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Privacy Technology Certification

Outline of the Body of Knowledge (BOK) for the **Certified Information Privacy Technologist (CIPT)**



Foundational Principles I.

- A. General Understanding of Privacy Risk Models and Frameworks and their Roles in Laws and Guidance
 - a. FIPPs and OECD Principles
 - b. Privacy frameworks (e.g., NIST/NICE, ISO/IEC 27701 and BS100112 Privacy Information Management System)
 - Nissenbaum's Contextual Integrity
 - d. Calo's Harms Dimensions
 - e. FAIR (Factor Analysis in Information Risk)
- General Understanding of Privacy by Design Principles
 - a. Full Life Cycle Protection
 - b. Embedded into Design
 - c. Full Functionality
 - d. Visibility and Transparency
 - e. Proactive not Reactive
 - Privacy by Default
 - Respect for Users
- C. General Understanding of Privacy-related Technology Fundamentals
 - a.Risk concepts (e.g., threats, vulnerability)
 - b.Data/security incidents vs. personal data/privacy breaches
 - c. Privacy and security practices within an organization
 - d.Understanding how technology supports information governance in an organization
 - e.External Data Protection and Privacy notices
 - f. Internal Data Protection and Privacy guidelines, policies and procedures
 - g.Third-party contracts and agreements
 - h.Data inventories, classification and records of processing
 - i. Enterprise architecture and data flows, including cross-border transfers
 - j. Data Protection and Privacy impact assessments (DPIA/PIAs)
 - k. Privacy related Key Risk Indicators (KRIs) and Key Performance Indicators (KPIs)
- D. General Understanding of the Data Life Cycle
 - a. Collection

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b. Use

- c. Disclosure
- d. Transfer
- e. Retention
- f. Destruction

II. The Privacy Technologist's Role in the Context of the Organization

A. General responsibilities

- a. Understanding various roles within the privacy team (e.g., DPO, CPO, legal compliance, security
- b.Implementing industry Privacy Standards and Frameworks
- c. Translating legal and regulatory requirements into practical technical and/or operational solutions
- d.Consulting on internal privacy notices and external privacy policies
- e.Consulting on contractual and regulatory requirements

B. Technical Responsibilities

- a. Advising on technology elements of privacy and security practices
- b. Advising on the privacy implications of new and emerging technologies
- c. Implementing privacy and security technical measures
- d.Implementing and developing privacy-enhancing technologies and tools
- e.Advising on the effective selection and implementation during acquisition of privacy impacting products
- f. Advising on privacy by design and security and privacy impact assessments in systems development
- g. Handling individuals' rights requests (e.g., access, deletion)
- h.Supporting records of processing activities (RoPA), automation of inventory and data flow mapping
- i. Reviewing security incidents/investigations and advising on breach notification
- j. Performing and supporting IT privacy oversights and audits including 3rd party assessment
- k. Developing, compiling and reporting Key Risk Indicators (KRIs) and Key Performance Indicators (KPIs)

III. Privacy Risks, Threats and Violations

A. Data Ethics

- a.Legal versus Ethical (e.g., when working with countries that lack privacy laws)
- b.Moral issues (e.g., gaining access to sensitive personal information through illegal means and using information for personal advantage)
- c. Societal issues (e.g., manipulating societal conversations and attitudes on controversial topics)
- d.Bias/discrimination (e.g., incorporating personal preference into data decisions)

B. <u>During Data Collection</u>

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a. Asking individuals to reveal personal information

- b. Tracking and surveillance (e.g., geo-tagging, geo-social patterns)
- c. Lack of informed consent
- d. Automatic collection
- e. Inaccuracies
- f. Extracting from publicly available sources
- g. Jurisdictional implications (e.g., localization, government access)

C. <u>During Data Use</u>

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- a. Insecurity
- b. Identification/re-identification
- c. Aggregation
- d. Secondary Use
- e. Exclusion
- f. Profiling

