Anchored Notice and Consent Receipt (ANCR) Transparency Performance Indicator (TPI) Conformity & Compliance Assessment Scheme 1, Parts 1&2, v0.9

Transparency Performance Indicators are specified as a standard measure of the operational performance of the presented PII Controller security and privacy information.

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Consent Receipt Specification

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59 transparency Code of Conduct[1], be open and free and not create any dependency that
60 limits or restricts the use, accessibility, and availability of digital transparency or the
61 ability for the PII Principal to provide and manage their own consent.

62 **Suggested Citation: (upon WG approval)**

63 ANCR Specification v`0.9 ANCR TPI Conformity & Compliance Assessment Scheme 1,
64 Part 1 & 2

NOTICE

66 This specification relies on (open access to) ISO/IEC 29100 Security and privacy
67 techniques, to generate a notice receipt, which is stored in an ANCR consent record
68 format for conformity assessment as specified in the Kantara Initiative Consent Receipt
69 v1.1.[2]

70

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74 108+ Chapter III, Rights of the Data Subject, Section 1 Transparency, and modalities,
75 Article 14, 1 – 8. This Transparency Code of Conduct is internationally representative of
76 notice and consent legal and social requirements. It can be represented today in the
77 forms of privacy policy links, physical signage, digital cookies and security or privacy
78 notices. These are found when accessing public and digital service spaces, in all
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80 or support the implementation of this Transparency Code of Conduct for transparency
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[1] Transparency Code of Conduct, to implement Transparency Modalities – Appendix C.

[2] Consent receipt v1, CISWG Kantara Initiative https://kantarainitiative.org/download/7902/

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101 Dear reader,

102 Thank you for downloading this publication prepared by the international community
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104 dedicated to improving trustworthy use of digital identity and personal data through
105 innovation, standardization and good practice.

106 Kantara is known around the world for incubating innovative concepts, operating Trust
107 Frameworks to assure digital identity and privacy service providers and developing
108 community-led best practices and specifications. Its efforts are acknowledged by OECD
109 ITAC, UNCITRAL, ISO SC27, other consortia and governments around the world.
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111 inclusive, equitable digital economy offering value and benefit to all.

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114 the working group that produced this and participation in all our endeavors so that
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129 Abstract

130 In context of processing personally identifiable information a PII Principal is not able to see
131 who is processing their data or is not notified when their data is disclosed. As a result, today,
132 the Individual is not able to trust the use of digital identity technologies and digital trust.

133 • At this time there is little transparency over required digital security and privacy
134   elements online.
135 • Transparency varies from service to service and as a result it is impossible for
136   people to see and trust how they are being identified as well as what is happening
137   with their own data.
138 • Even so, the requirement to identify the legal entity and the accountable person to
139   the PII Principal is a universal requirement for all data processing activities unless
140   explicitly derogated by legislated law or policy for a specific legal justification and
141   context.

142 If the PII Principal is not able to see how PII (Personally Identifiable Information) is
143 shared, disclosed or managed it is not possible to make the choice to trust the service
144 processing PII.

145 For people, security by default requires assurance to see when personal data is being
146 processed to operationally be transparent.   Standard and operational transparency
147 captured in records (Consent Receipts) people keep and own is what can makes
148 consent meaningful by default. To create and scale trust in digital contexts a Digital
149 Transparency Code of Conduct is introduced to simplify and clarify requirements and the
150 use of CoE 108+ Chapter 1 Transparency Modalities, which is mirrored in the GDPR
151 Article 12, 'Transparent information, communication and modalities for the exercise of
152 the rights of the data subject'.

153 **Scheme Applicability**

154 1. All data processing must be transparent, unless required not to be by legal
155   derogation.   In such an instance, the processing must be transparent to the
156   appropriate regulatory authority, according to the context of processing.
157 2. This applies to all services and every stakeholder, PII Controller, PII Processor, PII
158   Principal's, the PII Co-Regulating Authority and delegates.
159 3. All processing with consent requires a record of the privacy notice and privacy policy
160   link, which in this document is referred to as a Notice Receipt, also known as the
161   ANCR record of consent, and referred to as a consent record in ISO/IEC 27560
162   Consent record information structure.
163 4. Records and receipts provided as specified in Convention 108+, Art 31 Record of
164   Processing Activity (RoPA). The consent receipt is effectively a digital twin, which is
165   a mirrored notice and consent record, which is also held by the individual. This
166   Record can then effectively becomes the authoritative consent record.
167 5. A Notice Receipt can be created by any stakeholder to identify a PII Controller.
168 6. An Anchored Notice and Consent Receipt can be used as a record of consent to
169   access data subjects' rights for example, and/or to test and assess the operational
170   performance of PII Controllers' digital privacy in digital contexts.

