ISACA Privacy Principles and Program Management Guide

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Privacy Guidance Task Force

- Established in June 2014, in order to develop a series of practical privacy knowledge products in support of members currently responsible for managing or supporting privacy initiatives, and non-members in privacy operational roles.
- First action: realizing a survey “How enterprises are managing their Privacy function”
- Second action: Elaborating a « Privacy Principles and Program Management Guide”

Development team

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Document structure 1/2

- Two volumes (currently tome I is available, tome II planned for July 2017)
- Volume I is organized into six chapters and seven appendices,
- Chapter 1—Introduction to Privacy

  Introduction to privacy, including an explanation of why security and privacy are not the same and a list of privacy terms.
- Chapter 2—Privacy Legal Models, Categories and Emerging Concepts

  Overview of seven different categories of privacy as defined by major privacy laws, regulations and frameworks.
- Chapter 3—Privacy Risk from New and Evolving Technologies

  Overview of relatively new technologies and their corresponding privacy risk and impacts to the seven privacy categories.
- Chapter 4—ISACA Privacy Principles Description of the 14 ISACA privacy principles.
- Chapter 5—COBIT 5 and Privacy Guidance on how to embed privacy throughout enterprise processes and technologies, using COBIT 5 as the overarching framework for information governance and management of

Document structure 2/2

- Chapter 6—Establishing a Privacy Protection Program

  Guidance on how to use the concepts that are provided in earlier chapters to create, implement and sustain a privacy program. The guidance is divided into major phases:

  - Enabling privacy protection change
  - Implementing a life cycle approach to privacy governance and management
  - Key success factors for a successful implementation of a privacy management program
  - Creating the appropriate privacy protection environment and enabling change

- Appendix A—List of Privacy Laws and Regulations by Region

  Overview and listing of privacy laws, regulations and standards in the different regions of the world.

- Appendix B—Legal Actions for Privacy by Country

  Overview and listings of some of the legal privacy protections throughout the world, worldwide legal enforcement actions for privacy, and global industry-specific privacy standards.

- Appendix C—Privacy Standards, Frameworks and Self-Regulation Programs

  Existing privacy standards, principles and frameworks, and relevant security standards.

- Appendix D—Professional Privacy and Security Certifications

  List of generally and worldwide accepted professional certifications that are related to privacy.

- Appendix E—Connecting the ISACA Privacy Principles to Other Privacy Standards, Frameworks, Models and Good Practices

  List of privacy advice publications and standards to consider and how the ISACA privacy principles map to a few of these standards. enterprise IT.

What is privacy?

- No single world-wide definition of privacy
- Seven categories of privacy (from“European data protection: coming of age?” edited by Serge Gutwirth, Ronald Leenes, Paul de Hert and Yves Poullet)
  - Privacy of the person
  - Privacy of behaviour and actions
  - Privacy of communication
  - Privacy of association
  - Privacy of data and image (information)
  - Privacy of thoughts and feelings
  - Privacy of location and space (territorial)
- More details & examples see

  http://www.isaca.org/Knowledge-Center/Research/Documents/Privacy-Infographic_res_eng_0117.pdf

Applications of Privacy categories to relatively new technologies

- Social media
- Cloud computing
- Apps (the term most commonly used for mobile applications)
- Big Data Analytics
- Internet of Things
- BYOD (the common term used for “bring your own device” practices in organizations) including wearable technologies
- Tracking and surveillance technologies

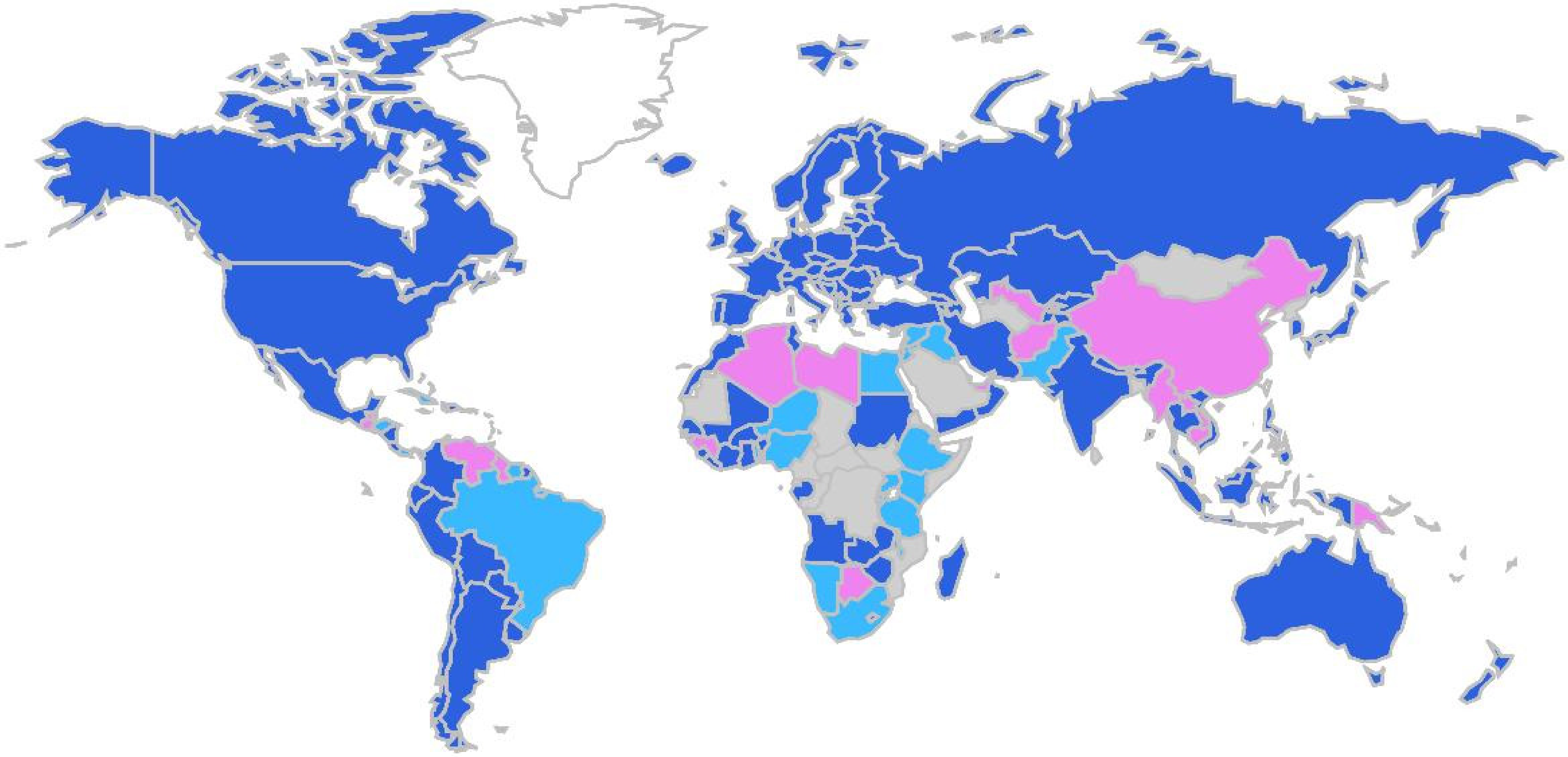
PRIVACY CATEGORIES\TECHNOLOGIES

	Social media	Cloud computing	Apps	Big Data Analytics	Internet of Things	BYOD	Tracking and surveillance
Privacy of the person			X	X	X		X
Privacy of behaviour and action	X		X	X	X	X	X
Privacy of communication	X	X	X	X	X	X	
Privacy of data and image	X	X	X	X	X	X	X
Privacy of thought and feelings	X	X	X	X	X	X	X
Privacy of location and space	X	X	X	X	X	X	X
Privacy of association	X	X	X	X	X		X

Data Privacy legislations around the world

107 countries have put in place legislation to secure the protection of data and privacy.

Data Protection and Privacy Legislation Worldwide



Legislation

Draft Legislation

No Legislation

No Data

Source: UNCTAD,14/04/2016

Models used in data protection laws

- Comprehensive Model
  e.g. European Union countries and the Canadian provinces

- Sectoral Model
  e.g. United States and Japan

- Co-Regulatory Model
  e.g. Australia, New Zealand and the Netherlands.

- Self-Regulatory Model
  e.g. Network Advertising Initiative (NAI) Code of Conduct and North American Energy Standards Board (NAESB)

THE 14 ISACA PRIVACY PRINCIPLES 1/2

After studying existing privacy standards, frameworks and principles, ISACA defined a uniform set of practical principles

