# Technology and Privacy Management

**John T. Sabo, CISSP**
**Director, Security and Privacy Initiatives**
**CA**

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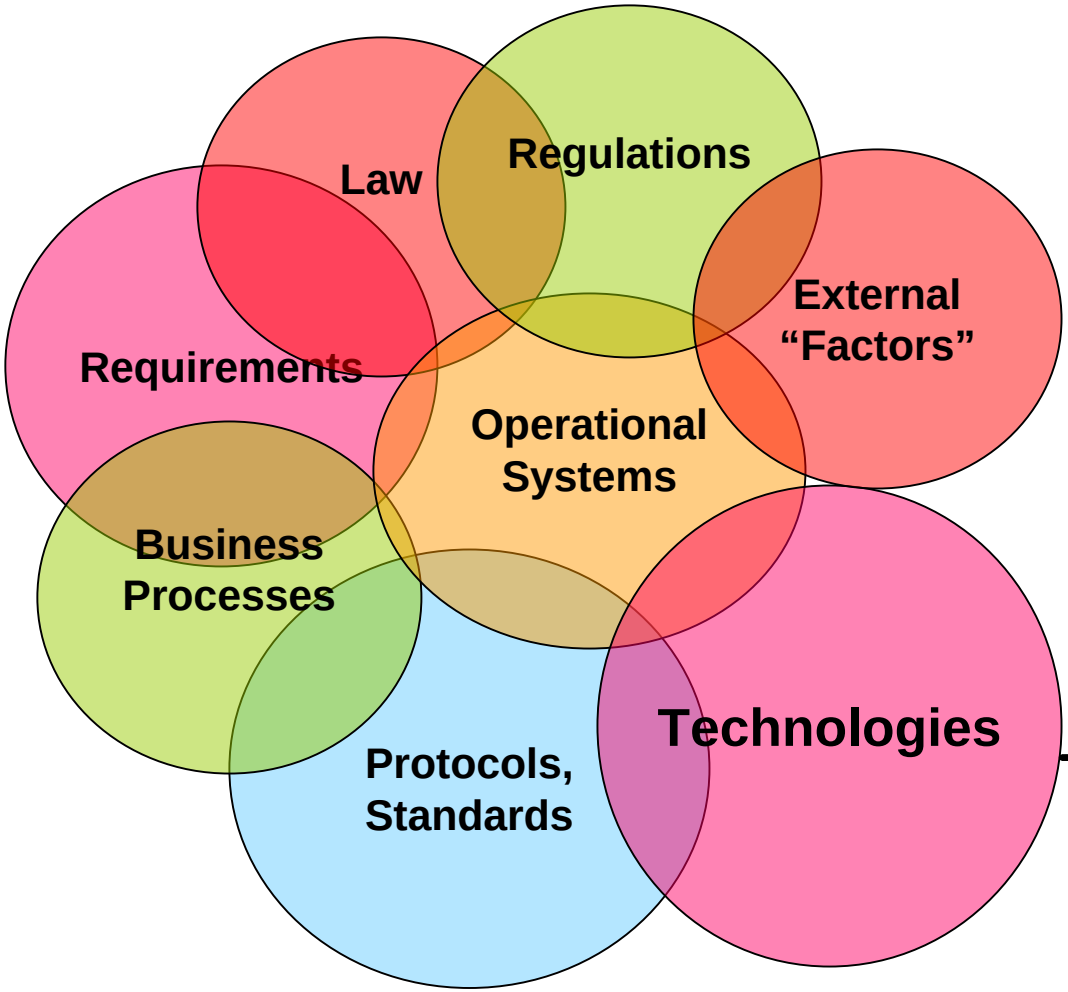
# Work Underway

Privacy Framework - International Security Trust and Privacy Alliance (ISTPA – www.istpa.org)

# Information Privacy "Environment"




DPIAC Framework
OMB M-03-22
FIPS-201 Section 2-4
SP-800-53
…
Media
Successful attacks
Legislative oversight

- Core
- Instantiation
- Implementation
- Integration
- Operation
- Interoperation

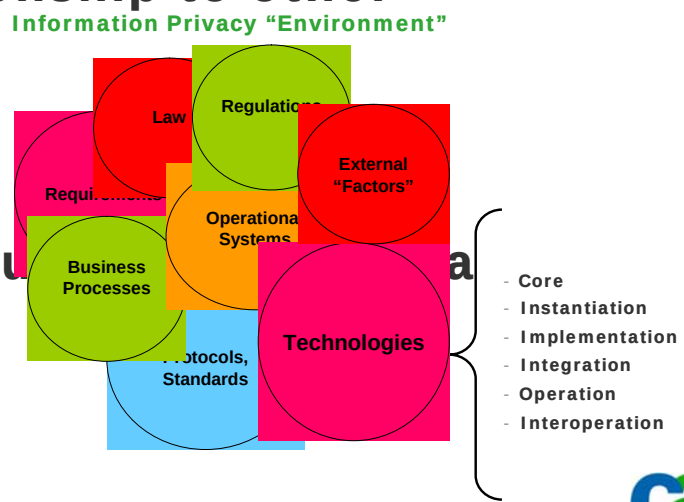
***Repeat this set across multiple jurisdictions***

# Rigor Needed to Improve Information Privacy Operations, Management, and Compliance

- Technology will change
- New technologies will be invented and used
- Use will change
- “Environment” will change
- ...everything will change
- Therefore...address technology in structured way

# Possible Approach to Mapping Technology

- **Model the Technology Set (agree on how to structure "left column" of matrix)**
- **Define Core technology (relational dbms, RFID Chip, search engine, Internet, etc.)**
  - **Instantiation (particular core technology as delivered, installed)**
  - **Implementation (its use in a particular system or application)**
  - **Integration (its operational relationship to other technologies)**
  - **Operation (its actual use)**
  - **Interoperation with Other Sets**
- **Prioritize analysis – start with most u… a… mining? Externally-collected data?)**
- **Test the Model**



# Discussion

John T. Sabo

john.t.sabo@ca.com

# DHS Data privacy and Integrity Advisory Committee Evaluation Framework for Programs, Technologies, Applications

- **Step 1. Scope**
- Description of the program, technology, or application.
- **Step 2. Legal Basis**
- Description of the legal authority and legal limits for program, technology, or application.
- **Step 3. Risk Management: Efficacy**
- Results of their risk analysis and estimation of the efficacy of the program, technology, or application.
- **Step 4. Effects on Privacy Interests**
- Analysis of the privacy interests implicated by the program, technology, or
- Application – privacy, fairness, liberty, data security.
- **Step 5. Recommendations**
- Assessment of the results of the first four steps and recommendations on
- the program, technology, or application.

# Privacy Impact Assessments

- M-03-22 - OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002
  - Section 208 of the E-Government Act of 2002 - privacy impact assessments for electronic information systems and collections addresses:
    - **what information is to be collected**
    - **why the information is being collected**
    - **intended use of the information**
    - **with whom the information will be shared**
    - **what opportunities individuals have to decline to provide information**
    - **how the information will be secured**
    - **whether a system of records is being created under the Privacy Act, 5 U.S.C. 552a**
  - Not Addressed:
    - **Individual access**
    - **Amendment of records**
    - **Maintain accounting of all disclosures of information**
    - **Assure records are accurate, relevant, timely, complete**
    - **Notice**
    - **Integrated systems**