GEANT Data protection Code of Conduct
FIM4R in Vienna 20 Feb 2017

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CSC – IT Center for Science

GEANT project (GN4-2 JRA3 Task 1.1)

Data protection Code of Conduct (CoCo) version 1.0 for SPs in EU/EEA or the EC whitelist

- Version 1.0 (6/2013)
- 106 Service Providers commited to
  - AT, CH, CZ, DE, FI, FR, GR, HU, HR, IT, NL, NO, SE, UK
  - Research services:
    arts and humanities, linguistics, climate, space (ESA), physics (CERN), biomedical
  - Others: tools and networking, cloud, e-learning
- 112 Home Organisations relying on
  - AT, CH, DE, FI, GR, IE, IT, LT, PL, SE

GÉANT Data Protection Code of Conduct

For Service Providers established in European Union, European Economic Area and countries with adequate data protection pursuant to Article 25.6 of the directive 95/46/EC

GN3-12-215

Document URI:
http://www.geant.net/uri/dataprotection-code-of-conduct/v1

Version 1.0, 14 June 2013

Purpose and Context

Without prejudice to the provisions as set forth in the agreement between the Home Organisation and Service Provider which in all cases takes precedence, this Code of Conduct sets the rules that Service Providers adhere to when they want to receive End Users' Attributes from Home Organisations or their Agent for providing access to their services. This Code of Conduct is a binding community code for the Service Providers that have committed to it.

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- CoCo submitted to WP29 in 12/2014

- Dialogue with WP29 representatives 2015
  - (The CoCo is not wrong, but…)
  - It doesn't provide the added value CoCos are expected to have.
    It just rephrases the directive
  - The CoCo must explain what the law means in the context of R&E federations

- Good news: we can use CoCo ver 1.0

- Bad news: more work needed to get the CoCo endorsed by WP29

Ref. Ares(2015)2604765 - 22/06/20

ARTICLE 29 Data Protection Working Party

Brussels, 22 June 2015

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Dear Mr Linden and Mr Nordh,

I am writing to you on behalf of the Article 29 Working Party (WP29) to provide a first response to your request for a formal endorsement of the Géant Data Protection Code of Conduct, as laid down in Article 27(3) of the Data Protection Directive.

The Code of Conduct and the enclosed Explanatory memorandum you submitted on 4th December 2014, has been examined and these documents accepted for evaluation assuming that they meet the preliminary criteria established in the Working Document on the procedure for the consideration by the Working Party of the Community Codes of Conduct adopted on 10 September 1998 as WP13.

First of all, I would like to underline that the above-mentioned rules of procedure require that a

1. Addresses the WP29 comments

2. Addresses the General Data Protection Regulation
   - The biggest European data protection reform for 20 years

3. Addresses attribute release out of EU/EEA
   - GDPR introduces approved CoCo as a means for the release to a 3rd country
   - International organisations

Excerpts from the CoCo 2.0 DRAFT
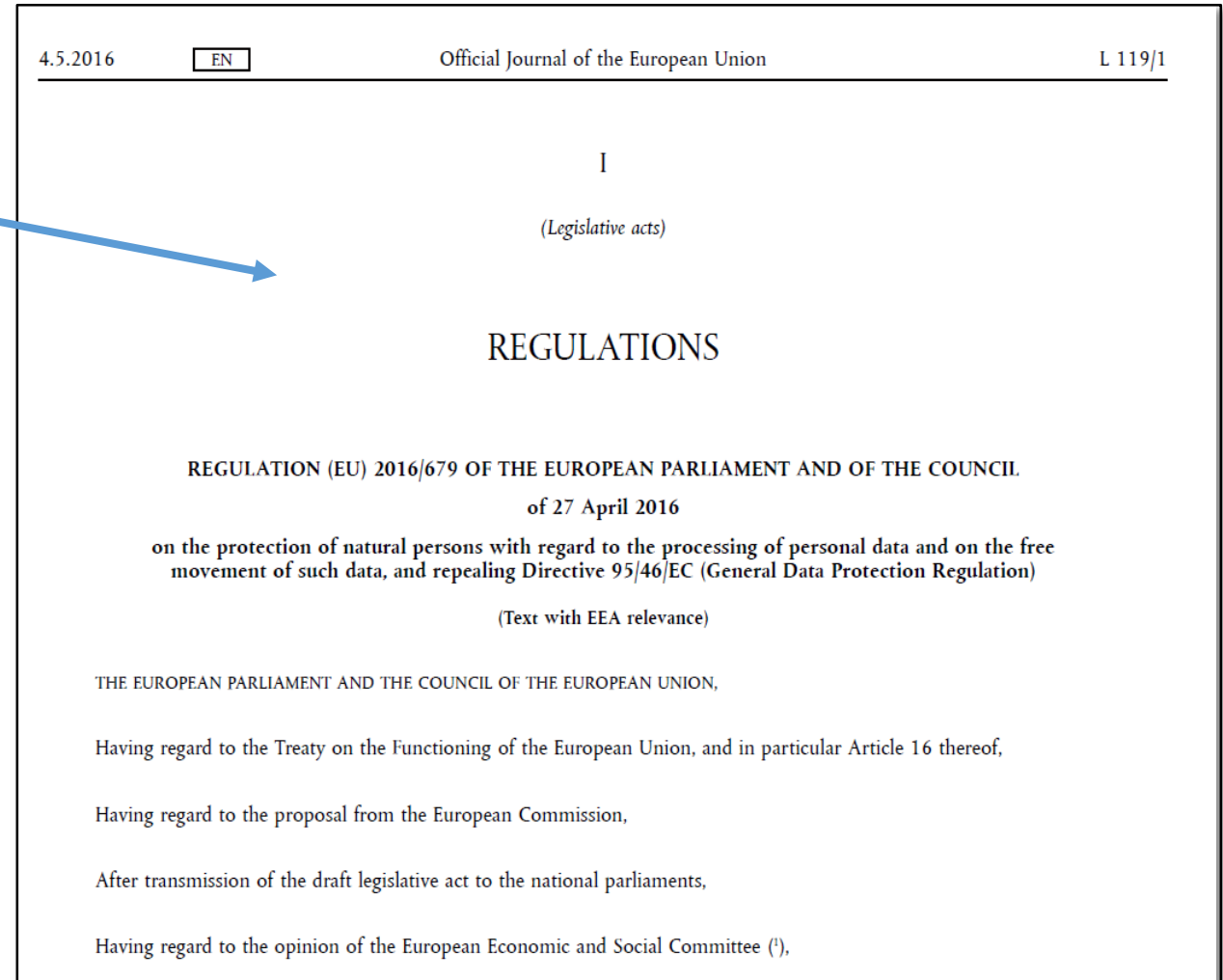
b. Purpose limitation

