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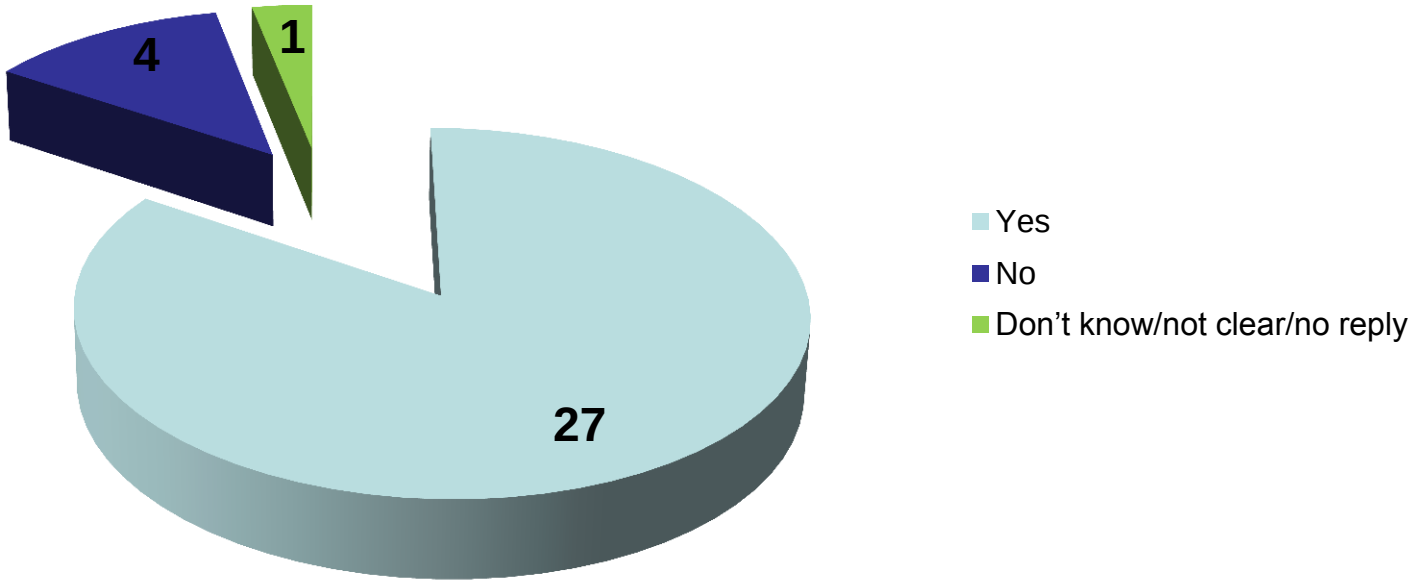
EU institutions websites workshop

19/09/2013

9.15 – 9.30

Survey results – EU public websites

Do you process personal data through websites?



