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Sent: Thursday, October 24, 2019 12:51 PM  
To: privacyframework <privacyframework@nist.gov>  
Subject: NIST Privacy Framework: Preliminary Draft Comments

NIST Team,

The Global Policy Working Group of the Sovrin Foundation appreciates the opportunity to offer a general comment with regard to the NIST Privacy Framework Preliminary Draft. The general comment is attached.

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## **THE SOVRIN FOUNDATION GLOBAL POLICY WORKING GROUP'S RESPONSE TO REQUEST FOR COMMENT TO THE DRAFT NIST PRIVACY FRAMEWORK**

### **ABOUT THE SOVRIN FOUNDATION AND ITS GLOBAL POLICY WORKING GROUP**

The Sovrin Foundation (the "Foundation") is a private-sector, international nonprofit that was established to govern the world's first self-sovereign identity (SSI) network. The purpose of the Foundation's Global Policy Working Group (GPWG) is to research, formulate, and recommend policies affecting the Sovrin infrastructure as a whole, in particular the intersection between the unique capabilities of SSI, regulatory policies and civil laws worldwide. This comment has been prepared and is being submitted by the GPWG.

Digital identity is one of the oldest and hardest problems on the internet. There is still no way to use digital credentials to prove our online identity the same way we do in the offline world. This is finally changing. First, the World Wide Web Consortium is standardizing the format of digitally-signed credentials. Secondly, public blockchains can provide decentralized registration and discovery of the public keys needed to verify digital signatures. These two steps pave the way to establish a global public utility for *self-sovereign identity (SSI)*—lifetime portable digital identity that uses multiple sources of formal and informal identification under the control and permission of the individual.

The Sovrin Network has been designed exclusively for this purpose, including governance (the Sovrin Foundation and the Sovrin Governance Framework), scalability (validator and observer nodes and state proofs), and accessibility (minimal cost and maximum availability). Most importantly, Sovrin implements Privacy by Design on a global scale, including pairwise pseudonymous identifiers, peer-to-peer private agents, and selective disclosure of personal data using zero-knowledge proof cryptography.

### **GENERAL COMMENT REGARDING APPENDIX B: GLOSSARY**

The GPWG appreciates the significant efforts and work undertaken by NIST and the various stakeholders in developing the preliminary draft of the NIST Privacy Framework: A Tool for Improving Privacy through Enterprise Risk Management (Privacy Framework). As an international nonprofit organization that is governing a privacy-enhancing SSI network, the Foundation has itself engaged in a cross-functional and cross-industry effort to develop governance frameworks that have led to the development of a comprehensive glossary of terms and their definitions: [the Sovrin Glossary](#). The glossary is an official document of the [Sovrin Governance Framework](#), is approved by the Foundation's Board of Trustees and reflects ongoing efforts by the Foundation to provide clarity as to the terminology needed across all dimensions of the Sovrin Governance Framework, including the business, legal, and technical ("BLT") layers. Accordingly, as NIST embarks on developing version 1.0 of the Privacy Framework, the Foundation invites NIST to review and, as needed, rely on any privacy-related definitions and concepts in the Sovrin Glossary as a resource with regard to any further development of Appendix B: Glossary. It is hoped that in doing so, the risk of inconsistent definitions in these widely-accepted glossaries will be minimized or even eliminated.

## **CONCLUSION**

The Foundation and the GPWG look forward to being a resource to help develop and provide input to future NIST privacy-related initiatives.

## **MEMBERSHIP OF THE GPWG**

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