

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
1	Definitions and General Provisions	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
2	Rights of Individuals	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
2.3	Rights of Individuals	Each Individual has the right to the protection of the Personal Data thereof that shall be processed only within the framework of transparency, honesty, and respect of human dignity, and acceptable practices according to provisions hereof.	Functional	No Relationship	N/A	N/A	N/A	0	
2.4	Rights of Individuals	The Controller shall process Personal Data only after obtaining the consent of the Individual, unless data processing is necessary to achieve a Lawful Purpose for the Controller or the other recipient of such data.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
2.4	Rights of Individuals	The Controller shall process Personal Data only after obtaining the consent of the Individual, unless data processing is necessary to achieve a Lawful Purpose for the Controller or the other recipient of such data.	Functional	Intersects With	Data Subject Consent	PRI-03	Mechanisms exist to enable data subjects to authorize the collection, receipt, processing, storage, transmission, sharing, updating and/or disposal of their Personal Data (PD), where the data subject is provided, prior to collection, with: (1) Plain language explaining the potential data privacy risks of the authorization; (2) A means to decline the authorization; and (3) Necessary choice and consent-related criteria required by applicable statutory, regulatory and contractual obligations.	8	
2.4	Rights of Individuals	The Controller shall process Personal Data only after obtaining the consent of the Individual, unless data processing is necessary to achieve a Lawful Purpose for the Controller or the other recipient of such data.	Functional	Intersects With	Authority To Collect, Process, Store & Share Personal Data (PD)	PRI-04.1	Mechanisms exist to determine and document the legal authority that permits the organization to collect, receive, process, store, transmit, share, update and/or dispose Personal Data (PD), either generally or in support of a specific business process.	8	
2.5	Rights of Individuals	An Individual may, at any time:	Functional	No Relationship	N/A	N/A	N/A	0	
2.5.1	Rights of Individuals	Withdraw the prior consent thereof for Personal Data Processing.	Functional	Intersects With	Revoke Consent	PRI-03.4	Mechanisms exist to allow data subjects to revoke consent to collect, receive, process, store, transmit, share and/or update their Personal Data (PD).	8	
2.5.1	Rights of Individuals	Withdraw the prior consent thereof for Personal Data Processing.	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
2.5.2	Rights of Individuals	Object to processing the Personal Data thereof if such processing is not necessary to achieve the purposes for which such Personal Data have been collected or where such collected Personal Data are beyond the extent required, discriminatory, unfair or illegal.	Functional	Intersects With	Data Subject Consent	PRI-03	Mechanisms exist to enable data subjects to authorize the collection, receipt, processing, storage, transmission, sharing, updating and/or disposal of their Personal Data (PD), where the data subject is provided, prior to collection, with: (1) Plain language explaining the potential data privacy risks of the authorization; (2) A means to decline the authorization; and (3) Necessary choice and consent-related criteria required by applicable statutory, regulatory and contractual obligations.	5	
2.5.2	Rights of Individuals	Object to processing the Personal Data thereof if such processing is not necessary to achieve the purposes for which such Personal Data have been collected or where such collected Personal Data are beyond the extent required, discriminatory, unfair or illegal.	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	8	
2.5.3	Rights of Individuals	Request omission or erasure of the Personal Data thereof in any of the cases referred to in the preceding two items, upon cessation of the purpose for which the processing has been conducted, or where all justifications for maintaining such Personal Data by the Controller cease to exist.	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	8	
2.5.3	Rights of Individuals	Request omission or erasure of the Personal Data thereof in any of the cases referred to in the preceding two items, upon cessation of the purpose for which the processing has been conducted, or where all justifications for maintaining such Personal Data by the Controller cease to exist.	Functional	Intersects With	Right to Erasure	PRI-06.5	Mechanisms exist to maintain a process to erase a data subject's Personal Data (PD), in accordance with applicable laws, regulations and contractual obligations pertaining to the retention of their PD.	8	
2.5.4	Rights of Individuals	Request corrections to the Personal Data thereof. A request so made shall be accompanied with proof of the accuracy of such request.	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	8	
2.5.4	Rights of Individuals	Request corrections to the Personal Data thereof. A request so made shall be accompanied with proof of the accuracy of such request.	Functional	Intersects With	Correcting Inaccurate Personal Data (PD)	PRI-06.1	Mechanisms exist to maintain a process for: (1) Data subjects to have inaccurate Personal Data (PD) maintained by the organization corrected or amended; and (2) Disseminating corrections or amendments of PD to other authorized users of the PD.	8	

