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Information security, cybersecurity and privacy protection — Privacy operationalisation model and method for engineering (POMME)

Sécurité de l'information, cybersécurité et protection de la vie privée — Méthode et modèle d'opérationnalisation de la confidentialité pour l'ingénierie (POMME)

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Foreword

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Introduction

Privacy principles and associated privacy control requirements face a number of challenges arising from the need to comply with consumer expectations and global regulations for privacy which are continually evolving, as well as the complex and rapidly changing ecosystem of devices, networks and applications through which personally identifiable information (PII) flows. To face these challenges, privacy principles and associated privacy control requirements are expected to be operationalized into sets of capability functions and mechanisms. The privacy operationalization model and method for engineering (POMME) addresses these challenges, particularly in interconnected and interdependent applications and rapid lifecycle development processes.

Achieving effective operationalization in this environment is a critical responsibility of privacy engineers and the developers and solution providers who support them. They should not only understand the technology interfaces and interdependencies among components as they design these systems, but also ensure that the appropriate privacy controls are selected and implemented across the entire data flow landscape relevant to their analysis.

POMME provides a structured and extensible analytic model and method to accomplish these objectives. It is based on the OASIS Privacy Management Reference Model and Methodology (PMRM),[1] and it reflects findings expressed in ISO/IEC TR 27550, which provides extensive information on privacy engineering that organizations can use to integrate privacy engineering into system lifecycle processes. It also describes the relationship between privacy engineering and other engineering viewpoints (system engineering, security engineering, and risk management).

POMME supports the operationalization of privacy as it is defined in ISO/IEC 29100, utilizing a process following ISO/IEC/IEEE 24774. The primary focus of POMME is on the functional architecture and implementation details of privacy engineering, rather than the “policy” aspects of privacy, such as privacy principles, privacy impact assessments (PIAs) and privacy control statements. These policy elements are essential inputs into the engineering process and are already addressed by existing standards, codes of practice, and guidance listed in the Bibliography. POMME utilizes these elements to support the functional role of the privacy engineer.

Through the use of POMME, a privacy engineer can define the domain boundaries of a target of analysis (TOA) and research, document, and organize the information (e.g. standards, privacy policies, and technical data). By doing so, the capabilities necessary to implement privacy control requirements can be identified. This enables the privacy engineer to:

a) determine the functions needed to implement privacy control requirements;

b) understand the relationship among controls, particularly when controls are interdependent or networked or cloud-based;

c) select the specific implementation mechanisms (such as code or product configurations) that deliver the required privacy controls in their operational state.

An additional benefit of POMME is that its structured processes support improved usage and integration of privacy management tools, such as privacy-specific open source software.

Figure 1 and Table 1 illustrate the POMME operationalization model and method.

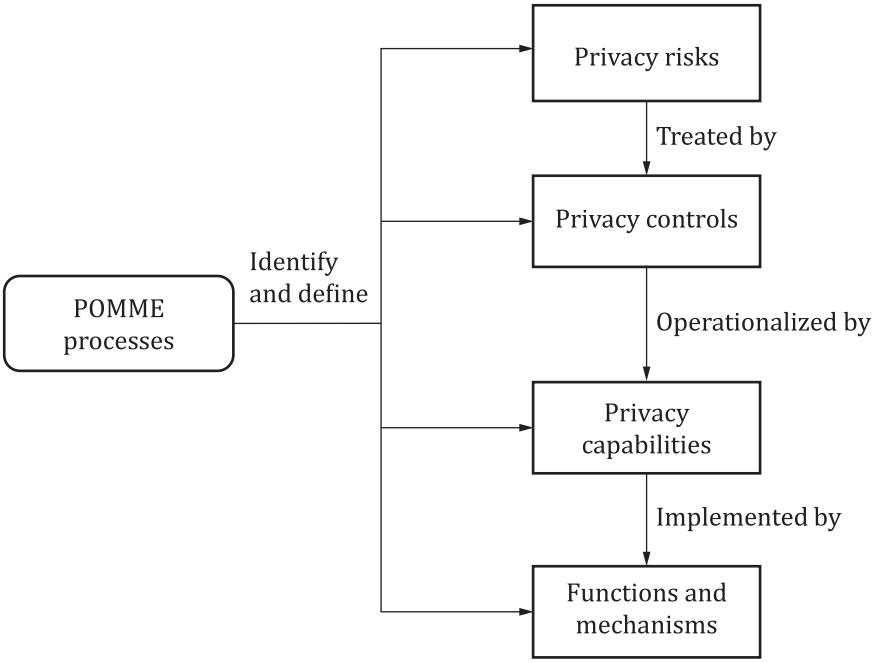

Figure 1 — POMME operationalization model

Table 1 includes an inventory process which consists of eight activities and an operationalization process which consists of five activities.

Table 1 — POMME method

POMME process	Clause	Activity
Initial information inventory process	6.3	Define and describe the TOA
	6.4	Participant and information source identification
	6.5	Systems and processes identification
	6.6	Domains and domain owners identification
	6.7	Intra-domain roles and responsibilities identification
	6.8	Touch points identification
	6.9	Data flows identification
	6.10	PII identification
Privacy controls, privacy control requirements, capabilities, risk assessment and iteration	7.3	Privacy control specification
	7.4	Privacy control requirement specification
	7.5	Capabilities specification
	7.6	Risk assessment
	7.7	Iteration

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1 Scope

This guidance document describes a model and method to operationalize the privacy principles specified in ISO/IEC 29100 into sets of controls and functional capabilities. The method is described as a process that builds upon ISO/IEC/IEEE 24774.

This document is designed for use in conjunction with relevant privacy and security standards and guidance which impact privacy operationalization. It supports networked, interdependent applications and systems. This document is intended for engineers and other practitioners developing systems controlling or processing personally identifiable information.

2 Normative references

There are no normative references in this document.