

GEANT Data Protection Code of Conduct (DP CoC) update

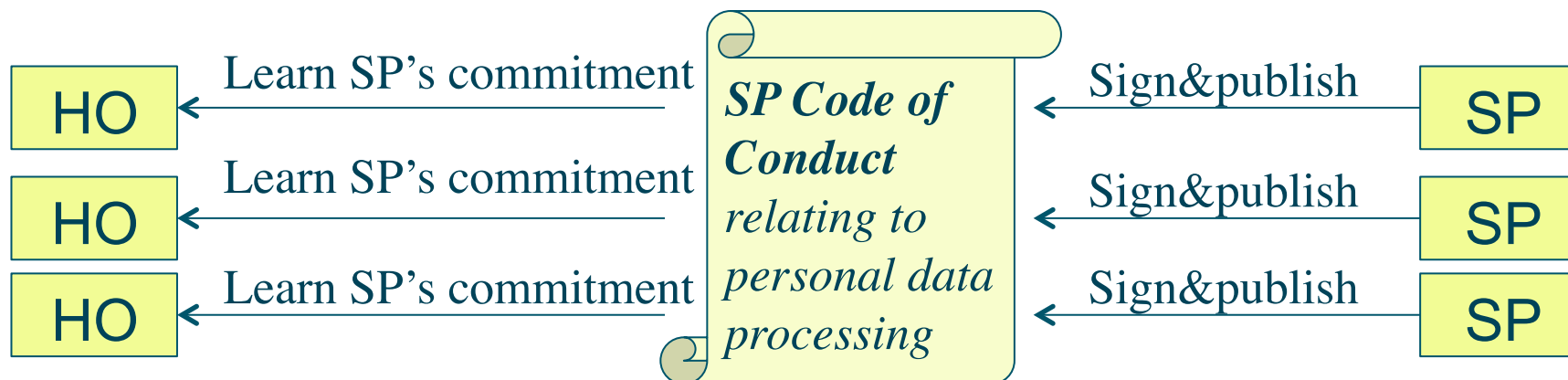
5.9.2012 REFEDS in Utrecht

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REFEDS attribute release wg & eduGAIN policy subtask

- Very short introduction to the CoC
- Outcome of the Call for Comments June-August 2012
- Call for Comments on the documents supporting the CoC
- Code of Conduct pilot
- Other future steps

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?
- The full document and the comments received:
https://refeds.terena.org/index.php/Code_of_Conduct_for_Service_Providers
- eduGAIN policy task will prepare an updated version
 - No major issues – can be done in parallel

Normative:

- Code of Conduct for Service Providers **<= the document**
- **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