171 Part 1 of the scheme introduces 4 Transparency Performance Indicators, these are used to
172 measure and rate the conformance of transparency. In Part 2 of the scheme (in the
173 Appendix A) a transparency information request is sent to the controller to; a) test the
174 controller information and, b) measure how compliant the performance of digital

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175 transparency is, to both legal expectations and the personal privacy expectations of PII
176 Principal.

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177   1   TERMS & DEFINITIONS

178

179   **Normative to Council of Europe, Convention 108+,**

180   The normative language for the TPI Scheme is defined by Convention 108+ the Common
181   wealth privacy convention the GDPR (General Data Protection Regulation) mirrors. .
182   Originally convened to establish a set of principles and rules to effectively safeguard
183   personal data and facilitate cross-border data flows

184   Normative terms for roles defined in national law are mapped to the roles which are defined
185   according to an international adequacy baseline.

186

187   ISO/IEC 29100 is also normative, this security and privacy framework standard maps terms
188   in the standard itself, for example PII Principal is mapped to the Data Subject.

189

190   The ANCR Record Framework is used to specify Transparency Performance Indicators
191   (TPIs) and is based on the consent receipt work where roles are mapped to standards and
192   laws.

193

Stakeholder	Conv 108+	GDPR	ISO/IEC 29100	PIPEDA	Quebec
Data Regulator					
Data Subject		X	PII Principal	Data Subject	
Data Controller	X	X	PII Controller	Organization	Person in charge of protecting personal information (PICPPI)
Data Processor					
Joint-Controller					
Sub-Processor					
Data Subject		X	PII Principal	Individual	

194   (compliance roles, mapped to be interoperable within any data privacy framework)

195

196   Roles in this document refer to the relationship between the Individual and any digital
197   service.

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198 Introduction

199 Transparency Performance Indicator's (TPIs) are introduced here as the object of
200 conformity to capture the presentation of PII Controller Credential information, and to
201 determine the operational capacity of the information in conformance Conv 108+ and
202 personal expectations.

203

204 The TPIs are used to create an ANCR (Anchored Notice and Consent Receipt) Record,
205 which presentable as a 'proof of notice' (or knowledge) claim, the object for both
206 conformity, and compliance assessments, presented in this scheme.

207 The TPI scheme, to test the performance of digital transparency with a privacy request.
208 This is used to, determine how dynamic the performance of transparency and consent
209 is for using data subject rights, independently of the service provider, and relative to
210 context.

211

212 The TPIs presented pinpoint 4 metrics that can be used to measure the conformance
213 of transparency and the integrity of consent in the relevant data capture context.

214

215 The TPIs assess the operational capacity of the *required and presented* PII Controller
216 Identity and Contact attributes, or meta-information. The TPIs measure the existence
217 and performance of the publicly required digital service information. The TPIs check
218 digital components, identifying the governance model, authority and security
219 framework to assure the validity of privacy state in an online service context. Providing
220 privacy risk assurance for people.

221 The ANCR record produced from a TPI Assessment captures digital governance and
222 surveillance context. Capturing at the point of presentation PII Controller Identifiers,
223 privacy rights access point(s), and importantly, under which digital governance
224 framework personal data processing is being governed.

225 The ANCR record, in which the PII Principle is the holder and controller of this record,
226 can be presented as a micro-notice claim and used as a credential to engage PII
227 Controller privacy services and track the PII Controller performance.

228 Most assessments for conformance of privacy information or services are mapped to
229 analogue legal requirements which measure response times in days, out of technical
230 context. TPIs all measure how dynamic privacy service information is in context, and
231 provides a rating, from -3 to +1, in which +1 is for a Dynamic, in context transparency
232 performance indicator. This introduces the concept of a shared *active privacy state*

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233   *transparency*, comprised of the signal that indicates if the privacy as expected in
234   context. .

235

Why was this specification written?

237   At the time of writing this specification, transparency and consent is governed
238   predominately by commercial governance frameworks that utilize digital identity
239   management technologies to identify people. At the same time the associated services
240   do not identify themselves in a standard way online, which is neither compliant nor
241   conformant, presenting critical cybersecurity risks.

