

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 001					During the adoption of ISO/IEC 27555 as an EN, the standard was also translated into German. A number of technical and linguistic issues were identified during the review of the German translation. The following comments address these findings and are intended to resolve them.		
DE- VH- 002				ge	<p>The predecessor standard, DIN 66398, differentiates: Deletion measures (or only measures) is used to combine the processes for identification, removal and actual erasure are summarized conceptually. Erasure mechanism (or only mechanism) is only used for the techniques that perform the actual overwriting or destruction, e.g. the last step of the measures.</p> <p>Rationale: The distinction helps the reader to recognize more clearly in the text whether a more complex procedure is necessary for deletion or whether secure deletion/destruction alone is meant.</p>	add a note of explanation the first time mechanism/ measures appear. Wherever the measure or mechanism is used in the text, use the terms clearly (see the following comments).	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 003		3.9	after Note 4 to Entry	te	[see DE-VH-002] Place the note in 'proposed change' as an additional note.	Add a Note: "NOTE 5 to entry A deletion measure can generally require several steps: The first step is to identify the data objects that are due for deletion. The data objects due for deletion may be linked to other data objects, for example in a database. It may then be necessary to unlink them in the context of processing, for example to maintain the consistency of a database. The actual deletion is executed in the third step. Two different terms are therefore used in the text: ,Deletion measure' (or only measure) is used to combines the three steps. ,Deletion mechanism' (or only mechanism) is only used for the techniques that perform the actual overwriting or destruction, i.e. the last step of the measures."	
DE- VH- 004		Introduction	2. paragraph, sentence 3	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 005		1	3. paragraph, item 3	te	[see DE-VH-002 and DE-VH-003] as measures and mechanisms are addressed, modify to:	Should read "- deletion measures and mechanisms;"	
DE- VH- 006		3.3	Note 3 to Entry, sentence 1	te	[see DE-VH-002 and DE-VH-003] current text "For selecting the methods for deletion, ..." should point out the distinction and should therefore be modify. This also allows the use of the precise term in sentence 2.	Should read "For selecting the methods for deletion (in terms of note 5: 'mechanisms'); ... "	
DE- VH- 007		3.3	Note 3 to Entry, sentence 2	te	[see DE-VH-002 and DE-VH-003] current text "Required measures ..." should be modify to:	Should read "Required mechanisms ..."	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 008		5.1	last paragraph (before 5.2)	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 009		5.4.2	Paragraph 2, sentence 2	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 010		9.1	2. paragraph after Note 1, sentence 3	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 011		9.1	4. paragraph after Note 1, sentence 4	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 012		9.1	5. paragraph after Note 1, item 5, first "mechanism " in item	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 013		9.1	5. paragraph after Note 1, item 6	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 014		9.1	5. paragraph after Note 1, item 7	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 015		9.1	Note 2	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 016		9.2	1. paragraph, sentence 2	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 017		9.2	1. paragraph, last sentence	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 018		9.4	1. paragraph after Note 1, last sentence	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 019		9.4	2. paragraph after Note 1, sentence 2	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 020		9.4	1. paragraph after Example, sentence 1	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 021		9.7.2	2. paragraph, item 2	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 022		9.7.2	4. paragraph, sentence 1 AND sentence 2	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure" in both positions	
DE- VH- 023		10.2	1. paragraph, item 5	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measure"	
DE- VH- 024		10.3	2. paragraph, sentence 1	te	The text read "... appropriate deletion processes are included in designs ...". At this point, however, the design of technical processes is addressed. In the sense of [see DE-	The text should read: "... appropriate deletion measures are included in designs ...".	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13	Document: ISO/IEC 27555:2021	Project:
------------------	-------------------------------------	----------

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
					VH-002 and DE-VH-003], 'measures' should therefore be used.		
DE- VH- 025		10.3	2. paragraph, item 1	te	[see DE-VH-002 and DE-VH-003]	modify "mechanism" to "measures including secure deletion mechanism"	
DE- VH- 026		3.9	Note 1	te	The wording "A specific cluster of PII typically has the same retention period." does not seem to make sense as it refers to ONE cluster of PII. Clusters of PII are also abstract structures to which no legal retention periods are assigned by law or other legal bases. They are used for for the classification of data objects.	A meaningful statement (and what is meant here) is that "The data objects of a specific cluster of PII typically has the same retention period."	
DE- VH- 027		5.1	2. paragraph, item 3	te	The text "allocate each cluster of PII to a deletion class;" does only describe a small part of the relevant action: The data sets of the organization need to be analysed and logically separated to find deletion rules by using the clusters of PII.	the item should read: "use the processing purposes to determine which data objects are categorized in a cluster of PII and allocate each cluster of PII to a deletion class"	
DE- VH- 028		5.1	2. paragraph, item 4	te	the item should be kept in the plural, as there is not just one deletion measure, but several measures are used for many data sets	the item should read: "apply the deletion rules for the various data sets by defining and implementing deletion measures and documenting them in requirements for implementations (see 9.)"	
