



NIST Privacy Workforce Public Working Group

Meeting #33
Wednesday,
March 13, 2024

INTRODUCTION

PWWG Co-Chairs



Dylan Gilbert
Privacy Policy
Advisor
*National Institute
of Standards and
Technology*



Doug Forman
Certification
Director
*International
Association of
Privacy
Professionals*



**Mary N. Chaney,
Esq., CISSP, CIPP/US**
Managing Attorney
*The Law Offices of
Mary N. Chaney,
PLLC*



Melanie Ensign
Founder & CEO
Discernable, Inc

PROJECT TEAM UPDATES

Project Team 9 (PT9): Data Processing Awareness (CM.AW-P)



Stuart Lee
Chief Privacy Officer,
VMware, Inc



Paul Lanois
Partner, Fieldfisher



Shoshana Rosenberg
Founder and
General Counsel,
SafePorter

Project Team 9: Scope of Work

Data Processing Awareness (CM.AW-P)

Privacy Framework Function: COMMUNICATE-P (CM-P): Develop and implement appropriate activities to enable organizations and individuals to have a reliable understanding and engage in a dialogue about how data are processed and associated privacy risks.

Privacy Framework Category – Data Processing Awareness (CM.AW-P): Individuals and organizations have reliable knowledge about data processing practices and associated privacy risks, and effective mechanisms are used and maintained to increase predictability consistent with the organization's risk strategy to protect individuals' privacy.

| Subcategory | Description |
|-------------|--|
| CM.AW-P1 | Mechanisms (e.g., notices, internal or public reports) for communicating data processing purposes, practices, associated privacy risks, and options for enabling individuals' data processing preferences and requests are established and in place. |
| CM.AW-P2 | Mechanisms for obtaining feedback from individuals (e.g., surveys or focus groups) about data processing and associated privacy risks are established and in place. |
| CM.AW-P3 | System/product/service design enables data processing visibility. |
| CM.AW-P4 | Records of data disclosures and sharing are maintained and can be accessed for review or transmission/disclosure. |
| CM.AW-P5 | Data corrections or deletions can be communicated to individuals or organizations (e.g., data sources) in the data processing ecosystem. |
| CM.AW-P6 | Data provenance and lineage are maintained and can be accessed for review or transmission/disclosure. |
| CM.AW-P7 | Impacted individuals and organizations are notified about a privacy breach or event. |
| CM.AW-P8 | Individuals are provided with mitigation mechanisms (e.g., credit monitoring, consent withdrawal, data alteration or deletion) to address impacts of problematic data actions. |

Project Team 9: Data Processing Awareness (CM.AW-P)

Progress Update

Current Status

- PT9 finished draft TKS Statements for CM.AW-P1-P6 which were submitted to the Co-Chairs for review.

Goals for this work period:

- Co-leads will review Co-Chair comments for CM.AW-P1-P6.
- PT9 will review and discuss TKS Statements for CM.AW-P7 and CM.AW-P8.

The Co-Leads encourage all members to continue to leave comments on the TKS Statements in the TKS Workbook between meetings.

Project Team 9: Data Processing Awareness (CM.AW-P) Meeting Schedule

Next Meeting:

Thursday, March 14, 2024

2:00 PM – 3:00 PM ET

PT9 (CM.AW-P): PrivacyWorkforcePT9+subscribe@list.nist.gov

Project Team 10 (PT10): Monitoring and Review (GV.MT-P)



Catherine Tomasi
Director and CPO,
Con Edison



Robert Taboada
Privacy Specialist,
Amazon



Phil Lowry
Senior Counsel,
Remitly

Project Team 10: Scope of Work Monitoring and Review (GV.MT-P)

Privacy Framework Function: GOVERN-P (GV-P): Develop and implement the organizational governance structure to enable an ongoing understanding of the organization's risk management priorities that are informed by privacy risk.