242   Individuals are forced to give up digital privacy to access analog privacy service online
243   .   While all the records of the digital relationships are kept by services, (if they
244   keep records at all). Without our own records of digital relationships Individuals are
245   not able to be empowered .

246   These risks and harms are exacerbated when PII Principals use privacy services online.
247   PII identifiers, by default, are captured and collected at an attribute level (known also
248   as meta-data). This means individuals must relinquish their digital privacy, to access
249   online privacy services. These "security" technologies themselves are used to profile
250   and track data subjects presenting systemic challenges to accessing privacy services in
251   a meaningful way for the PII Principal.

252   The second systemic obstacle is that individuals do not have their own records of digital
253   identity relationships. Preventing people from being able to exercise rights.

254   A notice receipt and consent record address this systemic and root challenge, with a
255   proof of notice, which is what is required to present evidence consent.   Evidence of
256   consent that is missing in today's online services.

Why Transparency Performance Indicators?

258   Currently, there is no way for people to see who is tracking them and to understand
259   how digitally exposed one is, in any given surveillance context, physical or digital.

260   TPIs assess if the notice information provided is operational, if the contact information
261   is fake or not, if a digital service is even capable of the security required for digital
262   privacy to be trust capable. requirement to be notified and have an understanding of
263   (digital) risks before making decisions. It is a necessary precondition for meaningful
264   consent.

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265 Digital transparency requires standard purpose specification to include who benefits,
266 how they benefit, and where they benefit from, is extremely important. This is required
267 but missing security information that's is made assessed in the Scheme. Without a
268 standardized notification and presentation format to govern identity management, it
269 is difficult for a Data Subject to make a trust decision, and impossible in a multi-service
270 context, limiting the capacity to trust any services provided in an online context.

271 The invisible risks need to be presented relevant to the context to make an informed
272 choice about whether or not to consent, withdraw consent, or even pause consent to
273 a service, to stop tracking for a particular private context

274

275 A challenge addressed with the use of this assessment, which makes these risks
276 transparent.

277 TPIs conformity and compliance assessment for digital transparency dramatically
278 improves the safety, security, privacy usability and awareness for all stakeholders.

279 # About the Scheme

280 The TPI Scheme presented here is scoped to specify the public digital transparency
281 assurance level referred to as level 0 (digital commons) transparency assurance in the
282 ANCR Framework . The Framework includes:

283 A conformity and compliance assessment scheme, implemented in 2 parts to generate
284 a full operational transparency report.

285 TPI Scheme 1 Part 1 - Conformance

286   - Initial test to diagnose the operational capacity of privacy services in any
287   specific context.

288 TPI Scheme 1 Part 2 – Compliance (found in Appendix A)

289   - Specifies an example operational transparency compliance performance test, in
290   which the transparency is tested by generating a privacy rights-based request,
291   to access privacy services.

292

293 Part 1 refers to conformance with digital identifier elements required to be presented
294 to initiate a session, and is the body of this document, while TPI Scheme 1, Part 2, is
295 Appendix A, which is the next set of TPI elements audited for compliance with
296 international digital governance transparency requirements referenced in Conv. 108+.
297 Article 14, Transparency Modalities.

298

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299 The 4 Transparency Performance Indicators h capture transparency and data capture
300 practices in context and are used to test the self-asserted information for its
301 operational usability.

302

303 These 4 TPIs and Scheme 1, Part 1, and Scheme 1 Part 2 can be used together with the
304 Guidance – Appendix –, for the public interest application, as well as the demonstration
305 of this project's use of the digital credential. In this regard, this TPI Scheme directed at
306 required public transparency level of risk assurance.

307 TPIs specified focus is on the initial point of contact. This includes the publicly required
308 information that MUST be provided and refers to the PII Controller Identity and Contact
309 information, which is required in all privacy legal instruments. Transparency, in this
310 regard, is a universal requirement, and required for free, prior and informed consent to
311 scale as digital privacy online.

312 The TPIs here are used to assess session-based data capture and self-asserted
313 information by organizations to specify a Public level of Trust Assurance that is
314 provided in an online context.[3]

TPI 1 - Measuring the Timing of PII Controller Identity Notification:

315
316

317 This TPI captures **when** the Controller's legal entity and accountable Privacy Officer
318 (digital identifiers) provide notice of their identity. This is measured to see if the notice
319 is delivered

320 i)   Before,
321 ii)   At the time of,
322 iii)   During, or
323 iv)   After

324 Personally identifiable information is captured.[3]

---

[3] Note to reader: The ANCR Record Framework presents 4 levels of transparency
assurance for PII Controller (Notice) Credentials, which can be use in 3 vectors of digital
governance; 1. Personal data control 2. Data Protection 3. Co-regulation, which is what
is assessed in this document at assurance level 0.

