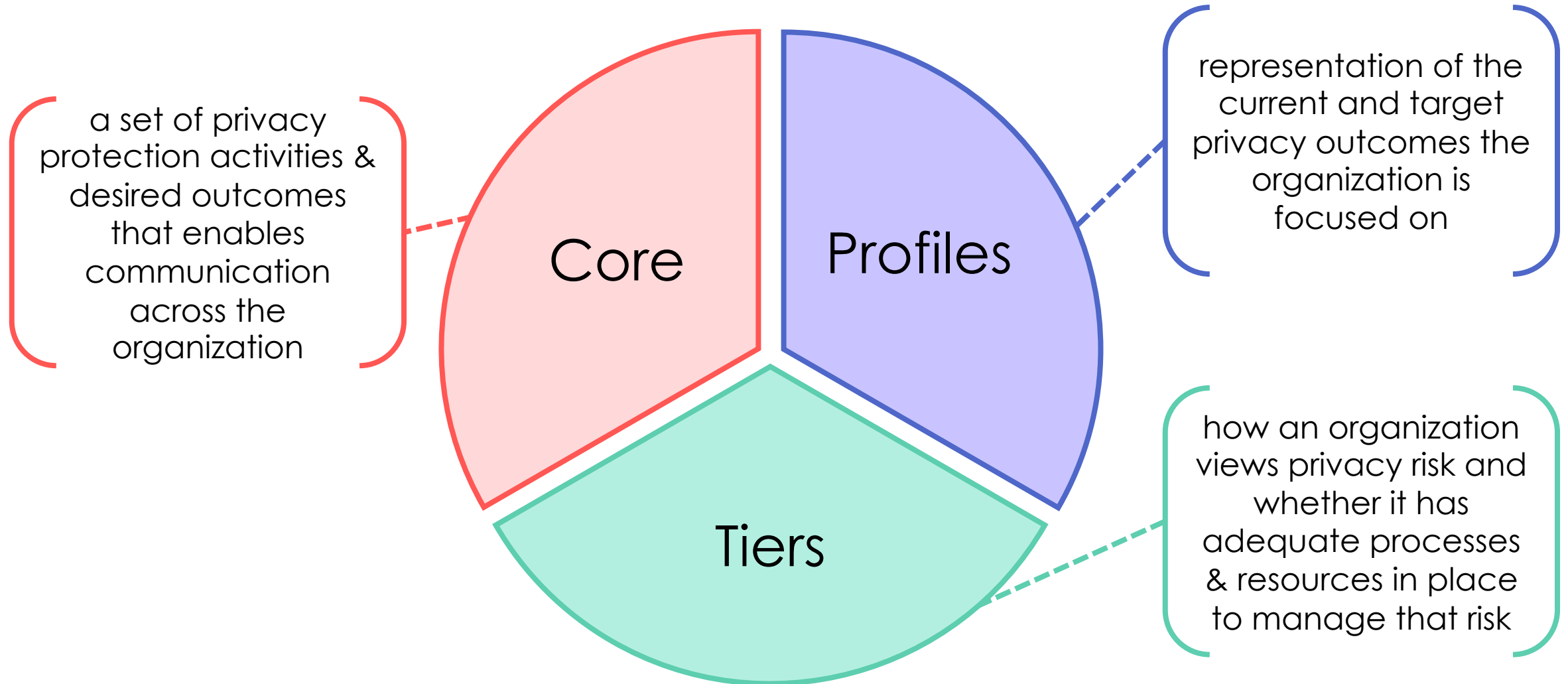


Creating Privacy  
Requirements  
Traceability



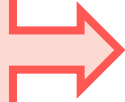
Monitoring Changing  
Privacy Risks

# Privacy Framework Structure



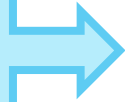
# Core Functions

Identify (ID)



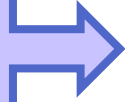
Develop the organizational understanding to manage privacy risk for individuals arising from data processing or their interactions with systems, products, or services.

Protect (PR)



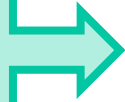
Develop and implement appropriate data processing safeguards.

