Hello,

The RFC does a good job on describing the goals of the Privacy outcome. Where the document needs to work on, is time lines. Data collection, storage length, use, and sharing should be minimized in a manner and to an extent reasonable and appropriate to the context and risk of privacy harm. We need to establish a timeline for what is reasonable. I propose that less than 30 days is a reasonable timeline.

Another thing that the document needs to address is to be more specific in explaining safeguards. Organizations should employ security safeguards to protect personal information they collect, store, use, or share. What do those safeguards entail? Is a firewall a safeguard or a lock on a filing cabinet sufficient?

Thanks,