

Dr. Kuljeet Kaur

Subject: RFI NIST Privacy Framework

Dear Privacy Framework Team

I am the IT Security Officer at Opus Fund Services and have my PhD in IT Security. Opus is founded in 2006, an award winning, independently owned and operated full service global fund administrator.

I have successfully implemented the NIST cyber security framework and directly work on GDPR/PIPA and ISO 27001. Our company has worldwide presence, so we must deal with many regulatory requirements inside and outside of the U.S like, but not limited to, GDPR, PIPA, PIPEDA etc.

NIST CSF is very successful and easy when it comes to implementation and helped us to conform to many cyber security regulatory requirements. Privacy framework is an excellent initiative, much needed in the industry. Getting more guidance on the compliance requirements and privacy outcome for personally identifiable information (PII) would be well appreciated by public and private industry.

My main concern is that NIST should consider synchronization between NIST CSF and any upcoming privacy framework. Such as similar structure of functions, categories, sub-categories and informative references.

The industry is well versed with CSF structure of implementation and informative references provides scope to consider different frameworks.

Data breaches and hacking attempts have forced everyone to comply to cyber security requirements, so currently the Industry needs a simplified privacy framework for NIST CSF.