325

326 By assessing dynamic and operational transparency, as opposed to static, infrequent
327 information, it provides a way for an individual to assess if they can trust a service or
328 not. This is also assessing compliance with Article 14.1, and specifically defined in
329 Article, 15 1, a) and b)

330 *Information to be provided where personal data are collected from the data*
331 *subject*

332 *1. Where personal data relating to a data subject are collected from the data*
333 *subject, the controller shall, at the time when personal data are obtained, provide*
334 *the data subject with all of the following information:*

335 *(a) the identity and the contact details of the controller;*

336 *(b) the contact details of the data protection officer;*

TPI 2 - Measures Required Data Elements

337

338 This TPI captures whether the required security and privacy attributes are provided,[4]
339 these are required to operationally the transparency information and identify the
340 accountable party. Namely **what** information is legally required.   In "all" cases, there is
341 a requirement for a Notice of who is processing your data, who is accountable and the
342 privacy contact information for access to personal information is required to be
343 *provided*. [Art 14.1]

344 Specifically, a first-time notice must include 2 factors, 1) is the notice adequate as notice
345 of risk. 2) is the practices relating to permissions permitted by the purpose, accepted
346 and can be used as proof of notice by the data subject.

347 These Digital Privacy transparency elements are the minimum required to
348 operationalize transparency and accountability.

349   i)   Legal Entity Identity Name,
350   ii)   Address, Contact information
351   iii)   Name or role of Data Privacy Officer (or the authoritative owner and
352   Accountable Person (AP) in charge of that legal entity.
353   iv)   Privacy services access and contact point information.
354   v)   Privacy or other Governance Policy Governing the processing of personal
355   information.

---

[4] This is the most common legislated privacy element in the world, required and mappable to all privacy legislation and instruments. (ISTPA 2007)p.64

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356   vi)   Transparency before use
357   a. Digital Gov-Framework
358   b. Legal Basis for Purpose of initial Processing of PII
359   c. Recipients or categories of recipients if Any
360   d. Transfer of data on networks out of Country, to a 3rd Country,
361   e. The existence of adequacy,
362   f. Existence of safeguards, where to get a copy of them, or where they have
363   been made available. (note)

364   *** edited to here ***

TPI 3 - Measure of Transparency Accessibility

This TPI measures the performance of transparency in terms of ***accessibility***by to the information in TPI 2.. For example, is the information readily available, ideally prior to the digital session and capture of PII. For example, is TPI-2 information presented in a pop-up notice at the initiation of a digital service session,   or is it required to click a link, e.g., to a privacy policy, and then access additional link. ,   Is the operational transparency information on the first screen, or is it at the bottom reached only after scrolling multi-pages, with links not highlighted, and not accessible to children or parents.

In this way TPI 3 – for Informational accessibility, is a key transparency metric that indicates if the context is digital privacy capable of being inclusive and accessible and trustworthy.

TPI 4 - Measures security information integrity

This TPI captures the (Secure Socket Layer/Transport Layer Security) SSL/TLS (e.g. 1.3) certificate or security keys (e.g. JOSE) to compare its security meta-data against the required information in TPI 2. This is very much along the lines of Certificate Transparency but looking specifically at whether the security certificate conforms to the ANCR Record profile policy. It also checks for consistency and continuity in the security provided and is it adequate to the task. E.g., does the SSL certificate Organization Unit field and Jurisdiction fields match the captured legal entity information. How does the policy and jurisdiction there relate to other beneficial entities. Importantly does this align with the policy expectations of the person.

TPI Metrics

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Table 1: Transparency Performance Rating

- The TPI Rating system is designed to measure dynamically the operational transparency and performance of the required security and privacy information and its usability. T+1 refers to the existence of a technical framework and PII Controller transparency **prior** to the initiation of a session. This provides security-based trust assurances for the data subject.
- 0 refers to dynamic a measure of providing dynamic transparency in the context of **once a technical session starts** (which is at the time of collection), in context transparency over purpose and disclosures,
- -1 refers to where there is a provision of r analogue legal expectations, represented by legal requirements not specific to a digital context. E,g,
- -2 refers to the provision of low quality legally required information..
- -3 refers to the provision of non-operable transparency and digital privacy and related information.

