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**Security techniques — Extension to  
ISO/IEC 27001 and ISO/IEC 27002 for  
privacy information management —  
Requirements and guidelines**

*Techniques de sécurité — Extension d'ISO/IEC 27001 et ISO/IEC  
27002 au management de la protection de la vie privée — Exigences  
et lignes directrices*

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## Foreword

ISO (the International Organization for Standardization) and IEC (the International Electrotechnical Commission) form the specialized system for worldwide standardization. National bodies that are members of ISO or IEC participate in the development of International Standards through technical committees established by the respective organization to deal with particular fields of technical activity. ISO and IEC technical committees collaborate in fields of mutual interest. Other international organizations, governmental and non-governmental, in liaison with ISO and IEC, also take part in the work.

The procedures used to develop this document and those intended for its further maintenance are described in the ISO/IEC Directives, Part 1. In particular, the different approval criteria needed for the different types of document should be noted. This document was drafted in accordance with the editorial rules of the ISO/IEC Directives, Part 2 (see [www.iso.org/directives](http://www.iso.org/directives)).

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. ISO and IEC shall not be held responsible for identifying any or all such patent rights. Details of any patent rights identified during the development of the document will be in the Introduction and/or on the ISO list of patent declarations received (see [www.iso.org/patents](http://www.iso.org/patents)) or the IEC list of patent declarations received (see <http://patents.iec.ch>).

Any trade name used in this document is information given for the convenience of users and does not constitute an endorsement.

For an explanation of the voluntary nature of standards, the meaning of ISO specific terms and expressions related to conformity assessment, as well as information about ISO's adherence to the World Trade Organization (WTO) principles in the Technical Barriers to Trade (TBT) see [www.iso.org/iso/foreword.html](http://www.iso.org/iso/foreword.html).

This document was prepared by Joint Technical Committee ISO/IEC JTC 1, *Information technology*, Subcommittee SC 27, *Security techniques*.

Any feedback or questions on this document should be directed to the user's national standards body. A complete listing of these bodies can be found at [www.iso.org/members.html](http://www.iso.org/members.html).

# Introduction

## 0.1 General

Almost every organization processes Personally Identifiable Information (PII). Further, the quantity and types of PII processed is increasing, as is the number of situations where an organization needs to cooperate with other organizations regarding the processing of PII. Protection of privacy in the context of the processing of PII is a societal need, as well as the topic of dedicated legislation and/or regulation all over the world.

The Information Security Management System (ISMS) defined in ISO/IEC 27001 is designed to permit the addition of sector specific requirements, without the need to develop a new Management System. ISO Management System standards, including the sector specific ones, are designed to be able to be implemented either separately or as a combined Management System.

Requirements and guidance for PII protection vary depending on the context of the organization, in particular where national legislation and/or regulation exist. ISO/IEC 27001 requires that this context be understood and taken into account. This document includes mapping to:

- the privacy framework and principles defined in ISO/IEC 29100;
- ISO/IEC 27018;
- ISO/IEC 29151; and
- the EU General Data Protection Regulation.

However, these can need to be interpreted to take into account local legislation and/or regulation.

This document can be used by PII controllers (including those that are joint PII controllers) and PII processors (including those using subcontracted PII processors and those processing PII as subcontractors to PII processors).

An organization complying with the requirements in this document will generate documentary evidence of how it handles the processing of PII. Such evidence can be used to facilitate agreements with business partners where the processing of PII is mutually relevant. This can also assist in relationships with other stakeholders. The use of this document in conjunction with ISO/IEC 27001 can, if desired, provide independent verification of this evidence.

This document was initially developed as ISO/IEC 27552.

## 0.2 Compatibility with other management system standards

This document applies the framework developed by ISO to improve alignment among its Management System Standards.

This document enables an organization to align or integrate its PIMS with the requirements of other Management System standards.





# Security techniques — Extension to ISO/IEC 27001 and ISO/IEC 27002 for privacy information management — Requirements and guidelines

## 1 Scope

This document specifies requirements and provides guidance for establishing, implementing, maintaining and continually improving a Privacy Information Management System (PIMS) in the form of an extension to ISO/IEC 27001 and ISO/IEC 27002 for privacy management within the context of the organization.

