General Data Protection Regulation – Are you up to speed?

Antonio Kung
Antonio Kung

- 30-year experience ICT
- Coordinator PRIPARE
  - Support action Privacy-by-design
  - Commitment 7001
- Active in standardisation
  - Editor ISO 21876 Privacy engineering
    - Started August 2016 – Target 2019
  - Co-rapporteur ISO SC27/WG5 Privacy in smart cities
    - Started October 2015
  - Participant ISO 20547 Big data reference architecture (2017)
    - Started 2016 by ISO WG9 – Transferred to SC27 in March 2016
Initiative

• Citizen Centric Approach to Data – Privacy-by-design
  – Snowden revelations
  – Something must be done to protect a citizen's right to privacy

• Initiative leaders
  – Antonio Kung (chair)
  – Chris Cooper (co-chair)
GDPR: General Data Protection Regulation

Published on May 4th 2016
Enter into force on May 24th 2016
Apply on May 25th 2018

• Privacy-by-design (PbD) and by-default
• Privacy Impact Assessment (PIA)
• Data Protection Officers
  – All public authorities and companies processing personal data on a large scale
• Sanctions for breaches
  – up to 20,000,000 EUR
  – up to 4% of the annual worldwide turnover
Concerns for Privacy Management

Antonio Kung

TRIALOG
## Stakeholder Concerns on Privacy

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Legal Compliance Level</th>
<th>Management Level</th>
<th>System Lifecycle Level</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Demand side</strong></td>
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<td>Compliances</td>
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<td>Policy maker</td>
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<td><strong>Operator</strong></td>
<td>Compliance requirements</td>
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<tr>
<td>Data Controller</td>
<td>Regulation</td>
<td>Regulation Privacy</td>
<td>Privacy-by-Design</td>
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<tr>
<td><strong>Operator</strong></td>
<td>Compliance</td>
<td>Compliance</td>
<td></td>
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<tr>
<td>Data processor</td>
<td>requirements</td>
<td>Requirements</td>
<td>Privacy Impact</td>
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<td><strong>Supplier</strong></td>
<td>GDPR</td>
<td>PIA</td>
<td>PbD</td>
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<td><strong>Supply side</strong></td>
<td>e.g. Operators Requirements</td>
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Example Big Data: City Viewpoint

Chain of operators

Data collecting

Data storage

Data transformation

Data exchange

Data analytics

GDPR

PIA

PbD

GDPR

PIA

PbD

GDPR

PIA

PbD

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PbD
Operators vs Suppliers

- GDPR
- PIA
- PbD

Product operator

Product

Product supplier
Supply Side Concern

Smart City Application operator

Sensor
Device
Smart device
Cloud solution
Electronics
Security module
OS
Middleware

Purpose unknown
Small operator VS big operator

Supply Chain

GDPR
PIA
PbD

22/09/2016
EIP-SCC / ERRIN workshop
Discussion

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Proposal for Support

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Recommendations

- Reuse current standards and practices
- Practice and Learn
- Establish common guidelines
Proposal: Dedicated Research Workshops

- Identify a number of cities and projects that are willing to participate to the programme

Guidelines
Common practice - towards GDPR compliance
Possible Workshops

• Privacy Management Plan

WORKSHOP FORMAT

THE WORKSHOP CONSISTS OF 4 STEPS

• Step 1: half-day briefing on privacy management
• Step 2: half-day discussion on the selected ecosystem initiative (e.g. Smart city)
• Step 3: one day discussion on example use cases
• Step 4: analysis and presentation of report on privacy management requirements

• Application Privacy-by-design

WORKSHOP FORMAT

THE WORKSHOP CONSISTS OF 4 STEPS

• Step 1: half-day briefing on privacy management
• Step 2: half-day discussion on application
• Step 3: one practicing privacy management
• Step 4: Providing a practice report
Privacy Management Plan Workshop

**Day One**

1. Briefing on privacy management
   - Introduction to privacy
   - Meeting privacy regulation
   - Implementation of privacy impact assessment
   - Implementing privacy-by-design and privacy-by-default

2. Discussion on the ecosystem
   - Structure
   - Today privacy management practice
   - Discussion on role and duties for privacy management

**Day Two**

3. Discussion on use cases
   - Presentation of use case 1 and use case 2
   - Applying demand side viewpoint to use cases
   - Applying supply side viewpoint to use cases
   - Discussion on resulting privacy management requirements
Privacy Management Plan Workshop

Contribution to report

Presentation
Joint
EIP-SCC
Smart
City
Report

ECOSYSTEM PRIVACY MANAGEMENT REQUIREMENTS RECOMMENDATION REPORTS (report structure)
- Brief description of initiative ecosystem (e.g. smart city)
- Introduction on the need for a privacy management plan
- Assumptions about city stakeholders roles and duties
- Example of use cases
- Recommendations for a privacy management plan
Timeline and Resource

• Next 6 months
  – Enrolment and agreement on content
  – Participants
    • Smart city and smart city projects stakeholders
    • EIP-SCC citizen focus experts
    • EIP-SCC and support actions facilitators
  – Resources for workshop expense
    • Smart cities
    • Smart city projects
    • Support actions
Discussion


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