Rating	TPI1 - Timing (wrt to processing)	TP2	TPI3 Accessibility (trans performance)	TPI4 - digital security
+1 (assured)	Before [Transparency of control/governance - Before, during or after processing]	+1 - credential is registered and present	Controller identity is presented prior to data collection - e	Security is required prior to collection (digital wallet based)
0 (dynamic assurance)	Just In time	0 credential is presented just in time (automated check and first-time notice)	Embedded as a credential linked to authoritative registries.	is assured -e.g., certificate is specific to and matches controller and context

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-1 (analogue assurance - online)	During	controller information is accessible during collection	PII Controller Identity prominently displayed on first view – prior to processing first page of viewing, the assessment question would be	not-specific to controller - does not match jurisdiction
-2 - (not mandatory in flow)	Available	Controller information is linked	is linked not presented	does not match you
- 3 (non-operative)	After	Controller information not present	Identity or credential is not accessible in context - e.g., two or more screens of view away, or privacy contact is mailing g address and non-operative in context of data collection.	is not valid or secure provider

404   Table 2: Transparency Performance Indicator Record Rating
405   Example

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Field Name	Field Description	Requirement: Must Shall May	TPI 1 before (out of band), just in time (before), at the start - or time of collection, during collection and after collection	TPI 2 Available Not Available	TPI 3 Rate: +1, 0, -1, -2, -3,	TPI 4 Certificate or Key CN-Matches OU – Match Jurisdiction – Match (optional)
Notice Location	Location the notice was read / observed	MUST	before, during, after	Present	+1	found
PII Controller Name	Name of presented organization	MUST		Present	0	Match
PII Controller Address	Physical organization Address	MUST		Present	0	Not match
Privacy Contact Point	Location / address of Contact Point	MUST		Present	1	Not match
Privacy Contact Method	Contact method for correspondence with PII Controller	MUST		Present	-1	No Match

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Session key or Certificate	A certificate for monitored practice	MUST		Present (or Not-found)	1 (or –3)	Present (or No Security Detected)

406

Summary

408 In summary, Transparency Performance Indicators, TPIs are specified here for people
409 to use depending on context, location, security, and other out of session elements.
410 TPIs are digital transparency tool used to self determine how much a service context
411 can be trusted.

412 These TPIs are designed to work with open standards, the ANCR WG Royalty Free
413 license, which requires open source software license to be valid for conformance.
414 Transparency tools are required to be open in multiple ways for people to be able to
415 use and create records they can own and keep across and independently of service
416 providers.

417 TPI 1 is a measure of trust, so that when asked, "Do you trust (accept) a service", you
418 necessarily know who is processing your data before, during or after."
419 Overwhelmingly people indicate trust would be higher. if notified prior to data
420 capture, which only makes sense.

421 TPI 2 is the legally required attributes ,present and available. Are they machine
422 readable

423 TPI 3 is an indicator of how accessible, and inclusive, digital transparency is. Are the
424 transparency attributes machine readable.

425 TPI 4 validates for the individual if security "matching the controller jurisdiction" to
426 addresses a critical cross-border security challenge widely overlooked today.

427

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APPENDIX A: TPI COMPLIANCE ASSESSMENT SCHEME PART 2

A.1 Operational Transparency Assessment

TPI – Operational Transparency Performance assurance test,

Most often, there is a missing, but required for operational digital governance, identifying attributes, held by commercial interest which systemically capture and control digital commons assets.

i)   Transparency required to be available in context, during the time when PII is obtained (found in Transparency Statement or Privacy Policy [note]
   a. Period of time data stored
   b. Existence of rights/controls to access and rectify
   c. Existence of right to manage consent
   d. Existence of right to lodge a complaint with a DPA
   e. Whether processing is based under a statutory, or contractual context or whether necessary for entering a contract, if the PII is obliged and the consequences of failure to provide this data,
      i. Note: (Added by Editor) and who controls access to the authoritative version of the data processed.
   f. Existence of
      i. AI, or any Automated decision-making technology,
      ii. digital identity management surveillance technologies
      iii. any profiles generated
      iv. Meaningful information about the logic involved, [Note]
         1. its significance
         2. Expected consequences for and to Data subject

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APPENDIX B: TPI ASSESSMENT GUIDANCE

The TPI Rating system is designed to measure the operational performance of the information, for example if only a mailing address is provided for a privacy contact on a website, this is considered non-operable according to the context. This means that privacy access and specific information is not retrievable in the context of data collection. Demonstrating a non-performant form of data governance.