DE- VH- 029		5.3	2. paragraph, item 1	te	The statement of this item „clusters of PII contain one or more data objects;" is empty (it corresponds to the definition of the "cluster of PII"). The text probably should read as a statement that is supplemented by the example.	the item may read: "different data objects may contain the same attributes;"	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 030		5.4.2	Note on figure 1	te	The note should be more clear on - relationship between retention period and regular deletion period - acceptable delay of deletion	The note should read: "In the example in Figure 1, the retention period for the order is significant shorter than the regular deletion period. Depending on which cluster of PII is involved and its defined deletion period, the retention period and the regular deletion period sometimes have nearly the same duration. The section 'acceptable delay for erasure' before the last time of deletion stands for the period of time that is permissible for the design of the deletion process according to the relevant legislation. In the example, the invoice and the booking of the payment received are categorized as separate clusters of PII and, therefore, have different deletion rules."	
DE- VH- 031		5.6	last paragraph, last sentence	te	The wording "For example, all clusters of PII which are subject to the same deletion period and the same starting point should be assigned to the same deletion class." is misleading at this point: By definition (3.4), clusters of PII with the same rule deletion period and the same abstract starting point fall into the same deletion class. This always applies, for the cited sentence as the same start times always fall into the same group of abstract starting point. Therefore, this is not an example of an assignment to a deletion class. A cluster of PII is only assigned to a deletion class to the extent that a "suitable" deletion class can be searched for when searching for the deletion rule, among other things to reduce the analysis effort for the rule deletion period.	Delete the sentence and add a new example: "Assume that the deletion rule "12 years after settlement of a receivable" is defined with the cluster of PII "Accounting data". This results in a deletion class "12 years after end of procedure". When searching for a suitable deletion rule for another cluster of PII "contracts", you could decide that the contracts should be assigned to the same deletion class. In this example, the deletion rule for "Contracts" may result in "12 years after the end of the contract". Add an additional note: "Note to the example: Such an assignment for a cluster of PII may depend e.g. on purposes of the processing, legal regulation for the data objects contained in the cluster and sensitivity of the attributes contained in the PII."	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 032		5.6	Note 1	te	Original Text: "In some jurisdictions, compliance requirements grant the PII principal a right to have PII deleted if certain prerequisites are met. For a specific cluster of PII, not all such requests need to be implemented, for example because of overriding compliance retention requirements." Comment a) The overriding compliance retention requirements often does not only address a single Cluster of PII but may cover several. It may also only refer to certain data objects of the specific clusters. Comment b) It is unclear, if the wording "not all ... need to be ..." is allowed by ISO for guidelines	Modify the second sentence to "For some cluster of PII, not all such requests need to be partially or fully executed , for example because of overriding compliance retention requirements for specific data objects."	
DE- VH- 033		5.8	paragraph 2, sentence 2	te	a) The Text "To prevent inconsistencies and inefficiencies, duplication of policies and procedures should be avoided." seems to address the level of documents. Duplication should also be avoided in single definitions and other details.	Modify the second sentence to: "It is recommended that each definition or specification is only made in one place, e.g. the definition of a cluster of PII and its deletion rule. This avoids inconsistencies and makes document maintenance more efficient."	
DE- VH- 034		5.8	Example 2, line 2	te	The term "... after a decision ..." is used. It is not clear which decision is meant. To be more clear the rest of the sentence should be modified.	modify the text to "...after a decision to hire or not to hire has been made. As the application documents are managed manually, deletion must also be carried out in a manual process. "	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 035		6.1	item 4	te	<p>The sentence "different clusters of PII can result, in particular, if: ... - PII is only used for purposes pursued by different functional entities" is barely comprehensible as a guide.</p> <p>According to the original standard (DIN 663989), what is meant is that the same data might be deleted differently if it is used for different purposes in different organizational units, which results in different time limits for active use and retention.</p>	<p>a) Modify the item to "- the same PII is used by different functional units for different purposes and therefore different rules for deletion are applied in each case;"</p> <p>b) And add a note "NOTE 1: Different clusters of PII can thus be used to define different standard deletion periods for the same data at different storage locations. Differentiating the deletion of the same PII in this way would, for example, comply with the basic principle of data minimization of the GDPR and can reduce the risk of data misuse."</p> <p>c) Following notes must be renumbered.</p>	
DE- VH- 036		6.1	Paragraph 3 including the two items.	te	<p>It should be expressed that clusters of PII can also be identified in iterative steps at later points in time during creation or maintenance of the deletion rules catalogue. Therefore, first sentence should be modified as well as more examples should be given in the item-list</p>	<p>The paragraph should read: " It can also be recognized at later points in time that further data types are required. These may be situations in which, for example</p> <ul style="list-style-type: none"> - it is determined that defined cluster of PII only partially cover a dataset; - it is recognized that the functional purposes for different data objects of a cluster of PII cannot be combined according to the relevant data protection regulation, but that it is necessary to split them up and form two or more further cluster of PII; - legal rules have been changed and therefore additional data with a new deletion rule (and therefore new cluster of PII) is required; - during the implementation of deletion rules, it is discovered that further data exists for which a further deletion rule (and therefore cluster of PII) is required; - new data objects are used when adapting a process and a new deletion rule is required for these." 	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 037		6.1	Note 1	te	Note 1 gives a hint that is contained in the new item list from [DE-VH-036]. Instead of the note, it would be better to insert an example of splitting a cluster of PII:	Delete NOTE 1. NOTE 2 need to be modified: without number New Example can read: „EXAMPLE: A cluster of PII for applications could be split into two clusters of PII: One for applications without pooling and one for applications with pooling. The two clusters of PII would have different deletion rules. The first would be deleted after the respective vacancy has been filled and the other after the consent to pooling has expired. This would comply with the different legal bases.“ The new example should be placed appropriately in the other examples. Further examples need to be renumbered.	
