

This is a preview of "ISO 31700-1:2023". [Click here to purchase the full version from the ANSI store.](#)

First edition
2023-01

Consumer protection — Privacy by design for consumer goods and services —

Part 1: High-level requirements

*Protection des consommateurs — Respect de la vie privée assuré
dès la conception des biens de consommation et services aux
consommateurs —*

Partie 1: Exigences de haut niveau



Reference number
ISO 31700-1:2023(E)

© ISO 2023



COPYRIGHT PROTECTED DOCUMENT

© ISO 2023

All rights reserved. Unless otherwise specified, or required in the context of its implementation, no part of this publication may be reproduced or utilized otherwise in any form or by any means, electronic or mechanical, including photocopying, or posting on the internet or an intranet, without prior written permission. Permission can be requested from either ISO at the address below or ISO's member body in the country of the requester.

ISO copyright office
CP 401 • Ch. de Blandonnet 8
CH-1214 Vernier, Geneva
Phone: +41 22 749 01 11
Email: copyright@iso.org
Website: www.iso.org

Published in Switzerland

This is a preview of "ISO 31700-1:2023". [Click here to purchase the full version from the ANSI store.](#)

Contents

	Page
Foreword	vi
Introduction	vii
1 Scope	1
2 Normative references	1
3 Terms and definitions	1
4 General	8
4.1 Overview.....	8
4.2 Designing capabilities to enable consumers to enforce their privacy rights	9
4.2.1 Requirement.....	9
4.2.2 Explanation.....	9
4.2.3 Guidance.....	10
4.3 Developing capability to determine consumer privacy preferences	10
4.3.1 Requirement.....	10
4.3.2 Explanation.....	11
4.3.3 Guidance.....	11
4.4 Designing human computer interface (HCI) for privacy	11
4.4.1 Requirement.....	11
4.4.2 Explanation.....	12
4.4.3 Guidance.....	12
4.5 Assigning relevant roles and authorities.....	12
4.5.1 Requirement.....	12
4.5.2 Explanation.....	12
4.5.3 Guidance.....	12
4.6 Establishing multi-functional responsibilities	13
4.6.1 Requirement.....	13
4.6.2 Explanation.....	13
4.6.3 Guidance.....	13
4.7 Developing privacy knowledge, skill and ability.....	13
4.7.1 Requirement.....	13
4.7.2 Explanation.....	14
4.7.3 Guidance.....	14
4.8 Ensuring knowledge of privacy controls	14
4.8.1 Requirement.....	14
4.8.2 Explanation.....	14
4.8.3 Guidance.....	15
4.9 Documentation and information management.....	15
4.9.1 Requirement.....	15
4.9.2 Explanation.....	15
4.9.3 Guidance.....	16
5 Consumer communication requirements	16
5.1 Overview.....	16
5.2 Provision of privacy information.....	17
5.2.1 Requirement.....	17
5.2.2 Explanation.....	17
5.2.3 Guidance.....	17
5.3 Accountability for providing privacy information.....	18
5.3.1 Requirement.....	18
5.3.2 Explanation.....	19
5.3.3 Guidance.....	19
5.4 Responding to consumer inquiries and complaints.....	19
5.4.1 Requirement.....	19
5.4.2 Explanation.....	19

This is a preview of "ISO 31700-1:2023". [Click here to purchase the full version from the ANSI store.](#)

