



EIP-SCC

European Innovation Partnership  
on Smart Cities and Communities





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# Towards Common body of knowledge and practice for GDPR Compliance

Antonio Kung, CTO, Trialog

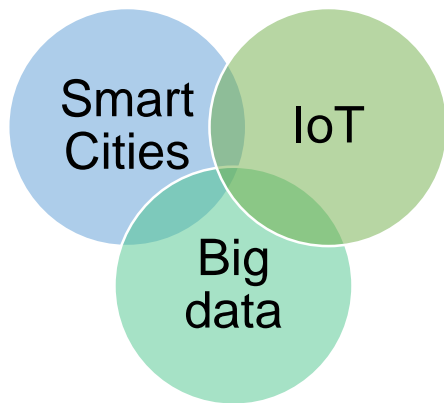
Chair EIP-SCC Citizen Approach to data: Privacy-by-design initiative

# Context

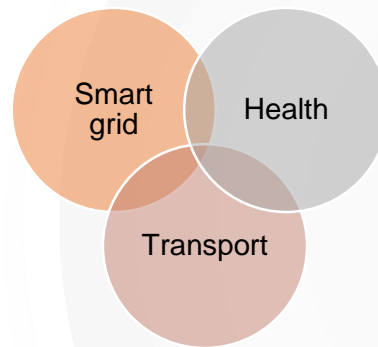
- PRIPARE commitment 7001
- Liaison category C ISO/IEC JTC 1/SC27/WG5
  - Editor ISO 27550 Privacy Engineering
  - Rapporteur Study period Privacy in Smart cities
- Initiative
  - GA 2015 Berlin: proposal for initiative
    - Nov 2015. Action Cluster meeting Brussels
    - April/May 2016. Two webinars on privacy for smart cities
  - GA 2016 Eindhoven: proposal for workshops in GDPR compliance
    - April 2016/Sept 2016: . Espresso webinar / ERRIN workshop
    - Nov 2016. Action cluster meeting Brussels
    - March 2017/July 2017 : Sharing cities PIA workshop
    - October 2017. Action Cluster meeting Brussels
  - GA 2017 Brussels: proposal for sharing GDPR compliance practice