This document specifies PIMS-related requirements and provides guidance for PII controllers and PII processors holding responsibility and accountability for PII processing.

This document is applicable to all types and sizes of organizations, including public and private companies, government entities and not-for-profit organizations, which are PII controllers and/or PII processors processing PII within an ISMS.

## 2 Normative references

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

ISO/IEC 27000, *Information technology — Security techniques — Information security management systems — Overview and vocabulary*

ISO/IEC 27001:2013, *Information technology — Security techniques — Information security management systems — Requirements*

ISO/IEC 27002:2013, *Information technology — Security techniques — Code of practice for information security controls*

ISO/IEC 29100, *Information technology — Security techniques — Privacy framework*

## 3 Terms, definitions and abbreviations

For the purposes of this document, the terms and definitions given in ISO/IEC 27000 and ISO/IEC 29100 and the following apply.

ISO and IEC maintain terminological databases for use in standardization at the following addresses:

- ISO Online browsing platform: available at <https://www.iso.org/obp>
- IEC Electropedia: available at <http://www.electropedia.org/>

### 3.1

#### joint PII controller

PII controller that determine the purposes and means of the processing of PII jointly with one or more other PII controllers

## 3.2

### **privacy information management system PIMS**

information security management system which addresses the protection of privacy as potentially affected by the processing of PII

## **4 General**

### **4.1 Structure of this document**

This is a sector-specific document related to ISO/IEC 27001:2013 and to ISO/IEC 27002:2013.

This document focuses on PIMS-specific requirements. Compliance with this document is based on adherence to these requirements and with the requirements in ISO/IEC 27001:2013. This document extends the requirements of ISO/IEC 27001:2013 to take into account the protection of privacy of PII principals as potentially affected by the processing of PII, in addition to information security. For a better understanding, implementation guidance and other information regarding the requirements is included.

[Clause 5](#) gives PIMS-specific requirements and other information regarding the information security requirements in ISO/IEC 27001 appropriate to an organization acting as either a PII controller or a PII processor.

NOTE 1 For completeness, [Clause 5](#) contains a subclause for each of the clauses containing requirements in ISO/IEC 27001:2013, even in cases where there are no PIMS-specific requirements or other information.

[Clause 6](#) gives PIMS-specific guidance and other information regarding the information security controls in ISO/IEC 27002 and PIMS-specific guidance for an organization acting as either a PII controller or a PII processor.

NOTE 2 For completeness, [Clause 6](#) contains a subclause for each of the clauses containing objectives or controls in ISO/IEC 27002:2013, even in cases where there is no PIMS-specific guidance or other information.

[Clause 7](#) gives additional ISO/IEC 27002 guidance for PII controllers, and [Clause 8](#) gives additional ISO/IEC 27002 guidance for PII processors.

[Annex A](#) lists the PIMS-specific control objectives and controls for an organization acting as a PII controller, (whether it employs a PII processor or not, and whether acting jointly with another PII controller or not).

[Annex B](#) lists the PIMS-specific control objectives and controls for an organization acting as a PII processor (whether it subcontracts the processing of PII to a separate PII processor or not, and including those processing PII as subcontractors to PII processors).

[Annex C](#) contains a mapping to ISO/IEC 29100.

[Annex D](#) contains a mapping of the controls in this document to the European Union General Data Protection Regulation.

[Annex E](#) contains a mapping to ISO/IEC 27018 and ISO/IEC 29151.

[Annex F](#) explains how ISO IEC 27001 and ISO/IEC 27002 are extended to the protection of privacy when processing PII.

### **4.2 Application of ISO/IEC 27001:2013 requirements**

[Table 1](#) gives the location of PIMS-specific requirements in this document in relation to ISO/IEC 27001.

**Table 1 — Location of PIMS-specific requirements and other information for implementing controls in ISO/IEC 27001:2013**

Clause in ISO/IEC 27001:2013	Title	Subclause in this document	Remarks
4	Context of the organization	<a href="#">5.2</a>	Additional requirements
5	Leadership	<a href="#">5.3</a>	No PIMS-specific requirements
6	Planning	<a href="#">5.4</a>	Additional requirements
7	Support	<a href="#">5.5</a>	No PIMS-specific requirements
8	Operation	<a href="#">5.6</a>	No PIMS-specific requirements
9	Performance evaluation	<a href="#">5.7</a>	No PIMS-specific requirements
10	Improvement	<a href="#">5.8</a>	No PIMS-specific requirements

NOTE The extended interpretation of “information security” according to [5.1](#) always applies even when there are no PIMS-specific requirements.