DE- VH- 038		6.1	Note 2	te	The note is somewhat unmotivated in this form. It makes sense if it refers to the technology-independent description in 5.8.	Note (2 - probably without number) might read: „NOTE (2) Remember: [Sentence 1] These technical details are generally irrelevant for the definition of clusters of PII. The clusters of PII including their deletion rules should be described without reference to the technology used for storage, control and deletion (see 5.8).	
DE- VH- 039		6.2	2. Paragraph, beginning of sentence	te	The phrase “The key steps for the definition of clusters of PII are” suggests a sequence. However, this is not what is meant here. It would make more sense to use “the most important criteria”	The text should read: "The key criteria for the definition of clusters of PII are." Alternative: "The most important criteria are "	
DE- VH- 040		6.2	Note 2, sentence 2	ed	The correct term for such data in the GDPR is not ‘special categories of data’, but ‘special categories of personal data’.	The text should read: "... ‘special categories of personal data ’ ..."	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 041		6.3	Paragraph 1, sentence 2	te	<p>The text "This allows its reuse without requiring modifications for different data storage technologies as well as in the event of a change to a technical system." is unclear and may be misleading.</p> <p>Rationales:</p> <ul style="list-style-type: none"> - The change to a "technical system", for example from a paper filing system to a document management system, is already covered by the change in the different data storage technologies. - What is meant is that the change between different technical systems used for the same purpose does not require a change to the definition of the data type. 	<p>a) The sentence should read: "This allows its reuse of the definition without requiring modifications in the event of a change from one another technical system."</p> <p>b) And add an EXAMPLE after the sentence: "Switching between different technical systems can mean, for example, that a paper filing system is transferred to a document management system. This also includes e.g. switching from digital file-based data storage to a database. Even if a CRM system is replaced by that of another manufacturer, a technology-independent definition of a cluster of PII does not require any adjustments."</p>	
DE- VH- 042		7.1	whole section	te	<p>There are several aspects to the revision of this section, in particular:</p> <ul style="list-style-type: none"> - The section begins directly with the requirement for standard deletion periods. It would be helpful if it were first clarified that regular deletion periods are required for clusters of PII with and without retention period. - In principle, at least a small gap is required between the retention period and the regular deletion period in order to perform the deletion runs. This is not clearly shown in these paragraphs. - A retention period may also result from (a long) business documentation that is required for longer than the legal retention period. - Some redundancy occurs in the text. - Regular deletion periods can also be defined that do not correspond to a standard deletion period. The sentence "Regular deletion periods should always be derived from the standard 	see [DE-VH-043 to DE-VH-053]	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
					<p>deletion periods." is therefore not correct (Paragraph 3 gives more alternatives.)</p> <ul style="list-style-type: none"> - The sequence of the description could be partially improved. Redundancy can be avoided. - NOTES 2 to 4 (old) should be shifted to 7.3. <p>All this is not presented in a consistent manner. The whole section 7.1 should be reviewed and corrected as a whole. Therefore [DE-VH-043 to DE-VH-053] belong together.</p>		
DE-VH-043		7.1	whole text	te	[see DE-VH-042 to DE-VH-053 as a whole]	Delete the whole text of the section.	
DE-VH-044		7.1	new text (sequence of comments)	te	[see DE-VH-042 to DE-VH-053 as a whole] new paragraph 1 of section	A short period is always required to perform deletion runs (see Figure 1). If a retention period is defined for a cluster of PII, this additional period is required after the retention period. If no retention period is defined, the additional period is required after the longest period for active use.	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 045		7.1	new text (sequence of comments)	te	[see DE-VH-042 to DE-VH-053 as a whole] two new items after new paragraph 1 in section NOTES (preferred) (Alternatively use two NOTES)	- With a cluster of PII for which no retention period is specified, the regular deletion period defines an upper limit for the permitted use of the data objects. Such clusters of PII offer the user greater flexibility to carry out the deletion: Whenever he decides that no further processing is necessary, he can delete the data objects, even much earlier than the regular deletion period. However, the regular deletion period must be observed as the last point in time for deletion. - The deletion of data objects of a cluster of PII with a retention period may only take place after the retention period. The regular deletion period must therefore be (slightly) longer than the retention period. A retention period results from the maximum of the business documentation and the legal retention obligation. Long (permissible) technical documentation can therefore lead to a long retention period and exceed the legal retention obligation.	
DE- VH- 046		7.1	new text (sequence of comments)	te	[see DE-VH-042 to DE-VH-053 as a whole] Continue with modified and extended old paragraph 1	The PII controller should define standard deletion periods for the organization (7.3). For each DA, the controller should select the smallest standard deletion period that fulfils the above conditions as the standard deletion period. If this standard deletion period is adequate and justifiable in relation to the period of active use or the retention period, it is called the "corresponding standard deletion period". This standard deletion period is then adopted as the regular deletion period for the cluster of PII.	
