

# ISO 31700

## Privacy by Design for Consumer Goods and Services

Online Launch Event 8th February 2023





## Webinar Host: Mr Jan Schallaböck

**Jan Schallaböck** is an attorney-at-law based in Berlin and a partner at iRights.Law. He is leading the privacy and data protection practice of the firm.

Jan is the chairperson of ISO PC 317 on "Consumer protection: privacy by design for consumer goods and services.

Before joining iRights.Law, he was employed with the Data Protection Authority of the federal state of Schleswig-Holstein (ULD), where he worked in various European research projects. His commitment to international standardization, where he also has been a vice-convenor to ISO/IEC JTC 1/SC 27/WG 5 for many years, stems from this context.



# Webinar Agenda

1. Welcome and housekeeping items: Jan Schallaböck
2. Introductory remarks: Ann Cavoukian
3. Background to the Standards:  
How was this work initiated? Pete Eisenegger
4. Overview of ISO 31700-1: Michelle Chibba
5. Overview of ISO 31700-2: Antonio Kung
6. Q & A
7. Concluding remarks: Jan Schallaböck

# Questions

- **Questions for the panellists can be raised in the chat and we will try to address as many as possible in the panel session.**
- **Zoom chats are visible to the meeting administrators, and are not private, even if you directly message another attendee**
- Please note that ISO confidentiality rules may apply to the standards-creation process, so some questions may be outside the scope of what panellists can discuss.
- Please note that attendees cannot answer questions regarding HOW to implement this standard or how to implement any individual requirement within the standard; delegates may, however, answer general questions about the standard and its requirements.
- Other eligible questions will be addressed in the follow-up email/information.



A close-up portrait of Dr. Ann Cavoukian, a woman with dark hair, wearing a dark red top and a ring, speaking into a microphone. The background is black.

## Introductory remarks: Dr Ann Cavoukian

**Dr. Ann Cavoukian** is recognized as one of the world's leading privacy experts. Dr. Cavoukian served an unprecedented three terms as the Information & Privacy Commissioner of Ontario, Canada.

There she created Privacy by Design, a framework that seeks to proactively embed privacy into the design specifications of information technologies, networked infrastructure and business practices, thereby achieving the strongest protection possible.



## Mr Pete Eisenegger

**Peter** is ANEC's expert contributing to the current CEN/CENELEC AI standardisation work. This is building on work undertaken on digital product safety and also ISO PC 317's work on consumer protection provided through the design of goods and services. He is also a member of BSI's IoT and Privacy and Security technical committees.

# The reason for ISO 31700 - Gap Analysis

(Pete Eisenegger for the ISO Committee on Consumer Policy: 2016)

## Status quo

Processing of data for  
organizational purposes

## The Privacy Gap

Processing of data for personal  
and household purposes

**Consumer products**  
( the 'front line' of consumer  
protection )

*“Organisations have capabilities - processes and procedures, systems, expertise and knowledge while consumers have none of that. Consumers live busy lives using many different goods and services for their own purposes. Many have additional challenges in life with low incomes, some reduced abilities and most with no technology expertise or understanding. Consumers have only the product and its capabilities to help protect them”*

# The case for ISO 31700-1 - New work item proposal 2017

ISO 31700 Title



- CONSUMER

ISO 31700-1 key characteristics  
**Protecting Consumer Privacy**

**Fundamentally Consumer Centric**

- PROTECTION

**When meeting consumer needs  
protecting consumers at the same time  
as generating income or cutting costs**

- BY DESIGN

**Achieved by good practice in the  
design of consumer goods and  
services**

- GOODS AND SERVICES





## Ms Michelle Chibba

**Michelle Chibba** is a co-instructor for the online course, Privacy by Design: The global privacy framework, offered through the Chang School at Toronto Metropolitan University, Toronto, Canada.

Michelle is the Project Editor to the ISO Committee ISO/PC317 for the international standard on Privacy by Design for Consumer Products, ISO 31700.