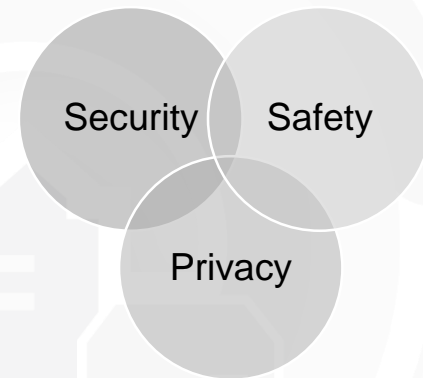
# Cities must Manage Ecosystems



Ecosystems



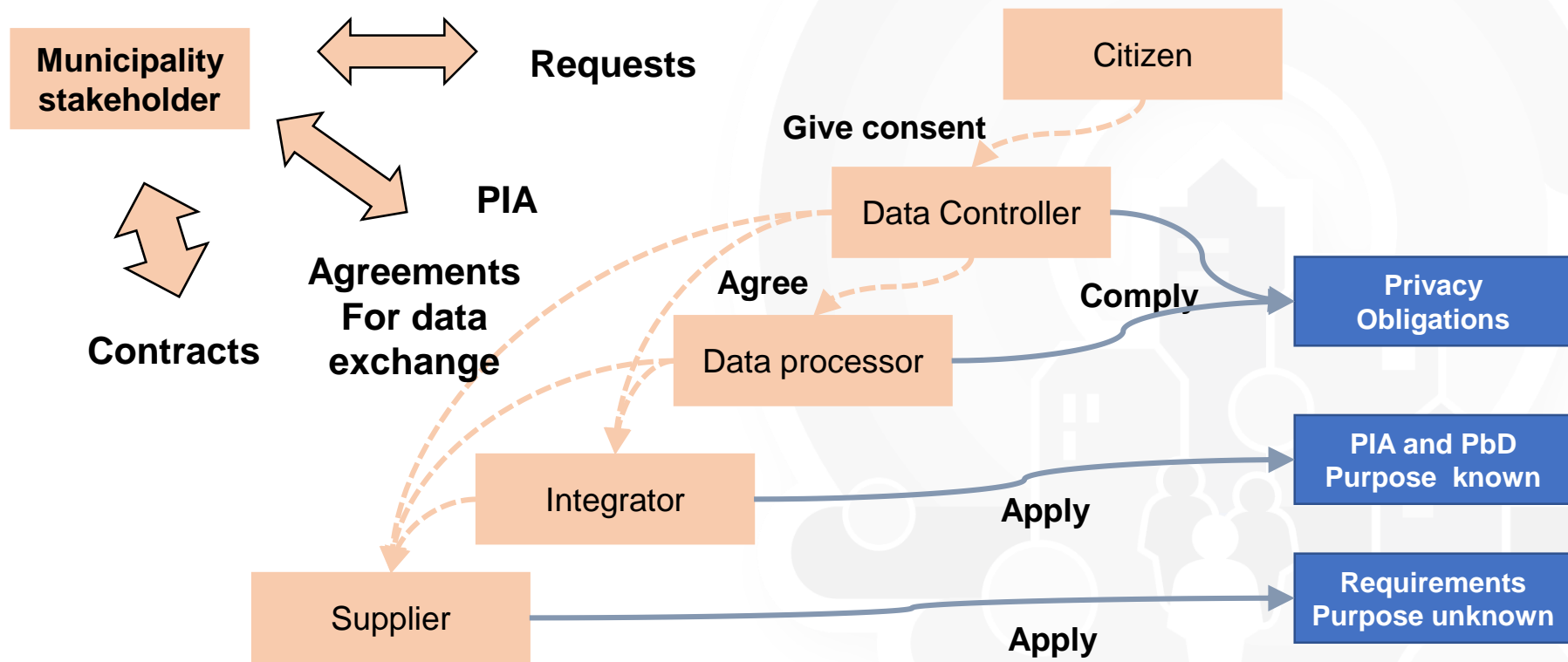
Domains



Concerns



# Cities must Manage Ecosystems



# First Workshop London - March 2017

- SCC Sharing Cities Project
  - London, Milan, Lisbon + Bordeaux, Warsaw, Burgas
- 15 attendees
  - managers and data protection officers
    - GLA, Royal Borough Greenwich, Lisbon and Milan
- Focus
  - understanding privacy compliance and impact on project use cases
    - London use case
    - Milan use case
    - Lisbon use case
- Conclusion (Report available)
  - carry out common privacy impact assessment practice in a subsequent workshop.

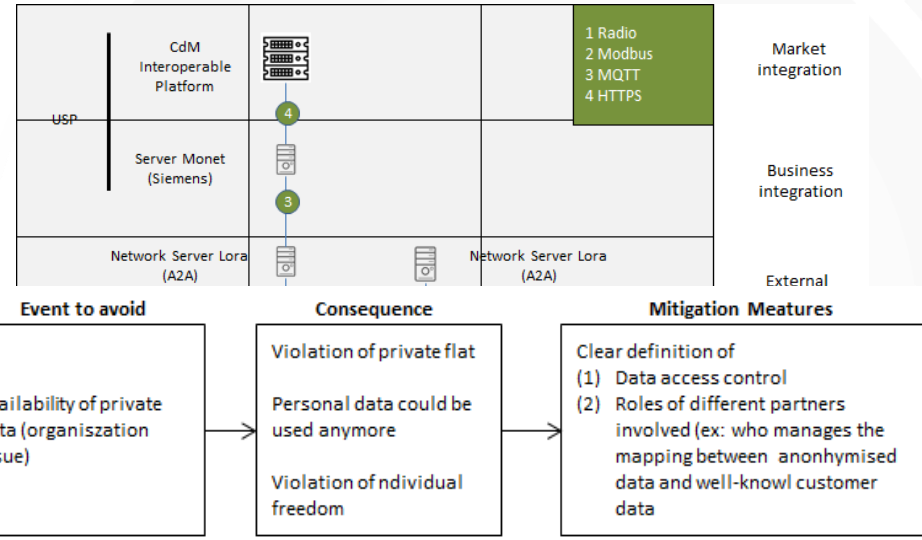
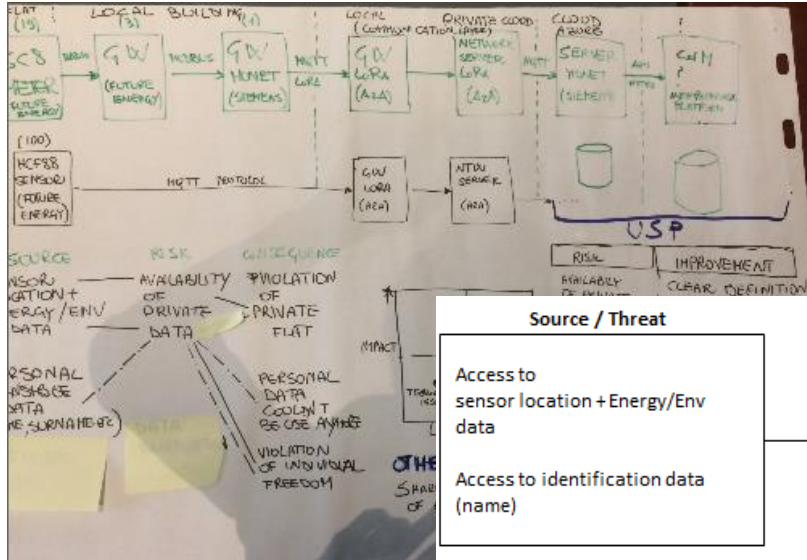