DE- VH- 047		7.1	new text (sequence of comments)	te	[see DE-VH-042 to DE-VH-053 as a whole] The NOTE 1 (old) follows now (NOTES 2 to 4 are sifted to 7.3)	NOTE 1 Legal requirements can limit the margin for the delay of deletion resulting from selecting the next higher standard deletion period	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13	Document: ISO/IEC 27555:2021	Project:
------------------	-------------------------------------	----------

MB/NC ¹	Line number (e.g. 17)	Clause/Subclause (e.g. 3.1)	Paragraph/Figure/Table/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE-VH-048		7.1	new text (sequence of comments)	te	[see DE-VH-042 to DE-VH-053 as a whole] Use now old paragraph 4 with following modification:	If the no corresponding standard deletion period is found, then the PII controller should check whether or not:	
DE-VH-049		7.1	new text (sequence of comments)	te	[see DE-VH-042 to DE-VH-053 as a whole] Use item 1 from old paragraph 4 with following modification: In particular, 'after' must not be used. The deletion must be 'within' (before the end).	- the retention period or period of active usage (when no retention is required) can be shortened by adjustments to the functional process in order to delete within the next-shorter standard deletion period;	
DE-VH-050		7.1	new text (sequence of comments)	te	[see DE-VH-042 to DE-VH-053 as a whole] Use item 2 from old paragraph 4 and add a NOTE and an EXAMPLE	to make full use of the next-shorter standard deletion period by carrying out the technical process of the deletion at the end of that period (and not within a larger interval);	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 051		7.1	new text (sequence of comments)	te	[see DE-VH-042 to DE-VH-053 as a whole] add a NOTE and an EXAMPLE to item 2 from old paragraph 4	NOTE 2: If deletion runs can be carried out very shortly after the retention period and, if necessary, very frequently, only a short delay is required for the deletion runs. In this case, the deletion rule of the cluster of PII may be able to remain within the standard deletion periods with a shorter regular deletion period. Example: Suppose a cluster of PII for contracts specifies a retention period of 6 years after the end of the contract. If contracts that have expired 6 years + 1 day are deleted daily, a regular deletion period of 6 years would fit. This could be carried out automatically in an IT system. However, if an employee had to go to an archive every day to erase paper files with such contracts, this would probably be very time-consuming. The organisation would then aim to carry out this deletion run only once a year. The regular deletion period would then be 7 years. In the first case, a standard deletion period of 6 years would be appropriate. In the second case, a standard deletion period of 7 years would be added to the list of standard deletion periods, or it would be necessary to check whether all other clusters of PII with a standard deletion period of 6 years could be adjusted to a standard deletion period of 7 years.	
DE- VH- 052		7.1	new text (sequence of comments)	te	[see DE-VH-042 to DE-VH-053 as a whole] Use item 3 from old paragraph 4 with following modification	to move the end of the retention period closer to the regular deletion period by choosing another starting point or another combination of starting point and standard deletion period for the deletion rule;	
DE- VH- 053		7.1	new text (sequence of comments)	ed	[see DE-VH-042 to DE-VH-053 as a whole] Use item 4 from old paragraph 4	— to use an individual regular deletion period not included in the list of the standard deletion periods. However, such special cases should, if possible, be avoided.	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE-VH-054		7.3	2. paragraph	te	If chapter 7.1 is modified as proposed [see DE-VH-042 ff] , the term "appropriate standard deletion period" should be modified	use instead "corresponding standard deletion period"	
DE-VH-055		7.3	after NOTE 1	ed	The Notes 3 to 4 relate to the use and concept of standard deletion periods. Therefore, they should be placed in this section. Note: the modification relates to the above comment and changes on chapter 7.1 [see DE-VH-042 ff]	Use NOTES 2 to 4 (old) from 7.1 here	
DE-VH-056		7.3	1. paragraph after example, sentence 2	te	There are several aspects to this paragraph: - The structure / text of the paragraph seems complicated for reading. - The fact that some standard deletion periods cannot be derived from specific legal provisions is the fundamental cause and not an example. - The difference between specific legal provisions and the general requirements of data protection law is not clearly expressed. - A legal retention period as a criterion is already mentioned in section 7.2. - The principles of use, retention and disclosure limitation and data minimisation apply in this paragraph. Note: the modification relates to the above comment and changes on chapter 7.1 [see DE-VH-042 ff] ('corresponding standard deletion period)	The paragraph should read: "Firstly, standard deletion periods are selected from regular deletion periods resulting from specific legislation. In some cases, there are large gaps in the list where one or more additional standard deletion periods are needed to define a justifiable deletion rule for multiple clusters of PII. In these cases, the principles use, retention and disclosure limitation and data minimisation can be applied to find further standard deletion periods. For the respective clusters of PII, the active use and the business documentation can be critically analysed with these principles in order to define corresponding standard deletion periods. The standard deletion periods should be selected in such a way that the gaps in the list are filled appropriately."	
DE-VH-057		7.3	paragraph before NOTE 2	te	'a telecommunication company' can be read as meaning a company. It should be used in the plural.	Modify "'a telecommunication company" to "telecommunication companies"	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 058		7.3	NOTE 2	te	"necessity" is not a principle from ISO 29100	Replace "principle of necessity" with "principles of data minimization and use, retention and disclosure limitation".	
DE- VH- 059		7.4.1	Paragraph 1, sentence 2	te	The wording "need to be documented" is close to a "must", even in translation. The wording should therefore be somewhat softer. The sentence could be split up in two sentences (ed).	Modify that sentence to the following: "To ensure that even such situations are closed by deletion, it is strongly recommended that they are documented appropriately. At least the cases discussed in 7.4.2 to 7.4.5 can be distinguished."	