5.4.3	Guidance	19
5.5	Communicating to diverse consumer population	19
5.5.1	Requirement	19
5.5.2	Explanation	19
5.5.3	Guidance	20
5.6	Prepare data breach communications	20
5.6.1	Requirement	20
5.6.2	Explanation	20
5.6.3	Guidance	20
6	Risk management requirements	21
6.1	Overview	21
6.2	Conducting a privacy risk assessment	21
6.2.1	Requirement	21
6.2.2	Explanation	21
6.2.3	Guidance	22
6.3	Assessing privacy capabilities of third parties	22
6.3.1	Requirement	22
6.3.2	Explanation	23
6.3.3	Guidance	23
6.4	Establishing and documenting requirements for privacy controls	23
6.4.1	Requirement:	23
6.4.2	Explanation	23
6.4.3	Guidance	24
6.5	Monitoring and updating risk assessment	24
6.5.1	Requirement	24
6.5.2	Explanation	24
6.5.3	Guidance	24
6.6	Including privacy risks in cybersecurity resilience design	25
6.6.1	Requirement	25
6.6.2	Explanation	25
6.6.3	Guidance	25
7	Developing, deploying and operating designed privacy controls	25
7.1	Overview	25
7.2	Integrating the design and operation of privacy controls into the product development and management lifecycles	26
7.2.1	Requirement	26
7.2.2	Explanation	26
7.2.3	Guidance	26
7.3	Designing privacy controls	27
7.3.1	Requirement	27
7.3.2	Explanation	27
7.3.3	Guidance	27
7.4	Implementing privacy controls	27
7.4.1	Requirement	27
7.4.2	Explanation	27
7.4.3	Guidance	27
7.5	Designing privacy control testing	28
7.5.1	Requirement	28
7.5.2	Explanation	28
7.5.3	Guidance	28
7.6	Managing the transition of privacy controls	29
7.6.1	Requirement	29
7.6.2	Explanation	29
7.6.3	Guidance	29
7.7	Managing the operation of privacy controls	30
7.7.1	Requirement	30
7.7.2	Explanation	30

This is a preview of "ISO 31700-1:2023". [Click here to purchase the full version from the ANSI store.](#)

	7.7.3	Guidance	30
7.8		Preparing for and managing a privacy breach.....	30
	7.8.1	Requirement.....	30
	7.8.2	Explanation.....	31
	7.8.3	Guidance	31
7.9		Operating privacy controls for the processes and products upon which the product in scope depends throughout the PII lifecycle.....	31
	7.9.1	Requirement.....	31
	7.9.2	Explanation.....	31
	7.9.3	Guidance	31
8		End of PII lifecycle requirements.....	32
	8.1	Overview.....	32
	8.2	Designing privacy controls for retirement and end of use.....	32
	8.2.1	Requirement.....	32
	8.2.2	Explanation.....	32
	8.2.3	Guidance	32
		Bibliography.....	34

This is a preview of "ISO 31700-1:2023". [Click here to purchase the full version from the ANSI store.](#)

Foreword

ISO (the International Organization for Standardization) is a worldwide federation of national standards bodies (ISO member bodies). The work of preparing International Standards is normally carried out through ISO technical committees. Each member body interested in a subject for which a technical committee has been established has the right to be represented on that committee. International organizations, governmental and non-governmental, in liaison with ISO, also take part in the work. ISO collaborates closely with the International Electrotechnical Commission (IEC) on all matters of electrotechnical standardization.

The procedures used to develop this document and those intended for its further maintenance are described in the ISO/IEC Directives, Part 1. In particular, the different approval criteria needed for the different types of ISO documents should be noted. This document was drafted in accordance with the editorial rules of the ISO/IEC Directives, Part 2 (see www.iso.org/directives).

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. ISO shall not be held responsible for identifying any or all such patent rights. Details of any patent rights identified during the development of the document will be in the Introduction and/or on the ISO list of patent declarations received (see www.iso.org/patents).

Any trade name used in this document is information given for the convenience of users and does not constitute an endorsement.

For an explanation of the voluntary nature of standards, the meaning of ISO specific terms and expressions related to conformity assessment, as well as information about ISO's adherence to the World Trade Organization (WTO) principles in the Technical Barriers to Trade (TBT), see www.iso.org/iso/foreword.html.

This document was prepared by Project Committee ISO/PC 317, *Consumer protection: privacy by design for consumer goods and services*.

Any feedback or questions on this document should be directed to the user's national standards body. A complete listing of these bodies can be found at www.iso.org/members.html.

This is a preview of "ISO 31700-1:2023". [Click here to purchase the full version from the ANSI store.](#)

Introduction

Consumers' trust and how well individual privacy needs are met are defining concerns for the digital economy. This includes how consumers' personally identifiable information (PII) and other data are processed (collected, used, accessed, stored, and deleted) — or intentionally not collected or processed — by the organization and by the digital goods and services within that digital economy. If PII has been compromised because of lax, outdated, or non-existent privacy practices, the consequences for the individual can be severe. In addition, consumers' trust of the digital product can be damaged with potentially legal or reputational impacts to the organization providing that consumer product.