# Overview:

**ISO 31700-1:2023**

**Consumer protection — Privacy by design for consumer goods and services — Part 1: High-level requirements**



# ISO Technical Committee - PC317 Stakeholders

17

Participating members

27

Observing members

## Liaisons to and from other ISO Committees

Organizations in liaison (Category A and B)

Acronym ↑	Title
ANEC	European Association for the Co-ordination of Consumer Representation in Standardization
CalConnect	The Calendaring and Scheduling Consortium
CI	Consumers International
IoT Lab	International Expertise in the Internet of Things and data protection
PDP4E	Privacy and Data Protection Engineering



## PC317 operational guidance/vision

1. be a starting point (i.e. basics in **privacy by design**) that lays out potentially substantial or essential requirements (shall), explanation, guidance (should)
2. should **not delve into detail about 'how to'**, or be prescriptive or restrictive on proving or providing evidence of privacy by design
3. be expressed in a manner that can be **understood by those who are not experts in privacy by design**
4. requirements to be **written such that** conformity assessment can be carried out, i.e. repeatable and reproducible results
5. think of **SMEs**

## Scope:

[...] “establishes **high-level requirements** for privacy by design to protect privacy throughout the lifecycle of a consumer product, including domestic data processing by the consumer.”

*“[...] **does not contain** specific requirements for the privacy assurances and commitments that organizations can offer consumers nor does it specify particular methodologies that an organization can adopt to design and-implement privacy controls, nor the technology that can be used to operate such controls.”*

# Some key terms defined:

## 3.1

### **consumer**

individual member of the general public purchasing or using property, products for private purposes [...]

## 3.5

### **privacy by design**

design methodologies in which privacy is considered and integrated into the initial design stage and throughout the complete lifecycle of products, processes or *services* (3.3) that involve processing of *Personally Identifiable Information* (3.2), including product *retirement* (3.13) and the eventual deletion (3.24) of any associated *personally identifiable information* (3.2)

Note: The lifecycle also includes changes or updates.

(cf. Online Browsing Platform: <https://www.iso.org/obp/ui/#iso:std:iso:31700:-1:ed-1:v1:en>)



### **3 Guiding principles to support the benefits of privacy by design:**

- Empowerment and Transparency;
- Institutionalization and Responsibility;
- Ecosystem and Lifecycle

## **There are 8 clauses, 5 of which include requirements:**

- General (privacy rights)
- Consumer Communication
- Risk Management
- Develop, Deploy, Operate designed Privacy Controls
- End of PII lifecycle



# Format of the requirements

## 1.1 Clause Title

### 1.1.1 Requirement

...

### 1.1.2 Explanation

...

### 1.1.3 Guidance

## **Example clause:**

### **8.2 Designing privacy controls for retirement and end of use**

#### **8.2.1 Requirement**

With relevant third parties, the organization shall design and operate privacy controls to manage the risks to PII at and after product retirement, and at the end of consumer product use.

#### **8.2.2 Explanation**

Organizational accountability for PII extends to the end of the PII lifecycle; the point at which consumers' PII is no longer processed. This point can occur long after the end of the product's lifecycle, so accountability should be designed for long-term resilience.

[...]

#### **8.2.3 Guidance**

a) When designing the product, the end of life should be considered, including cases when consumers pass the product to other consumers through gifts or second-hand markets, [...]



## Mr Antonio Kung

**Antonio Kung** is co-founder of Trialog. With more than 30 years of experience in the field of cyber physical systems and the Internet of Things, he brings expertise and know-how particularly on architecture, interoperability or data security and protection.

He was the coordinator of numerous national and European collaborative projects in these fields. He is active in standardisation on the Internet of Things, security and data protection.