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2.6	Rights of Individuals	An Individual may, at any time, access the Personal Data thereof and apply to review the same, in facing any Controller, and an Individual has, in particular, the right to:	Functional	Subset Of	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	10	
2.6.1	Rights of Individuals	Be notified of processing the Personal Data thereof and the purposes for which such processing is conducted.	Functional	Subset Of	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	10	
2.6.2	Rights of Individuals	Be notified of any disclosure of inaccurate Personal Data.	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	8	
2.6.2	Rights of Individuals	Be notified of any disclosure of inaccurate Personal Data.	Functional	Intersects With	Data Subject Communications	PRI-17	Mechanisms exist to craft disclosures and communications to data subjects in a manner that is concise, unambiguous and understandable by a reasonable person.	8	
2.6.3	Rights of Individuals	Obtain a copy of the Personal Data thereof after paying an amount that shall not exceed the service charge.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
2.7	Rights of Individuals	The controls and procedures, related to individuals' exercise of rights provided for in the two preceding Articles, shall be specified by a decision of the Minister.	Functional	No Relationship	N/A	N/A	N/A	0	
3	Liabilities of Controller and Processor	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
3.8	Liabilities of Controller and Processor	The Controller shall abide by the following:	Functional	Subset Of	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	10	
3.8.1	Liabilities of Controller and Processor	Processing Personal Data honestly and legitimately.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	8	
3.8.2	Liabilities of Controller and Processor	Consider the controls related to designing, changing or developing products, systems and services pertinent to Personal Data Processing.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	8	
3.8.3	Liabilities of Controller and Processor	Taking appropriate administrative, technical and financial precautions to protect Personal Data, in accordance with what is determined by the Competent Department.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	8	
3.8.4	Liabilities of Controller and Processor	The privacy protecting policies developed by the Competent Department, and a decision thereon shall be issued by the Minister.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	8	
3.9	Liabilities of Controller and Processor	The Controller shall, prior to starting processing any Personal Data, inform the Individual with the following:	Functional	Subset Of	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	10	
3.9.1	Liabilities of Controller and Processor	The Controller's details or any other party conducting the processing for the Controller or to be used thereby.	Functional	Subset Of	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	10	

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3.9.2	Liabilities of Controller and Processor	The Lawful Purposes that the Controller or any other party wants to process the Personal Data therefor.	Functional	Subset Of	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	10	
3.9.3	Liabilities of Controller and Processor	Comprehensive and accurate description of the processing activities and the levels of disclosure of such Personal Data for the Lawful Purposes, and if the Controller fails to do so, the Controller shall provide the Individual with a general description thereof.	Functional	Subset Of	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	10	
3.9.4	Liabilities of Controller and Processor	Any other information that is necessary and required for fulfilling conditions of Personal Data Processing.	Functional	Subset Of	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	10	
3.10	Liabilities of Controller and Processor	The Controller shall verify that Personal Data that he collects, or being collected for the benefit thereof, is relevant to Lawful Purposes and adequate for achieving the same. The Controller shall, also, ensure such data is accurate, complete and up to date to meet such Lawful Purposes. In addition, the Controller shall not keep any Personal Data for a period of time that exceeds the necessary period for achieving such purposes.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
3.10	Liabilities of Controller and Processor	The Controller shall verify that Personal Data that he collects, or being collected for the benefit thereof, is relevant to Lawful Purposes and adequate for achieving the same. The Controller shall, also, ensure such data is accurate, complete and up to date to meet such Lawful Purposes. In addition, the Controller shall not keep any Personal Data for a period of time that exceeds the necessary period for achieving such purposes.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	8	
3.11	Liabilities of Controller and Processor	The Controller shall take the following procedures:	Functional	Subset Of	Data Privacy Program	PRI-01	Mechanisms exist to facilitate the implementation and operation of data protection controls throughout the data lifecycle to ensure all forms of Personal Data (PD) are processed lawfully, fairly and transparently.	10	
3.11.1	Liabilities of Controller and Processor	Reviewing privacy protection measures before proceeding with new processing operations.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