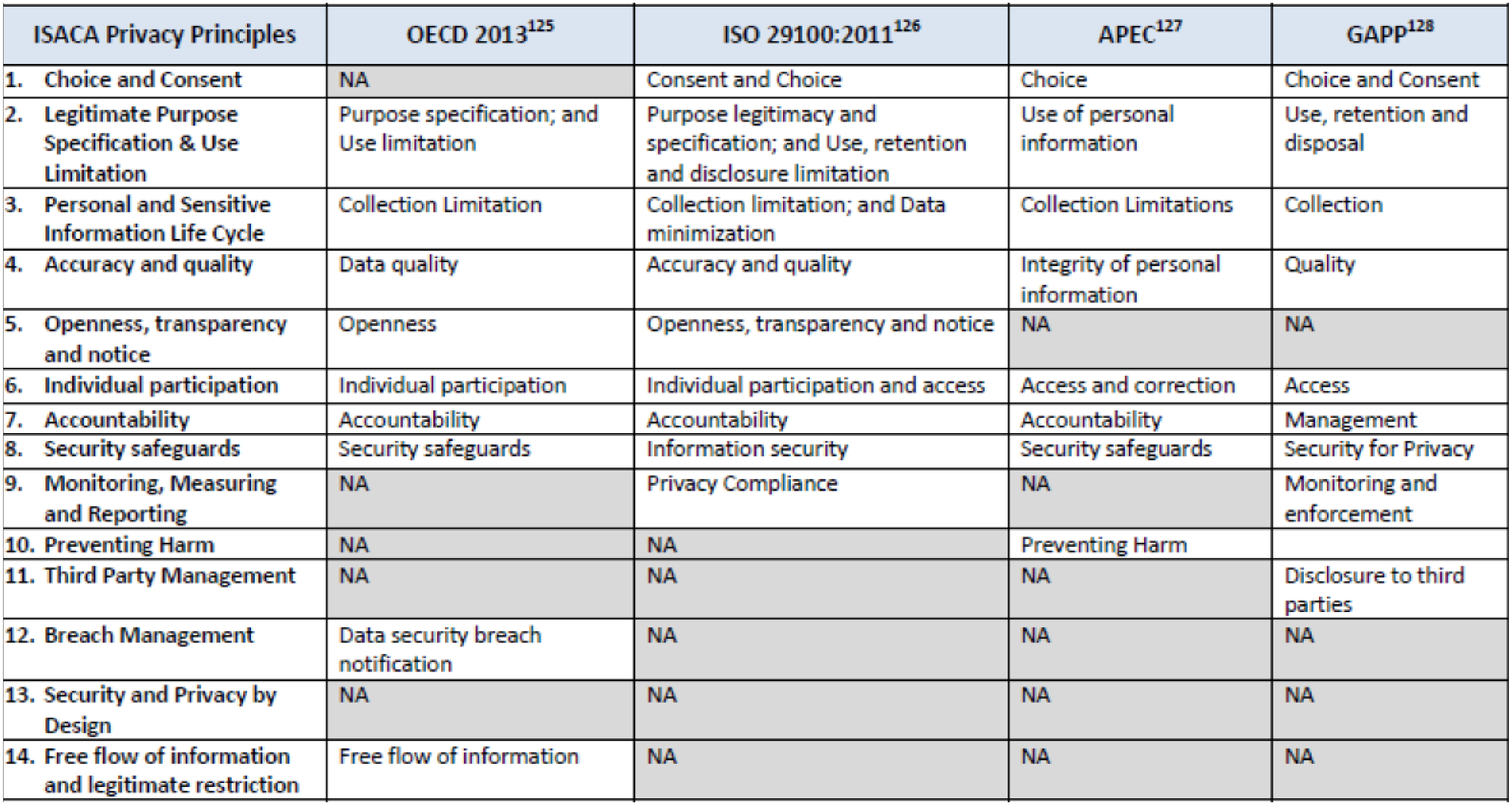
- Principle1: Choice and Consent
- Principle 2: Legitimate Purpose Specification and Use Limitation
- Principle 3: Personal information and Sensitive Information Life Cycle
- Principle 4: Accuracy and Quality
- Principle 5: Openness, Transparency and Notice
- Principle 6: Individual Participation
- Principle 7: Accountability

THE 14 ISACA PRIVACY PRINCIPLES 2/2

- Principle 8: Security Safeguards
- Principle 9: Monitoring, Measuring and Reporting
- Principle 10: Preventing Harm
- Principle 11: Third Party / Vendor Management
- Principle 12: Breach Management
- Principle 13: Security and Privacy by Design
- Principle 14: Free flow of information and legitimate restriction

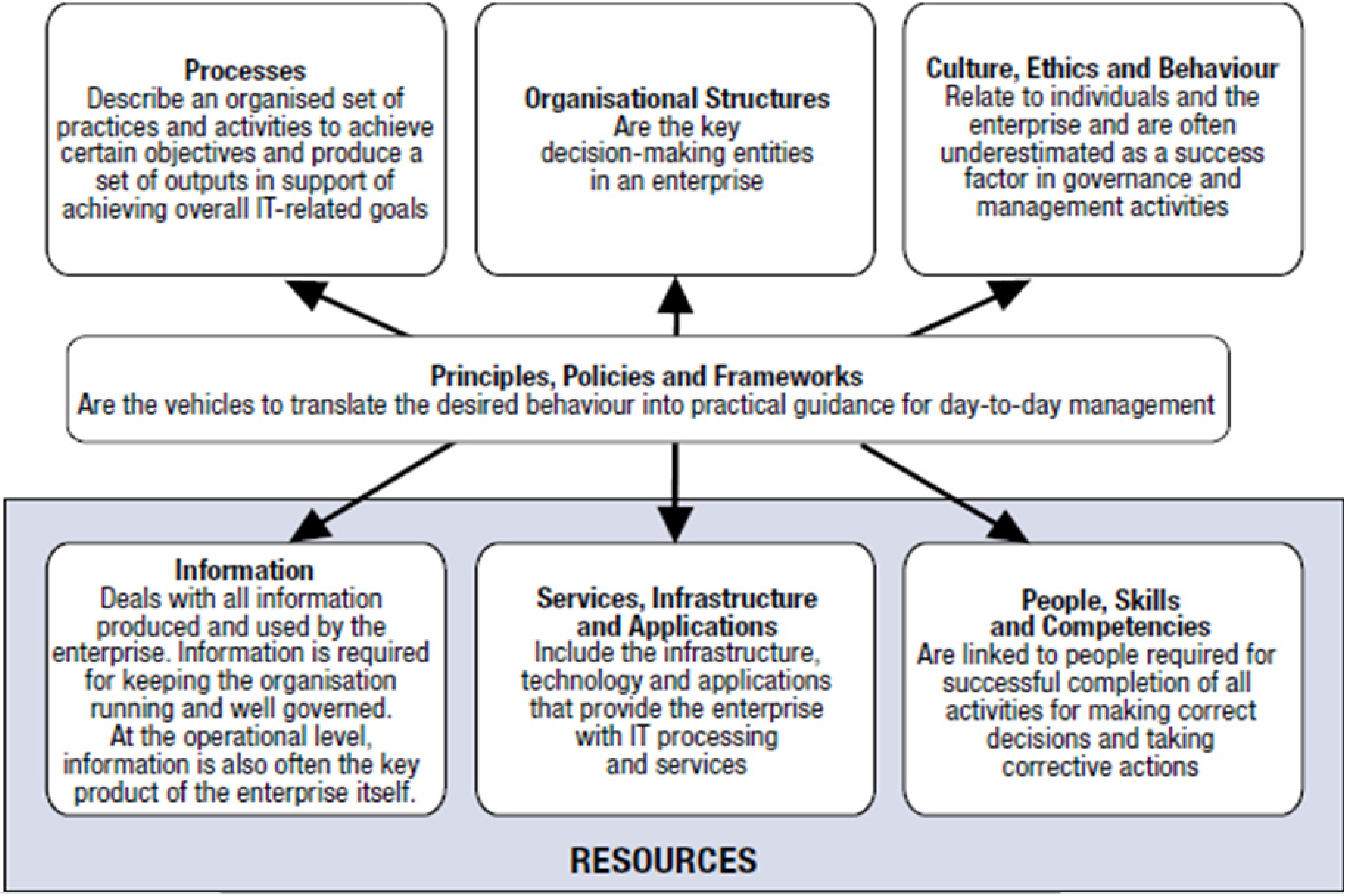
- For more details see https://s3.amazonaws.com/bizzabo.users.files/mV4kG3VQ6A3TpAQaclKA_DPA%20-%20Using%20ISACA's%20Privacy%20Principles.pdf

Mapping of the ISACA Privacy Principles



ISACA Privacy Principles	OECD 2013[125]	ISO 29100:2011[126]	APEC[127]	GAPP[128]
1. Choice and Consent	NA	Consent and Choice	Choice	Choice and Consent
2. Legitimate Purpose Specification & Use Limitation	Purpose specification; and Use limitation	Purpose legitimacy and specification; and Use, retention and disclosure limitation	Use of personal information	Use, retention and disposal
3. Personal and Sensitive Information Life Cycle	Collection Limitation	Collection limitation; and Data minimization	Collection Limitations	Collection
4. Accuracy and quality	Data quality	Accuracy and quality	Integrity of personal information	Quality
5. Openness, transparency and notice	Openness	Openness, transparency and notice	NA	NA
6. Individual participation	Individual participation	Individual participation and access	Access and correction	Access
7. Accountability	Accountability	Accountability	Accountability	Management
8. Security safeguards	Security safeguards	Information security	Security safeguards	Security for Privacy
9. Monitoring, Measuring and Reporting	NA	Privacy Compliance	NA	Monitoring and enforcement
10. Preventing Harm	NA	NA	Preventing Harm	
11. Third Party Management	NA	NA	NA	Disclosure to third parties
12. Breach Management	Data security breach notification	NA	NA	NA
13. Security and Privacy by Design	NA	NA	NA	NA
14. Free flow of information and legitimate restriction	Free flow of information	NA	NA	NA

COBIT 5 ENABLER: SYSTEMIC MODEL WITH INTERACTING ENABLERS



Processes
Describe an organised set of practices and activities to achieve certain objectives and produce a set of outputs in support of achieving overall IT-related goals

Organisational Structures
Are the key decision-making entities in an enterprise

Culture, Ethics and Behaviour
Relate to individuals and the enterprise and are often underestimated as a success factor in governance and management activities

Principles, Policies and Frameworks
Are the vehicles to translate the desired behaviour into practical guidance for day-to-day management

Information
Deals with all information produced and used by the enterprise. Information is required for keeping the organisation running and well governed. At the operational level, information is also often the key product of the enterprise itself.