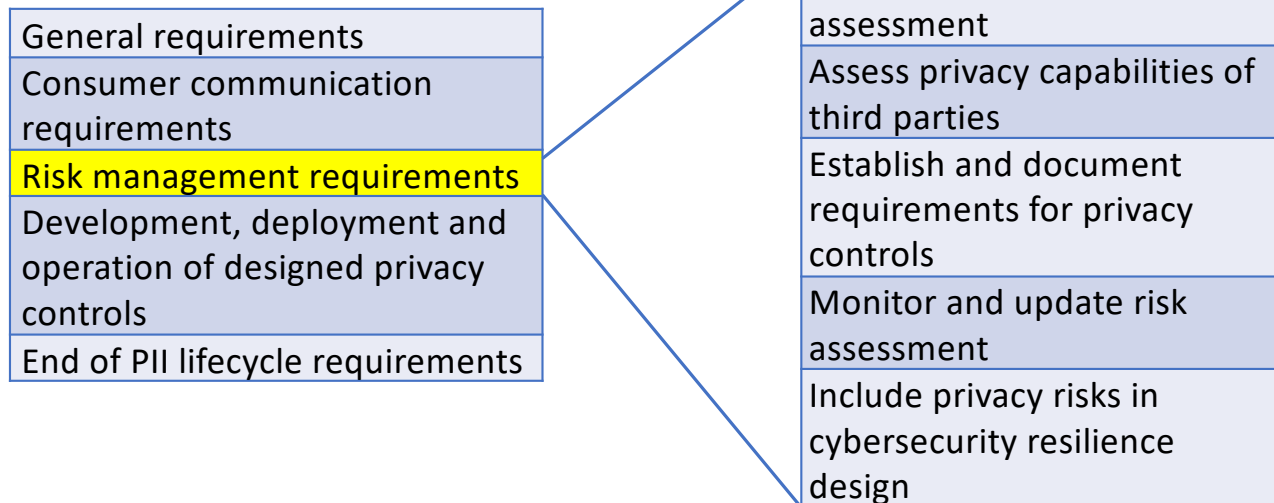
## **Overview:**

**ISO TR 31700-2:2023**

**Consumer protection — Privacy by design for consumer goods and services — Part 2: Use cases**

## Scope of ISO TR 31700-2

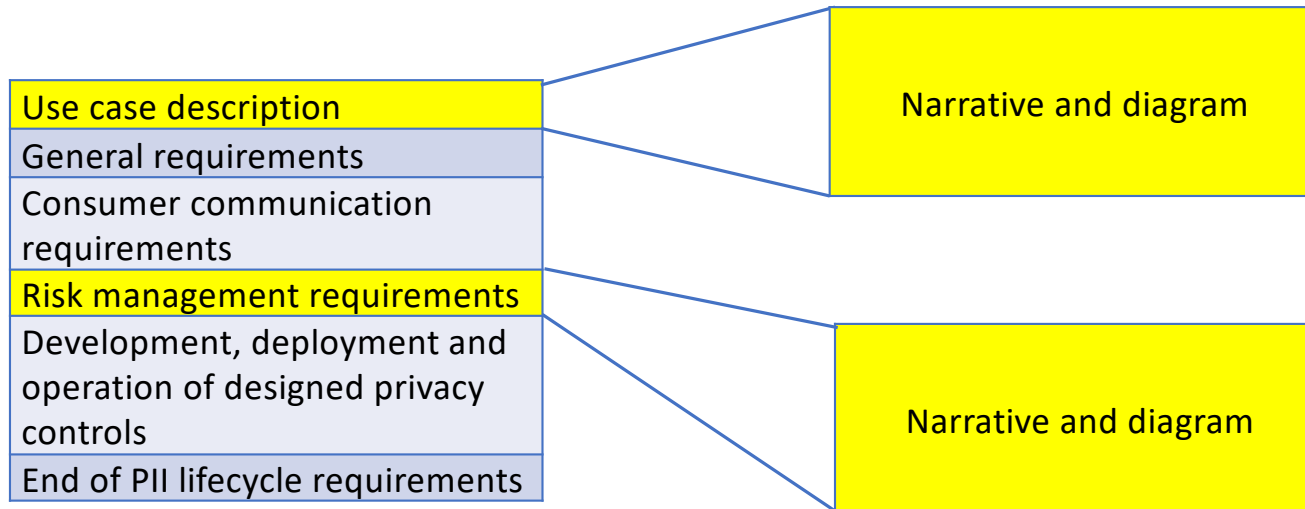
- Provides illustrative use cases
- Helps understand requirements of 31700-1
  - Example



