

Internet of Things Advisory Board International Subgroup

Draft Recommendations
August 2023

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Create data minimization international **guidance** related to IoT devices

Create **internationally compatible** data minimization **guidance** related to IoT devices, aligning with the NIST Privacy Framework principles ((Control) Disassociated Processing (CT.DP-P)) and **NIST Cybersecurity Framework principles**

Implementation/ Funding

- Collaborate with public sector, private sector, and international counterparts
- Develop universally acceptable **guidance** on data minimization tailored to various IoT applications

Agencies

- The National Institute of Standards and Technology (NIST)
- **The National Telecommunications and Information Administration**
- **The International Trade Administration**
- Federal Trade Commission (FTC)

Modifications Approved August 2023

Federal considerations

- Consider the impact on businesses, especially small and medium-sized enterprises
- Recognize that data minimization should not hinder innovation or competitiveness in the IoT industry
- **Include principles of this guidance in future international agreements**

Justification

- Data minimization (collection & retention) reduces potential harm from data breaches or unauthorized access
- **Data minimization is inherently supportive of Privacy By Design**
- Boosts consumer trust by ensuring data is only used for necessary purposes
- Helps to **promote** uniform data privacy standards across the globe

Barriers

- Differences in privacy laws and cultural attitudes towards privacy in different countries
- Resistance from companies that rely on extensive data collection



US Cyber Trust Mark recommendation

The IoTAB strongly supports the voluntary public/private partnership that created the US Cyber Trust Mark.

<https://www.whitehouse.gov/briefing-room/statements-releases/2023/07/18/biden-harris-administration-announces-cybersecurity-labeling-program-for-smart-devices-to-protect-american-consumers/>

The U.S. Department of State must be committed to supporting the FCC and other members of the IoT Federal Working Group to identify and engage allies and partners toward harmonizing standards and pursuing mutual recognition of similar labeling efforts.