Services, Infrastructure and Applications
Include the infrastructure, technology and applications that provide the enterprise with IT processing and services

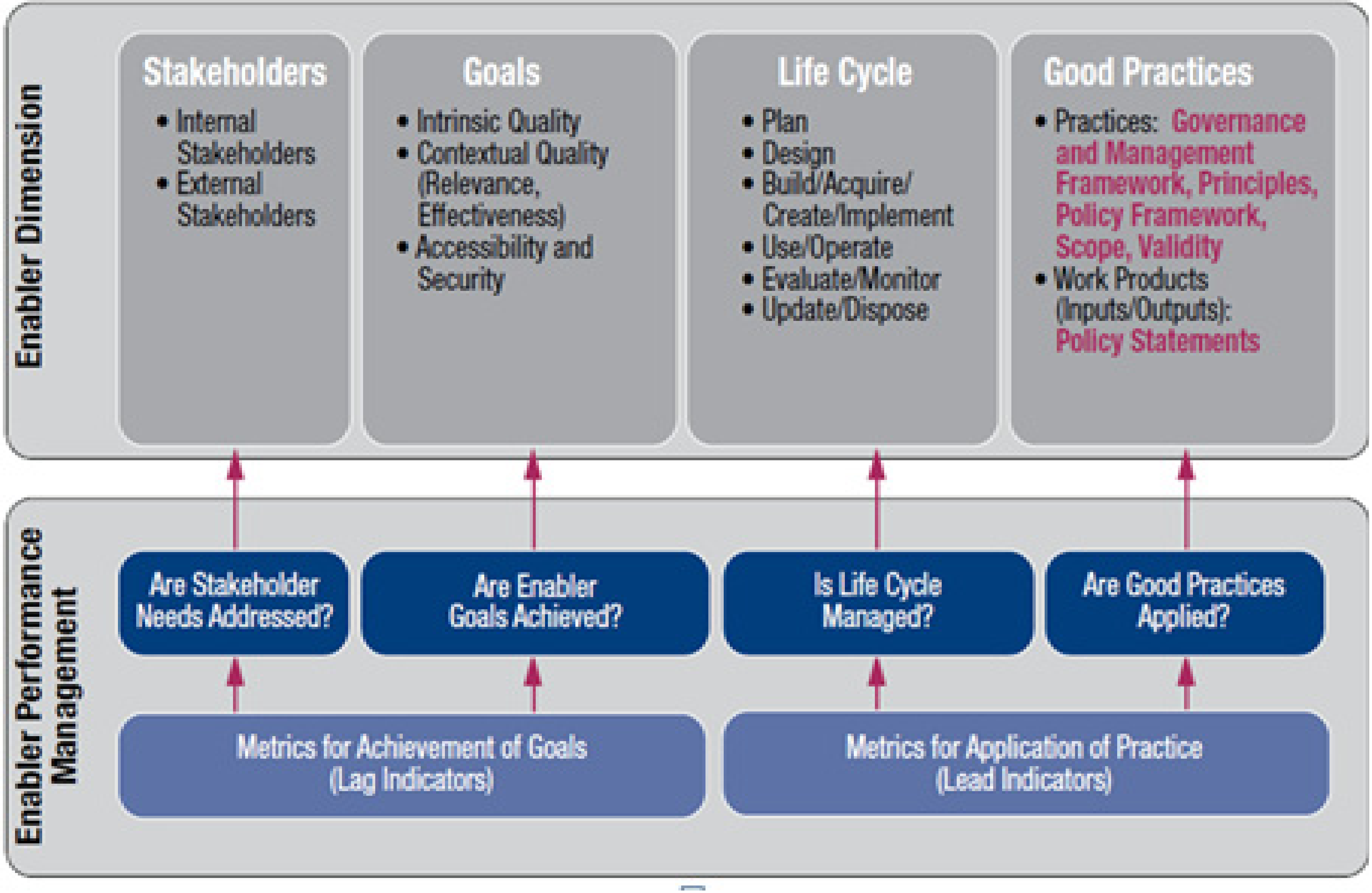
People, Skills and Competencies
Are linked to people required for successful completion of all activities for making correct decisions and taking corrective actions

RESOURCES

USING COBIT 5 ENABLERS TO SUPPORT THE PRIVACY PROGRAM

1. Privacy **policies, principles and frameworks** (e.g., the ISACA Privacy Principles, internal organizational privacy policies, the APEC Privacy Framework, etc.)
2. **Processes**, including privacy-specific details and activities (e.g., identity verification, providing notice, offering opt-in, etc.)
3. Privacy-specific **organizational structures** (e.g., Information Technology, Human Resources, Physical Security, Legal Counsel, etc.)
4. In terms of **culture, ethics and behavior**, factors determining the success of privacy governance and management (e.g., executive support of the privacy program, providing privacy training, etc.)
5. Privacy-specific **information** types (e.g., personal information, sensitive information, and other types of information that can have privacy impacts, such as communications metadata, etc.) and concepts for enabling privacy governance and management within the enterprise
6. **Service capabilities** required to provide privacy related functions and activities to an enterprise (e.g., applications, infrastructure, technologies, etc.)
7. **People, skills and competencies** specific for privacy (e.g., understanding of privacy enhancing technologies, knowing geographic locations where personal information is collected from and where it is stored, privacy certifications, etc.)

COBIT 5 ENABLER:
PRINCIPLES, POLICIES AND FRAMEWORKS



Enabler Dimension

Stakeholders

- Internal Stakeholders
- External Stakeholders

Goals

- Intrinsic Quality
- Contextual Quality (Relevance, Effectiveness)
- Accessibility and Security

Life Cycle

- Plan
- Design
- Build/Acquire/ Create/Implement
- Use/Operate
- Evaluate/Monitor
- Update/Dispose

Good Practices

- Practices: Governance and Management Framework, Principles, Policy Framework, Scope, Validity
- Work Products (Inputs/Outputs): Policy Statements

Enabler Performance Management

Are Stakeholder Needs Addressed?

Are Enabler Goals Achieved?

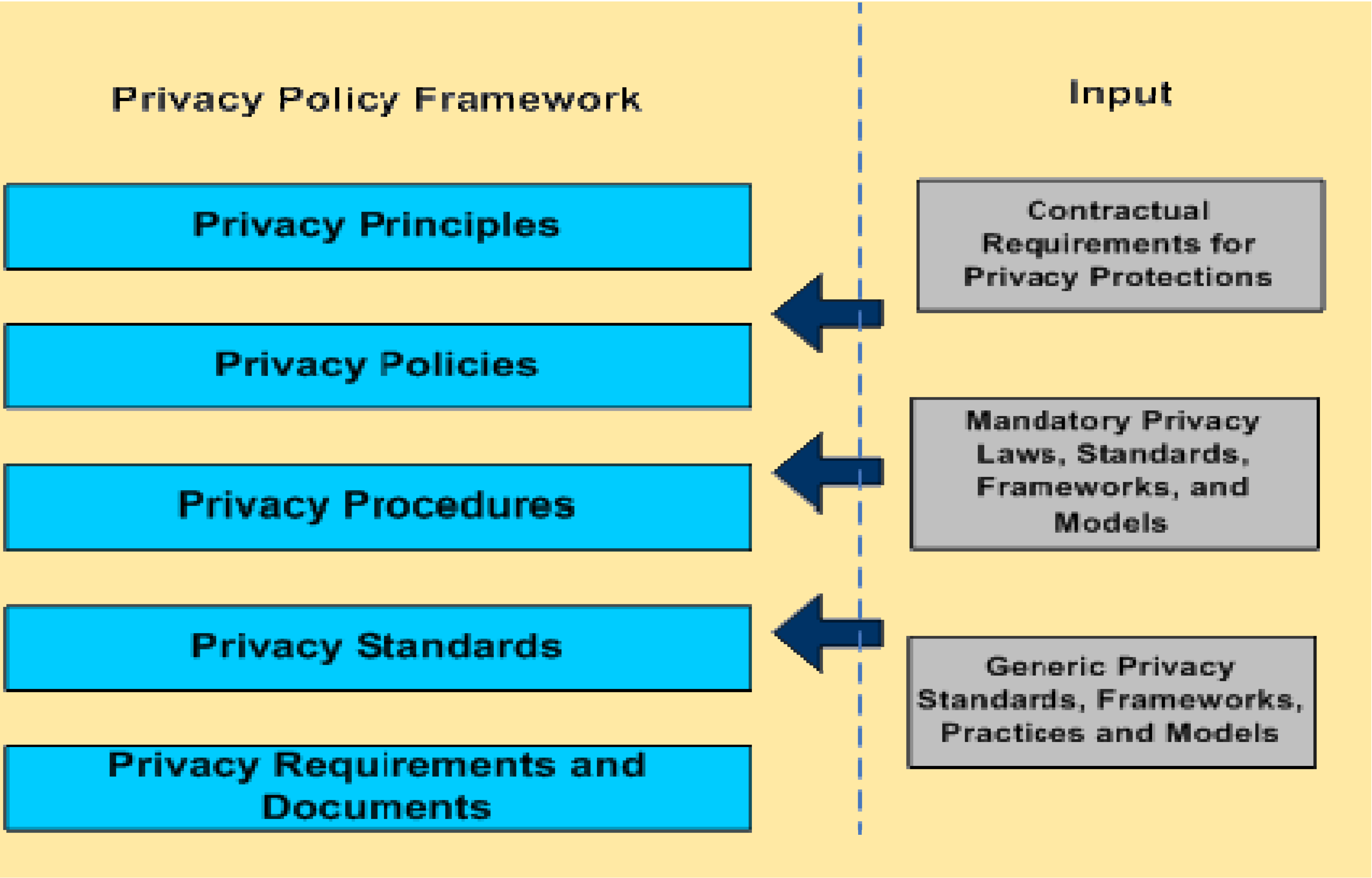
Is Life Cycle Managed?

Are Good Practices Applied?

