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2. CDMC Key Controls and Automation Test Case Guide

/ Chapter 3: CDMC Capabilities & Control Examples /

# **Properties**

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# **Body**

# A. CDMC Description

COMPONENT 3.0: ACCESSIBILITY & USAGE CAPABILITY 3.2 ETHICAL USE AND PURPOSE OF DATA ARE TRACKED	
Control Description	Data Consumption Purpose must be provided for all Data Sharing Agreements involving sensitive data. The purpose must specify the type of data required and should include country or legal entity scope for complex international organizations.
Risks Addressed	Data is shared or used in an uncontrolled manner with the result that the producer is not aware of how it is being used and cannot ensure it is fit for the intended purpose.  Data is not shared in compliance with the ethical, legislative, regulatory and policy framework in which the enterprise operates.
Drivers / Requirements	There are emerging ethical-use frameworks and guidelines that include specifications for what should happen when the use of data changes.
Legacy / On-Premises Challenges	It is difficult for human capabilities to recognize when the use of data has changed into a new kind of processing that could be protected under some regulatory or legal basis without specific authorization.
Automation Opportunities	Record data access tracking information for sensitive data. Inforce of capture of purpose, for example integrated with model governance. Provide alerts to the data owner or data governance teams when there is an additional use case for existing user access to sensitive data. Recognize when specific technologies are employed (e.g Machine Learning), and leverage usage and cost tracking to highlight potential new use cases.
Benefits	Streamlined ethical data accountability for data that is accessed for new purposes.
Summary	Data sharing agreement between a user and the authoritative source expresses the intent to use the data for a specific purpose. Automated tracking and monitoring of data consumption purpose can alert data owners and data governance teams when there is new or changed use.

# **B.** Commentary

· Access, sharing, usage, and security policies should be in place so all requests for access to data sources should be known. This should result in data source owners and stewards being aware of all projects and/or technologies that are consumers of the source.