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ISO 29100:2024 VERSUS ISO 29100:2020

Information technology — Security techniques — Privacy framework

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Report Description	Gap assessment showing ISO 29100:2024 VERSUS ISO 29100:2020
Industry Type	Information Systems
Document Type	Pre-audit record
Summary of changes	Core scope and purpose of the privacy framework remain stable, with 2024 mainly refining references (e.g., WG 5 SD2, ISO/IEC 27000 NOTE/Table A.1) and integration points with ISMS rather than introducing new mandatory elements.

1.0. Comparison Table:

Below Table describes the alignment clause-by-clause between the two versions of the ISO standard, which can be fully aligned (**Full**) or partially aligned (**Part**) or not aligned (**Not**).

Clause ISO IEC 29100-2024	Requirement ISO IEC 29100-2024	Clause ISO 29100-2020	Requirement ISO 29100-2020	Alignment	Remarks
4 Abbreviated terms	The 2024 version continues to emphasize the centrality of three recurring abbreviations—ICT, PET, and PII. Their presence reflects how privacy frameworks rely on a shared vocabulary to anchor obligations around technology systems, privacy safeguards, and personal data. Rather than introducing new terms, this reaffirmation signals stability in the conceptual foundation of the standard, ensuring consistency across revisions and easing comparison with earlier versions.	**3 Symbols and abbreviated terms**	In the 2020 version, the abbreviations ICT, PET, and PII are presented as common shorthand within ISO/IEC 29100. This reflects the standard's intent to establish a shared vocabulary for discussing technology systems, privacy-enhancing measures, and personal data. By codifying these terms, the framework reinforces consistency across compliance discussions, ensuring that privacy obligations are interpreted against a stable set of concepts rather than shifting definitions.	Full	No gaps exist in the abbreviation's clause (ICT, PET, PII) between ISO/IEC 29100:2024 and 2020 versions; definitions are identical.

Clause ISO IEC 29100-2024	Requirement ISO IEC 29100-2024	Clause ISO 29100-2020	Requirement ISO 29100-2020	Alignment	Remarks
5 Basic elements of the privacy framework **5.1 Overview of the privacy framework**	The 2024 framework positions privacy in ICT systems as a structured model built around roles, interactions, data recognition, and safeguards. Its defining move is the alignment with ISO/IEC 27000, showing a deliberate effort to integrate privacy into established security management practices. This signals a maturity shift: privacy is no longer treated as a standalone layer but as an embedded dimension of the broader ISMS ecosystem.	**4 Basic elements of the privacy framework** **4.1 Overview of the privacy framework**	The 2020 framework organizes privacy in ICT systems around six core elements—roles, interactions, data recognition, safeguards, policies, and controls. Its reliance on WG 5 SD2 as the reference base shows that privacy was still anchored in specialized documents, reflecting a stage where the framework stood apart from broader ISMS integration.	Part	No substantive gaps in privacy framework overview; 2024 version refines references (WG 5 SD2) and adds ISO/IEC 27000 NOTE/Table A.1 for ISMS integration.
5.2 Actors and roles **5.2.1 General**	The 2024 framework underscores the importance of defining four distinct actors in PII processing—principals, controllers, processors, and third parties. This clarity of roles reinforces accountability and ensures that privacy responsibilities are distributed in a structured, transparent way.	**4.2 Actors and roles**	The 2020 text emphasizes the need to distinguish four actors in PII processing—principals, controllers, processors, and third parties. This reflects the framework's focus on role clarity as the foundation for accountability. At this stage, the approach is straightforward: privacy responsibilities are mapped to these categories to ensure oversight and compliance, without yet layering in broader integration with security standards.	Full	No gaps