

NIST PRIVACY FRAMEWORK TRANSLATED INTO PLAIN ENGLISH

ID. IDENTIFY DATA PRIVACY UNIVERSE

ID.IM IDENTIFY SCOPE OF PRIVACY PROGRAM

1	Clarify the scope of your organization’s data privacy program.	DO	DN	NA	
2	Understand your organization’s data processing environment.	DO	DN	NA	
3	Understand your organization’s process owners and operators.	DO	DN	NA	
4	Understand your organization’s personal data sources and uses.	DO	DN	NA	
5	Understand who provides personal data to your organization.	DO	DN	NA	
6	Understand your organization’s data processing activities.	DO	DN	NA	
7	Understand the purpose of each data processing action.	DO	DN	NA	
8	Understand the elements of each data processing action.	DO	DN	NA	
9	Understand data processing flows, roles, and interactions.	DO	DN	NA	
10	Use this knowledge to manage your organization’s privacy risks.	DO	DN	NA	

ID.IM.1 IDENTIFY DATA PROCESSING ACTIVITIES

11	Establish an inventory of your organization’s data processing activities.	DO	DN	NA	
12	Establish an inventory of your organization’s data processing systems.	DO	DN	NA	
13	Establish an inventory of your organization’s data processing products.	DO	DN	NA	
14	Establish an inventory of your organization’s data processing services.	DO	DN	NA	

ID.IM.2 IDENTIFY PROCESS OWNERS AND OPERATORS

15	Establish an inventory of data processing owners and operators.	DO	DN	NA	
16	Identify the data processing roles performed by each owner and operator.	DO	DN	NA	
17	Identify the data processing roles performed by people in your organization.	DO	DN	NA	
18	Identify roles related to the systems that handle data within your organization.	DO	DN	NA	
19	Identify roles related to the products that handle data within your organization.	DO	DN	NA	

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20	Identify roles related to the services that handle data within your organization.	DO	DN	NA
21	Identify roles related to the components that handle data within your organization.	DO	DN	NA
22	Identify the data processing roles performed by relevant third parties.	DO	DN	NA
23	Identify data processing roles carried out by your providers.	DO	DN	NA
24	Identify roles related to the systems that providers supply.	DO	DN	NA
25	Identify roles related to the products that providers supply.	DO	DN	NA
26	Identify roles related to the services that providers supply.	DO	DN	NA
27	Identify roles related to the components that providers supply.	DO	DN	NA
28	Identify data processing roles carried out by your partners.	DO	DN	NA
29	Identify roles related to the systems that partners manage.	DO	DN	NA
30	Identify roles related to the products that partners manage.	DO	DN	NA
31	Identify roles related to the services that partners manage.	DO	DN	NA
32	Identify roles related to the components that partners manage.	DO	DN	NA
33	Identify data processing roles carried out by your customers.	DO	DN	NA
34	Identify roles related to the systems that customers use.	DO	DN	NA
35	Identify roles related to the products that customers use.	DO	DN	NA
36	Identify roles related to the services that customers use.	DO	DN	NA
37	Identify roles related to the components that customers use.	DO	DN	NA
38	Identify data processing roles carried out by your developers.	DO	DN	NA
39	Identify roles related to the systems that developers support.	DO	DN	NA
40	Identify roles related to the products that developers support.	DO	DN	NA

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41		Identify roles related to the services that developers support.	DO	DN	NA	
42		Identify roles related to the components that developers support.	DO	DN	NA	

ID.IM.3 IDENTIFY PROVIDERS OF PERSONAL DATA

43		Establish an inventory of people who provide personal data to your organization.	DO	DN	NA	
44		Identify categories of people who provide personal data to your organization.	DO	DN	NA	
45		Identify customer categories and consider their privacy needs and requirements.	DO	DN	NA	
46		Identify consumer categories and consider their privacy needs and requirements.	DO	DN	NA	
47		Identify employee categories and consider their privacy needs and requirements.	DO	DN	NA	

ID.IM.4 IDENTIFY DATA PROCESSING ACTIONS

48		Establish an inventory of data processing actions that your organization performs.	DO	DN	NA	
49		Establish an inventory of data processing actions that data processing systems perform.	DO	DN	NA	
50		Establish an inventory of data collection actions that data processing systems perform.	DO	DN	NA	
51		Establish an inventory of data utilization actions that data processing systems perform.	DO	DN	NA	
52		Establish an inventory of data disclosure actions that data processing systems perform.	DO	DN	NA	
53		Establish an inventory of data generation actions that data processing systems perform.	DO	DN	NA	
54		Establish an inventory of data transmission actions that data processing systems perform.	DO	DN	NA	
55		Establish an inventory of data transformation actions that data processing systems perform.	DO	DN	NA	
56		Establish an inventory of data retention actions that data processing systems perform.	DO	DN	NA	
57		Establish an inventory of data disposal actions that data processing systems perform.	DO	DN	NA	
58		Establish an inventory of data sharing actions that data processing systems perform.	DO	DN	NA	
59		Establish an inventory of data logging actions that data processing systems perform.	DO	DN	NA	