3.11.1	Liabilities of Controller and Processor	Reviewing privacy protection measures before proceeding with new processing operations.	Functional	Intersects With	Authority To Collect, Process, Store & Share Personal Data (PD)	PRI-04.1	Mechanisms exist to determine and document the legal authority that permits the organization to collect, receive, process, store, transmit, share, update and/or dispose Personal Data (PD), either generally or in support of a specific business process.	5	
3.11.1	Liabilities of Controller and Processor	Reviewing privacy protection measures before proceeding with new processing operations.	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	
3.11.2	Liabilities of Controller and Processor	Identifying Processors responsible for Personal Data protection.	Functional	Intersects With	Stakeholder Identification & Involvement	AST-01.2	Mechanisms exist to identify and involve pertinent stakeholders of critical Technology Assets, Applications, Services and/or Data (TAASD) to support the ongoing secure management of those assets.	8	
3.11.2	Liabilities of Controller and Processor	Identifying Processors responsible for Personal Data protection.	Functional	Intersects With	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing Technology Assets, Applications, Services and/or Data (TAASD)-related risks.	8	
3.11.3	Liabilities of Controller and Processor	Training and raising awareness of Processors on protecting personal data.	Functional	Intersects With	Role-Based Security, Compliance & Resilience Training	SAT-03	Mechanisms exist to provide role-based security, compliance and resilience-related training: (1) Before authorizing access to the system or performing assigned duties; (2) When required by system changes; and (3) Annually thereafter.	5	
3.11.3	Liabilities of Controller and Processor	Training and raising awareness of Processors on protecting personal data.	Functional	Intersects With	Sensitive / Regulated Data Storage, Handling & Processing	SAT-03.3	Mechanisms exist to ensure that every user accessing a system processing, storing or transmitting sensitive and/or regulated data is formally trained in data handling requirements.	8	
3.11.4	Liabilities of Controller and Processor	Developing internal systems to receive and investigate complaints, and data access and omission or correction requests; and they shall be made available to individuals.	Functional	Intersects With	Data Subject Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns and/or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	8	
3.11.4	Liabilities of Controller and Processor	Developing internal systems to receive and investigate complaints, and data access and omission or correction requests; and they shall be made available to individuals.	Functional	Intersects With	Data Subject Communications	PRI-17	Mechanisms exist to craft disclosures and communications to data subjects in a manner that is concise, unambiguous and understandable by a reasonable person.	8	
3.11.5	Liabilities of Controller and Processor	Developing internal systems for the effective management of Personal Data, and reporting any breach of measures aiming at the protection thereof.	Functional	Intersects With	Data Privacy Program	PRI-01	Mechanisms exist to facilitate the implementation and operation of data protection controls throughout the data lifecycle to ensure all forms of Personal Data (PD) are processed lawfully, fairly and transparently.	8	
3.11.5	Liabilities of Controller and Processor	Developing internal systems for the effective management of Personal Data, and reporting any breach of measures aiming at the protection thereof.	Functional	Intersects With	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity and data protection-related incidents.	8	
3.11.6	Liabilities of Controller and Processor	Using appropriate technologies to enable individuals to exercise their rights to directly access, review and correct their respective Personal Data.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	

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3.11.6	Liabilities of Controller and Processor	Using appropriate technologies to enable individuals to exercise their rights to directly access, review and correct their respective Personal Data.	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	8	
3.11.7	Liabilities of Controller and Processor	Conducting comprehensive audits and reviews on the compliance extent with Personal Data protection requirements.	Functional	Intersects With	Conformity Assessment	CPL-01.4	Mechanisms exist to conduct assessments to demonstrate security, compliance and/or resilience capability conformity with applicable cybersecurity and data protection laws, regulations and/or contractual obligations.	8	
3.11.7	Liabilities of Controller and Processor	Conducting comprehensive audits and reviews on the compliance extent with Personal Data protection requirements.	Functional	Intersects With	Security, Compliance & Resilience Controls Oversight	CPL-02	Mechanisms exist to provide a security, compliance and resilience controls oversight function that reports to the organization's executive leadership.	8	
3.11.8	Liabilities of Controller and Processor	Verifying Processor's compliance with the instructions directed thereto, taking the appropriate precautions to protect Personal Data, and monitoring and following-up the same constantly.	Functional	Intersects With	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for applicable security, compliance and resilience requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	5	
