

From: Sara DePaul <sdepaul@SIIA.net>  
Sent: Monday, October 21, 2019 4:14 PM  
To: privacyframework <privacyframework@nist.gov>  
Cc: Sharon Burk <sburk@SIIA.net>; Carl Schonander <cschonander@SIIA.net>  
Subject: NIST Privacy Framework: Preliminary Draft Comments

On behalf of the Software & Information Industry Association (SIIA), I am filing the attached comments to the preliminary draft of the NIST Privacy Framework.

Kind regards,

Sara

SIIA  
Sara DePaul  
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Katie McFarland  
National Institute of Standards and Technology  
100 Bureau Drive, Stop 2000  
Gaithersburg, MD 20899  
[privacyframework@nist.gov](mailto:privacyframework@nist.gov)

**Re: Preliminary Draft of the Privacy Framework**

Dear Ms. McFarland:

On behalf of the members of the Software & Information Industry Association (SIIA), thank you for the opportunity to provide comments on the preliminary draft of the Privacy Framework. We also thank the National Institute of Standards and Technology (NIST) for its leadership and expertise in working with diverse stakeholders to develop the Framework. SIIA strongly supports the preliminary draft of the Privacy Framework.

SIIA is the principal trade association for the software and digital information industries worldwide. Our membership includes global industry leaders for the digital age, including software, data analytics, information service companies, and digital publishers. SIIA's member companies reflect the broad and diverse landscape of software and digital content, including both B2B and B2C services, small specialized providers, and large multinational industry leaders.

Our more than 800 members depend on data to serve nearly every segment of society, including business, education, government, healthcare, and consumers. These business models rely on the ability to collect and use data to achieve important public policy outcomes in public safety, extensions of credit, and "know your customer standards," to name a few. As the guardians of the personal data that drive these outcomes, our Members are committed to ensuring strong privacy protections, both as a matter of compliance and as a fundamental business norm that is dependent on customer trust.

SIIA strongly supports the preliminary draft of the Privacy Framework. We believe the final Framework will prove critically important to enterprise risk management. Like the NIST Cybersecurity Framework, the preliminary draft of the Privacy Framework is flexible, comprehensive, and focused on risks and outcomes. Moreover, its suite of standards, guidance, and best practices will help companies ensure they have the awareness and roadmap to bake privacy management into their overall enterprise.

We are particularly pleased that the preliminary draft of the Privacy Framework promises to be adaptable to help companies execute and record compliance programs for diverse data privacy laws and regulations – a vital feature due to the evolving privacy regulatory landscape in the United States and globally. By avoiding catering to a specific privacy standard, the Framework ensures that companies will be able to use it to build and sustain compliance programs as new privacy laws implement. Similarly, as privacy laws overlap, and in some instances conflict, the Framework can help businesses manage the complexity of divergent



compliance requirements. This is particularly important for SMEs, which privacy regulation disproportionately burdens.

Thank you again for the opportunity to provide comments on the preliminary draft. At this time, we fully support the preliminary draft, and look forward to reviewing the Privacy Framework 1.0 when it is released later this year. If you have any questions, please contact me at (202) 725-1419 or [sdepaul@siaa.net](mailto:sdepaul@siaa.net).

Respectfully submitted,

Sara DePaul, Senior Director, Technology Policy  
Software & Information Industry Association