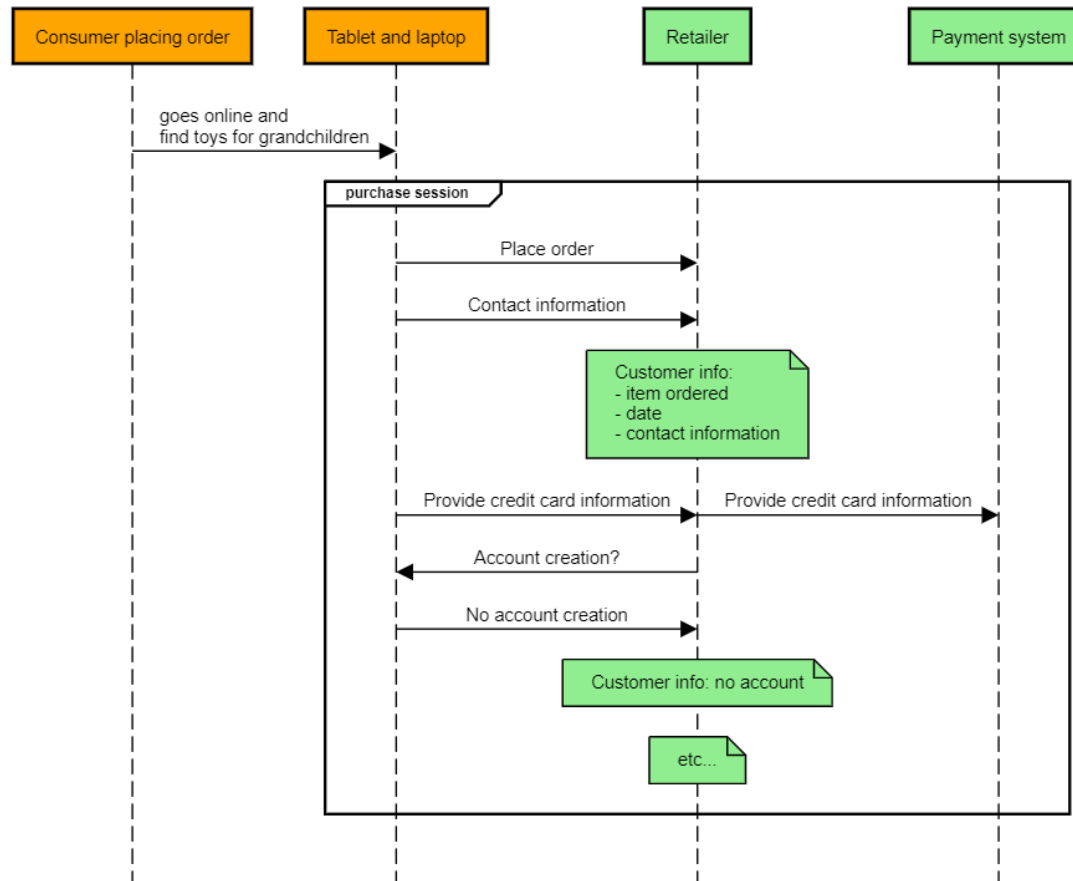
## Consumer Goods and Services Uses Cases

- On line retailing
  - ▀ Search, select and purchase products, services and information on the Internet
- Fitness centre
  - ▀ Practice physical activities in an external place and track health info on mobile phone
- Smart locks product line
  - ▀ Basic use
  - ▀ Colocation use
  - ▀ Family use