3.11.8	Liabilities of Controller and Processor	Verifying Processor's compliance with the instructions directed thereto, taking the appropriate precautions to protect Personal Data, and monitoring and following-up the same constantly.	Functional	Intersects With	First-Party Declaration (1PD)	TPM-05.6	Mechanisms exist to obtain a First-Party Declaration (1PD) from applicable External Service Providers (ESPs) that provides assurance of compliance with specified statutory, regulatory and contractual obligations for security, compliance and resilience controls, including any flow-down requirements to subcontractors.	5	
3.11.8	Liabilities of Controller and Processor	Verifying Processor's compliance with the instructions directed thereto, taking the appropriate precautions to protect Personal Data, and monitoring and following-up the same constantly.	Functional	Intersects With	Third-Party Attestation (3PA)	TPM-05.8	Mechanisms exist to obtain an attestation from an independent Third-Party Assessment Organization (3PAO) that provides assurance of conformity with specified statutory, regulatory and contractual obligations for security, compliance and resilience controls, including any flow-down requirements to contractors and subcontractors.	5	
3.11.8	Liabilities of Controller and Processor	Verifying Processor's compliance with the instructions directed thereto, taking the appropriate precautions to protect Personal Data, and monitoring and following-up the same constantly.	Functional	Intersects With	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and assess External Service Providers (ESPs) for compliance with established contractual requirements for security, compliance and resilience controls.	5	
3.12	Liabilities of Controller and Processor	The Controller shall, at the time of disclosing Personal Data or transferring it to the Processor, take into consideration that it is in line with Lawful Purposes and is processed according to provisions hereof.	Functional	Intersects With	Prohibition of Selling, Processing and/or Sharing Personal Data (PD)	PRI-03.3	Mechanisms exist to prevent the sale, processing and/or sharing of Personal Data (PD) when: (1) Instructed by the data subject; or (2) The data subject is a minor, where selling and/or sharing PD is legally prohibited.	5	
3.12	Liabilities of Controller and Processor	The Controller shall, at the time of disclosing Personal Data or transferring it to the Processor, take into consideration that it is in line with Lawful Purposes and is processed according to provisions hereof.	Functional	Intersects With	Restrict Collection, Processing & Sharing To Identified Purpose	PRI-04	Mechanisms exist to minimize the collection, processing and/or sharing of Personal Data (PD) to only what is adequate, relevant and limited to the purposes identified in the data privacy notice, including protections against collecting PD from minors without appropriate parental or legal guardian consent.	5	
3.12	Liabilities of Controller and Processor	The Controller shall, at the time of disclosing Personal Data or transferring it to the Processor, take into consideration that it is in line with Lawful Purposes and is processed according to provisions hereof. Each of the Controller and the Processor shall take the precautions necessary to protect Personal Data against loss, damage, change, disclosure, access thereto, or the inadvertent or illegal use thereof. Such precautions shall be commensurate with the nature and the importance of the Personal Data intended to be protected. The Processor shall forthwith notify the Controller of the existence of any breach of the precautions referred to, or where any risk arises threatening Personal Data in any way.	Functional	Intersects With	Information Sharing With Third Parties	PRI-07	Mechanisms exist to disclose Personal Data (PD) to third-parties only for the purposes identified in the data privacy notice and with the implicit or explicit consent of the data subject.	5	
3.13	Liabilities of Controller and Processor	Each of the Controller and the Processor shall take the precautions necessary to protect Personal Data against loss, damage, change, disclosure, access thereto, or the inadvertent or illegal use thereof. Such precautions shall be commensurate with the nature and the importance of the Personal Data intended to be protected. The Processor shall forthwith notify the Controller of the existence of any breach of the precautions referred to, or where any risk arises threatening Personal Data in any way.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
3.13	Liabilities of Controller and Processor	Each of the Controller and the Processor shall take the precautions necessary to protect Personal Data against loss, damage, change, disclosure, access thereto, or the inadvertent or illegal use thereof. Such precautions shall be commensurate with the nature and the importance of the Personal Data intended to be protected. The Processor shall forthwith notify the Controller of the existence of any breach of the precautions referred to, or where any risk arises threatening Personal Data in any way.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
3.14	Liabilities of Controller and Processor	The Controller shall inform the Individual and Competent Department of the occurrence of any breach of the precautions provided for in the preceding Article, and if such breach may cause serious damage to Personal Data or individual privacy.	Functional	Intersects With	Cyber Incident Reporting for Sensitive / Regulated Data	IRO-10.2	Mechanisms exist to report sensitive and/or regulated data incidents in a timely manner.	8	
