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datatracker.ietf.org/wg/scitt

vCon Privacy by Default

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Reference: **Privacy Primer for vCon Developers**

<https://www.ietf.org/archive/id/draft-james-privacy-primer-vcon-00.html>

Enabling Adherence to Privacy Governance

- **CCPA and GDPR:**

Businesses Sharing Personal Data with Others Must Enter Into Contracts Outlining the Purpose Limitation and Other Rules

- In many jurisdictions, **businesses** (data controllers) sharing personal data with others **must enter into agreements outlining the purpose limitation and other data handling** rules.
 - For example, this rule applies under the General Data Privacy Regulation (GDPR) and California Consumer Privacy Act (CCPA).
- This is akin to a "data use license" and is already widely being used. The requirements for the agreement's contents differ slightly between jurisdictions, but it is possible to develop a "best practices" agreement template.

Diana James

CIPP/US Attorney | Telecom | Privacy

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Enabling Adherence to Privacy Governance

- Businesses (**data controllers**) have a **legal obligation to communicate a consumer's deletion request** to others with whom the data was shared (e.g., service providers and data processors)
- **GDPR: The data controller must take reasonable steps** (considering the available technology and the cost of implementation) **to inform other entities** which are processing the personal data **requested to be erased** of any links to, or copy or replication of, those personal data.
- **CCPA: The businesses must notify their service providers** or contractors and all third parties with whom the business has shared the personal data **to delete the data** a consumer requested to be deleted **unless this proves impossible** or involves disproportionate effort.
- **Data processors** (service providers and contractors) in general **are not required** to comply with a direct erasure request from a consumer **but must inform the data controller** (the principal business making decisions about personal data handling).

Diana James

CIPP/US Attorney | Telecom | Privacy

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Lifecycle of a vCon



Gavin - (Consumer)

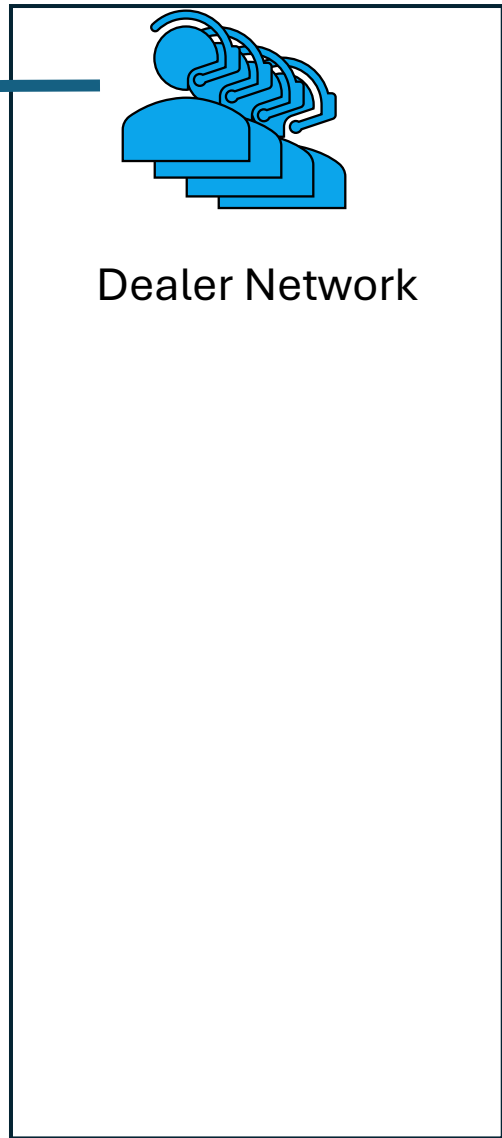
Data Source
zTelco

vcon

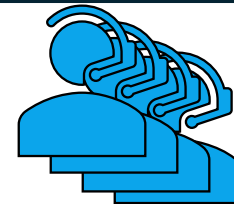
Hash:aaaa..1111

```
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  dailog: {
    call.mp3},
  consent: {
    111-867-5309,
    111-555-0199}
}
```

```
subject:      vcon://abc123
Registered:   01-01-2024-00-01
Payload:      aaaa..1111
vcon_operation: create
```