Control (CT)



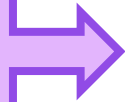
Develop and implement appropriate activities to enable organizations or individuals to manage data with sufficient granularity to manage privacy risks.

Inform (IN)



Develop and implement appropriate activities to enable organizations and individuals to have a reliable understanding about how data are processed.

Respond (RS)



Develop and implement appropriate activities to take action regarding a privacy breach or event.

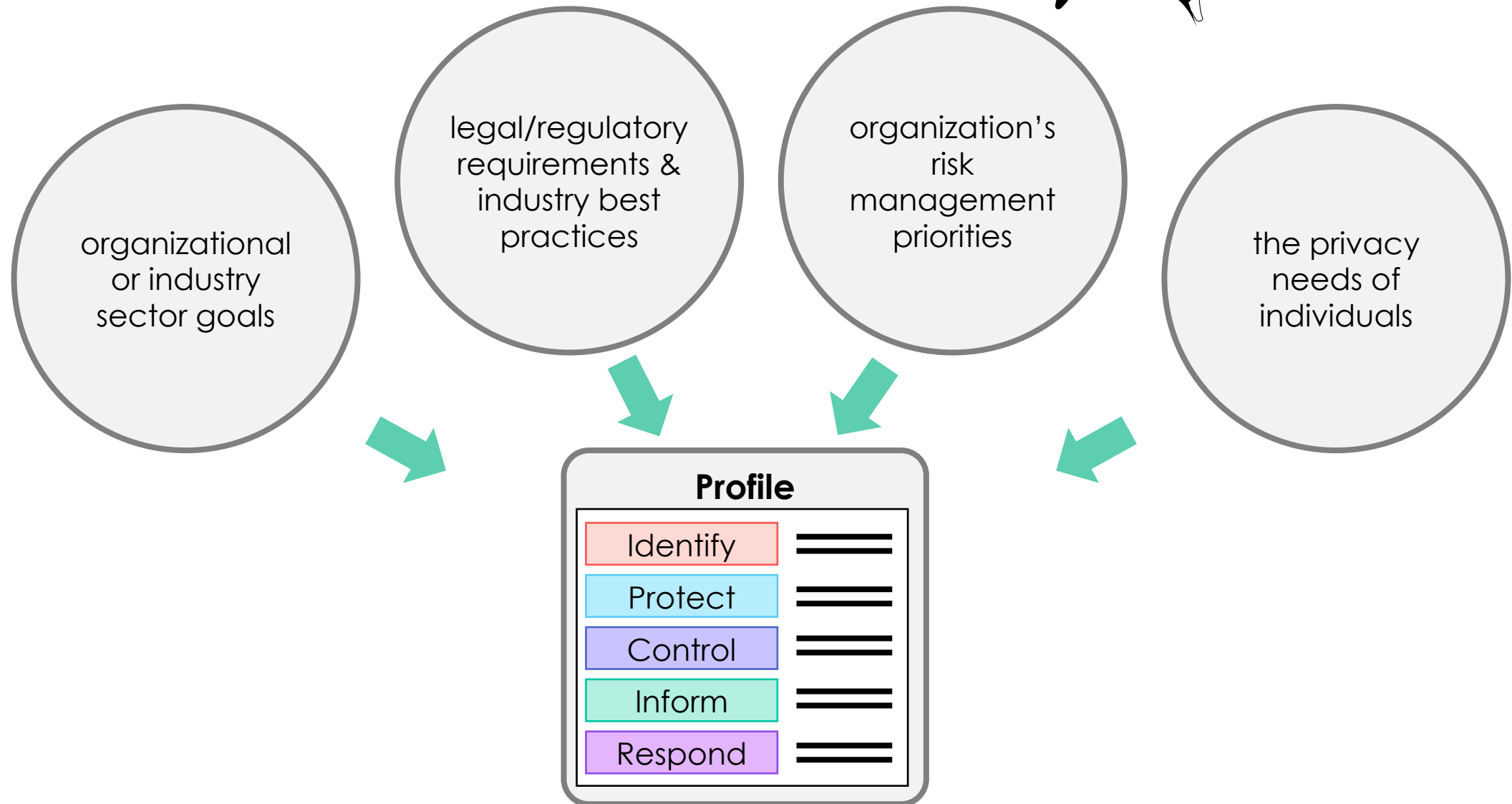
# Example Core Categories

ID	Inventory and Mapping (ID.IM-P)	Data processing and individuals' interactions with systems, products, or services are understood and inform the management of privacy risk.
PR	Protected Processing (PR.PP-P)	Technical data processing solutions increase disassociability consistent with related policies, procedures, and agreements and the organization's risk strategy to protect individuals' privacy.
CT	Data Management (CT.DM-P)	Data are managed consistent with the organization's risk strategy to protect individuals' privacy and increase manageability.