Privacy Framework Category – Monitoring and Review (GV.MT-P): The policies, processes, and procedures for ongoing review of the organization's privacy posture are understood and inform the management of privacy risk.

| Subcategory | Description |
|-------------|---|
| GV.MT-P1: | Privacy risk is re-evaluated on an ongoing basis and as key factors, including the organization's business environment (e.g., introduction of new technologies), governance (e.g., legal obligations, risk tolerance), data processing, and systems/products/services change. |
| GV.MT-P2 | Privacy values, policies, and training are reviewed and any updates are communicated. |
| GV.MT-P3 | Policies, processes, and procedures for assessing compliance with legal requirements and privacy policies are established and in place. |
| GV.MT-P4 | Policies, processes, and procedures for communicating progress on managing privacy risks are established and in place. |
| GV.MT-P5 | Policies, processes, and procedures are established and in place to receive, analyze, and respond to problematic data actions disclosed to the organization from internal and external sources (e.g., internal discovery, privacy researchers, professional events). |
| GV.MT-P6 | Policies, processes, and procedures incorporate lessons learned from problematic data actions. |
| GV.MT-P7 | Policies, processes, and procedures for receiving, tracking, and responding to complaints, concerns, and questions from individuals about organizational privacy practices are established and in place. |

Project Team 10 (PT10): Monitoring and Review (GV.MT-P)

Progress Update

Current Status

- PT10 finished draft TKS Statements for GV.MT-P1-P7 and these were submitted to the Co-Chairs for review.

Goals for this work period:

- PT10 will review and discuss Co-Chair comments for GV.MT-P3 – GV.MT-P7.

The Co-Leads encourage all members to continue to leave comments on the TKS Statements in the TKS Workbook between meetings.

Project Team 10 (PT10): Monitoring and Review (GV.MT-P)

PT10 meets weekly on Wednesdays.

Next meeting:

As needed

Project Team 11 (PT11): Disassociated Processing (CT.DP-P)



Dr. Sarah Lewis Cortes
Privacy Engineering
Netflix



Hank Roser
Privacy Engineer
Technology & Innovation
CFPB



Sri Maddipati
Senior Privacy Engineer
Google

Project Team 11: Scope of Work

Disassociated Processing (CT.DP-P)

Privacy Framework Function: CONTROL-P (CT-P): Develop and implement appropriate activities to enable organizations or individuals to manage data with sufficient granularity to manage privacy risks.

Privacy Framework Category – Disassociated Processing (CT.DP-P): Data processing solutions increase disassociability consistent with the organization's risk strategy to protect individuals' privacy and enable implementation of privacy principles (e.g., data minimization).

| Subcategory | Description |
|-------------|--|
| CT.DP-P1 | Data are processed to limit observability and linkability (e.g., data actions take place on local devices, privacy-preserving cryptography). |
| CT.DP-P2 | Data are processed to limit the identification of individuals (e.g., de-identification privacy techniques, tokenization). |
| CT.DP-P3 | Data are processed to limit the formulation of inferences about individuals' behavior or activities (e.g., data processing is decentralized, distributed architectures). |
| CT.DP-P4 | System or device configurations permit selective collection or disclosure of data elements. |
| CT.DP-P5 | Attribute references are substituted for attribute values. |

Project Team 11: Disassociated Processing (CT.DP-P)

Current Status

- PT11 finished draft TKS Statements for CT.DP-P1, CT.DP-P4, and CT.DP-P5 which have been submitted to the Co-Chairs for review.

Goals for this work period:

- Co-Leads will review Co-Chair comments for CT.DP-P1-P5.

The Co-Leads encourage all members to continue to leave comments on the TKS Statements in the TKS Workbook between meetings.

Project Team 11 (PT11): Disassociated Processing (CT.DP-P)