Dealer Network



Dealer Network

Data Source
zTelco

Data Controller
vConGPT

```

vcon
Hash:aaaa..1111
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  dialog: {
    call.mp3},
  consent: {
    111-867-5309,
    111-555-0199}
}

```

```

vcon
Hash:aaaa..1111
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  dialog: {
    call.mp3},
  consent: {
    111-867-5309,
    111-555-0199},
  *license: private,
  consent_lifetime: 15d,
  data_controller: vcongpt
}

```

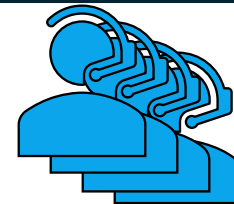
```

subject:      vcon://abc123
Registered:   01-01-2024-00-01
Payload:      aaaa..1111
vcon_operation: create

```



Gavin - (Consumer)



Dealer Network

Data Source
zTelco

Data Controller
vConGPT



```

vcon
Hash:aaaa..1111
{
  vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  dialog: {
    call.mp3},
  consent: {
    111-867-5309,
    111-555-0199}
}

```

```

vcon
Hash:bbbb..2222
{
  vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-01-2024-00-02,
  dialog: {
    call.mp3
    transcription},
  consent: {
    111-867-5309,
    111-555-0199}.
    *license: private,
    consenst_lifetime: 15d,
    data_controller: vcongpt
}

```

```

subject:      vcon://abc123
subject:      vcon://abc123
Registered:   01-01-2024-00-02
Payload:      bbbb..2222
vcon_operation: transcribe

```

SCIT



Gavin – (Consumer)

Data Source
zTelco

Data Controller
vConGPT

Data Processor
Data Processor
Data Processor
ACME_Rockets
Data Processor
Stroid

Dealer Network

```
vcon Hash:aaaa..1111
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  dialog: {
    call.mp3},
  consent: {
    111-867-5309,
    111-555-0199}
}
```

```
vcon Hash:bbbb..2222
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-01-2024-00-02,
  dialog: {
    call.mp3
    transcription},
  consent: {
    111-867-5309,
    111-555-0199},
  *license: private,
  consenst_lifetime: 15d,
  data_controller: vcongpt
}
```



```
vcon Hash:bbbb..2222
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-01-2024-00-02,
  dialog: {
    call.mp3
    transcription},
  consent: {
    111-867-5309,
    111-555-0199},
  *license: private,
  consenst_lifetime: 15d,
  data_controller: vcongpt
}
```

```
subject:      vcon://abc123
subject:      vcon://abc123
Registered:   01-01-2024-00-02
Payload:      bbbb..2222
vcon_operation: transcribe
```

SCIT

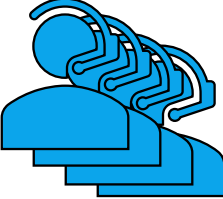


Gavin – (Consumer)

Data Source
zTelco

Data Controller
vConGPT

Data Processor
Data Processor
Data Processor
ACME-Rockets
Data Processor
Stroid


Dealer Network

```
vcon Hash:aaaa..1111
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  dialog: {
    call.mp3},
  consent: {
    111-867-5309,
    111-555-0199}
}
```