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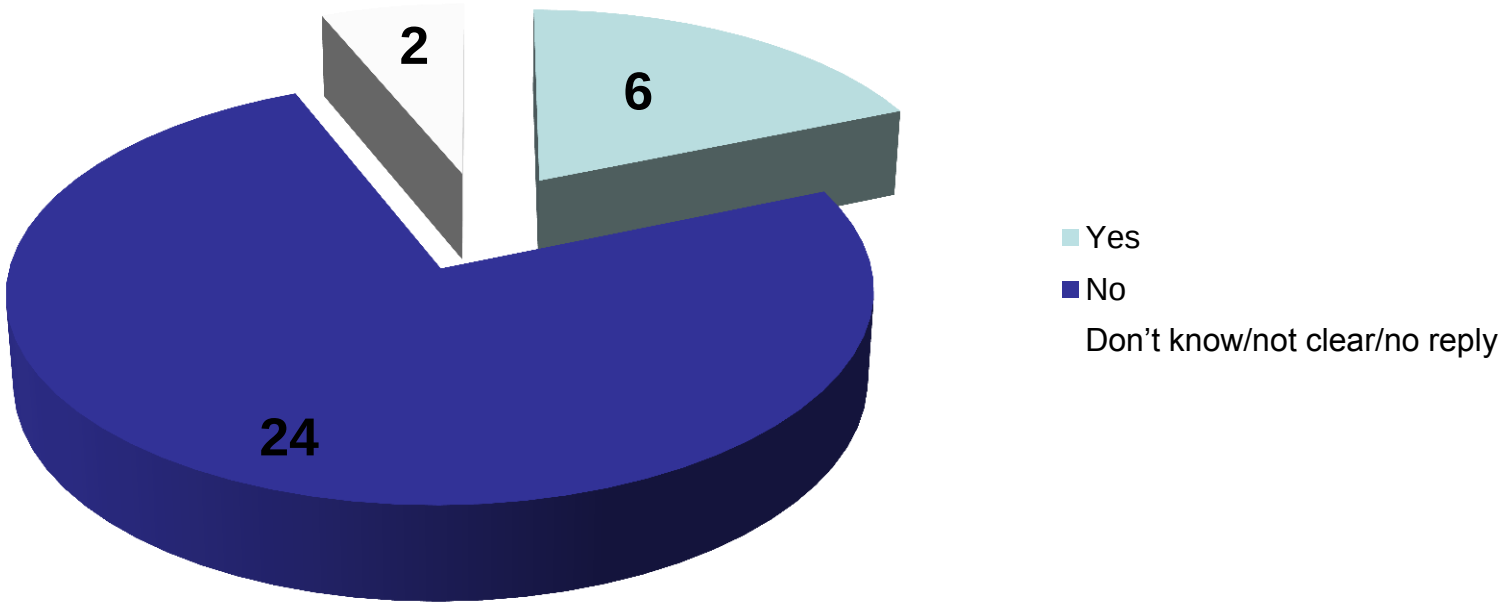
Tools used to process personal data

- Web forms to collect personal information
- Data are stored in databases
- SSL to protect data in transit
- Logs and cookies (in a small number of cases)