DE- VH- 060		7.4.3	Headline	te	<p>Headline "Need to extend period of active use" is not appropriate for that case.</p> <p>„Active usage“ in Fig. 1 indicates the time during which the functional purposes are processed. A longer period of functional processing is usually BEFORE the starting Point of the deletion rule; i.e. does not require an extension of the deletion period.</p> <p>This section deals with cases that typically arise from tasks or disputes "alongside" technical use. The data objects are then often required as evidence and should be stored for longer (which is no longer a functional use in the original sense). The data is (additionally) used for another purpose that may justify a different deletion rule.</p> <p>In this case, the solution for delayed deletion may be to assign data objects to another cluster of PII, possibly for a limited period of time. The appropriate deletion rule for the special case is then defined in the new allocated cluster of PII.</p> <p>The headline of the section should express this.</p>	Headline should read: "Delayed deletion by allocation to another cluster of PII"	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 061				ge	<p>Some passages in the text make a statement according to which a cluster of PII can or should be assigned to another cluster of PII. This does not make sense. A cluster of PII is a ,logical container' for data objects.</p> <ul style="list-style-type: none"> - If the entire cluster of PII is assigned to another cluster of PII, the original ,container' could be abandoned, i.e. the cluster of PII could be dispensed. - If the original cluster of PII is defined incorrectly, e.g. an incorrect deletion rule was specified, the definition would be corrected, but the cluster of PII itself would remain. <p>Instead, the passages usually mean that individual data objects can be assigned to a different cluster of PII and thus a different deletion rule has to be applied, e.g. with longer deletion period. Some of the following comments refer to this rationale.</p>	for specific modifications see some of the following comments	
DE- VH- 062		7.4.3	1. paragraph, sentence 2	ed	to be more precise [see DE-VH-061]	Modify "... should allocate the PII concerned ..." to "... should allocate the data objects concerned ..."	
DE- VH- 063		7.4.3	Example, sentence 2	te	It does not make sense to assign one cluster of PII to another cluster of PII. Rationale: see [DE-VH-061]	Modify "The cluster of PII required..." to "The data objects required"	
DE- VH- 064		7.4.3	Example, sentence 3	te	<p>Regarding the beginning of the sentence with the deletion rule, which reads "The deletion rule also specifies a period of one year and refers to ..."</p> <p>The two deletion rules differ in the start time. The 'and refers to' does not make this difference between the two deletion rules very clear. It should be better highlighted.</p>	Modify "... and refers to ..." to "... but refers to ..."	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 065		7.4.3	paragraph after example, sentence 2	te	<p>'Processing of PII' is formulated very generically and can be misleading. What is meant here is that the processing purpose for data objects can also change during regular processing (in contrast to the special cases at the beginning of 7.4.3) and THIS DATA OBJECTS can then be assigned to a different cluster of PII.</p> <p>(If the purpose for the entire set of data objects in a cluster of PII changes, then all data objects are assigned to the new cluster of PII. Whether the definition of the old cluster of PII is then still required depends on whether new data objects could be allocated there).</p> <p>for rationale see also [DE-VH-061]</p>	Even if the functional purpose of data objects is changed during regular processing, the deletion rule can, if required, be adapted by allocating the data objects to another cluster of PII.	
DE- VH- 066		7.4.4	Note 2	te	<p>Two aspects:</p> <p>A) The phrase " ...program errors or erroneous cluster of PII, ..." addresses the case of errors in (IT-Systems or) data, e.g. technical failure in attributes or structure of data objects. (This is NOT failures in the definition of a cluster of PII. For rationale see [DE-VH-061])</p> <p>B) "... legal hold, ..." means a regular legal obligation. This legal retention period should be covered by the retention period and thus part of the defined deletion rule of the appropriate cluster of PII. Therefore "legal hold" should be omitted from this list.</p>	<p>A) Text should read " ...program errors or data sets containing technical errors, ..."</p> <p>B) „legal hold,“ should be removed from the list.</p>	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE-VH-067		7.4.4	last paragraph, sentence 1	te	<p>It does not make sense to use the phrase "The clusters of PII concerned should be kept as small as possible." Which data objects fall into a cluster of PII depends on the functional purposes and not on the reasons for suspending a deletion. It therefore does not make sense to keep a cluster of PII small. [See also comment DE-VH-061]</p> <p>The aim must be to keep the amount of data for which erasure is suspended as small as possible.</p>	<p>The sentence should read: "The number of data objects for which deletion is suspended should be kept as small as possible."</p>	
DE-VH-068		5.5	1. paragraph	ed	<p>Text in 5.5 "Archives & Backup" reads: "... An archive can contain different clusters of PII with different deletion periods. The relevant compliance and/or contractual requirements can require restriction of processing for archived data."</p> <p>Text in 7.4.4 "Suspension of the deletion" paragraph 2 reads: "... The presence of special categories of PII and the measures for usage limitation during the exception should be used as criteria for the duration and permissibility of the suspension."</p> <p>In 5.5 paragraph 1 the term „restriction of processing“ is used. In 7.4 paragraph 2 the term „usage limitation“ is used. As this standard refers to ISO/IEC 29100, where the term ‘usage limitation’ is described in 5.6, the term ‘usage limitation’ should be used consistently. (The GDPR defines ‘restriction of processing’, but in a somewhat more limited way than ‘usage limitation’ in ISO/IEC 29100).</p>	<p>Recommended modification in 5.5 paragraph 1: ".... can require usage limitation for archived data."</p>	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13	Document: ISO/IEC 27555:2021	Project:
------------------	-------------------------------------	----------

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 069		7.4.5	1. paragraph after note 3	te	<p>The half-sentence "..., for instance to carry out documented checks after ..." directs the focus to a possible reason for storing a backup for a longer period of time. This reason is less relevant for the framework for deletion.</p> <p>But: It is essential that these exceptions for storing backups are also documented, controlled and terminated.</p> <p>The wording should be adapted. Possible reasons for suspension could be added as a separate example [see next comment DE-VH-070]</p>	<p>The full paragraph should read: "In exceptional cases longer retention periods of backup copies may be permitted. Even such exceptions should be approved, documented, controlled and terminated, for example with the help of change management."</p>	
DE- VH- 070		7.4.5	new EXAMPLE after 1. paragraph after note 3	te	<p>Add a paragraph for examples of possible reasons for suspending the deletion of backup copies [see previous comment DE-VH-061]</p>	<p>"EXAMPLES Reasons for temporarily suspending the deletion of backup copies could be, for example: Those responsible are unsure whether the re-import of data will be successful the first time, and by the time a second attempt is made, the backup would already have been overwritten. It is important to be able to check at a later point in time whether the data is processed correctly when it is re-imported, and this point in time is after the time for deleting the backup. As part of a migration, a backup is used to fill the new IT system with data. At a later point in time, tests and checks should be possible using the reference data from the backup.</p>	
DE- VH- 071		8.1	Example, sentence 3	te	<p>The wording in the last example ... 'The link sent in the confirmation e-mail after deregistration has been requested' does not define a starting point, as it does not specify a time. Also, the time at which the link is sent would probably not be sufficient in practice.</p>	<p>The text may read: "... ,The time at which the member clicked the unsubscribe confirmation link'."</p>	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
de- VH- 072		8.3	1. paragraph	te	<p>The text does not make it clear how the matrix of deletion classes can be used as to assistant building deletion rules. The reference to 7.2 only addresses the 2nd case in the sentence. This is also not clear.</p> <p>The paragraph should be replaced by the proposed change.</p> <p>Note: the modification relates to the above comment and changes on chapter 7 [see DE-VH-042 ff]</p>	<p>The matrix of deletion classes can be used as a tool to identify the deletion rule for new clusters of PII. To do this, the matrix can be searched for a corresponding standard deletion period via</p> <ul style="list-style-type: none"> - the next highest standard deletion period to the period of active use or retention period, or - the clusters of PII with comparable or similar purposes, even if there are not yet any ideas about the period of active use or retention period. <p>If the criteria from 7.1 result in a corresponding standard deletion period, the deletion rule can be specified from this. Where possible, every cluster of PII should be allocated to a deletion class. If this is impractical, it should be checked whether another standard deletion period is needed (7.3) or whether to specify an additional, specific deletion period (following 7.2).</p>	
DE- VH- 073		9.1	3. paragraph, item 1	te	<p>The item list is intended to list the 4 areas in the following image. The first item is difficult to assign. It should be made clear that this point refers to the organisation-wide aspects. The term should therefore be included in the half-sentence-</p> <p>The sentence structure also appears ambiguous because "used uniformly in the organisation independently' could refer to both requirement for implementation or PII. The term ,cluster of PII' not seem necessary for understanding, as it is about different data objects and contents.</p>	<p>The item may read:</p> <p>"- implementation specifications that are to be applied uniformly in the organisation to data sets that may contain different PII (organisation-wide aspects, e.g. backup copies, logs, see also 9.3);"</p>	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE-VH-074		9.1	3. paragraph after figure 4, sentence 2 and 3	te	The text the sentences " ... it can be sufficient to store them after active use until the end of the retention period on only one system. Therefore, a shorter deletion period can, where applicable, be defined in the requirements for implementation for each system. " is conflicting, as in at least one system the deletion period can NOT be shortened.	The text of sentence 3 should read: " ... requirements for implementation for each other system."	
DE-VH-075		9.1	4. paragraph after NOTE 1, sentence 7	te	The sentence "The type of proof available should be specified in the requirements for implementation, e.g. by defining deletion run log entries." implicitly assumes that a proof is available. However, the aim here is that it is generated.	The sentence should read: "The type of proof to be generated should be specified in the requirements for implementation, e.g. by defining expected deletion run log entries."	
DE-VH-076		9.1	5. paragraph after NOTE 1, item 3	te	In 3. paragraph after figure 4 it was described that in some systems it is possible to define shorter deletion periods compared to the regular deletion period [see also DE-VH-074]. These decisions can be documented here. This should be described in a note.	Add a note after that item: "NOTE 2: Decisions on shortened deletion periods at a storage place in relation to the regular deletion period can be documented here." Further NOTES need to be renumbered.	