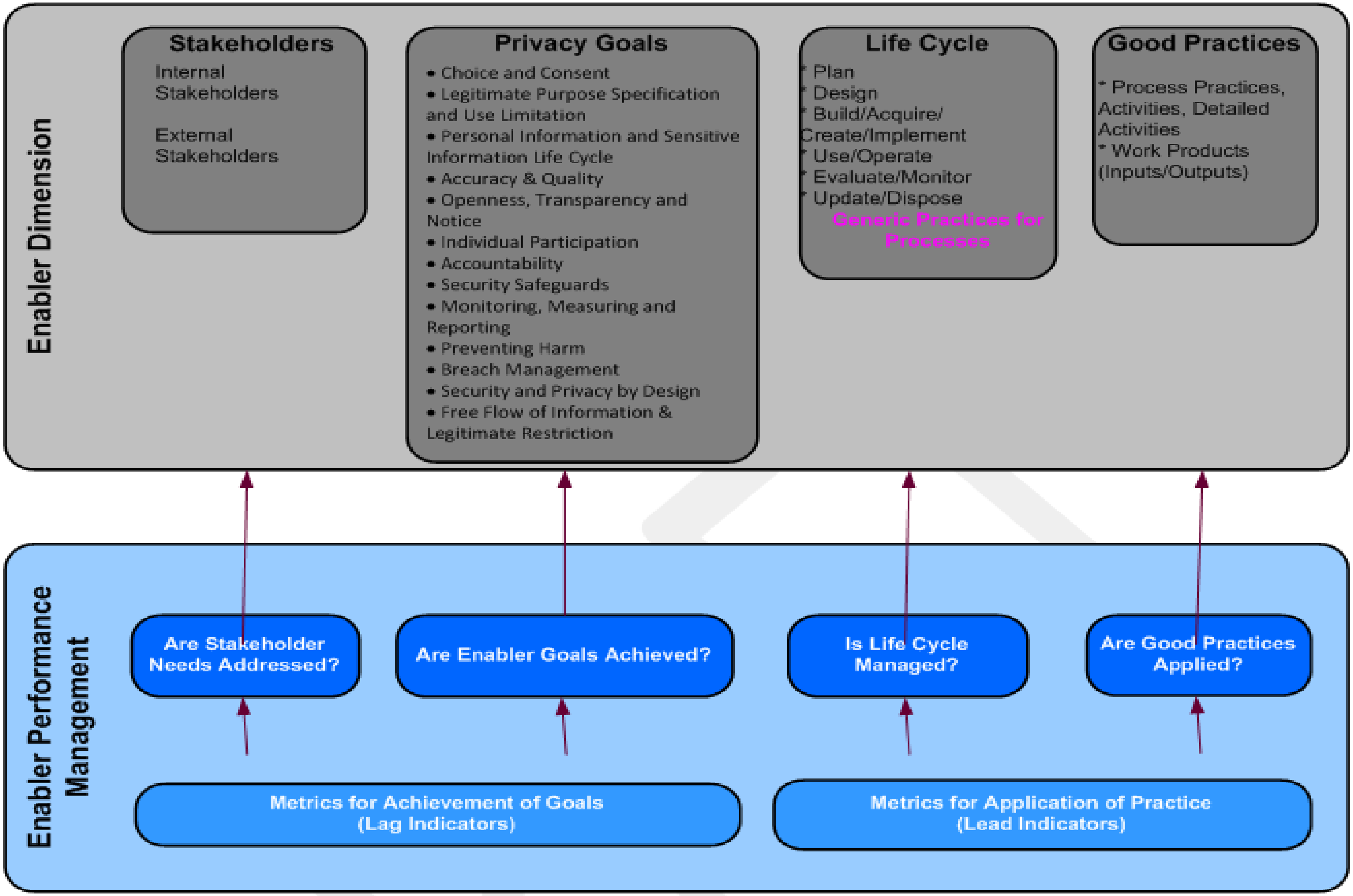
Metrics for Achievement of Goals (Lag Indicators)

Metrics for Application of Practice (Lead Indicators)

PRINCIPLES, POLICIES AND FRAMEWORKS


Privacy Policy Framework
Input
Privacy Principles
Privacy Policies
Privacy Procedures
Privacy Standards
Privacy Requirements and Documents
Contractual Requirements for Privacy Protections
Mandatory Privacy Laws, Standards, Frameworks, and Models
Generic Privacy Standards, Frameworks, Practices and Models

COBIT 5 PROCESSES ENABLER



Enabler Dimension

Stakeholders

Internal Stakeholders

External Stakeholders

Privacy Goals

- Choice and Consent
- Legitimate Purpose Specification and Use Limitation
- Personal Information and Sensitive Information Life Cycle
- Accuracy & Quality
- Openness, Transparency and Notice
- Individual Participation
- Accountability
- Security Safeguards
- Monitoring, Measuring and Reporting
- Preventing Harm
- Breach Management
- Security and Privacy by Design
- Free Flow of Information & Legitimate Restriction

Life Cycle

* Plan
* Design
* Build/Acquire/ Create/Implement
* Use/Operate
* Evaluate/Monitor
* Update/Dispose

Generic Practices for Processes

Good Practices

* Process Practices, Activities, Detailed Activities
* Work Products (Inputs/Outputs)

Enabler Performance Management

Are Stakeholder Needs Addressed?

Are Enabler Goals Achieved?

Is Life Cycle Managed?

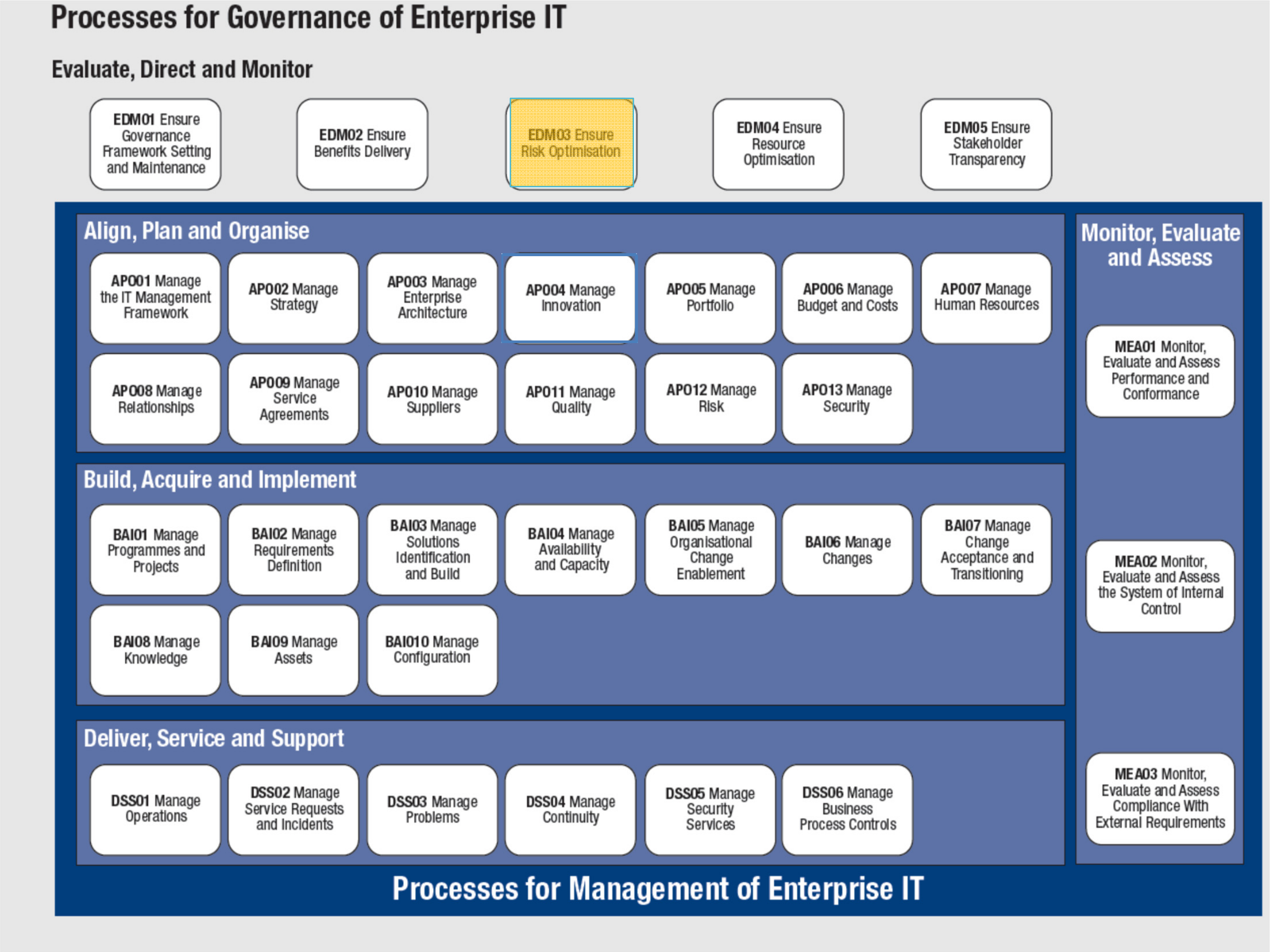
Are Good Practices Applied?