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60	Establish an inventory of data processing actions that data processing products perform.	DO	DN	NA
61	Establish an inventory of data collection actions that data processing products perform.	DO	DN	NA
62	Establish an inventory of data utilization actions that data processing products perform.	DO	DN	NA
63	Establish an inventory of data disclosure actions that data processing products perform.	DO	DN	NA
64	Establish an inventory of data generation actions that data processing products perform.	DO	DN	NA
65	Establish an inventory of data transmission actions that data processing products perform.	DO	DN	NA
66	Establish an inventory of data transformation actions that data processing products perform.	DO	DN	NA
67	Establish an inventory of data retention actions that your products perform.	DO	DN	NA
68	Establish an inventory of data disposal actions that data processing products perform.	DO	DN	NA
69	Establish an inventory of data sharing actions that data processing products perform.	DO	DN	NA
70	Establish an inventory of data logging actions that data processing products perform.	DO	DN	NA
71	Establish an inventory of data processing actions that data processing services perform.	DO	DN	NA
72	Establish an inventory of data collection actions that data processing services perform.	DO	DN	NA
73	Establish an inventory of data utilization actions that data processing services perform.	DO	DN	NA
74	Establish an inventory of data disclosure actions that data processing services perform.	DO	DN	NA
75	Establish an inventory of data generation actions that data processing services perform.	DO	DN	NA
76	Establish an inventory of data transmission actions that data processing services perform.	DO	DN	NA
77	Establish an inventory of data transformation actions that data processing services perform.	DO	DN	NA
78	Establish an inventory of data retention actions that data processing services perform.	DO	DN	NA
79	Establish an inventory of data disposal actions that data processing services perform.	DO	DN	NA
80	Establish an inventory of data sharing actions that data processing services perform.	DO	DN	NA
81	Establish an inventory of data logging actions that data processing services perform.	DO	DN	NA

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ID.IM.5 IDENTIFY THE PURPOSE OF EACH ACTION

82	Establish the purpose of each data processing action performed.	DO	DN	NA	
83	Establish the purpose of each data action performed by each data processing system.	DO	DN	NA	
84	Establish the purpose of each data collection action performed by each data processing system.	DO	DN	NA	
85	Establish the purpose of each data utilization action performed by each data processing system.	DO	DN	NA	
86	Establish the purpose of each data disclosure action performed by each data processing system.	DO	DN	NA	
87	Establish the purpose of each data generation action performed by each data processing system.	DO	DN	NA	
88	Establish the purpose of each data transmission action performed by each data processing system.	DO	DN	NA	
89	Establish the purpose of each data transformation action performed by each data processing system.	DO	DN	NA	
90	Establish the purpose of each data retention action performed by each data processing system.	DO	DN	NA	
91	Establish the purpose of each data disposal action performed by each data processing system.	DO	DN	NA	
92	Establish the purpose of each data sharing action performed by each data processing system.	DO	DN	NA	
93	Establish the purpose of each data logging action performed by each data processing system.	DO	DN	NA	
94	Establish the purpose of each data action performed by each data processing product.	DO	DN	NA	
95	Establish the purpose of each data collection action performed by each data processing product.	DO	DN	NA	
96	Establish the purpose of each data utilization action performed by each data processing product.	DO	DN	NA	
97	Establish the purpose of each data disclosure action performed by each data processing product.	DO	DN	NA	
98	Establish the purpose of each data generation action performed by each data processing product.	DO	DN	NA	
99	Establish the purpose of each data transmission action performed by each data processing product.	DO	DN	NA	
100	Establish the purpose of each data transformation action performed by each data processing product.	DO	DN	NA	
101	Establish the purpose of each data retention action performed by each data processing product.	DO	DN	NA	
102	Establish the purpose of each data disposal action performed by each data processing product.	DO	DN	NA	

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ID. IDENTIFY DATA PRIVACY UNIVERSE

103	Establish the purpose of each data sharing action performed by each data processing product.	DO	DN	NA	
104	Establish the purpose of each data logging action performed by each data processing product.	DO	DN	NA	
105	Establish the purpose of each data action performed by each data processing service.	DO	DN	NA	
106	Establish the purpose of each data collection action performed by each data processing service.	DO	DN	NA	
107	Establish the purpose of each data utilization action performed by each data processing service.	DO	DN	NA	
108	Establish the purpose of each data disclosure action performed by each data processing service.	DO	DN	NA	
109	Establish the purpose of each data generation action performed by each data processing service.	DO	DN	NA	
110	Establish the purpose of each data transmission action performed by each data processing service.	DO	DN	NA	
111	Establish the purpose of each data transformation action performed by each data processing service.	DO	DN	NA	
112	Establish the purpose of each data retention action performed by each data processing service.	DO	DN	NA	
113	Establish the purpose of each data disposal action performed by each data processing service.	DO	DN	NA	
114	Establish the purpose of each data sharing action performed by each data processing service.	DO	DN	NA	
115	Establish the purpose of each data logging action performed by each data processing service.	DO	DN	NA	

