

From: Marcin Czabanski
Sent: Friday, December 14, 2018 3:41 PM
To: privacyframework
Subject: Developing a Privacy Framework

Ms. Katie MacFarland,

Below are comments for “Developing a Privacy Framework” RFI.

1. Non-prescriptive approach allows for flexibility to meet the needs of the business
2. A jurisdiction agnostic framework that would be recognized globally as addressing the protections and rights of individuals
3. Organizations adopting the NIST Privacy Framework and demonstrating accountability would achieve ‘adequacy’ status. Thus, eliminating the need for alternative approaches to legitimizing the transfer and processing of personal information. (e.g., Standard Contractual Clauses, Privacy Shield)