# Second Workshop Milan - July 2017

- Privacy Impact Assessment Workshop
- 34 attendees
  - managers, data protection officers and suppliers of applications representatives
    - Milan, GLA, Greenwich, Lisbon, Burgas.
- Four applications:
  - building retrofit (Milan),
  - bike sharing scheme (Lisbon),
  - smart energy management system (Greenwich),
  - lamppost (Milan).
- Results
  - Four privacy impact assessment canvases



# Example PIA canvas: Building Retrofit Milan



Maximum Impact				
Significant Impact	Must be avoided or reduced	Absolutely avoided or reduced		
Limited Impact	1	2		
Negligible Impact	These risks may be taken	Must be reduced		
	Negligible Likelihood	Limited Likelihood	Significant Likelihood	Maximum Likelihood

- 1 Technical issues
- 2 Organisational issues

**Issues**

- SharingCities common definition of risk and risk sources





# Conclusion of Milan Workshop

- Insight on privacy impact assessment process
  - need for a common list of risks,
  - need for guidelines to assess a given level of risk,
  - necessity to integrate alternate design approaches when data subject consent is not provided,
  - need for a data collection strategy when multiple applications are anticipated.
- SharingCities first project taking consortium level action to build common understanding
  - Italian data protection authorities very positive
- Recommendation
  - Create of a body of knowledge and of common practices on GDPR compliance.
  - Higher level measures
    - GDPR compliance helpdesk
    - H2020 guidelines for GDPR compliance
    - Consortium concertation instruments involving data protection authorities.





# Create of a body of knowledge and of common practices on GDPR compliance.

- Workshop to be proposed to projects
  - Light house projects
  - Others
- Results and practices are shared
  - Win-Win
  - GDPR compliance is for May 2018
- Objective
  - At least 5 workshops



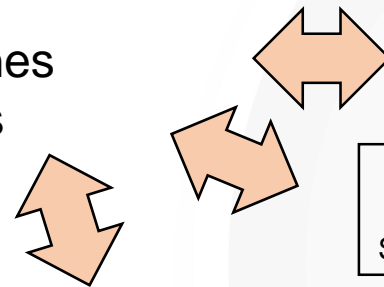
## Towards General Data Protection Regulation Compliance

### Privacy Workshop for Cities

Workshop facilitators	
	Antonio KUNG, CTO of Trialog, has 35 years' experience in ICT. An Ecole Centrale Paris and Harvard University graduate, Antonio has focussed on privacy since 2007, leading a number of European projects on the topic, including PRIPARE (pripareproject.eu) a support action on privacy-by-design. Antonio is the chairman of the <i>Citizen approach to data: privacy-by-design</i> initiative of the European Innovation Platform – Smart cities and communities. Antonio is also the editor of ISO/IEC 27550 <i>Privacy engineering</i> as well as the rapporteur of two ISO/IEC SC27/WG5 study periods: <i>Privacy in smart cities</i> and <i>Privacy guidelines in the IoT</i> .
	Antony PAGE is a recognised cities services expert, with over 20 years' experience working across legal services, governance, transformation, efficiencies and innovation with most local public services (including City Authorities, Health, Probation & Police), and public-facing private sector services (BPO, transformation, services to business, digital by default). A Kiwi by origin, he has worked internationally (EU, US, and Australia), and has a deep UK knowledge (over 30 UK Local Authorities). Antony is responsible for customer engagement and leads UrbanDNA's BlueRoom projects and leads Data Privacy policy for the H2020 Sharing Cities consortium.
About this workshop	The objective of this 2-day workshop is to help cities prepare for GDPR compliance. The workshop will carry out a privacy analysis of applications which a city is considering for deployment.
Outcome of this workshop	The result of the workshop will be a mutual understanding of what it will take to achieve GDPR compliance and a strategy or plan to follow. A privacy impact assessment (PIA) will be undertaken for up to 5 applications utilising a PIA canvas .
Participant profiles	The workshop preferably includes a representative number of stakeholders involved in the management, development and operation of a city application: <ul style="list-style-type: none"> <li>▶ City authorities and operators of applications to be deployed</li> <li>▶ Supplier Chain (infrastructure, applications, platforms, devices, etc...)</li> </ul> The workshop can involve the analysis of up to 5 applications
Content	Day 1 <ul style="list-style-type: none"> <li>▶ Briefing on privacy and GDPR compliance</li> <li>▶ Briefing on privacy impact assessment process</li> <li>▶ Presentation of city applications and/or use cases (up to 5)</li> </ul> Day 2 <ul style="list-style-type: none"> <li>▶ Presentation of privacy impact assessment canvas</li> <li>▶ Breakout session for each application</li> <li>▶ Debriefing for each application</li> <li>▶ Discussion on next steps</li> </ul>
Organisation and cost	The workshop is organised by a city. The workshop can involve several cities. Two workshop facilitators will be involved. Travel expenses plus facilitating fee to be covered by the organiser
<b>Contact</b>	
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# Impact on Standardisation