“Privacy by Design” was originally used by the Information and Privacy Commissioner of Ontario, Canada, with the goal that the individual need not bear the burden of striving for protection when using a consumer product.

Privacy by design refers to several methodologies for product, process, system, software and service development, e.g. References [1], [2], [3], [4], [5] and [6]. These methodologies take into account the privacy of a consumer throughout the design and development of a product, considering the entire product lifecycle - from before it is placed on the market, through purchase and use by consumers, to the expected time when all instances of that product finally stop being used. It means that a product has default consumer-oriented privacy controls and settings that provide appropriate levels of privacy, without placing undue burden on the consumer.

NOTE This document provides references in the bibliography to other existing standards and resources, that provide more detailed requirements and guidance on privacy (e.g. identification of PII, PII access and privacy controls, consumer consent, notification of privacy breach, secure disposal of PII, interactions with third party processors) for common functions within the organization (e.g. Corporate Governance; Data and Privacy Governance; IT Operations and IT Services Management; Security and Security Management; Data Management and Database Administration; Marketing, Product Management; Web and mobile application development, systems development; Systems administration, network administration).

In this document, the benefits of privacy by design can be viewed through three guiding principles as outlined below.

Empowerment and transparency

There is growing demand for accurate privacy assertions, systematic methods of privacy due diligence, and greater transparency and accountability in the design and operation of consumer products that process PII. The goal is to promote wider adoption of privacy-aware design, earn consumer trust and satisfy consumer needs for robust privacy and data protection. In addition, the intent is to create and promote innovative solutions that protect and manage consumers' privacy: a) by analysing and implementing privacy controls based on the consumer's perspective, context, and needs, and b) by succinctly documenting and communicating directly to consumers how privacy considerations were approached.

Institutionalization and responsibility

In today's digital world of shared platforms, interconnected devices, cloud applications and personalization, it is increasingly important to delineate and distinguish the responsibilities and perspectives of the consumer of the products that process PII from those of product design, business and other stakeholders in the ecosystems in which the product operates.

Privacy by design focuses on the consumer perspective when institutionalizing robust privacy norms throughout the ecosystem including privacy protection and data handling practices. With privacy by design, the consumer's behavioural engagement with the product(s) and their privacy needs are considered early and throughout the product lifecycle process. This way, decisions concerning consumer privacy needs will be more consistent and systematic and become a functional requirement alongside the interests of product design, business and other stakeholders.

Privacy by design also focuses on accountability, responsibility, and leadership. These aspects are essential to successfully operationalizing and institutionalizing the privacy by design process.

This is a preview of "ISO 31700-1:2023". [Click here to purchase the full version from the ANSI store.](#)

A demonstrated leadership commitment to privacy by design is essential to operationalize and institutionalize privacy in the product design process of an organization.

Ecosystem and lifecycle

A privacy by design approach can be applied to the broader information ecosystems in which both technologies and organizations operate and function. Privacy and consumer protection benefit from taking a holistic, integrative approach that considers as many contextual factors as possible (e.g. the type of consumer, their goal and intent in using a product, and the data the product will process for that consumer) – even (or especially) when these factors lie outside the direct control of any particular actor, organization, or component in the system. [see [5.5.3 a](#)].

Privacy by design applies to all products that use PII, whether physical goods, or intangible services such as software as a service, or a mixture of both. It is intended to be scalable to the needs of all types of organizations in different countries and different sectors, regardless of organization size or maturity.

It is possible that additional privacy issues and a need for related controls are identified at any point in the product lifecycle, including during development or after use by consumers. Privacy by design methodologies support iterative approaches to product development, with supplementary privacy enhancements designed and deployed long after the initial design phase.

Audience for this document

The primary audiences for this document are those staff of organizations and third parties, who are responsible for the concept, design, manufacturing, management, testing, operation, service, maintenance and disposal of consumer goods and services.