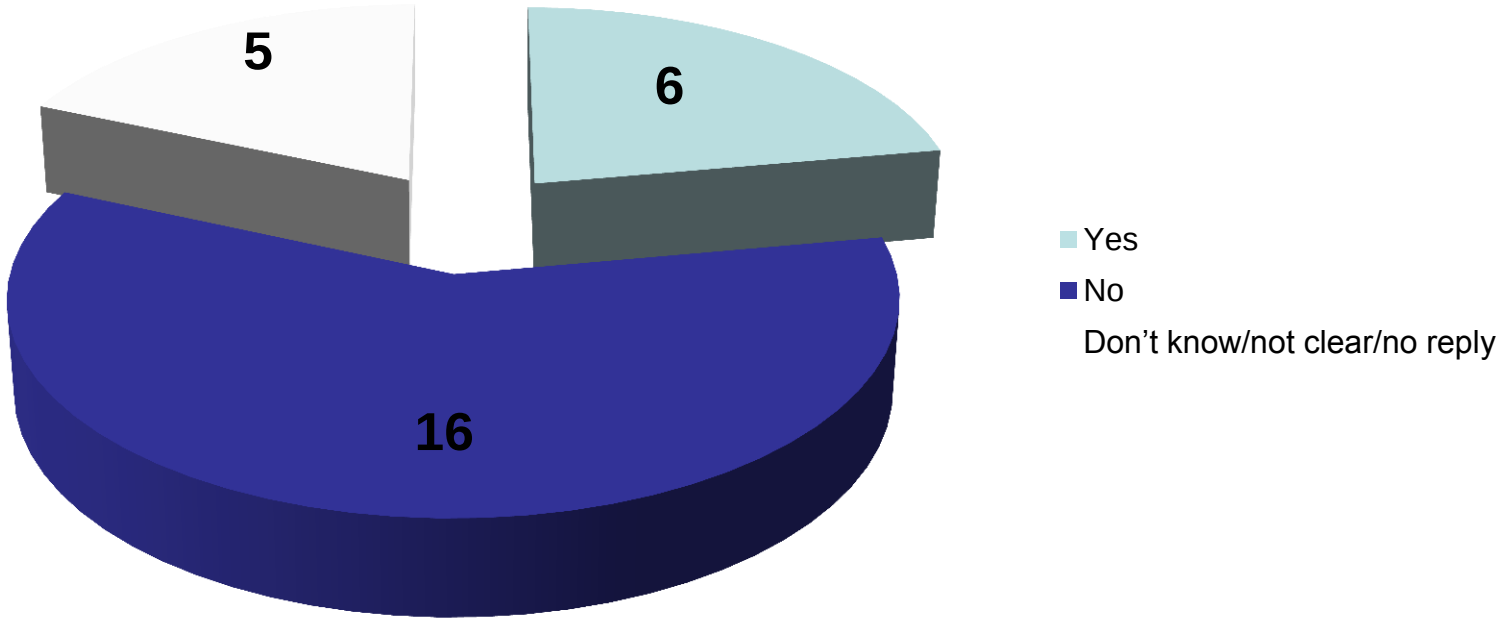
Mobile apps to access public websites

Do you provide mobile "apps" to access your websites?



Management of risks to personal data

Have you carried out a risk assessment?



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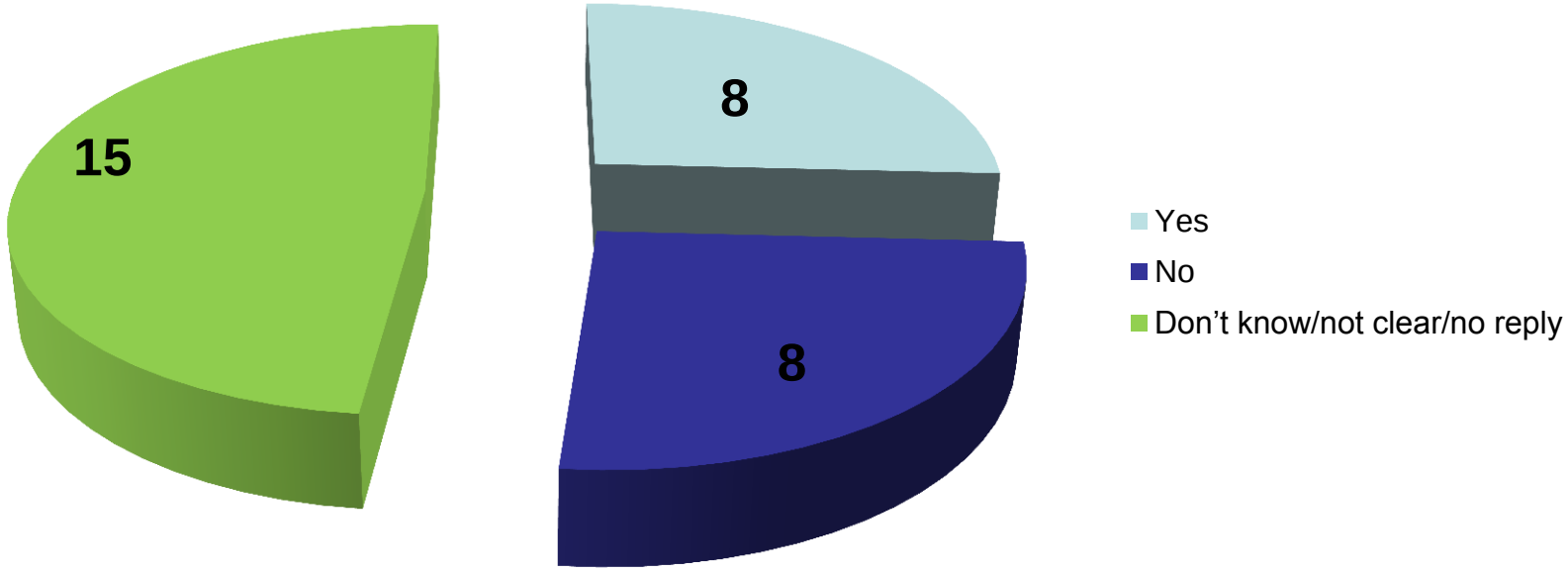
Risk treatment & countermeasures