Additional guidelines  
For ecosystems



**Privacy Standards  
for Smart Cities**  
Management oriented

**Privacy Standards  
for Big Data**  
Sharing chain oriented

**Privacy Standards for IoT**  
Supply chain oriented

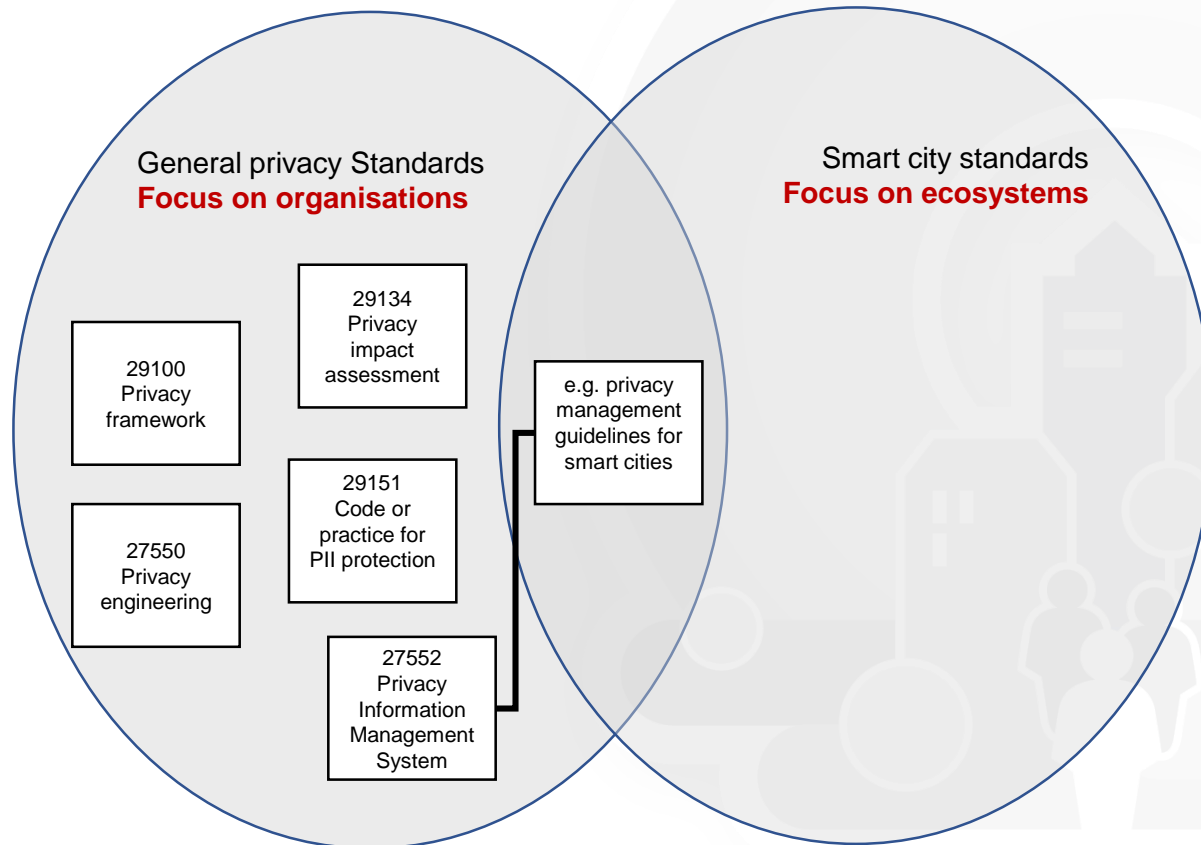
## **General Privacy Standards**

Privacy framework 29100  
Privacy impact assessment 29134  
Privacy engineering 27550 (new)  
Code of practice 29151  
Privacy Information management systems 27552 (new)

OASIS-PMRM



# Potential for new standard



# Questions

Antonio Kung

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