Metrics for Achievement of Goals (Lag Indicators)

Metrics for Application of Practice (Lead Indicators)

PROCESS

- For each process, a limited number of **privacy-specific** process goals are included, and for each process goal a limited number of **privacy-specific** example metrics is listed.
- For each practice, we will find **privacy-specific** practice inputs and outputs (work products), with indication of origin and destination and **privacy-specific** process activities
- Volume II will provide the details of privacy-specific processes (those that involve personal information, or could be used to reveal details about individuals and their associated lives)



Processes for Governance of Enterprise IT

Evaluate, Direct and Monitor

EDM01 Ensure Governance Framework Setting and Maintenance

EDM02 Ensure Benefits Delivery

EDM03 Ensure Risk Optimisation

EDM04 Ensure Resource Optimisation

EDM05 Ensure Stakeholder Transparency

Align, Plan and Organise

APO01 Manage the IT Management Framework

APO02 Manage Strategy

APO03 Manage Enterprise Architecture

APO04 Manage Innovation

APO05 Manage Portfolio

APO06 Manage Budget and Costs

APO07 Manage Human Resources

APO08 Manage Relationships

APO09 Manage Service Agreements

APO10 Manage Suppliers

APO11 Manage Quality

APO12 Manage Risk

APO13 Manage Security

Build, Acquire and Implement

BAI01 Manage Programmes and Projects

BAI02 Manage Requirements Definition

BAI03 Manage Solutions Identification and Build

BAI04 Manage Availability and Capacity

BAI05 Manage Organisational Change Enablement

BAI06 Manage Changes

BAI07 Manage Change Acceptance and Transitioning

BAI08 Manage Knowledge

BAI09 Manage Assets

BAI010 Manage Configuration

Deliver, Service and Support

DSS01 Manage Operations

DSS02 Manage Service Requests and Incidents

DSS03 Manage Problems

DSS04 Manage Continuity

DSS05 Manage Security Services

DSS06 Manage Business Process Controls

Monitor, Evaluate and Assess

MEA01 Monitor, Evaluate and Assess Performance and Conformance

MEA02 Monitor, Evaluate and Assess the System of Internal Control

MEA03 Monitor, Evaluate and Assess Compliance With External Requirements

Processes for Management of Enterprise IT

EDM02 ENSURE BENEFITS DELIVERY

EDM02 Ensure Benefits Delivery	Area: Governance Domain: Evaluate, Direct and Monitor
COBIT 5 Process Description Optimize the value contribution to the business from the business processes, IT services and IT assets resulting from investments made by IT at acceptable costs.	
COBIT 5 Process Purpose Statement Secure optimal value from IT-enabled initiatives, services and assets; cost-efficient delivery of solutions and services; and a reliable and accurate picture of costs and likely benefits so that business needs are supported effectively and efficiently.	
Primary Privacy Principles Involved: • **Principle 10: Preventing Harm** • **Principle 12: Breach Management** • **Principle 13: Security and Privacy by Design** • **Principle 14: Free Flow of Information & Legitimate Restriction**	
EDM02 Privacy-specific Process Goals and Metrics	
Privacy-specific Process Goals	Related Metrics
1. Benefits, costs and risk of information security investments are balanced and managed and contribute optimal value.	• Percent of risk reduction vs. budget deviation (budgeted vs. projection) • Level of stakeholder satisfaction with the privacy program requirements in place, based on surveys
1. Privacy harms and privacy breaches are prevented.	• Number of breaches • Level of Data Subject satisfaction with privacy, based on phone calls, complaints, and surveys
1. Information flow is not restricted.	• Number of communications with Data Protection Authorities necessary to enable personal information transmissions

EDM02 ENSURE BENEFITS DELIVERY

EDM02 Privacy-specific Process Practices, Inputs/Outputs and Activities	
Governance Practice	**Privacy-specific Activities**
EDM02.01 Evaluate value optimization. Continually evaluate the portfolio of IT-enabled investments, services and assets to determine the likelihood of achieving enterprise objectives and delivering value at a reasonable cost. Identify and make judgement on any changes in direction that need to be given to management to optimise value creation.	• Identify and record the requirements of stakeholders (such as shareholders, regulators, auditors and customers) for protecting their interests and delivering value through privacy management activity. Set direction accordingly. • Identify and record the expectations of Data Subjects for protecting their personal information and privacy and determine the value of the privacy management activities. Change direction as appropriate.
EDM02.02 Direct value optimization. Direct value management principles and practices to enable optimal value realisation from IT-enabled investments throughout their full economic life cycle.	• Establish a method of demonstrating the value of privacy management activities (including defining and collecting relevant data) to ensure the efficient use of existing privacy-related assets. • Establish a method of demonstrating the value to Data Subjects of privacy protection activities (including defining and collecting relevant data) to ensure the effective use of existing privacy-related assets. • Ensure the use of financial and non-financial measures to describe the added value of privacy initiatives. • Use business-focused methods of reporting on the added value of privacy initiatives.
EDM02.03 Monitor value optimization. Monitor the key goals and metrics to determine the extent to which the business is generating the expected value and benefits to the enterprise from IT-enabled investments and services. Identify significant issues and consider corrective actions.	• Track outcomes of privacy initiatives and compare to expectations to ensure value delivery against business goals. • Track outcomes of providing privacy practices transparency to Data Subjects and Data Protection Authorities and compare to expectations to ensure value delivery with original goals.

APO03 MANAGE ENTERPRISE ARCHITECTURE

APO03 Manage Enterprise Architecture	Area: Management Domain: Align, Plan and Organize

COBIT 5 Process Description

Establish a common architecture consisting of business process, information, data, application and technology architecture layers for effectively and efficiently realizing enterprise and IT strategies by creating key models and practices that describe the baseline and target architectures. Define requirements for taxonomy, standards, guidelines, procedures, templates and tools, and provide a linkage for these components. Improve alignment, increase agility, improve quality of information and generate potential cost savings through initiatives such as reuse of building block components.

COBIT 5 Process Purpose Statement

Represent the different building blocks that make up the enterprise and their interrelationships as well as the principles guiding their design and evolution over time, enabling a standard, responsive and efficient delivery of operational and strategic objectives.

Primary Privacy Principles Involved:

- **Principle 8: Security Safeguards**
- **Principle 9: Monitoring, Measuring and Reporting**
- **Principle 10: Preventing Harm**
- **Principle 11: Third Party / Vendor Management**
- **Principle 12: Breach Management**
- **Principle 13: Security and Privacy by Design**
- **Principle 14: Free Flow of Information & Legitimate Restriction**

APO03 Privacy-specific Process Goals and Metrics

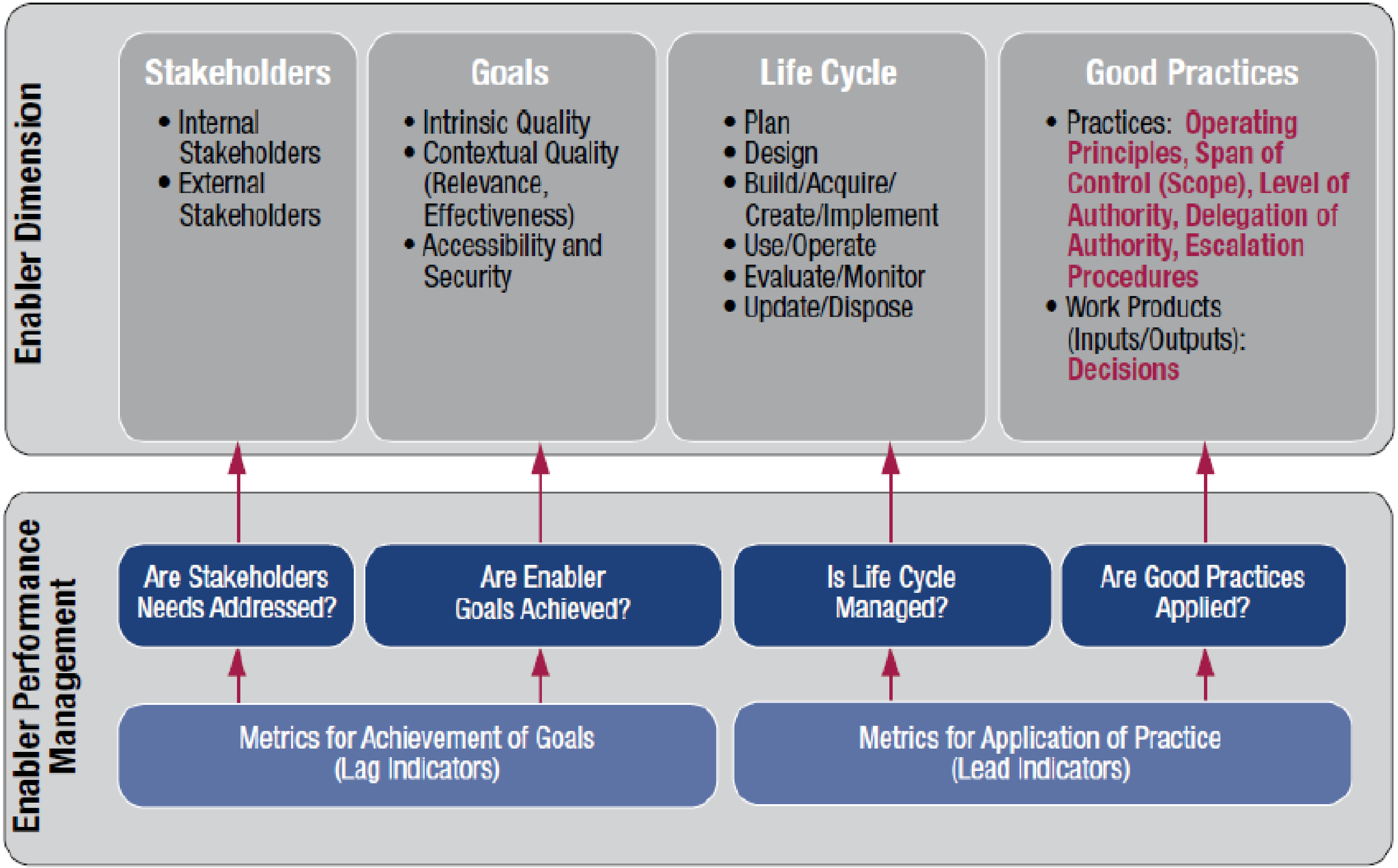
Privacy-specific Process Goals	Related Metrics
1. Privacy requirements are embedded within the enterprise architecture and translated into a formal privacy protection and management architecture.	• Number of exceptions to privacy management architecture standards
2. Privacy management architecture is understood as part of the overall enterprise architecture.	• Number of deviations between privacy management architecture and enterprise architecture
3. Privacy management architecture is aligned and evolves with changes to the enterprise architecture.	• Date of last review and/or update to privacy controls applied to enterprise architecture
4. A privacy management architecture framework and methodology are used to enable reuse of privacy management components across the enterprise.	• Percent of projects that use the privacy management architecture framework and methodology • Number of people trained in the privacy management framework and methodology

