EIP-SCC
European Innovation Partnership on Smart Cities and Communities
Towards Common body of knowledge and practice for GDPR Compliance

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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

Smart Cities

IoT

Big data

Smart grid

Health

Transport

Security

Privacy

Safety
Cities must Manage Ecosystems

Requests

- Municipality stakeholder
- Supplier
- Integrator
- Data processor
- Data Controller
- Citizen

Agreements For data exchange

- Contracts
- PIA

Give consent

- Agree

Comply

- Apply
- Apply
- Apply

Privacy Obligations

- PIA and PbD Purpose known
- Requirements Purpose unknown

Give consent

- Agree

- Apply
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, Greenwith, 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

Source / Threat
- Access to sensor location + Energy/Env data
- Access to identification data (name)

Event to avoid
- Availability of private data (organization issue)

Consequence
- Violation of private flat
- Personal data could be used anymore
- Violation of individual freedom

Mitigation Measures
- Clear definition of
  1. Data access control
  2. Roles of different partners involved (ex: who manages the mapping between anonymised data and well-known customer data)

Impact:
- Maximum impact
- Significant impact
- Limited impact
- Negligible impact

Likelihood:
- 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
Impact on Standardisation

Additional guidelines
For ecosystems

- Privacy Standards for Smart Cities
  - Management oriented
- Privacy Standards for IoT
  - Supply chain oriented
- Privacy Standards for Big Data
  - Sharing 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

General privacy Standards
Focus on organisations

- 29100 Privacy framework
- 27550 Privacy engineering
- 29134 Privacy impact assessment
- 29151 Code or practice for PII protection
- 27552 Privacy Information Management System

Smart city standards
Focus on ecosystems

- e.g. privacy management guidelines for smart cities

October 11, 2017
EIP-SCC Action Cluster Meeting
Questions

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