

From: Viegas <gviegas1@gmail.com>

Sent: Monday, October 21, 2019 3:26 PM

To: privacyframework <privacyframework@nist.gov>

Subject: NIST Privacy Framework: Preliminary Draft Comments

Hi,

My comments in attached template.

-George Viegas

Comment #	Organization Name	Submitted By (Name/Email)	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested Change	Type of Comment (General/Editorial/Technical)
1	Individual	George Viegas/ gviegas1@gmail.com	21		Table2: IDENTIFY	I don't see data retention schedule in this section	While we are mapping user, systems and data actions to the actual data elements gathered, it is crucial that we also record at the same time, the data retention for the data elements; Suggest adding a new subsection ID.IM-P9 or adding this change to the end of ID.IM-P8	Technical
2	Individual	George Viegas/ gviegas1@gmail.com	22		Table 2: GOVERN-P	I don't see a categorisation for organization approach to privacy of the employees differentiated from that of non employees	Some Privacy regulations will differentiate in the treatment of employees v/s non-employees from a Privacy standpoint. This can result in a separate data processing prerogative or not. I would amend GV.PP_P1 to read "data processing, individuals" to read as "data processing, individuals, employees"	
3	Individual	George Viegas/ gviegas1@gmil.com	24		Table 2: GOVERN-P	I do not see any timeline for any of the sub categories here	Most privacy regulations will require a timeframe to respond. All the subcategories here can be achieved, but the question is can they be achevied in the timeframe defined by the privacy policies and procedures established at GV.PP-P1? Suggested appending "within approved time frame" to GV.MT-P5 and GV.MT-P7	