3.15	Liabilities of Controller and Processor	Taking into account the liabilities provided for hereto, the Controller shall be forbidden from taking any decision or measure that may limit the Cross-Border Data Flow, unless the processing of such data is in breach of this Law, or where such processing may cause serious damage to the Personal Data or to the Individual's privacy.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
4	Personal Data with Special Nature	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
4.16	Personal Data with Special Nature	The Personal data, related to ethnic origin, children, health, physical or psychological condition, religious creeds, marital relations, and criminal offenses, shall be regarded as Personal data with special nature. The Minister may add other types of Personal Data of a special nature, where the misuse or disclosure of the same may cause serious damage to Individual. Personal Data of a special nature may only be processed after obtaining the permission from the Competent Department, as per the measures and controls determined by a decision issued by the Minister. The Minister may, upon a decision therefrom, imposing additional precautions with the intent of protecting Personal Data of a special nature.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
4.17	Personal Data with Special Nature	Taking into consideration the liabilities provided for hereto, an owner or operator of any website addressing children shall take into account the following:	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
4.17.1	Personal Data with Special Nature	Posting a notification on the website as to what child data is, the way of its use, and the policies followed in the disclosure thereof.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	8	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
4.17.2	Personal Data with Special Nature	Obtaining, either electronically or through any other appropriate means, an explicit consent from the guardian of the child whose Personal Data is processed.	Functional	Intersects With	Parent or Guardian Opt-In Consent For Minors	PRI-03.13	Mechanisms exist to obtain parental or guardian consent for Personal Data (PD) processing actions through reasonable consumer expectations, when the data subject is a minor.	8	
4.17.3	Personal Data with Special Nature	Providing a child's guardian, upon the request thereof, and after verifying the identity thereof, with a description of the type of the Personal Data processed, along with stating the purpose of the process together with a copy of the data processed or gathered about the child.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
4.17.3	Personal Data with Special Nature	Providing a child's guardian, upon the request thereof, and after verifying the identity thereof, with a description of the type of the Personal Data processed, along with stating the purpose of the process together with a copy of the data processed or gathered about the child.	Functional	Intersects With	Data Subject Authentication	PRI-06.8	Mechanisms exist to utilize reasonable consumer expectations to verify a data subject's identity, prior to taking action to disclose, share, correct, amend and/or delete Personal Data (PD).	5	
4.17.4	Personal Data with Special Nature	Deleting, removing or suspending processing any Personal Data that has been gathered from or about a child, if such is requested by child's guardian.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
4.17.4	Personal Data with Special Nature	Deleting, removing or suspending processing any Personal Data that has been gathered from or about a child, if such is requested by child's guardian.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	8	
4.17.5	Personal Data with Special Nature	A child's participation in a game, promotional award or any other activity shall not be conditional on the child's provision of Personal Data in excess of the necessary for the participation in such activity.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
5	Exemptions	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
6	Electronic Communication for the Purpose of Direct Marketing	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
6.22	Electronic Communication for the Purpose of Direct Marketing	The transmission of any Electronic Communication to an Individual, for the purpose of Direct Marketing, shall be forbidden, except after obtaining the prior consent thereof. The Electronic Communication shall include the identity of the originator thereof, and highlight that it is sent for the purpose of Direct Marketing. In addition, it shall include a valid address for easy access thereto and through which an Individual can send a request to the originator to stop such communications or revoke the consent on the sending thereof.	Functional	No Relationship	N/A	N/A	N/A	0	
7	Penalties	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
8	Final Provision	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
8.26	Final Provision	An Individual may file a complaint to the Competent Department in case of violating provisions hereof and the issued decisions in the implementation	Functional	No Relationship	N/A	N/A	N/A	0	
8.27	Final Provision	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
8.28	Final Provision	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
8.29	Final Provision	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
8.30	Final Provision	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
8.31	Final Provision	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
8.32	Final Provision	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	