IN	Data Processing Awareness (IN.AW-P)	Individuals and organizations have an awareness of data processing practices, and processes and procedures are used and maintained to increase predictability consistent with the organization's risk strategy to protect individuals' privacy.
RS	Redress (RS.RE-P)	Organizational response activities include processes or mechanisms to address impacts to individuals that arise from data processing.

# Example Core Subcategories

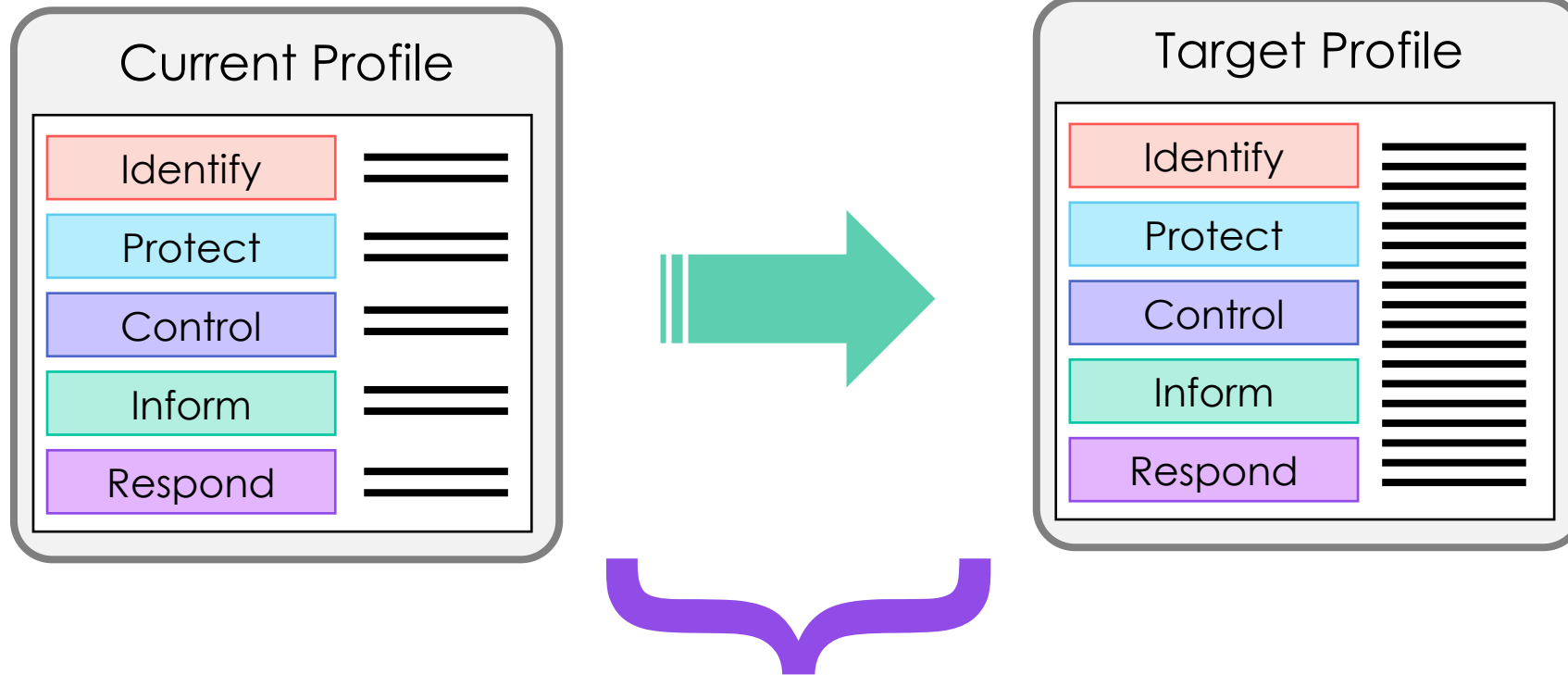
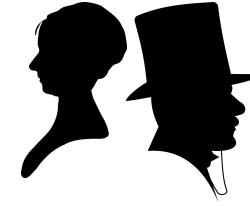
ID	ID.IM-P	ID.IM-P6	Data processing is mapped, illustrating the processing of data elements by system components and their owner/operators, and interactions of individuals and organizations with the systems/products/services.
PR	PR.PP-P	PR.PP-P2	Data are processed to limit the identification of individuals.
CT	CT.DM-P	CT.DM-P6	Data elements can be accessed for deletion.
IN	IN.AW-P	IN.AW-P7	Data analytic inputs and outputs are understood and evaluated for bias.
RS	RS.RE-P	RS.RE-P1	Processes for receiving and responding to complaints, concerns, and questions from individuals about organizational privacy practices are in place.

