GEANT Data protection Code of Conduct
Code of Conduct 2.0 workshop 22 Feb 2017

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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 committed 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
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
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
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 now!
• The Code of Conduct draft is here:
• Please provide your comments to this Google documents before 22 Apr 2017:
  • [http://tinyurl.com/hv8vo44](http://tinyurl.com/hv8vo44)
• Please join the CoCo workshop on Wed 22 Feb:
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 May 2018, submit the CoCo to the European Data Protection Board for approval