These include…

- Access control
- Data/ password encryption, SSL for data in transit
- Secure development
- Network IDS, penetration testing
- Firewall
- Separation of environments
- Logs
- Liaison with EU-CERT
- Awareness of most common security threats
- Contractual clauses with external contractors
- Data minimisation, privacy notices, audits etc…

Security

Do you have any security policies for web site development, operation and maintenance?



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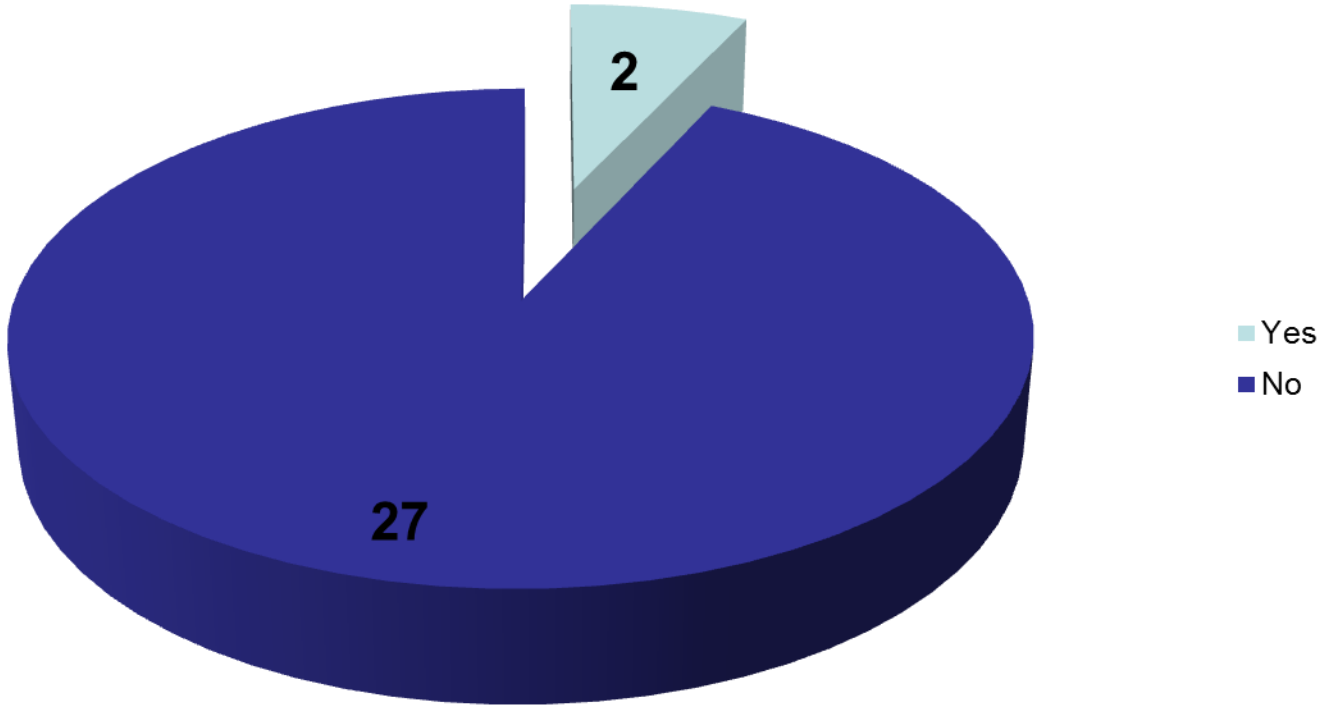
Incident management

Has any security incident occurred to date?



