

From: Christoph Roesch <christoph.roesch@franke.com>
Sent: Tuesday, October 22, 2019 9:00 AM
To: privacyframework <privacyframework@nist.gov>
Subject: NIST Privacy Framework: Preliminary Draft Comments

Dear all,

good job... I just had little time available and so just a five change requests... refer to comments excel attached.

Best regards,

Christoph

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Kind Regards | Freundliche Grüsse

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Comment #	Organization Name	Submitted By (Name/Email)	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested Change	Type of Comment (General/Editorial/Technical)
1	Franke Group, Switzerland	christophroesch@web.de	6	203	1.2.1'	Figure 2: Privacy Risk description	Privacy Risk - associated with <u>the personal freedom of individuals</u>	General
2	Franke Group, Switzerland	christophroesch@web.de	7	247	1.2.1'	Figure 3: Individual experiences direct impact...	"Individual experiences <u>direct or indirect</u> impact"	General
3	Franke Group, Switzerland	christophroesch@web.de	4	126	1.0	missing indirect impacts on individuals (refer to line above)	"with follow-on effects on <u>data subjects or</u> organizations' reputuation, bottom line, and furture prospects for growth."	General
4	Franke Group, Switzerland	christophroesch@web.de	21	684	Appendix A, Table 1	ID.IM-P5: not just the purpose, but also the origin of the data (by 3rd party, individual itself, etc) and the legal basis (contract, individuals explicit consent, legitimate interest etc.)	The origin of the data as well as the purposes and legal bases for the data actions are inventoried.	General
5	Franke Group, Switzerland	christophroesch@web.de	30	687	Terms	"Individual (... cannot be) a group of persons" as I think a individual needs to be an identifiable subject	A single person or a group of <u>identifiable</u> persons, including...	General