

From: Shivam Satnani <shivam.satnani@tcs.com>

Sent: Thursday, October 17, 2019 1:23 AM

To: privacyframework <privacyframework@nist.gov>

Cc: Logamurugan V <logamurugan.v@tcs.com>; Dileep R <dileep.r@tcs.com>

Subject: RE: [privacyframework] Reminder: Submit Comments on the Preliminary Draft of the NIST Privacy Framework

Dear Team,

First of all, thanks and congratulations for putting all efforts and coming up with the draft framework. This would be helpful for many organizations developing and implementing privacy program, globally.

We went through the framework, and had few observations. PFA the same provided in the template suggested by you.

Hope these would be considered. Please let us know if further discussion on these or review is required from our end.

Thanks & Regards

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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	TCS	Shivam Satnani/ shivam.satnani@tcs.com	NA	NA	NA	Defining privacy framework, but not defining PI (Personal Information) anywhere might be an issue.	PI can be defined in Glossary and accordingly can be used wherever required in the framework.	General
2	TCS	Shivam Satnani/ shivam.satnani@tcs.com	4	140-141	1	There could be systems/products/services processing PI, but not affecting individuals directly, but indirectly. E.g., back-end solutions/services.	Taking privacy protection into account as they design and deploy systems, products, and services that process information about individuals (PI);	Technical
3	TCS	Shivam Satnani/ shivam.satnani@tcs.com	6	217	1.2.1	Disposal needs to be defined, because in some cases data might not be deleted/erased and only anonymized for future usage purposes.	Intended definition of "Disposal" can be provided in Glossary	Technical