The Service Provider warrants processing Attributes of the End User solely for the purposes of **enabling access to the services**. The parties agree that the End User's personal data is collected for specific, explicit and legitimate purposes. The Attributes shall not be further processed in a manner which is not compatible with the initial purposes (Article 5.b of the GDPR).

The Service Provider must ensure that Attributes are used only for **enabling access to the services**. In practice, enabling access to the service covers:

- **Authorisation**: i.e. managing End User's access rights to services provided by the Service Provider based on the Attributes. Examples of such Attributes are ...

- **Identification** i.e. End Users need to have a personal account to be able to access their own files, datasets, pages, documents, postings, settings, etc. ...

- **Transferring real-world's trust to the online world**. For instance, if two members of the user community know each other's name in the real world, it is important that their names are displayed ...

- **Researcher unambiguity** i.e. ensuring that a researcher's scientific contribution is associated properly to them and not to a wrong person ...

- **Other functionalities** offered by the Service Provider for enabling access. It is common that services on the Internet send e-mail or other notifications to their users ...

Public community consultation on the GEANT CoCo ver 2.0

- The public consultation starts on Wednesday
  - Ends 22 April 2017

- Please join the CoCo workshop on Wed 22 Feb:
  - https://wiki.refeds.org/display/CODE/GEANT+Data+Protection+Code+of+Conduct+workshop+22+Feb+2017

1. Expose the CoCo 2.0 draft to a community consultation
   - CoCo workshop 22 February in Vienna
   - Written comments on the CoCo
2. Integrate the comments to the CoCo draft
3. Iterate with the data protection authorities
4. In 25th May 2018, submit the CoCo to the European Data Protection Board for approval

REFEDS CoCo WP29
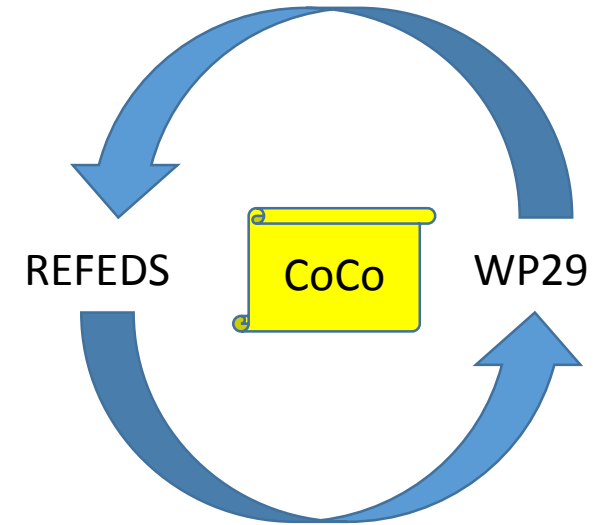
Iterate!

REFEDS Assurance framework

Mikael Linden, REFEDS assurance wg chair
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REFEDS assurance framework

- AARC: Minimal LoA recommendation for low-risk research 11/2015
- REFEDS established an assurance working group 6/2016
  - AARC contributed the Minimal LoA recommendation and manpower
- DRAFT: REFEDS assurance framework
  - http://tinyurl.com/h8z3joe
  - Currently in the REFEDS consultation queue

Assurance components and component values

Identifier
- Unique user ID

Identity proofing
- Local-enterprice
- AL2/eIDAS low/IGTF birch
- AL3/eIDAS substantial

Authentication
- Password good-entropy
- Multifactor authentication

Attribute quality
- eduPersonAffiliation is fresh

Assurance profiles: take a cup of coffee!

"Cappuccino" profile

"Espresso" profile

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