D. <u>During Data Dissemination</u>

- a. Disclosure
- b. Distortion
- c. Exposure
- d. Breach of Confidentiality (personal data breaches)
- e. Increased accessibility
- f. Blackmail
- g. Appropriation

E. <u>Intrusion</u>, <u>Decisional Interference and Self-Representation</u>

- a. Behavioral advertising
- b. Cyberbullying
- c. Social engineering
- d. Blackmail
- e. Dark patterns

F. Software Security

- a. Vulnerability management
- b. Intrusion detection and prevention
- c. Change management (e.g., patches, upgrades)
- d. Open-source vs Closed-source
- e. Possible violations by service providers

IV. Privacy-Enhancing Strategies, Techniques and Technologies

A. Data Oriented Strategies

- a. Separate
- b. Minimize
- c. Abstract
- d. Hide

B. Process Oriented Strategies

- a. Informing the Individual
- b. User Control
- c. Policy and Process Enforcement

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d. Demonstrate Compliance

C. Techniques

- a. Aggregation
- b. De-identification
- c. Anonymization
- d. Pseudonymization
- e. Encryption
- f. Identity and access management
- g. Authentication
- h. Technology implications of Privacy Regulations and Techniques needed for:
 - . Processing/verification of Individual Rights Request (IRR)
 - ii. Ability for record processing activities related to customer data
 - iii. Notice and Consent; obligations management
 - iv. Retention Requirements
 - v. Privacy Incident Reporting

v. Privacy Engineering

- A. The Privacy Engineering role in the organization
 - a. Effective Implementation
 - b. Technological Controls
 - c. Protecting Privacy during the Development Lifecycle
- B. Privacy Engineering Objectives
 - a. Predictability
 - b. Manageability
 - c. Disassociability
- C. Privacy Design Patterns
 - a. Design patterns to emulate
 - b. Dark patterns to avoid
- D. Privacy Risks in Software
 - a. Controls/countermeasures

VI. Privacy by Design Methodology

- A. The Privacy by Design Process
 - a. Goal Setting
 - b. Documenting Requirements
 - c. Understanding quality attributes
 - d. Identify information needs
 - e. Privacy risk assessment and analysis
 - f. High-level design
 - g. Low-level design and implementation
 - h. Impose controls
 - i. Architect

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ii. Secure

- iii. Supervise
- iv. Balance
- i. Testing and validation

B. Privacy Interfaces and User Experience

- a.Design Effects on User Behavior
- b.UX Design and Useability of privacy-related functions
- c. Privacy Notices, Setting and Consent Management
- d.Usability Testing

C. Value Sensitive Design

- a. How Design Affects Users
- b.Strategies for Skillful Practice

D. Ongoing Vigilance

- a. Privacy audits and IT control reviews
- b. Code reviews
- c. Code audits
- d. Runtime behavior monitoring
- e. Software evolution
- f. Data cleansing in production and non-production environments

VII. Evolving or Emerging Technologies in Privacy

A. Robotics and Internet of Things (IoT)

- a. Mobile phones
- b. Wearable devices
- c. Edge Computing
- d.Smart homes and cities (e.g., CCTV and tracking/surveillance)
- e.Robots
- f. Drones

B. Internet/eCommerce

- a.Adtech
- b. Cookies and other webtracking technologies
- c. Alerts and notifications
- d.Location tracking
- e.Chatbots
- f. Online/mobile payments

C. Biometrics

- a. Facial recognition
- b.Speech recognition
- c. Fingerprint ID
- d.Behavioral profiling

D. Corporate IT Services

- a. Shared Data centers
- b.Cloud-based infrastructure

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c. Third-party vendor IT solutions

d.Remote working

e. Video calls and conferencing

E. Advanced Computing

a. Data Management and Analytics

b.Artificial Intelligence

c. Quantum computing

d.Blockchain

e.Cryptocurrencies

f. Non-fungible tokens (NFT

g.Machine and Deep Learning

F. Social Networks

a.Social media

b.Messaging and video calling

c. Virtual/Augmented reality