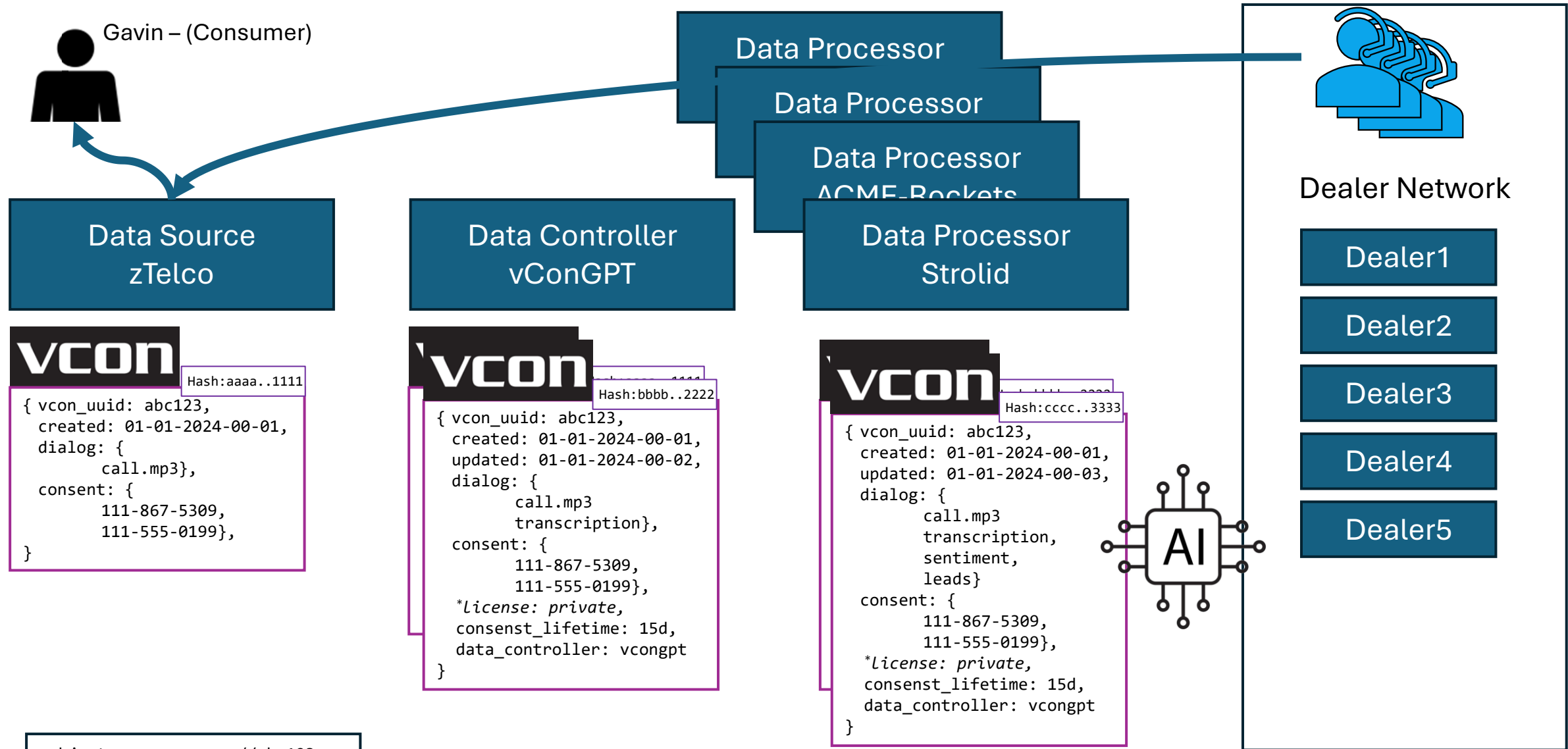
```
vcon Hash:bbbb..2222
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-01-2024-00-02,
  dialog: {
    call.mp3
    transcription},
  consent: {
    111-867-5309,
    111-555-0199},
  *license: private,
  consenst_lifetime: 15d,
  data_controller: vcongpt
}
```

```
vcon Hash:cccc..3333
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-01-2024-00-03,
  dialog: {
    call.mp3
    transcription
    sentiment,
    leads},
  *license: private,
  consenst_lifetime: 15d,
  data_controller: vcongpt
}
```



```
subject: vcon://abc123
subject: vcon://abc123
subject: vcon://abc123
Registered: 01-01-2024-00-03
Payload: cccc..3333
vcon_operation: sentiment
```

SCIT



```

vcon
Hash:aaaa..1111
{
  vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  dialog: {
    call.mp3},
  consent: {
    111-867-5309,
    111-555-0199},
}

```

```

vcon
Hash:bbbb..2222
{
  vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-01-2024-00-02,
  dialog: {
    call.mp3
    transcription},
  consent: {
    111-867-5309,
    111-555-0199},
  *license: private,
  consenst_lifetime: 15d,
  data_controller: vcongpt
}