APO03 MANAGE ENTERPRISE ARCHITECTURE

APO03 Privacy-specific Process Practices, Inputs/Outputs and Activities	
Management Practice	**Privacy-specific Activities**
APO03.01 Develop the enterprise privacy management architecture vision. The privacy management architecture vision provides a first-cut, high-level description of the baseline and target architectures, covering the business, information, data, application, and technology domains. The architecture vision provides the sponsor with a key tool to sell the benefits of the proposed capability to stakeholders within the enterprise. The architecture vision describes how the new capability will meet enterprise goals and strategic objectives and address stakeholder concerns when implemented.	• Define privacy management objectives and requirements for the enterprise architecture. • Define the privacy management value proposition and related goals and metrics. • Consider industry good privacy practices, such as using the ISACA Privacy Principles, in building the privacy management architecture vision.
APO03.02 Define reference architecture. The reference architecture describes the current and target architectures for the business, information, data, application and technology domains.	• Ensure inclusion of privacy artefacts, policies and standards in the architecture repository. • Ensure privacy is integrated throughout all architectural domains (e.g., business, information, data, applications, technology). • Establish a centralised personal information inventory for all areas of the enterprise to use. • Establish a catalogue of privacy tools, standards and technologies to be available for enterprise-wide use

COBIT 5 ENABLER:

ORGANISATIONAL STRUCTURES



Enabler Dimension

Stakeholders

- Internal Stakeholders
- External Stakeholders

Goals

- Intrinsic Quality
- Contextual Quality (Relevance, Effectiveness)
- Accessibility and Security

Life Cycle

- Plan
- Design
- Build/Acquire/ Create/Implement
- Use/Operate
- Evaluate/Monitor
- Update/Dispose

Good Practices

- Practices: **Operating Principles, Span of Control (Scope), Level of Authority, Delegation of Authority, Escalation Procedures**
- Work Products (Inputs/Outputs): **Decisions**

Enabler Performance Management

Are Stakeholders Needs Addressed?

Are Enabler Goals Achieved?

Is Life Cycle Managed?

Are Good Practices Applied?

Metrics for Achievement of Goals (Lag Indicators)

Metrics for Application of Practice (Lead Indicators)

ORGANIZATIONAL STRUCTURES

New organizational structures

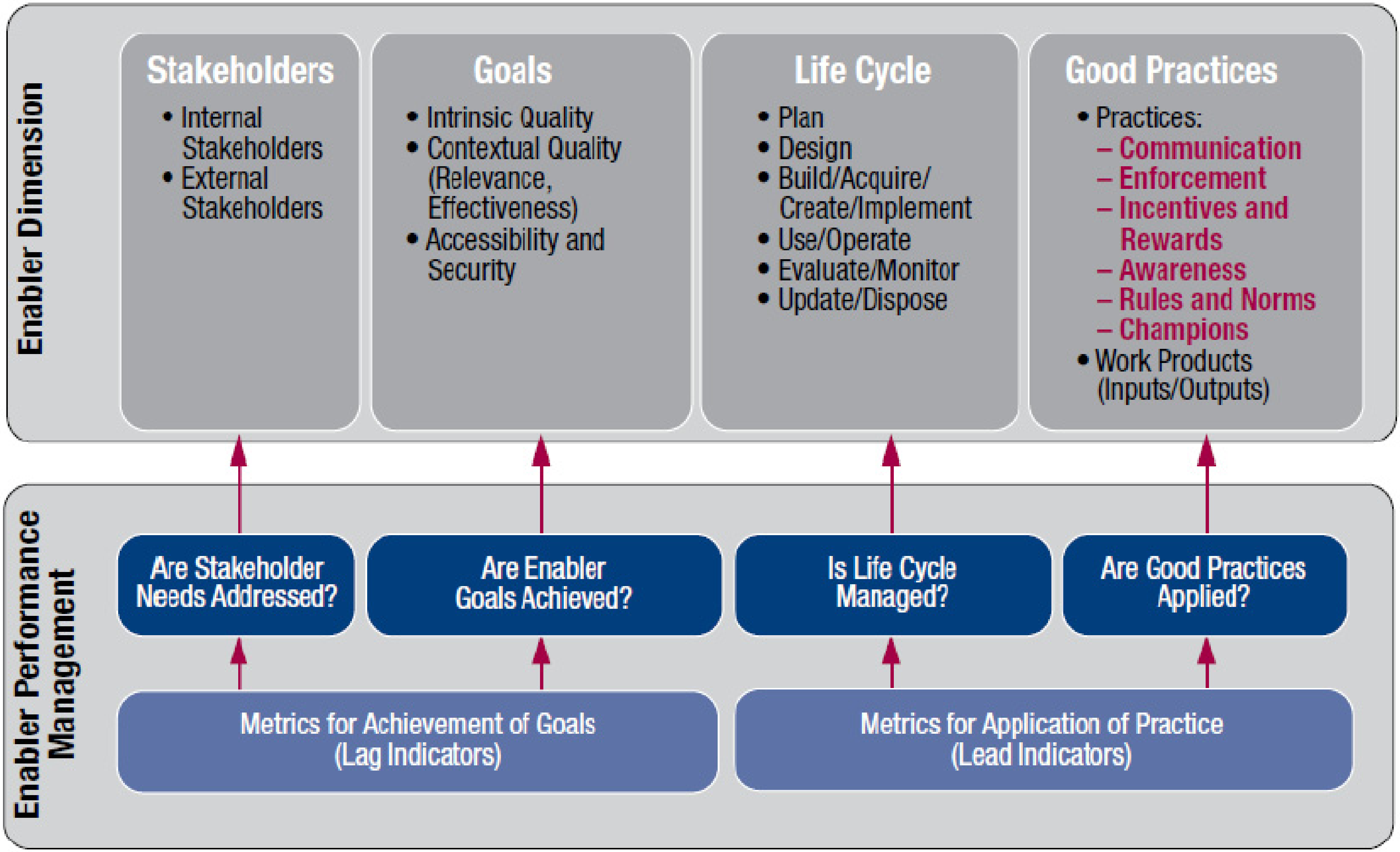
- Chief Privacy Officer (CPO) / Data Protection Officer (DPO)
- Privacy Steering Committee (PSC)
- Privacy Manager (PM)
- Enterprise Risk Management (ERM) Committee
- Data Processor

In Volume II detailed descriptions of these groups and roles will be provided:

- **Composition—**An appropriate skill set should be required of all members of the organisational group.
- **Mandate, operating principles, span of control and authority level—**These elements describe the practical arrangements of how the structure will operate, the boundaries of the organisational structure's decision rights, the responsibilities and accountabilities, and the escalation path or required actions in case of problems.
- **High-level RACI chart—**RACI charts link process activities to organisational structures and/or individual roles in the enterprise. The charts describe the level of involvement of each role, for each process practice: accountable, responsible, consulted or informed.
- **Inputs/Outputs—**A structure requires inputs (typically information) before it can make informed decisions; it produces outputs, such as decisions, other information or requests for additional inputs.

COBIT 5 ENABLER:

CULTURE, ETHICS AND BEHAVIOUR



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Life Cycle
- Plan
- Design
- Build/Acquire/ Create/Implement
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- Evaluate/Monitor
- Update/Dispose

Good Practices
- Practices:
  - Communication
  - Enforcement
  - Incentives and Rewards
  - Awareness
  - Rules and Norms
  - Champions
- Work Products (Inputs/Outputs)

Enabler Performance Management

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CULTURE, ETHICS AND BEHAVIOR ENABLER

Eight desirable privacy behaviors:

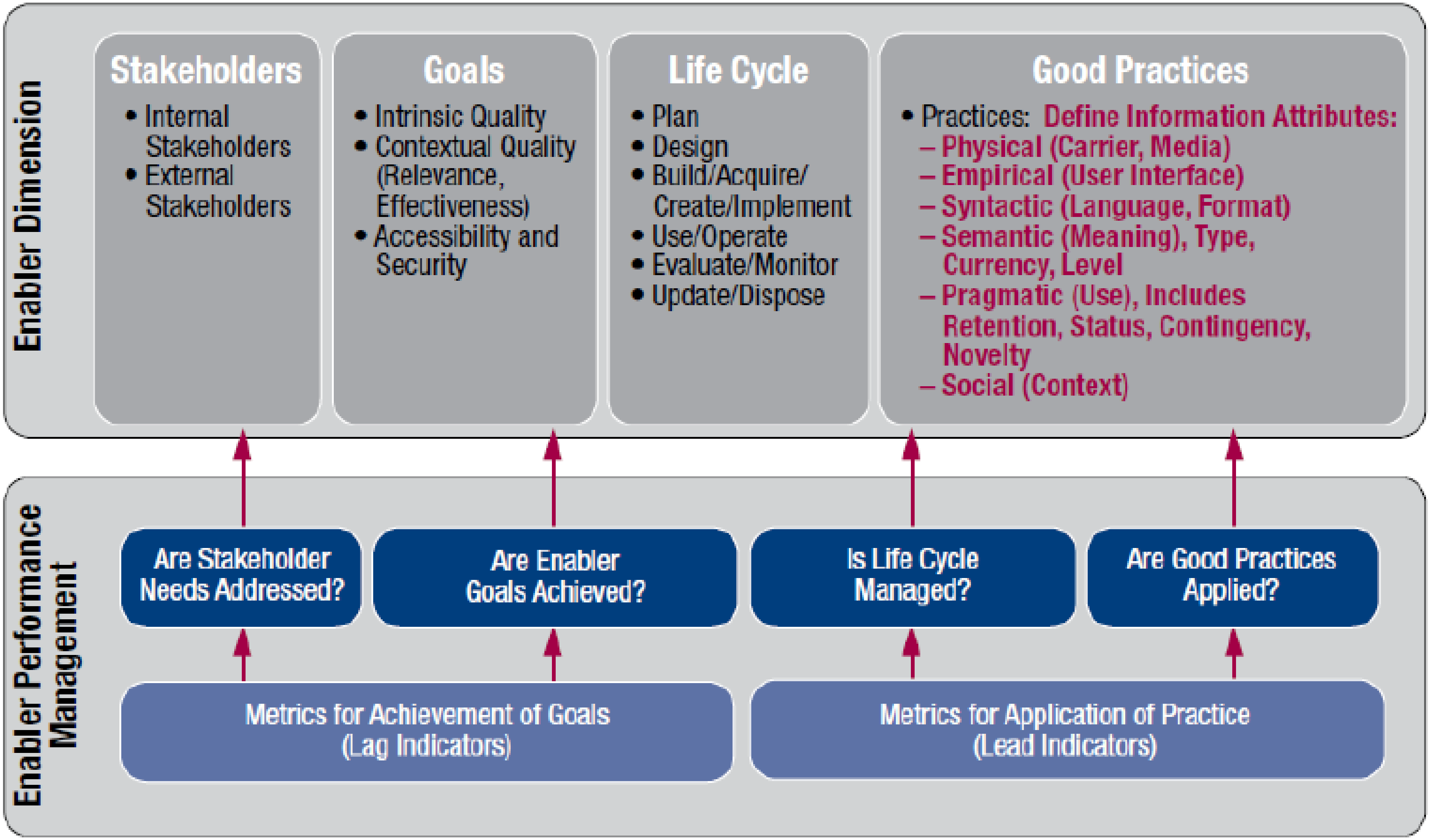
- Privacy protecting actions are performed in daily operations.
- Personnel respect the importance of privacy policies, procedures, standards and principles.
- Personnel are provided with sufficient and detailed privacy guidance, and are encouraged to participate in and proactively suggest privacy protection improvements.
- Everyone is responsible and accountable for the protection of personal information within the enterprise.
- Stakeholders are aware of how to identify and respond to privacy threats and vulnerabilities.
- Management proactively supports and anticipates new privacy protection innovations and communicates this to the enterprise.
- The enterprise is receptive to account for and deal with new privacy challenges.
- Business management engages in continuous cross-functional collaboration to allow for efficient and effective privacy programs.
- Executive management recognizes the business value of privacy protection.

CULTURE, ETHICS AND BEHAVIOR ENABLER

For each of the behaviors defined, the following attributes are:

- **Organisational privacy ethics:** Determined by the values by which the enterprise wants to operate
- **Individual privacy ethics:** Determined by the personal values of each individual in the enterprise and, to an important extent, depend on external factors, such as personal experiences, beliefs, socio-economic background and geographic location
- **Leadership:** Ways that leadership can influence desired behavior and privacy-impacting actions:
  - Privacy policy enforcement and rules and norms
  - Incentives and rewards
  - Communications and activities
- Detailed description will be in Volume II

COBIT 5 ENABLER: INFORMATION



Enabler Dimension

Stakeholders

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- Intrinsic Quality
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Life Cycle

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- Evaluate/Monitor
- Update/Dispose

Good Practices

- Practices: Define Information Attributes:
  – Physical (Carrier, Media)
  – Empirical (User Interface)
  – Syntactic (Language, Format)
  – Semantic (Meaning), Type, Currency, Level
  – Pragmatic (Use), Includes Retention, Status, Contingency, Novelty
  – Social (Context)

Enabler Performance Management

Are Stakeholder Needs Addressed?

Are Enabler Goals Achieved?

Is Life Cycle Managed?

Are Good Practices Applied?

Metrics for Achievement of Goals (Lag Indicators)

Metrics for Application of Practice (Lead Indicators)

INFORMATION

The following items are discussed:
1. The information model
2. Examples of common information types
3. Information stakeholders and how to identify the impacted parties within the enterprise
4. Information life cycle, describing the different phases of information management in this context

For each of the examples of common information types, we provide:

- **Goals**—This describes a number of goals to be achieved, using the three categories defined in the COBIT 5 information model. For these information types, goals for information are divided into three dimensions of quality:
  - Intrinsic quality—The extent to which data values are in conformance with the actual or true values
  - Contextual quality—The extent to which information is applicable to the task of the information user and is presented in an intelligible and clear manner, recognizing that information quality depends on the context of use
  - Privacy/accessibility quality—The extent to which information is available or obtainable
- **Life cycle—A** specific description of the life cycle requirements
- **Good practices** for this type of information—A description of typical contents and structure

EXAMPLES OF INFORMATION TYPES 1/2

- Privacy management strategy
- Privacy management budget
- Privacy management plan
- Privacy policies
- Privacy principles
- Privacy standards
- Privacy procedures
- Privacy protection requirements, which can include:
  - Privacy protection configuration requirements
  - SLA/OLA privacy protection requirements
- Training and Awareness material

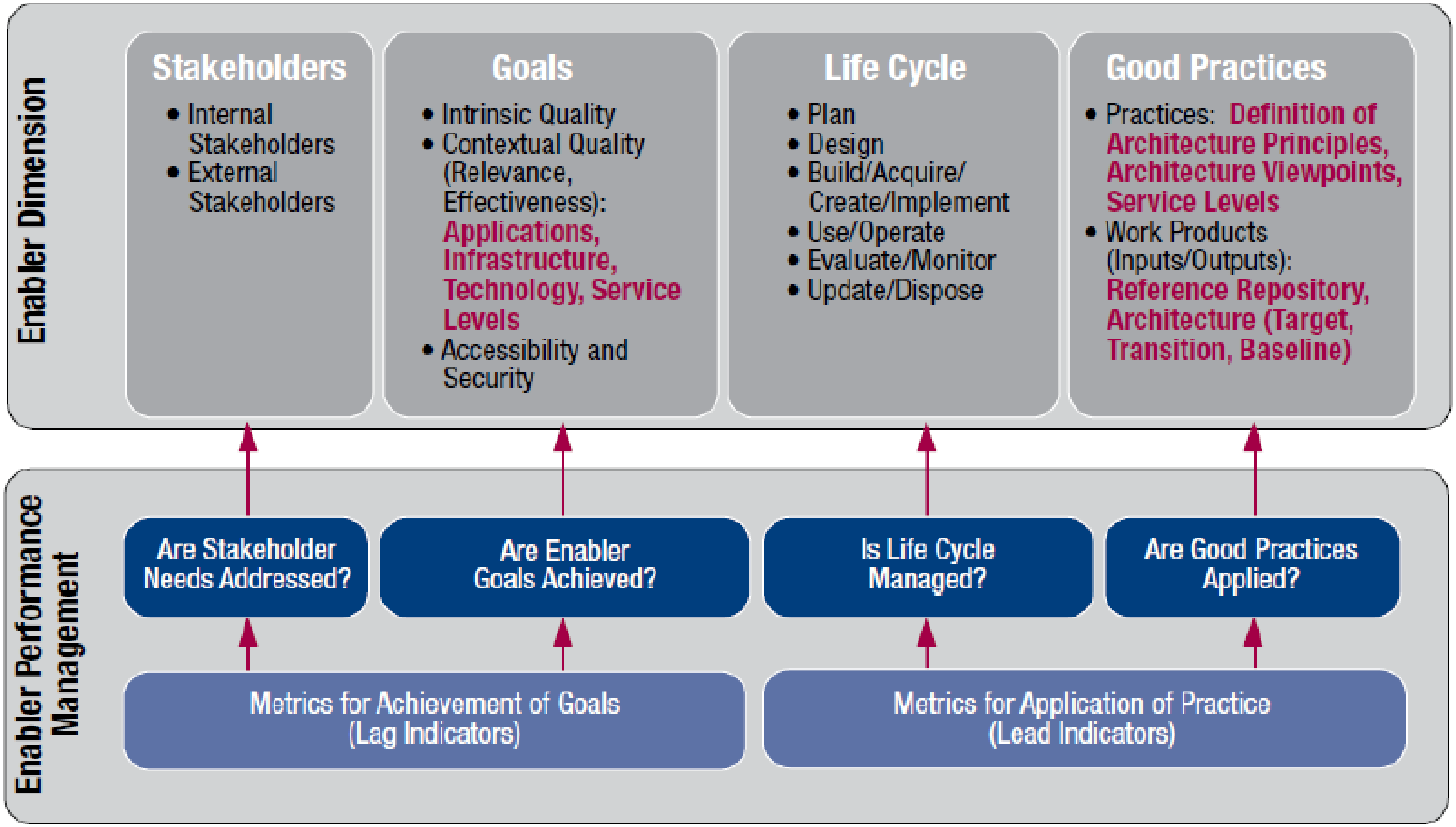
EXAMPLES OF INFORMATION TYPES 2/2

- Privacy management review reports, which include:
  - Privacy management audit findings
  - Privacy management maturity report
  - Privacy impact assessment
  - Privacy management-related risk management
    - Threat analysis
    - Vulnerability assessment reports
    - Harms analysis
- Privacy management dashboard (or equivalent), which includes:
  - Privacy breaches
  - Privacy management problems
  - Privacy compliance fines and penalties
  - Privacy management metrics