### 4.3 Application of ISO/IEC 27002:2013 guidelines

[Table 2](#) gives the location of PIMS-specific guidance in this document in relation to ISO/IEC 27002.

**Table 2 — Location of PIMS-specific guidance and other information for implementing controls in ISO/IEC 27002:2013**

Clause in ISO/IEC 27002:2013	Title	Subclause in this document	Remarks
5	Information security policies	<a href="#">6.2</a>	Additional guidance
6	Organization of information security	<a href="#">6.3</a>	Additional guidance
7	Human resource security	<a href="#">6.4</a>	Additional guidance
8	Asset management	<a href="#">6.5</a>	Additional guidance
9	Access control	<a href="#">6.6</a>	Additional guidance
10	Cryptography	<a href="#">6.7</a>	Additional guidance
11	Physical and environmental security	<a href="#">6.8</a>	Additional guidance
12	Operations security	<a href="#">6.9</a>	Additional guidance
13	Communications security	<a href="#">6.10</a>	Additional guidance
14	System acquisition, development and maintenance	<a href="#">6.11</a>	Additional guidance
15	Supplier relationships	<a href="#">6.12</a>	Additional guidance
16	Information security incident management	<a href="#">6.13</a>	Additional guidance
17	Information security aspects of business continuity management.	<a href="#">6.14</a>	No PIMS-specific guidance
18	Compliance	<a href="#">6.15</a>	Additional guidance

NOTE The extended interpretation of “information security” according to [6.1](#) always applies even when there is no PIMS-specific guidance.

#### 4.4 Customer

Depending on the role of the organization (see [5.2.1](#)), "customer" can be understood as either:

- a) an organization who has a contract with a PII controller (e.g. the customer of the PII controller);

NOTE 1 This can be the case of an organization which is a joint controller.

NOTE 2 An individual person in a business to consumer relationship with an organization is referred to as a "PII principal" in this document.

- b) a PII controller who has a contract with a PII processor (e.g. the customer of the PII processor); or

- c) a PII processor who has a contract with a subcontractor for PII processing (e.g. the customer of the subcontracted PII sub-processor).

NOTE 3 Where "customer" is referred to in [Clause 6](#), the related provisions can be applicable in contexts a), b), or c).

NOTE 4 Where "customer" is referred to in [Clause 7](#) and [Annex A](#), the relation provisions are applicable in context a).

NOTE 5 Where "customer" is referred to in [Clause 8](#) and [Annex B](#), the relation provisions can be applicable in contexts b) and/or c).

### 5 PIMS-specific requirements related to ISO/IEC 27001

#### 5.1 General

The requirements of ISO/IEC 27001:2013 mentioning "information security" shall be extended to the protection of privacy as potentially affected by the processing of PII.

NOTE In practice, where "information security" is used in ISO/IEC 27001:2013, "information security and privacy" applies instead (see [Annex F](#)).

#### 5.2 Context of the organization

##### 5.2.1 Understanding the organization and its context

**A requirement additional to ISO/IEC 27001:2013, 4.1 is:**

The organization shall determine its role as a PII controller (including as a joint PII controller) and/or a PII processor.

The organization shall determine external and internal factors that are relevant to its context and that affect its ability to achieve the intended outcome(s) of its PIMS. For example, these can include:

- applicable privacy legislation;
- applicable regulations;
- applicable judicial decisions;
- applicable organizational context, governance, policies and procedures;
- applicable administrative decisions;
- applicable contractual requirements.

Where the organization acts in both roles (e.g. a PII controller and a PII processor), separate roles shall be determined, each of which is the subject of a separate set of controls.

NOTE The role of the organization can be different for each instance of the processing of PII, since it depends on who determines the purposes and means of the processing.

## 5.2.2 Understanding the needs and expectations of interested parties

**A requirement additional to ISO/IEC 27001:2013, 4.2 is:**

The organization shall include among its interested parties (see ISO/IEC 27001:2013, 4.2), those parties having interests or responsibilities associated with the processing of PII, including the PII principals.

