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2. CDMC Key Controls and Automation Test Case Guide

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## A. CDMC Description

COMPONENT 4.0: PROTECTION & PRIVACY CAPABILITY 4.2 A DATA PRIVACY FRAMEWORK IS DEFINED AND OPERATIONAL	
Control Description	Data Privacy Impact Assessments (PIAs) must be automatically triggered for all personal data according to its jurisdiction.
Risks Addressed	Data is not secured to an appropriate level for the nature and content of that data set. Resulting in either data being secured at greater cost / inconvenience than required or data loss or breaches of privacy requirements resulting in reputational damage, regulatory fines and legal action.
Drivers / Requirements	If a data set is classified as containing personal information, an organization needs to be able to demonstrate that it has performed a privacy impact assessment on it in certain jurisdictions.
Legacy / On-Premises Challenges	It is a very expensive workflow to initiate and complete a privacy impact assessment for the data assets that are classified as containing personal information.  Identification of the PIAs that need to be performed can be challenging, and completion of those PIAs can be very expensive.
Automation Opportunities	<ul> <li>Automatically initiate data privacy impact assessments based on factors such as the geography of the data infrastructure, classification of the data or the specified consumption purpose.</li> </ul>
Benefits	Evidence that all privacy requirements have been met for sensitive data is easy to produce since PIAs are automatically initiated.  Cost savings opportunities arising from more efficient identification of the need for PIAs.
Summary	Automatically enforcing a PIA on data that is classified as personal ensures policy compliance and reduces manual labor costs for that function.

## **B.** Commentary

- A privacy risk assessment methodology needs to be defined and all personnel who are responsible for performing the assessments must be trained and certified.
- Certified individuals must be perpetually recertified and receive continuing education.
- The risk assessment methodology needs to include a scoring approach that standardizes