

From: Harsha Banavara <harsha.banavara@signify.com>
Sent: Thursday, October 24, 2019 4:58 PM
To: privacyframework <privacyframework@nist.gov>
Subject: NIST Privacy Framework: Preliminary Draft Comments

Signify Classified - Internal

Hello,

Please find attached the comments for NIST Privacy Framework: Preliminary Draft.

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	Signify NA Corporation	harsha.banavara@signify.com	7	242-244		Impact on revenue is not mentioned. This would be the foremost impact as customers abandon products and services.	Include impact on revenue along with the other impacts as mentioned	General
2	Signify NA Corporation	harsha.banavara@signify.com	21	684	Table 2	It will be good to highlight which of the sub-categories fall under technical/administrative/management for better readability of the document.		General
3	Signify NA Corporation	harsha.banavara@signify.com	11	385		Profiles can be used to describe both the current state or the desired target state of specific privacy activities.	Profiles can be used to describe both the current state and/or the desired target state of specific privacy activities.	General
4	Signify NA Corporation	harsha.banavara@signify.com	11	407,408		Why should an organization consider moving to a higher tier when they are not capable of being compliant to a lower lever tier in the first place. Normally an organization considers moving to the next tier when there is a necessity and have completely met or are competent enough of meeting all the requirements in the current tier.	Reword to suggest something as commented in column G.	General

5	Signify NA Corporation	harsha.banavara@signify.com	11	410,411		Tiers just show the capability of an organization to meet the target level and provide a justification to the stakeholders as to why it feels that level/tier is good enough.	The second half of the sentence after stakeholders can be deleted.	General
6	Signify NA Corporation	harsha.banavara@signify.com	15	539-541		at other places you have used the word 'data' instead of information e.g 551,573 need to be consistent and data makes more sense for 539-541	replace information by data	General
7	Signify NA Corporation	harsha.banavara@signify.com	24		GV.MT-P2	No mention of any time	reviewed annually or at a timeframe decided appropriate by the organization	General
8	Signify NA Corporation	harsha.banavara@signify.com	26		CM.AW-P7	No point in notifying individuals and organizations about privacy event. End user will be bombarded with a number of messages if an organization start reporting events.	Delete the words 'or event'. Include and/or instead of individuals or organizations.	General