NOTE 1 Other interested parties can include customers (see 4.4), supervisory authorities, other PII controllers, PII processors and their subcontractors.

NOTE 2 Requirements relevant to the processing of PII can be determined by legal and regulatory requirements, by contractual obligations and by self-imposed organizational objectives. The privacy principles set out in ISO/IEC 29100 provide guidance concerning the processing of PII.

NOTE 3 As an element to demonstrate compliance to the organization's obligations, some interested parties can expect that the organization be in conformity with specific standards, such as the Management System specified in this document, and/or any relevant set of specifications. These parties can call for independently audited compliance to these standards.

## 5.2.3 Determining the scope of the information security management system

**A requirement additional to ISO/IEC 27001:2013, 4.3 is:**

When determining the scope of the PIMS, the organization shall include the processing of PII.

NOTE The determination of the scope of the PIMS can require revising the scope of the information security management system, because of the extended interpretation of "information security" according to 5.1.

## 5.2.4 Information security management system

**A requirement additional to ISO/IEC 27001:2013, 4.4 is:**

The organization shall establish, implement, maintain and continually improve a PIMS in accordance with the requirements of ISO/IEC 27001:2013 Clauses 4 to 10, extended by the requirements in [Clause 5](#).

## 5.3 Leadership

### 5.3.1 Leadership and commitment

The requirements stated in ISO/IEC 27001:2013, 5.1 along with the interpretation specified in [5.1](#), apply.

### 5.3.2 Policy

The requirements stated in ISO/IEC 27001:2013, 5.2 along with the interpretation specified in [5.1](#), apply.

### 5.3.3 Organizational roles, responsibilities and authorities

The requirements stated in ISO/IEC 27001:2013, 5.3 along with the interpretation specified in [5.1](#), apply.

## 5.4 Planning

### 5.4.1 Actions to address risks and opportunities

#### 5.4.1.1 General

The requirements stated in ISO/IEC 27001:2013, 6.1.1 along with the interpretation specified in [5.1](#), apply.

#### 5.4.1.2 Information security risk assessment

The requirements stated in ISO/IEC 27001:2013, 6.1.2 apply with the following refinements:

**ISO/IEC 27001:2013, 6.1.2 c) 1) is refined as follows:**

The organization shall apply the information security risk assessment process to identify risks associated with the loss of confidentiality, integrity and availability, within the scope of the PIMS.

The organization shall apply privacy risk assessment process to identify risks related to the processing of PII, within the scope of the PIMS.

The organization shall ensure throughout the risk assessment processes that the relationship between information security and PII protection is appropriately managed.

NOTE The organization can either apply an integrated information security and privacy risk assessment process or two separate ones for information security and the risks related to the processing of PII.

**ISO/IEC 27001:2013, 6.1.2 d) 1) is refined as follows:**

The organization shall assess the potential consequences for both the organization and PII principals that would result if the risks identified in ISO/IEC 27001:2013, 6.1.2 c) as refined above, were to materialize.

#### 5.4.1.3 Information security risk treatment

The requirements stated in ISO/IEC 27001:2013, 6.1.3 apply with the following additions:

**ISO/IEC 27001:2013, 6.1.3 c) is refined as follows:**

The controls determined in ISO/IEC 27001:2013 6.1.3 b) shall be compared with the controls in [Annex A](#) and/or [Annex B](#) and ISO/IEC 27001:2013, Annex A to verify that no necessary controls have been omitted.

When assessing the applicability of control objectives and controls from ISO/IEC 27001:2013 Annex A for the treatment of risks, the control objectives and controls shall be considered in the context of both risks to information security as well as risks related to the processing of PII, including risks to PII principals.

**ISO/IEC 27001:2013, 6.1.3 d) is refined as follows:**

Produce a Statement of Applicability that contains:

- the necessary controls [see ISO/IEC 27001:2013, 6.1.3 b) and c)];
- justification for their inclusion;
- whether the necessary controls are implemented or not; and
- the justification for excluding any of the controls in [Annex A](#) and/or [Annex B](#) and ISO/IEC 27001:2013, Annex A according to the organization's determination of its role (see [5.2.1](#)).

Not all the control objectives and controls listed in the annexes need to be included in a PIMS implementation. Justification for exclusion can include where the controls are not deemed necessary