DE-VH-077		9.1	5. paragraph after NOTE 1, item 5	te	The text in brackets „(if required, the mechanisms need to be such that the appropriate security processes are implemented) “ is hard to understand. This means that the deletion mechanisms used fulfil the requirements of security classification (see end of 9.1). Brackets can be avoided for better reading. The modifications from comment [DE-VH-012] must also be applied (related to [see DE-VH-002 and DE-VH-003]). Therefore also "deletion processes" should be replaced by "deletion runs"	The item should read: "the measures to perform the deletion runs including, if necessary, the mechanisms to fulfil the requirements of the requirements of the security classification (see end of 9.1);"	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE-VH-078		9.1	Note 2	te	<p>The 'implement' in the sentence probably leads to misunderstandings: It is usually understood to mean 'create' or 'realise'. However, this is usually too late in a specific recovery case. These deletion measures should generally be prepared in advance. They are then applied in the recovery case. The amendment to the note should clarify this.</p> <p>The wording "for example," should be omitted, as it is no example but the reason why deletion measures during recovery may be necessary.</p>	<p>The note should read: "During recovery processes, it can be necessary to run deletion measures to identify and delete the PII that are restored and has exceeded its deletion period. If this deletion cannot be performed using the regular deletion measure, the specific deletion measure for recovered data should be prepared before recovery is necessary. This may include implementing technical processes and describing their application in the recovery manual."</p>	
DE-VH-079		9.3.2	2. paragraph	te	<p>„should be linked“ in the first sentence does not provide guidance as to how the deletion rules of the cluster of PII and those for the backup copies should be related.</p> <p>In addition, the focus should be on ensuring that the backup copies are deleted immediately after the retention period, as the reference to the retention period does not express this.</p>	<p>The paragraph should read: "The retention period of backup copies should be in a reasonable proportion to the deletion rules of the DA contained in the backup copies and should be comparatively short. The sensitivity of the PII should be taken into account when choosing the retention period. The retention period of backup copies should be defined, e.g. in a backup policy. As some data objects in the backup copies have already exceeded their deletion period, it is important that they are deleted immediately after the retention period has been reached, for example by overwriting them with the next backup."</p>	
DE-VH-080		9.3.4	1. paragraph, sentence 2	te	<p>In the wording "After successful transmission, clusters of PII or metadata related to the cluster of PII that has been transmitted ..." the term "cluster of PII" is wrong in both cases: No clusters of PII are transmitted, but data objects and metadata related to the data objects that has been transmitted. (Both are allocated to one ore more clusters of PII). [See also DE-VH-061]</p>	<p>The text should read: "After successful transmission, PII data objects or PII metadata related to the data objects that has been transmitted ..."</p>	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 081		9.3.4	1. paragraph, last sentence	te	[related to DE-VH-080] The possible procedure within the framework for deletion should be described more clearly. The sentence should be substituted by the following text:	The text should read: " This harmonized procedure and the uniform deletion period for the transmission systems can be defined in a policy, for example. The short period of time for deletion in such systems should be such that regular deletion periods of all PII transferred in such systems are not compromised. This means that the time period must be shorter than the shortest deletion rule of all clusters of PII that are relevant for data transmitted."	
DE- VH- 082		9.3.4	2. paragraph, sentence 2	te	A reference to the deletion rule of a cluster of PII is insufficient. The list is not intended to establish a reference to the shortest standard deletion period for the clusters of PII: The aim is to define a uniform short deletion period for all transmission systems, irrespective of the clusters of PII in which the transferred data objects are classified.	The sentence 2 should be substituted by: "The list may refer to a ,policy for transmission systems'. In such a possible 'policy for transmission systems', a short deletion period can be defined, e.g. a few days. This time can be used to monitor and check whether the transfer was successful and, if necessary, to correct errors. After that period all PII is deleted in the data transmission systems, calculated from the date of received data objects. The short deletion period in the data transmission systems prevents the standard deletion periods for the transmitted data from being exceeded."	
DE- VH- 083		9.3.4	after 2. paragraph: additional example and additional note	te	An example would be useful to clarify which deadline and other measures a policy for transmission systems could contain.	Additional EXAMPLE: "One policy could state: A standardised deletion period for PII of 2 weeks applies in all transmission systems listed below. These systems are monitored 24/7 for errors. As soon as errors are detected, deletion is suspended until the error has been rectified. The person in charge of privacy matters must be informed if troubleshooting takes longer than 2 weeks."	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13	Document: ISO/IEC 27555:2021	Project:
------------------	-------------------------------------	----------

MB/NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE-VH-084		9.3.4	additional note after 2. paragraph (after new example)	te	Furthermore, the benefits of such an approach could be illustrated in an additional note.	Additional NOTE: "The advantage of such a policy and the associated list is that no differentiated deletion measures need to be defined and documented for the transfer systems. The short uniform deletion period for the transfer systems is only possible in cases in which the data sets are later used and retained in other systems."	
DE-VH-085		9.4	2. paragraph after NOTE 1, sentence 4	te	The sentence is ambiguous (and difficult to understand in translation). The intention here is to say that changes to the attributes in the data objects of a cluster of PII can result in these data objects falling into another cluster of PII with a longer deletion rule. It will help to use more and simpler sentences.	The following text may substitute the sentence 4: "For example, sensitivity of PII could be reduced by modifying the attributes of data objects of a cluster of PII. This could allow a longer storage period and other purposes: Then the changed data objects fall into a different cluster of PII. In such cases, it should be specified which attributes are to be modified and how the modification is to be made."	
DE-VH-086		9.5	2. paragraph, sentence 3	te	This sentence should say "data objects" instead of cluster of PII, as manual processes often only deal with parts of the inventory that fall into one data type. [Rationale: see also DE-VH-061]	Modify "cluster of PII" to "data objects" Alternative: Move the examples to a new EXAMPLE-Paragraph and explain a little bit more.	