# Privacy Framework Profiles





# Current and Target Profiles



- identify gaps
- develop an action plan for improvement
- gauge the resources that would be needed (e.g., staffing, funding) to achieve privacy outcomes

# Implementation Tiers



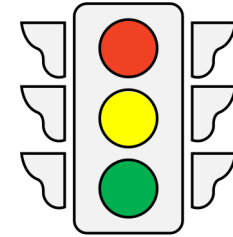
# How to Use the Privacy Framework



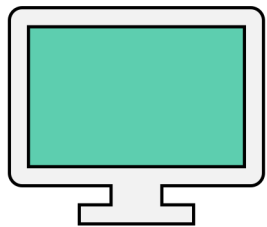
Strengthening  
Accountability



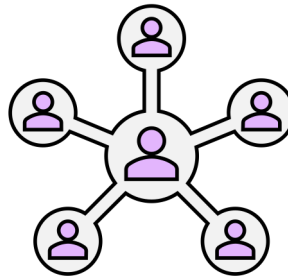
Basic Review of  
Privacy Practices



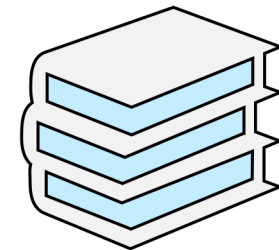
Establishing or Improving  
a Privacy Program



Application in the  
System Development  
Life Cycle

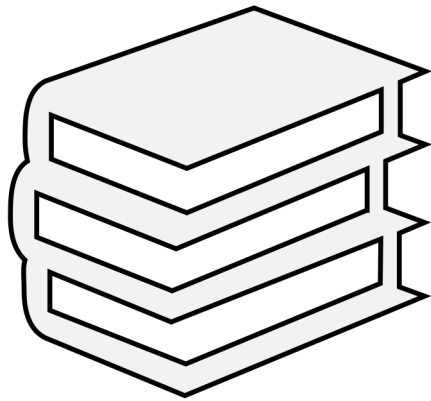


Communicating Privacy  
Requirements with  
Stakeholders



Informative  
References

# Informative References



- Specific sections of standards, guidelines, and practices that can be mapped to the Core subcategories and support achievement of the subcategory outcomes
- NIST has provided a mapping of the Core subcategories to relevant NIST guidance
- NIST will develop a process for accepting external informative references

# Roadmap



# Resources



## Website

<https://nist.gov/privacyframework>



## Mailing List

<https://groups.google.com/a/list.nist.gov/forum/#!forum/privacyframework>



## Contact Us

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