Next Meeting:
As needed

Sign up for PT11 (CT.DP-P): PrivacyWorkforcePT11+subscribe@list.nist.gov

PWWG UPDATES

PWWG Updates

Timeline to Completion

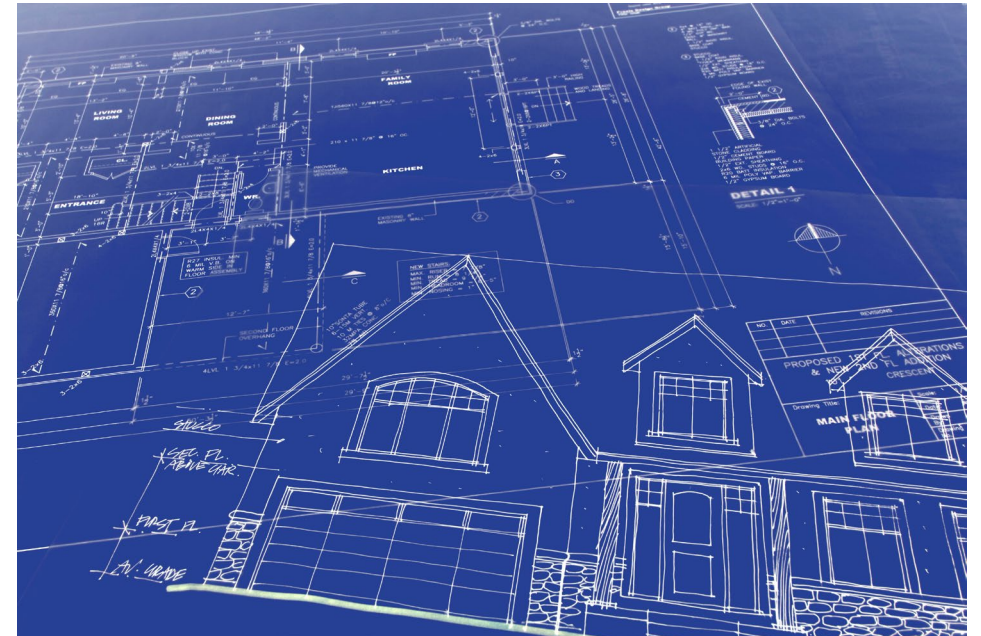
- Initial Public Draft complete by end of March!
- Public comment period to follow soon after release, date TBD



PWWG Updates

IPD Details ****Subject to change!****

- TKS comment template downloadable as Excel from the PWWG webpage
- TKS Mapped to Privacy Framework Subcategories
- “Baseline” to be included with TKS Mapping and will be concise (appx. a dozen TKS)
- Background, how to use, reference resources available on PWWG website





OPEN DISCUSSION

Open Discussion

Future Work

Where do we go from here?

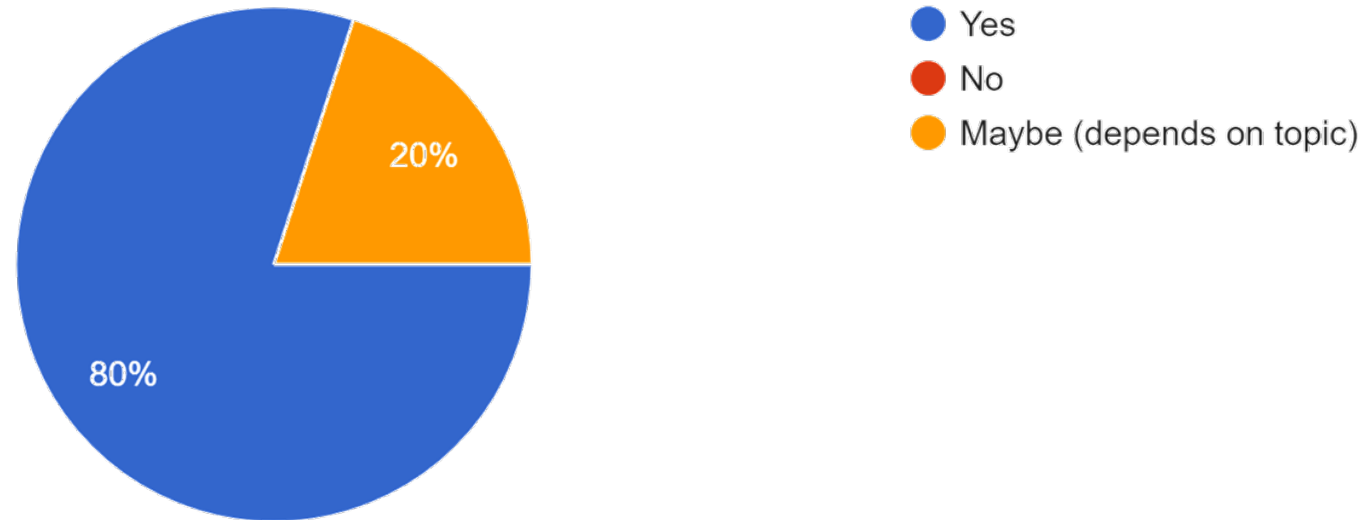


Open Discussion

Future Work: Second Phase?

