

From: Gregory Lee Vint
Sent: Monday, August 10, 2020 10:37 AM
To: dig-comments-RFC <dig-comments-rfc@nist.gov>
Subject: Call for Comments on the NIST Special Publication 800-63-3, Digital Identity Guidelines

dig-comments-RFC@nist.gov.

United States Department of Commerce

National Institute of Standards and Technology, Computer Security Resource Center

Re: Pre-Draft Call for Comment: Digital Identity Guidelines

10 August 2020

We are pleased to respond to the National Institute of Standards and Technology (NIST) request issued June 2020 for comments on the NIST Special Publication 800-63-3, *Digital Identity Guidelines*.

Veriff is a global provider of identity verification services headquartered in Tallinn, Estonia. Our verification process supports over 8,000 government issued identification documents from over 190 countries in 35 languages. Veriff clients include leading digital companies in finance, payment systems, e-commerce, the "sharing economy", government agencies, and social media. Identities of customers, employees, and other users are verified for our clients.

NIST's efforts to offer guidance and standards applicable to the identity verification process are an important step to ensure that identity verification is properly and reliably performed in an increasingly digital world. As written, the guidelines are thorough and correct, but we believe that Section 7, *Digital Identity Guidelines: Enrollment and Identity Proofing*, would be enhanced with additional information and discussion.

In Section 7 of Volume A, *Digital Identity Guidelines: Enrollment and Identity Proofing*, several approaches are offered to mitigate impersonation risks. The general limitations in Section 2.3 of SP 800-63-3, *Digital Identity Guidelines*, note that device identity is not addressed in the guidelines and exclude them from the authentication techniques used to verify individual identities. We believe that device identity already can play a role in mitigating impersonation risk. For example, an individual attempting to impersonate multiple individuals will be flagged when attempting to impersonate a second individual from the same device identity. We recommend adding this technique to the strategies to mitigate impersonation risk.

Section 8 of Volume A, *Privacy Considerations*, describes privacy issues that surround the collection and processing of Personally Identifiable Information. Veriff appreciates that the privacy principles described in the guidelines are generally aligned with similar standards and considerations codified in the General Data Protection Regulation (GDPR) framework, which became effective in May 2018 in the European Union. For those individuals that need to verify their identity for a Relying Party from a jurisdiction subject to the GDPR framework, this alignment allows the identification process to be executed without the additional burden of reconciling incompatible data protection frameworks. Because Veriff verifies the identity of individuals around the world for global clients, this alignment is especially appreciated.

Recognition in the Guidelines of data privacy and data protection requirements is also welcome. All of Veriff's operations are subject to the GDPR which requires adherence to the principles and concepts of data minimization, plain text for information, purpose limitations for data, and privacy risk assessments. Individuals that interact with a CSP that adheres to these principles will be assured that personal information and data submitted is

protected and its use is clearly described. Considerations described in Section 8.5, Privacy Risk Assessment, and Section 8.6, Agency Specific Privacy Compliance, are embedded in Veriff's standard operating procedures in order to comply with the GDPR. Since these are known and recognized principles and concepts, Relying Parties should have confidence that identity verification providers, such as Veriff, can attain the assurance level desired, and individuals' data submitted for verification will be protected. In addition, this consistency also benefits Relying Parties by offering greater choice in selecting the appropriate CSP.

Gregory Vint.