Conformity Assessment: utilizing the ISO/IEC 29100 security framework for generating interoperable records and receipts of data processing activity, according to transparency in context.

B.1 TPIs are captured in sequence

1. TPI measuring the point when the individual is notified versus when personal information/digital identifiers are collected and processed. Capturing the timing of notice presentation in relation to first data capture

2. TPI measuring the contents of the notification for required PII Controller digital attributes that correspond to the physical brick and mortar attributes specified in privacy, security, safety and surveillance legislation. This is the Controller identity and entity information and access point

3.TPI for how accessible the transparency is (transparency of digital transparency and the accessibility of the notice access for use

4.TPI validating the cybersecurity information versus the digital transparency information capturing the SSL certificate or keys and its associated meta-data.

Combined, these TPIs provide an overall Indication of the operational state of digital privacy.

B.2 TPI – Scheme 1, Part 1(S1-P1) metric logic

Rating - Instruction	TPI 1 - Timing (wrt to processing)	TP2 - Required Info Presentation	TPI3 Accessibility (trans performance)	TPI4 - Digital Security

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+1 (assured)	PII Controller credential is displayed, using a standard format with machine readable language and linked, for example, in an http header in a browser	The Controller is discoverable automatically prior to session (out of band) in a machine-readable format. Number of ways 1. is a Controller Identity Trust registry 2. is client-side record of processing (via a wallet or browser)	Controller identity is presented prior to data collection	Security is required prior to collection (digital wallet based)
0(dynamic assurance)	PII Controller Identity or credential is provided in first notice	0 credential is presented just in time (automated check and first-time notice)	Embedded as a credential and dynamically available upon access (almost just in time)	is assured - e.g., certificate is specific to and matches controller and context
-1 (analogue assurance - online)	The Controller Identity, or screen with the Controller Identity is one screen and click away. For example, the privacy policy link in the footer of a webpage	controller information is accessible (not presented) during collection	PII Controller Identity prominently displayed on first view – prior to processing first page of viewing, the assessment question would be	not-specific to controller - does not match jurisdiction
-2 - (not mandatory in flow)		Controller Credential information is linked during collection	is linked not presented	does not match ou

-3 (non-operative)	PII Controller Identity is not accessible enough to be considered 'provided'	Controller information not present	Identity or credential is not accessible in context - e.g., two or more screens of view away, or privacy contact is mailing g address and non-operative in context of data collection.	It is not a valid, secure, or recognized provider. Not security operational (proving nonreciprocal security assurance)

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B.3   1.2.   Table 2 : ANCR Record Schema Example

482 In this appendix, here is a notice record template to fill out when recording a rating,
483 along with a rating template, and analysis results format.

484 Notice Record Schema & , Notice Record and Report - Template and Example

485

486

FIELD NAME	FIELD DESCRIPTION	REQUIREMENT: MUST, SHALL, MAY	FIELD DATA EXAMPLE
Notice Location	Location the notice was read/observed	MUST	Walmart.com | Save Money. Live Better
PII Controller Name	Name of presented business	MUST	Walmart
Controller Address	The physical address of controller and/or accountable person	MUST	1940 Argentina Road Mississauga, Ontario L5N 1P9

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PII Controller Contact Type	Contact method for correspondence with PII Controller	MUST	Email, phone
PII Controller-Correspondence Contact	General contact point	SHALL	Privacy@org.com
Privacy Contact Type	The Contact method provided for access to privacy contact	MUST	email
Privacy Contact Point	Location/address of Contact Point	MUST	Org.com/privacy.html
Session Certificate	A certificate for monitored practice	Optional	SSL Certificate Security (TLS) and Transparency

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APPENDIX C: DIGITAL TRANSPARENCY CODE OF CONDUCT

These digital transparency code of conduct rules coincide with the TPIs presented and reference the international adequacy requirements for transparency required for digital identifier management. In reference to [Report on the Adequacy of Digital Identity Governance](#), for cross border transparency and consent.

PII Controller must:

1. Must provide their PII Controller Notice Credentials, before or at the time of processing personal information (TPI 1) Article 14.1
2. PII Controller credential information must be accessible
3. PII Controller credential information must be operationally capable for access to rights with evidence of notice & consent
4. The security context must match the controller's jurisdiction where it is assumed PII is processed

Endnotes

[1] Lizar, M, Pandit, H, Jesus, V, "Privacy as expected Consent Gateway", Next Generation Internet (NGI) Grant [Access July 4] privacy-as-expected.org/

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