

BVI¹ position on FSB's consultation on the draft Cyber Lexicon

BVI gladly takes the opportunity to present its views on the consultation on the draft Cyber Lexicon.

Q 1: *Are the criteria used by the FSB in selecting terms to include in the draft lexicon appropriate in light of the objective of the lexicon? (See Section 2 for the objective, Section 3.2 for the criteria and the Annex for the lexicon.) Should additional criteria be used?*

The criteria sound reasonable. It is a good thing to restrict the usage and not to intend use in the legal interpretation in the first place, which might be too much of a burden. Keeping the lexicon open to the public and share information to the maximum will be key success factor. All terms which are required for the scope should be included, perhaps with some input from industry where necessary especially when it comes down to standardization some (not all) technical terms might be required.

Q 2: *Are the criteria used by the FSB in defining the terms in the draft lexicon appropriate in light of the objective of the lexicon? (See Section 3.3 for the criteria.) Should any additional criteria be used?*

The criteria used sound reasonable. There will be a trade-off between being specific and precise on one hand and plain language on the other hand. Based on feedback the balance should be adjusted.

Q 3: *In light of the objective of the lexicon, should any particular terms be deleted from, or added to, the draft lexicon? If any particular terms should be added, please suggest a definition, along with any source material for the definition and reasons in support of inclusion of the term and its definition.*

- Level of confidentiality: several (hierarchical) levels of sensitivity. An organization's system and processes reflects those in different levels of access controls and encryption.
- Non repudiation: A service that is used to provide assurance of the integrity and origin of data in such a way that the integrity and origin can be verified and validated by a third party as having originated from a specific entity in possession of the private key (i.e., the signatory).
<https://csrc.nist.gov/Glossary/?term=308#AlphaIndexDiv>
- Log / Logging: A record of the events occurring within an organization's systems and networks.
<https://csrc.nist.gov/Glossary/?term=5289#AlphaIndexDiv>

¹ BVI represents the interests of the German fund industry at national and international level. The association promotes sensible regulation of the fund business as well as fair competition vis-à-vis policy makers and regulators. Fund companies act as trustees in the sole interest of the investor and are subject to strict regulation. Funds match funding investors and the capital demands of companies and governments, thus fulfilling an important macro-economic function. BVI's over 100 members manage assets of more than 3 trillion euros for private investors, insurance companies, pension and retirement schemes, banks, churches and foundations. BVI's ID number in the EU Transparency Register is 96816064173-47. For more information, please visit www.bvi.de/en.



Q 5: *Going forward and following the publication of the final lexicon, how should the lexicon be maintained to ensure it remains up to date and a helpful tool?*

There should be a regular (for the beginning annual) revamp, which includes feedback from all bodies and the industry. Obsolete techniques should be deleted and replaced by new order if necessary.