```

```

vcon
Hash:cccc..3333
{
  vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-01-2024-00-03,
  dialog: {
    call.mp3
    transcription,
    sentiment,
    leads}
  consent: {
    111-867-5309,
    111-555-0199},
  *license: private,
  consenst_lifetime: 15d,
  data_controller: vcongpt
}

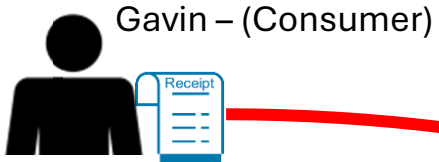
```

```

subject: vcon://abc123
subject: vcon://abc123
subject: vcon://abc123
Registered: 01-01-2024-00-03
Payload: cccc..3333
vcon_operation: sentiment

```

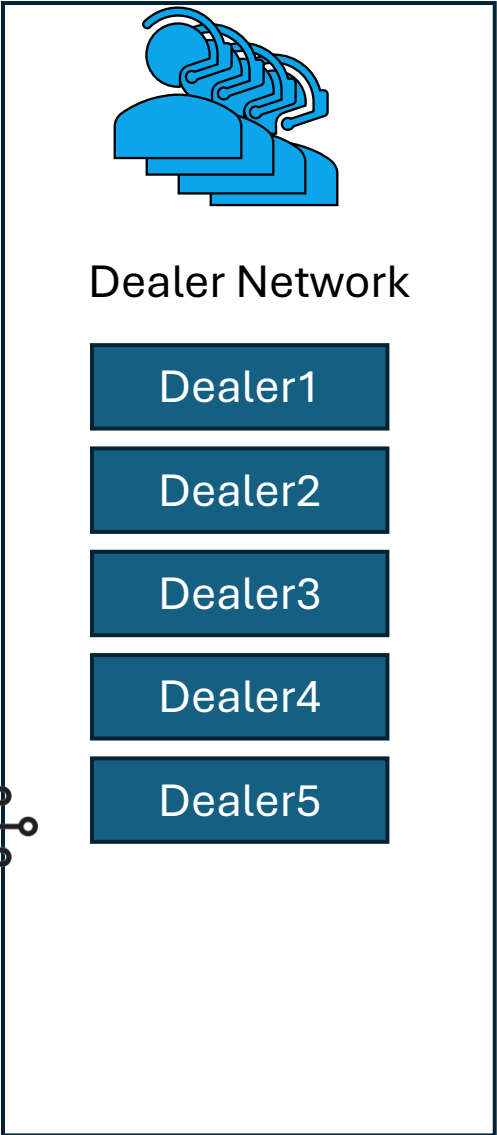
SCIT



Data Source
zTelco

Data Controller
vConGPT

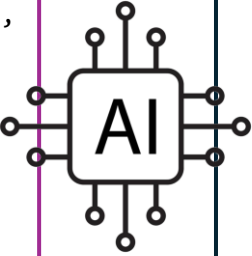
Data Processor
Data Processor
Data Processor
ACME-Rockets
Data Processor
Stroid



```
vcon Hash:aaaa..1111
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  dialog: {
    call.mp3},
  consent: {
    111-867-5309,
    111-555-0199},
}
```

```
vcon Hash:bbbb..2222
vcon Hash:dddd..4444
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-20-2024-00-04,
  dialog: {
    call.mp3
    transcription},
  consent: {
    111-555-0199},
  revoke-consent: {
    111-867-5309}
  *license: private,
  consenst_lifetime: 15d,
  data_controller: vcongpt
}
```

```
vcon Hash:cccc..3333
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-01-2024-00-03,
  dialog: {
    call.mp3
    transcription,
    sentiment,
    leads}
  consent: {
    111-867-5309,
    111-555-0199},
  *license: private,
  consenst_lifetime: 15d,
  data_controller: vcongpt
}
```



```
subject: vcon://abc123
subject: vcon://abc123
subject: vcon://abc123
subject: vcon://abc123
Registered: 01-01-2024-00-04
Payload: dddd..4444
vcon_operation: revoke-consent
```



Gavin – (Consumer)