ID.IM.6 IDENTIFY THE ELEMENTS OF EACH ACTION

116	Establish an inventory of data elements within each data action.	DO	DN	NA	
117	Establish an inventory of data elements within data actions performed by each system.	DO	DN	NA	
118	Identify data elements within each data collection action performed by each system.	DO	DN	NA	
119	Identify data elements within each data utilization action performed by each system.	DO	DN	NA	
120	Identify data elements within each data disclosure action performed by each system.	DO	DN	NA	
121	Identify data elements within each data generation action performed by each system.	DO	DN	NA	
122	Identify data elements within each data transmission action performed by each system.	DO	DN	NA	

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123	Identify data elements within each data transformation action performed by each system.	DO	DN	NA
124	Identify data elements within each data retention action performed by each system.	DO	DN	NA
125	Identify data elements within each data disposal action performed by each system.	DO	DN	NA
126	Identify data elements within each data sharing action performed by each system.	DO	DN	NA
127	Identify data elements within each data logging action performed by each system.	DO	DN	NA
128	Establish an inventory of data elements within data actions performed by each product.	DO	DN	NA
129	Identify data elements within each data collection action performed by each product.	DO	DN	NA
130	Identify data elements within each data utilization action performed by each product.	DO	DN	NA
131	Identify data elements within each data disclosure action performed by each product.	DO	DN	NA
132	Identify data elements within each data generation action performed by each product.	DO	DN	NA
133	Identify data elements within each data transmission action performed by each product.	DO	DN	NA
134	Identify data elements within each data transformation action performed by each product.	DO	DN	NA
135	Identify data elements within each data retention action performed by each product.	DO	DN	NA
136	Identify data elements within each data disposal action performed by each product.	DO	DN	NA
137	Identify data elements within each data sharing action performed by each product.	DO	DN	NA
138	Identify data elements within each data logging action performed by each product.	DO	DN	NA
139	Establish an inventory of data elements within data actions performed by each service.	DO	DN	NA
140	Identify data elements within each data collection action performed by each service.	DO	DN	NA
141	Identify data elements within each data utilization action performed by each service.	DO	DN	NA
142	Identify data elements within each data disclosure action performed by each service.	DO	DN	NA
143	Identify data elements within each data generation action performed by each service.	DO	DN	NA

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ID. IDENTIFY DATA PRIVACY UNIVERSE

144	Identify data elements within each data transmission action performed by each service.	DO	DN	NA	
145	Identify data elements within each data transformation action performed by each service.	DO	DN	NA	
146	Identify data elements within each data retention action performed by each service.	DO	DN	NA	
147	Identify data elements within each data disposal action performed by each service.	DO	DN	NA	
148	Identify data elements within each data sharing action performed by each service.	DO	DN	NA	
149	Identify data elements within each data logging action performed by each service.	DO	DN	NA	

ID.IM.7 IDENTIFY DATA PROCESSING ENVIRONMENT

150	Establish where data processing is being carried out.	DO	DN	NA	
151	Establish the geographic location of data processing activities.	DO	DN	NA	
152	Identify your organization's internal data processing environment.	DO	DN	NA	
153	Identify your organization's external data processing environment.	DO	DN	NA	
154	Identify your organization's third party data processing environment.	DO	DN	NA	
155	Identify your organization's cloud based data processing environment.	DO	DN	NA	

ID.IM.8 IDENTIFY DATA PROCESSING FLOWS AND ROLES

156	Establish data maps for data processing activities.	DO	DN	NA	
157	Establish data maps for data processing systems.	DO	DN	NA	
158	Map interactions of individuals with data processing systems.	DO	DN	NA	
159	Map interactions of third parties with data processing systems.	DO	DN	NA	
160	Map data actions and data elements of data processing systems.	DO	DN	NA	
161	Map data actions and data elements of these system components.	DO	DN	NA	
162	Identify roles of data process owners and operators of system components.	DO	DN	NA	
163	Establish data maps for data processing products.	DO	DN	NA	