Would you like the PWWG to continue to a second phase of work?

35 responses

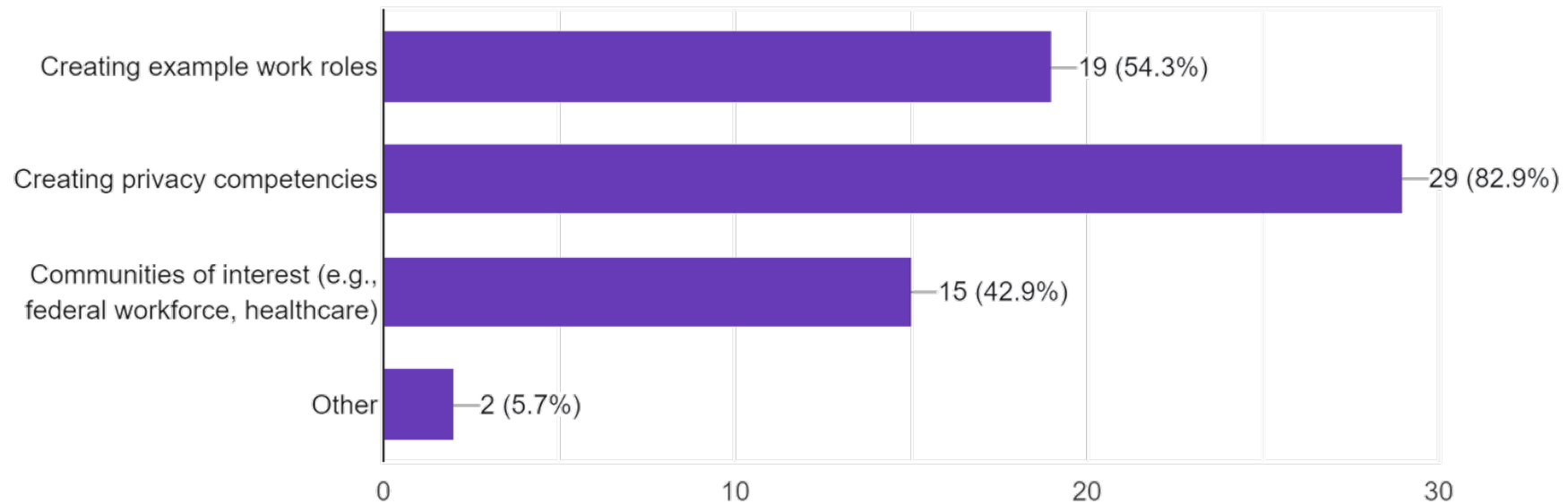


Open Discussion

Future Work: Areas of Interest

If you would like to continue, please select from the following areas of interest (choose all that apply):

35 responses



Open Discussion

Future Work: Other Areas of Interest

If you selected 'other', please tell us what you would like the PWWG to focus on in the future? (4 responses)

1. Creating a certification process comparable to ISO 27701
2. Update TKS to PF 1.1. Tie knowledge and skills as informative reference to 800-50 rev 1
3. Intersection of AI and privacy
4. Privacy in new and emerging technologies

Open Discussion

Future Work

Where do we go from here?





NEXT STEPS

Next Steps

Upcoming Meetings

Project Team 9: Data Processing Awareness (CM.AW-P)

Next Meeting: **Thursday, March 14, 2024 | 2:00 p.m. - 3:00 p.m. ET**

Project Team 10: Monitoring and Review (GV.MT-P)

Next Meeting: **As needed**

Project Team 11: Disassociated Processing (CT.DP-P)

Next Meeting: **As needed**

NIST Privacy Workforce Public Working Group

Wednesday, April 10, 2024 | 1:00pm – 2:00pm ET (New recurring invite will be sent soon)

* For updated meeting schedules see the [Privacy Workforce Public Working Group | NIST](#) web page.

Next Steps

Mailing List Sign-up

- Privacy Workforce Working Group (PWWG):
PrivacyWorkforceWG+subscribe@list.nist.gov
- **All mailing lists are moderated**

Next Steps

Troubleshooting

- Email questions to pwwg@nist.gov