GEANT data protection Code of Conduct update

Mikael Linden, CSC – IT center for Science
REFEDS meeting
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Status of deployment

GEANT CoCo for SPs in EU/EEA or similar
• 84 SPs committed to CoCo
• 74 IdPs releasing attributes to CoCo SPs

CoCo monitoring tool integrated to the eduGAIN entity listing tool:
https://technical.edugain.org/entities.php
Since the last meeting (1/2): Article 29 working party

- GEANT CoCo submitted to data protection authorities (WP29) in 2014
- Met some WP29 reps 12/2015 (meeting notes)
  - "Your CoCo just rephrases the data protection directive”
  - "CoCo should give more practical guidelines for SPs”
  - "CoCo should prescribe what the abstract law means in the context of an R&E identity federation (e.g. purpose limitation, data minimisation, data subject rights, data retention…”
- In other words: CoCo 1.0 is to convince the IdPs to release attributes, but WP29 wants the CoCo to help the SPs as well
- Good news: WP29 didn’t shoot down the CoCo
  - we can continue using ver 1.0
  - But we need to extend it if we want the WP29 approval
Since the last meeting (2/2): General Data Protection Directive GDPR

- GDPR was approved by European Parliament 4/2016
- Replaces data protection directive and the national laws 25 May 2018

- Draws more attention to data protection issues (also in the GEANT community)
- Reduces fragmented interpretations (also in the GEANT community), easing attribute release between member states
- Introduces new things, such as
  - More transparency requirements for data subjects
  - Incident reporting (to authorities and data subjects)
  - More requirements for Codes of Conducts (self-regulation)
Our plan for the CoCo work in GN4-2 JRA3-T1

- our suggestion is not to develop an “intermediate” version of CoCo
  - That addresses WP29’s concerns but not GDPR
- Instead, JRA3-T1’s suggestion is to develop ver 2.0
  - Addresses WP29’s concerns
  - Is forwards compatible with GDPR
- Goal is to submit ver 2.0 to community consultation in Autumn 2016

- Comments on that approach?
Thank you!

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