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164	Map interactions of individuals with data processing products.	DO	DN	NA
165	Map interactions of third parties with data processing products.	DO	DN	NA
166	Map data actions and data elements of data processing products.	DO	DN	NA
167	Map data actions and data elements of these product components.	DO	DN	NA
168	Identify roles of data process owners and operators of product components.	DO	DN	NA
169	Establish data maps for data processing services.	DO	DN	NA
170	Map interactions of individuals with data processing services.	DO	DN	NA
171	Map interactions of third parties with data processing services.	DO	DN	NA
172	Map data actions and data elements of data processing services.	DO	DN	NA
173	Map data actions and data elements of these service components.	DO	DN	NA
174	Identify roles of data process owners and operators of service components.	DO	DN	NA

ID.BE IDENTIFY YOUR BUSINESS ENVIRONMENT

175	Clarify your organization's business environment.	DO	DN	NA
176	Identify and understand your organization's mission.	DO	DN	NA
177	Identify and understand your organization's objectives.	DO	DN	NA
178	Identify and understand your organization's stakeholders.	DO	DN	NA
179	Identify and understand your organization's activities.	DO	DN	NA
180	Use this knowledge to clarify business requirements.	DO	DN	NA
181	Use this business knowledge to help develop your privacy program.	DO	DN	NA
182	Use this business knowledge to help develop your privacy roles.	DO	DN	NA
183	Use this business knowledge to help develop privacy responsibilities.	DO	DN	NA
184	Use this business knowledge to help make risk management decisions.	DO	DN	NA

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ID.BE.1 IDENTIFY DATA PROCESSING ECOSYSTEM

185	Identify your organization's role in the data processing ecosystem.	DO	DN	NA	
186	Identify the relationships your organization has in the data processing ecosystem.	DO	DN	NA	
187	Identify how you interact with entities that create or deploy data processing systems.	DO	DN	NA	
188	Identify how you interact with entities that create or deploy system components.	DO	DN	NA	
189	Identify how you interact with entities that create or deploy data processing products.	DO	DN	NA	
190	Identify how you interact with entities that create or deploy product components.	DO	DN	NA	
191	Identify how you interact with entities that create or deploy data processing services.	DO	DN	NA	
192	Identify how you interact with entities that create or deploy service components.	DO	DN	NA	
193	Communicate your organization's role in the data processing ecosystem.	DO	DN	NA	

ID.BE.2 IDENTIFY YOUR ORGANIZATION'S PRIORITIES

194	Establish business priorities for your organization.	DO	DN	NA	
195	Consider your organization's mission and establish business priorities.	DO	DN	NA	
196	Consider your organization's objectives and establish business priorities.	DO	DN	NA	
197	Consider your organization's activities and establish business priorities.	DO	DN	NA	
198	Communicate your organization's business priorities.	DO	DN	NA	

ID.BE.3 IDENTIFY ORGANIZATION'S REQUIREMENTS

199	Identify data processing functions that support your organization's priorities.	DO	DN	NA	
200	Identify data processing systems that support your organization's priorities.	DO	DN	NA	
201	Identify key business requirements for these data processing systems.	DO	DN	NA	
202	Communicate key requirements for these data processing systems.	DO	DN	NA	
203	Identify data processing products that support your organization's priorities.	DO	DN	NA	

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204	Identify key business requirements for these data processing products.	DO	DN	NA
205	Communicate key requirements for these data processing products.	DO	DN	NA
206	Identify data processing services that support your organization’s priorities.	DO	DN	NA
207	Identify key business requirements for these data processing services.	DO	DN	NA
208	Communicate key requirements for these data processing services.	DO	DN	NA

ID.RA IDENTIFY PRIVACY RISKS AND RESPONSES

209	Carry out data privacy risk assessments for your organization.	DO	DN	NA
210	Identify and understand the privacy risks individuals could encounter.	DO	DN	NA
211	Prioritize the privacy risks that individuals could possibly encounter.	DO	DN	NA
212	Identify and understand the impacts potential privacy problems could have.	DO	DN	NA
213	Identify the impact privacy problems could have on organizational operations.	DO	DN	NA
214	Identify the impact privacy problems could have on the organization’s mission.	DO	DN	NA
215	Identify the impact privacy problems could have on the organization’s priorities.	DO	DN	NA
216	Identify the impact privacy problems could have on the organization’s functions.	DO	DN	NA
217	Identify the impact privacy problems could have on the organization’s reputation.	DO	DN	NA
218	Identify the impact privacy problems could have on the organization’s workforce.	DO	DN	NA
219	Identify the impact privacy problems could have on the organization’s culture.	DO	DN	NA
220	Consider high priority privacy risks and develop a suitable set of responses.	DO	DN	NA

ID.RA.1 IDENTIFY YOUR DATA PRIVACY CONTEXT

221	Consider each data processing system and identify all related contextual factors.	DO	DN	NA
222	Consider data actions performed by each system and identify all related contextual factors.	DO	DN	NA
223	Etcetera			

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