GEANT Data Protection Code of Conduct (DP CoC) update

5.9.2012 REFEDS in Utrecht
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REFEDS attribute release wg & eduGAIN policy subtask
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Very short introduction: Data Protection Code of Conduct

- A legal statement signed and published by an SP on their privacy practice
  - Derived from the EU Data protection directive
- SP provides a link to the signed copy of the CoC in SAML metadata
- Home organisations (in EU/EEA) may feel more comfortable to release attributes to the SPs that indicate compliance with the CoC
Outcome of the Call for comments June-August

- The SP Data Protection Code of Conduct (21 June 2012, 4 pages) was exposed to public commenting 26th Jun – 12th Aug
- 28 comments from 3 persons received
  - Some legal issues (jurisdiction, secondary use, release to 3rd party, audits, terminating the CoC)
  - GÉANT’s name and role in the document vs. applicability outside eduGAIN?
  - Is there a process to update the CoC. If, how?
- eduGAIN policy task will prepare an updated version
  - No major issues – can be done in parallel
Documents supporting the CoC

Normative:
- Code of Conduct for Service Providers
- SAML 2 Profile for the Code of Conduct

Informative:
- Introduction to Data protection directive
- Introduction to Code of Conduct
- Managing data protection risks
- Privacy policy guidelines for Service Providers
- What attributes are relevant for a Service Provider
- Data protection good practice for Home Organisations
- Federation operator's guidelines
- Handling non-compliance
- Notes on Implementation of INFORM/CONSENT GUI Interfaces
Call for Comments on the documents supporting the CoC

- REFEDS Reykjavik meeting: please organise another Call for Comments on the supporting documentation

- The supporting documents are now nearly finished for a Call for Comments in https://refeds.terena.org/index.php/Data_protection_coc

- Call for Comments starts: ____________

- Follow the REFEDS mailing list
Planned: Pilot on the Code of Conduct

- Pilot on the Code of Conduct
- Goals
  - Legal: is the CoC OK for Home Orgs and SPs?
  - Technical: is it technically solid?
  - Community: Dissemination
- Target community in the pilot: CLARIN (linguistics)
- Planned pilot parties:
  - Feds: SurfFed, DFN-AAI, Haka, SWAMID
  - Home orgs: 9 Dutch univs, Uppsala, Helsinki, some in Germany
  - SPs: MPI at Nijmegen, CSC in Finland, IDS in Germany
- Phase 1: working technically 9/2012
- Phase 2: piloting 9-12/2012
Other activities planned

- Submit the Data Protection Code of Conduct to WP29 for approval
  - The EU body contributing to the uniform application of the Data protection directive

- Extend the Code of Conduct to cover attribute release out of EU
  - EU model contracts

**Multilateral Code of Conduct**

*IdPs MUST:*

*SPs MUST:*

*Liability:*

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