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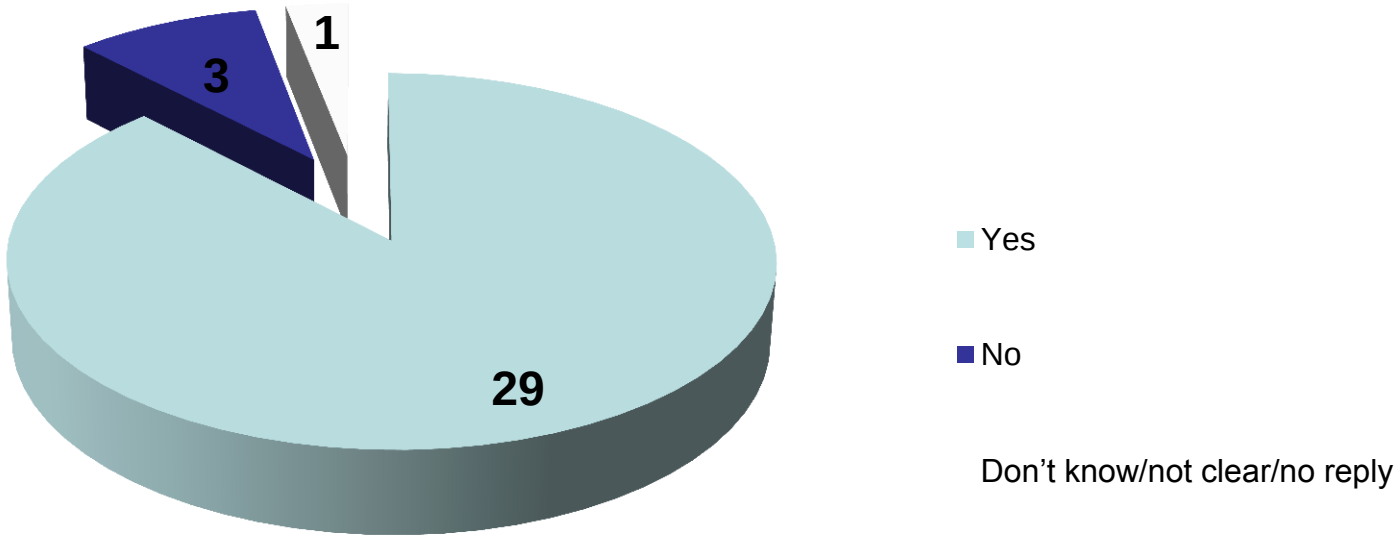
Privacy by design & by default

- Less than half of institutions involve the DPO at website design phase
- Contractual clauses with external contractors
- Cookies disabled by default
- Data minimisation
- A few have NO privacy by design approach

Cookies and client side scripts

Do you use cookies or scripts ?



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Use of cookies

- Most for session management, user preferences and half for statistics (analytics)
- Most say they do not process personal data through cookies
- Some say they collect IP addresses
- Client scripts not used to read or write on client side