	Privacy Information Type									
Stakeholder	Privacy Strategy	Privacy Budget	Privacy Plan	Privacy Policies	Privacy Requirements	Privacy Awareness Material	Privacy Review Reports	Privacy Services Catalogue	Privacy Risk Profile	Privacy Program Dashboard
Internal: Enterprise										
Board	U			I		U	I		A	
Chief Executive Officer (CEO)	U			A		U	I		U	
Chief Financial Officer (CFO)		A		U		U			U	
Chief Privacy Officer (CPO)	O	U	O	O	A	A	A	A	U	U
Chief information security officer (CISO)										
Privacy Steering Committee (PSC)	A	O	A	U	U	I	U	I	U	U
Business Unit Head				U	O	U		U	U	
Head of Human Resources (HR)				U	U	U				
Internal: IT										
Chief information officer (CIO)/IT manager	U	O	U	U	U	U	I		U	U
Privacy Manager (PM)	U	U	U	O	U	O	O	O	O	O
External										
Investors		I				I				
Insurers				I		I	I		I	
Data Protection Authorities	I/U	I/U	I/U	I/U	I/U	I/U	I/U	I/U	I/U	I/U
Regulators						I				
Business Partners		I			I	I	I			
Vendors/Suppliers					I					
External Auditors	I		I	I	I	I	I	I	I	I

COBIT 5 ENABLER:

SERVICES, INFRASTRUCTURE AND APPLICATIONS



Enabler Dimension

Stakeholders

- Internal Stakeholders
- External Stakeholders

Goals

- Intrinsic Quality
- Contextual Quality (Relevance, Effectiveness): **Applications, Infrastructure, Technology, Service Levels**
- Accessibility and Security

Life Cycle

- Plan
- Design
- Build/Acquire/ Create/Implement
- Use/Operate
- Evaluate/Monitor
- Update/Dispose

Good Practices

- Practices: **Definition of Architecture Principles, Architecture Viewpoints, Service Levels**
- Work Products (Inputs/Outputs): **Reference Repository, Architecture (Target, Transition, Baseline)**

Enabler Performance Management

Are Stakeholder Needs Addressed?

Are Enabler Goals Achieved?

Is Life Cycle Managed?

Are Good Practices Applied?

Metrics for Achievement of Goals (Lag Indicators)

Metrics for Application of Practice (Lead Indicators)

SERVICES, INFRASTRUCTURE AND APPLICATIONS

Examples of potential privacy-related services (1/2)

- Privacy Management Architecture
- Privacy Training and Awareness Communications
- Provide a process to allow Data Subjects (individuals) to get access to their associated personal information
- Provide privacy protecting development (development in line with privacy by design standards)
- Privacy Assessments
- Provide legal resources for privacy protections
- Provide systems with adequate privacy protections and configurations, supporting privacy requirements and privacy architecture
- Provide user (data processor) access and access rights to personal information in line with business and legal requirements

SERVICES, INFRASTRUCTURE AND APPLICATIONS

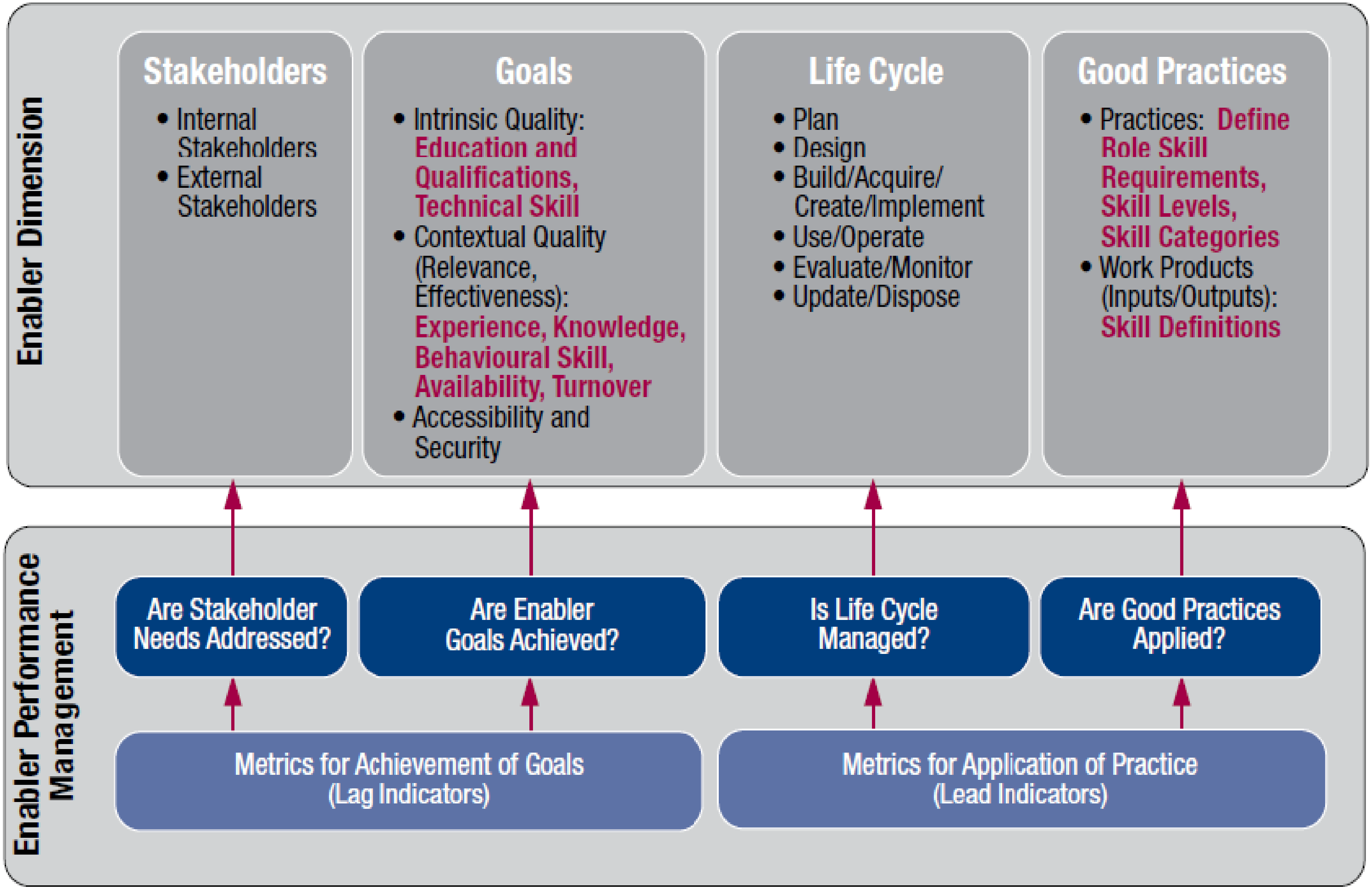
Examples of potential privacy-related services (2/2)

- Provide adequate protection against inappropriate sharing, misuse, unauthorized access, malware, external attacks and intrusion attempts
- Provide adequate privacy incident response
- Provide privacy protection testing
- Provide monitoring and alert services for privacy-impacting events

For each of these service capabilities, we provide:

- Detailed description of the service, including business functionality
- Attributes: The inputs, supporting technologies (including applications and infrastructure)
- Goal: The quality and compliance goals for each service capability and the related metrics

COBIT 5 ENABLER:
PEOPLE, SKILLS AND COMPETENCIES



Enabler Dimension

Stakeholders

- Internal Stakeholders
- External Stakeholders

Goals

- Intrinsic Quality: **Education and Qualifications, Technical Skill**
- Contextual Quality (Relevance, Effectiveness): **Experience, Knowledge, Behavioural Skill, Availability, Turnover**
- Accessibility and Security

Life Cycle

- Plan
- Design
- Build/Acquire/Create/Implement
- Use/Operate
- Evaluate/Monitor
- Update/Dispose

Good Practices

- Practices: **Define Role Skill Requirements, Skill Levels, Skill Categories**
- Work Products (Inputs/Outputs): **Skill Definitions**

Enabler Performance Management

Are Stakeholder Needs Addressed?

Are Enabler Goals Achieved?

Is Life Cycle Managed?

Are Good Practices Applied?

Metrics for Achievement of Goals (Lag Indicators)

Metrics for Application of Practice (Lead Indicators)

PEOPLE, SKILLS AND COMPETENCIES

To effectively operate the privacy function within an enterprise, individuals with appropriate knowledge and experience (e.g., skills and competencies) must exercise that function. Some typical privacy-related skills and competencies are:

- Privacy management governance
- Privacy management strategy formulation
- Privacy risks and harms management
- Privacy management architecture development
- Privacy management operations
- Privacy impact assessment, testing and compliance

For each of the skills and competencies, the following attributes are described:

- Skill description and definition
- Experience, education and qualifications required for the skill/competency
- Knowledge, technical skills and behavioral skills
- Related structure (if relevant):

ADAPTING THE ISACA PRIVACY PRINCIPLES TO THE ENTERPRISE ENVIRONMENT

This section provides generic guidance for a privacy governance and management. Major considerations discussed include:

- Considering the context for which personal information is collected, and how it is used within the enterprise's privacy context.
- How to create the appropriate privacy protection environment for your organization to match your business environment.
- Recognizing and addressing privacy protection pain points and trigger events.
- Enabling privacy protection change.
- Implementing a life cycle approach to privacy governance and management.

IMPLEMENTATION LIFE CYCLE SEVEN PHASES

- Phase 1: What are the privacy protection program drivers?
- Phase 2: Where is the enterprise now with the privacy management program?
- Phase 3: Where does the enterprise want to be with the privacy management program?
- Phase 4: What needs to be done for the privacy management program?
- Phase 5: How does the enterprise get the new or updated privacy management program?
- Phase 6: Was there success with the privacy management program plans?
- Phase 7: How does the enterprise achieve continued privacy protection program improvement?

ADAPTING THE ISACA PRIVACY PRINCIPLES TO THE ENTERPRISE ENVIRONMENT

- The ISACA Privacy Program Management Guide was created to provide information assurance practitioners of all kinds (information security, privacy, risk management, audit, legal, etc.) with a practical guide to creating, improving and evaluating a privacy program specific to a practitioner’s own organization, and to support or be used in conjunction with other privacy frameworks, good practices and standards.
- In order to facilitate this work, we describe and explore the relationship of the ISACA privacy principles to some of the other existing privacy frameworks, good practices and standards.

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Y a-t-il des questions?