Data Source
zTelco

Data Controller
vConGPT

Data Processor

Data Processor
ACME_Rockets

Data Processor
Stroid



```

vcon Hash:aaaa..1111
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  dialog: {
    call.mp3},
  consent: {
    111-867-5309,
    111-555-0199},
}

```

```

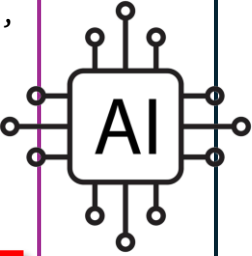
vcon Hash:bbbb..2222
vcon Hash:dddd..4444
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-20-2024-00-04,
  dialog: {
    call.mp3
    transcription},
  consent: {
    111-555-0199},
  revoke-consent: {
    111-867-5309}
  *license: private,
  consenst_lifetime: 15d,
  data_controller: vcongpt
}

```

```

vcon Hash:cccc..3333
{ vcon_uuid: abc123,
  created: 01-01-2024-00-01,
  updated: 01-01-2024-00-03,
  dialog: {
    call.mp3
    transcription,
    sentiment,
    leads}
  consent: {
    111-867-5309,
    111-555-0199},
  *license: private,
  consenst_lifetime: 15d,
  data_controller: vcongpt
}

```



```

subject: vcon://abc123
subject: vcon://abc123
subject: vcon://abc123
subject: vcon://abc123
Registered: 01-01-2024-00-04
Payload: dddd..4444
vcon_operation: revoke-consent