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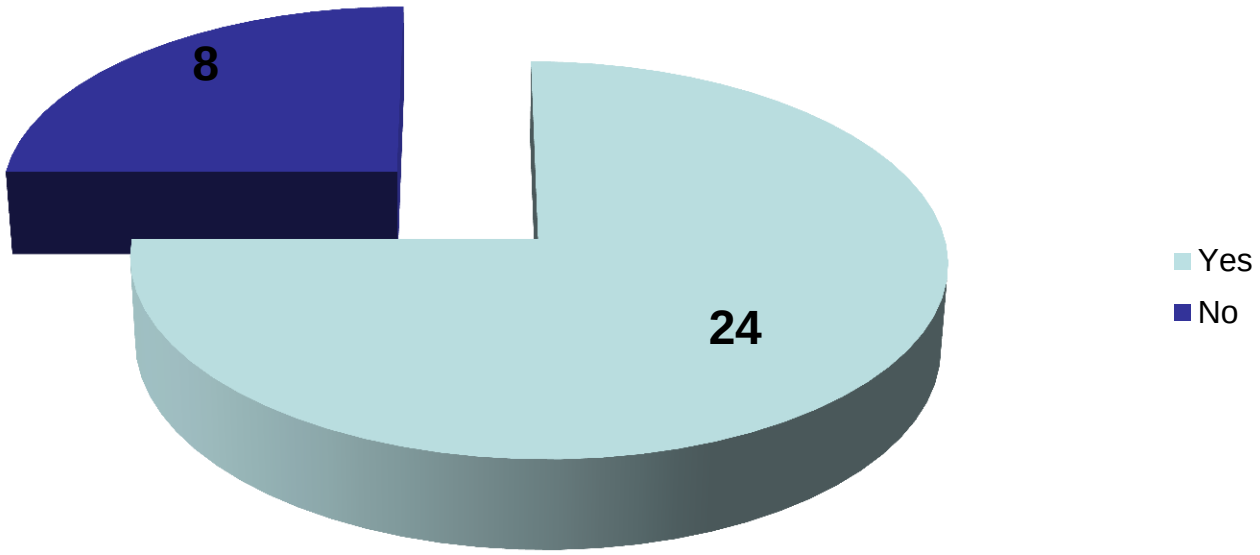
Compliance with EU rules on cookies

- Described in legal notice
- Not always clear what the applicable rules are
- Some do not provide any explanation
- EC Guidelines issued on use of cookies for EC departments' websites

Tracking

Do you track your websites users?



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Processing by third parties

- 13 institutions declared use of Google Analytics
- Research into other software allowing processing on institutions' own servers
- Analytic software building statistics over logs
- External mailing/ newsletter service
- YouTube
- Embedded social websites software to share pages
- Use of external contractor pages or tools

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9.30 – 10.00

Accountability & data protection Management

- Data controller responsibility/ DPO roles
- Adoption of policies
- Website design, development, operation & maintenance - in light of data protection requirements
- Data protection risk assessment
- Privacy by design and by default

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10.00 – 10.30

Collection & further processing of personal data by EU websites

- Legal basis
- Adequate, relevant and not excessive
- Compatibility with purpose of collection
- Retention
- Website features to ensure data quality
- Information provided to data subjects
- Special categories of data & appropriate safeguards

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10.30 – 11.00

Cookie management, scripts & web tracking

- Tracking technologies & mechanisms
- Risks to privacy & other fundamental rights
- Legal rules
- Compliance with EU rules on cookies, including consent
- Information to data subjects
- IP addresses & other identifiers
- “Do not track” notifications
- Third party tracking

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11.15 – 11.45

Processing of personal data by third parties

- Data protection requirements in relation to procurement and data processors
- Third party analytics, behavioural advertising cookies, social networking, content management website components & cookies – **safeguards?**
- International transfers
- Information to data subjects about international transfers

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11.45 – 12.15

Website security, access monitoring/ logging and access restriction

- Security risk management process & policies
- Involvement of DPO in website security management
- Web protocol confidentiality & integrity, including backups
- Access restrictions
- Information to data subjects
- Privacy by design measures in terms of security
- Necessity & proportionality when following up incidents

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12.15 – 12.45

EU-made mobile apps

- Risks to privacy & other fundamental rights – **safeguards?**
- Legal rules, including consent & information to data subjects
- Purpose limitation, data minimisation, necessity
- Secure development policies and best practices of controllers & contractors. Contained in **contracts?**
- Processors & transfers
- Testing of app vulnerabilities, security countermeasures & patching
- Security of apps developed for children

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12.45 – 13.00

Summary, conclusions and next steps

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Process towards Guidelines (websites and mobile devices)

- Survey
  - Start collecting facts and understanding institutions reality
- Workshop
  - Orientation document for further insight and first perspectives
  - Other exchange opportunities as requested (IT managers, webmasters etc.)
- Draft guidelines (tentatively Oct 2013)
  - Your feedback on draft guidelines (tentatively Nov 2013)
  - Final consultation (?)
- Guidelines