# Use Case Structure

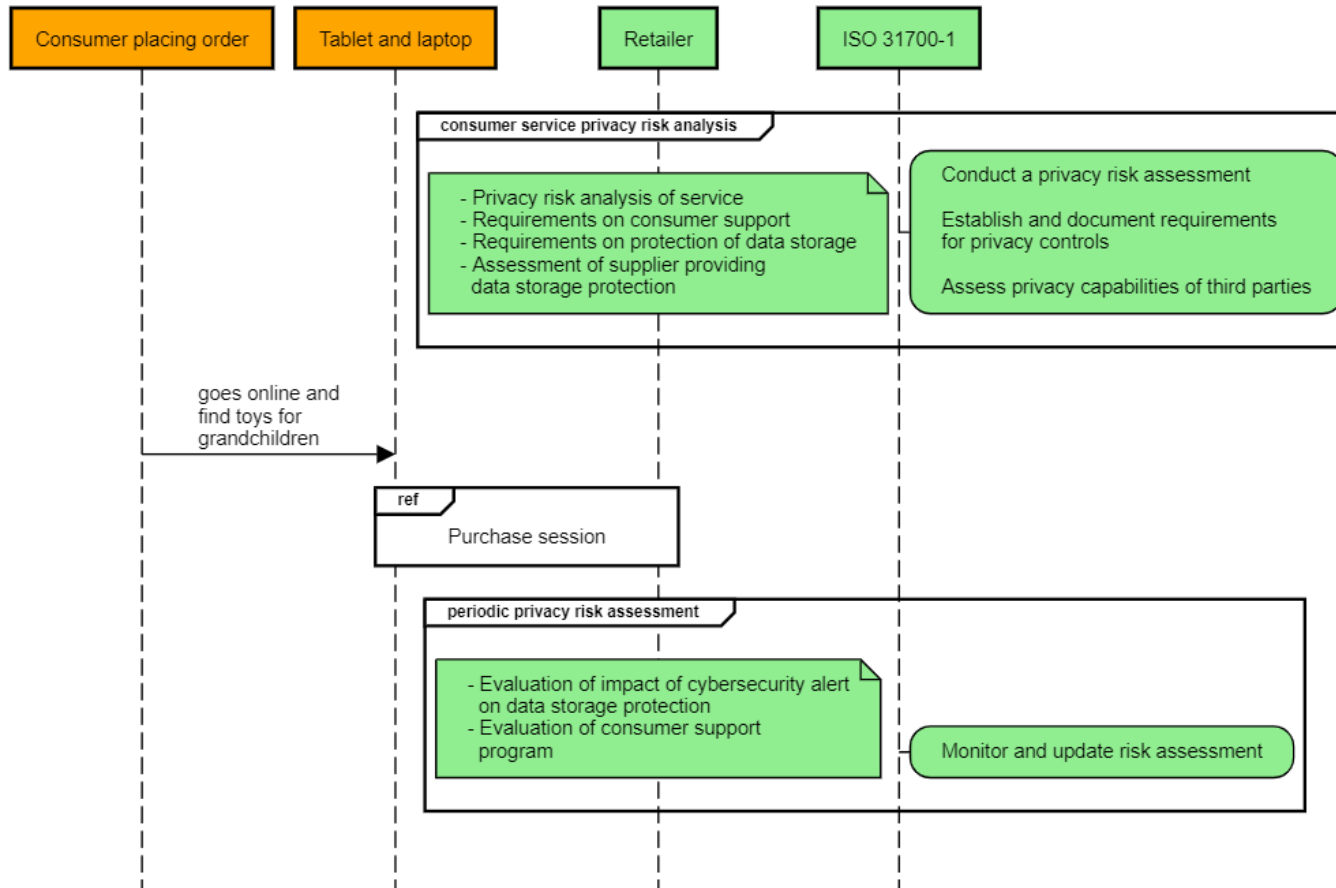


# Use Case Description: On-line Retailing Diagram (Excerpt)





# Risk Management Requirements: On-line Retailing Diagram (Excerpt)



**Q&A**

**Copies of the ISO 31700 series of standards can be purchased from:**

<https://knowledge.bsigroup.com/>

For a limited time, attendees can use the 10% discount code: EVE31700 (courtesy of BSI)

**You can also obtain copies of the standards from your National Standards Body and find out more about participating in future standards development work in this area:**

<https://www.iso.org/members.html>



# Appreciations

- ▶ **Our speakers:  
Ann, Pete, Michelle and Antonio**
- ▶ **ISO/PC 317 Communications  
Group: Brad Gold, Rae Dulmage**
- ▶ **ISO/PC 317 Manager: Jean Stride**
- ▶ **Event host: Jan Schallaböck**
- ▶ **ISO**
- ▶ **BSI**
- ▶ **And to all the attendees for your  
interest in ISO 31700**