```



Auditors Content Enforcement

Inclusion & Consistency

SCITT

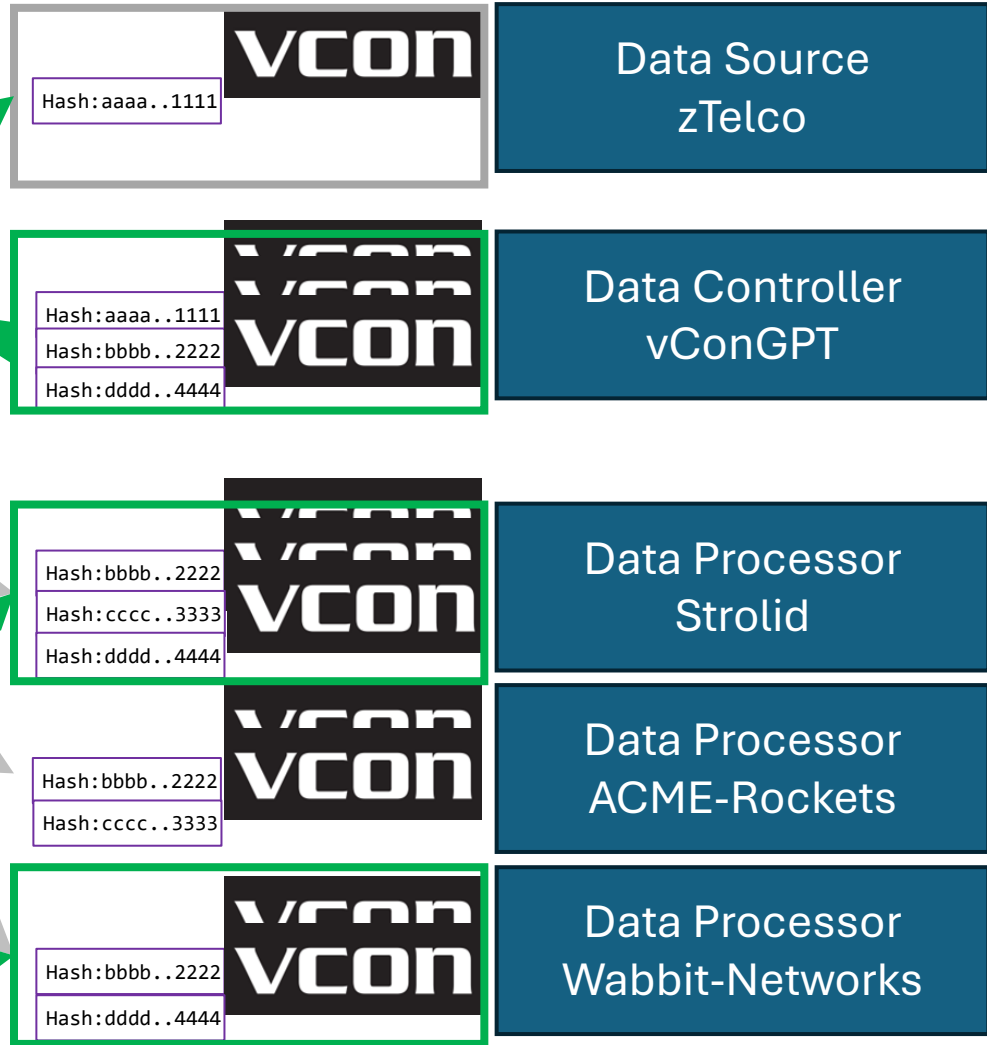
 Ledger

subject:	vcon://abc123
vcon_operation:	create
Payload:	aaaa..1111
Registered:	01-01-2024-00-01

subject:	vcon://abc123
vcon_operation:	transcribe
Payload:	bbbb..2222
Registered:	01-01-2024-00-02

subject:	vcon://abc123
vcon_operation:	sentiment
Payload:	cccc..3333
Registered:	01-01-2024-00-03

subject:	vcon://abc123
Registered:	01-01-2024-00-04
Payload:	dddd..4444
vcon_operation:	revoke-consent



Inclusion & Consistency

SCITT



subject: vcon://abc123
vcon_operation: create
Payload: aaaa..1111
Registered: 01-01-2024-00-01

subject: vcon://abc123
vcon_operation: transcribe
Payload: bbbb..2222
Registered: 01-01-2024-00-02

subject: vcon://abc123
vcon_operation: sentiment
Payload: cccc..3333
Registered: 01-01-2024-00-03

subject: vcon://abc123
Registered: 01-01-2024-00-04
Payload: dddd..4444
vcon_operation: revoke-consent

Hash: aaaa..1111

Data Source
zTelco

Hash: aaaa..1111
Hash: bbbb..2222
Hash: dddd..4444

Data Controller
vConGPT

Hash: bbbb..2222
Hash: cccc..3333
Hash: dddd..4444

Data Processor
Strolid

Hash: bbbb..2222
Hash: cccc..3333

Data Processor
ACME-Rockets

Hash: bbbb..2222
Hash: dddd..4444

Data Processor
Wabbit-Networks

Inclusion & Consistency

SCITT



subject: vcon://abc123
vcon_operation: create
Payload: aaaa..1111
Registered: 01-01-2024-00-01

subject: vcon://abc123
vcon_operation: transcribe
Payload: bbbb..2222
Registered: 01-01-2024-00-02

subject: vcon://abc123
vcon_operation: sentiment
Payload: cccc..3333
Registered: 01-01-2024-00-03

subject: vcon://abc123
Registered: 01-01-2024-00-04
Payload: dddd..4444
vcon_operation: revoke-consent

Hash: aaaa..1111

Data Source
zTelco

Hash: aaaa..1111
Hash: bbbb..2222
Hash: dddd..4444

Data Controller
vConGPT

Hash: bbbb..2222
Hash: cccc..3333
Hash: dddd..4444

Data Processor
Stroid

Hash: bbbb..2222
Hash: cccc..3333

Data Processor
ACME-Rockets

Hash: bbbb..2222
Hash: dddd..4444
Hash: eeee..6666

Data Processor
Wabbit-Networks

Proposal

- To enable Privacy by Design primitives as vCon quickly begins adoption:
- Add fields communicating intended use and source of ownership
 - **license : uri**
A versioned license that specifies the rules for use. By including in the vCon, any consumer of a vCon has no question what expectations are required to use the vCon
 - **consent_lifetime : ?**
The value the license would refer, setting specific expectations
 - **data_controller : <identity>**
Who must be contacted, within the consent_lifetime, to get any updates to revocation

Integration with SCITT

- SCITT provides:
 - proof a vCon was generated with an intended use
 - a reliable source of updates, including correction and revocation
- SCITT is not just integrity protection.
SCITT becomes a trusted source for updates, consistent with intended use, privacy and right to be forgotten
- A vCon that does not have a SCITT entry or receipt should not be trusted