DE-VH-087		9.7.1	Example: third part of the sentence	te	The Wording "...; clusters of PII which are required" should say "data sets" instead of "cluster of PII" as in general specific data objects are required (which may fell into different clusters of PII). [Rationale: see also DE-VH-061]	Modify "cluster of PII" to "sets of data"	
DE-VH-088		9.7.2	1. paragraph, sentence 2	te	The word "overseen" is probably a "false friend" taken from the original German standard. What is meant is that these sets of data are regularly "overlooked" in practice, i.e. they are not monitored for deletion because they are not used in a regular process.	Modify "overseen" to "overlooked"	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 089		9.7.2	1. paragraph, sentence 2	ed	For better understanding, the two statements of the sentence should be divided into two sentences.	The text to substitute sentence 2 may read: "Such sets are usually overlooked by the organization in the regular processes of analysing and deleting PII. The sets can also contain PII outside the defined clusters of PII."	
DE- VH- 090		9.7.2	1. paragraph, last sentence	te	regarding "...where it is neither useful nor appropriate to allocate them to a deletion class." Assigning these datasets to a cluster of PII is insufficient for two reasons. Firstly, the deletion class only provides an abstract deletion rule, i.e. no concrete starting point. However, a deletion rule is required for a regular deletion. The dataset must therefore be assigned to one (or more) clusters of PII. Secondly, the dataset must be integrated into a regular process with deletion measures so that it is deleted when the regular deletion period is reached. If one of the two conditions is not met, e.g. because there is no suitable process, an individual deletion measure is required for the data set.	the text may read: "... where it is neither useful nor appropriate to allocate them to clusters of PII nor a regular process with deletion measures can be used,"	
DE- VH- 091		9.7.2	last paragraph	te	Whether the data subject has a right to erasure when unlawful data is processed depends on the relevant law. The paragraph is worded unspecific and should be focussed on the case discussed here.	The text should read " The relevant laws may grant the data subject the right to request the deletion of unlawfully processed data. If this right is exercised, then the PII concerned needs to be deleted by the controller."	
DE- VH- 092		10.1	1. paragraph, sentence 2	te	What is meant by "This should include a definition of the operational structure for deletion."? To ensure that responsibility for tasks is assigned (including those for executing deletion runs), an organizational structure must be defined.	The sentence 2 may read: "This includes the definition of an organizational structure for deletion, through which responsibility is systematically assigned."	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13

Document: **ISO/IEC 27555:2021**

Project:

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 093		10.1	2. paragraph	te	The sentence does not make sense because " organizational structures ... should be embedded in organizational structures . In addition, operational structures should also be embedded in organizational structures . The sentence should be phrased more specifically and precisely with respect to the contents of the previous modified paragraph [DE-VH-092.	The paragraph may read: "Systematic means that the organisational structure defines the responsibilities for deletion in such a way that all sets of PII in the organisation are covered. Where existing organisational structures are suitable, the responsibilities for deletion should be embedded in these structures."	
DE- VH- 094		10.1	7. paragraph, first item	ed	Since the list refers to the implementation areas from Figure 4, the first item should be formulated in the plural (like the following).	the item "the IT system;" should read: "the IT systems;"	
DE- VH- 095		10.1	last paragraph before 10.2	te	The sentence is unsystematic and too weakly worded. Why are only findings with PII Processors addressed? In this paragraph, all issues from audits should be addressed. Whenever a finding needs to be fixed, a clear strategy should be required.	The paragraph may read: "Any relevant finding from an audit regarding deletion should be resolved by a responsible person with a clear strategy in a reasonable time. In the case of findings at a PII processor, the controller could instruct the processor in high-level terms to eliminate the relevant findings. If appropriate, the suggestions for exception management (see 9.7.1) can help to track the activities to resolve the issues."	
DE- VH- 096		10.3	2. paragraph, sentence 2	te	The text read: "This includes the ability to check whether ..." The text should not address the „ability“, but the „task to check“.	The text should read "This includes the tasks to check whether ..."	
DE- VH- 097		10.3	2. paragraph, item 3	te	The wording "... can be required for single data objects or whole clusters of PII, e.g." may be misleading. As in other places: As usual, not entire clusters of PII are affected, but one or several data objects or bigger data sets. (The latter would also cover the situation that one or more entire clusters of PII are affected). [See also DE-VH-061]	The text should read "... can be required for single data objects, groups of data objects or bigger data sets , e.g."	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2025-08-13	Document: ISO/IEC 27555:2021	Project:
------------------	-------------------------------------	----------

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DE- VH- 098			whole text	ge	The standard uses 'may' in various places in the text. This is typically translated in German as 'allowed'. Such a translation can lead to misunderstandings because the standard does not intend to give "permission" or "authorisation", but only indicates options in such places.	All occurrences of "may" should be checked to see whether "can" or "could" is better used.	
DE- VH- 099		9.6	2. paragraph	te	The wording 'where applicable' is very general. The request should be formulated more strictly.	Text should read: "... where legally possible..."	
DE- VH- 100		7.4.4	1. paragraph, sentence 2	te	The second sentence is difficult to read. It should be clear that both the individual specific situations should be documented and, if necessary, the criteria under which such exceptions are permitted. For similar exceptions that occur more frequently, general rules can be defined, for example in a policy	Text modifying sentence 2 could read: "Criteria should be defined to determine when deletion can be suspended in a specific situation. For similar special situations that occur more frequently, general rules can be defined, for example in a policy. Each of the situations should be documented."	
~~							

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial