Universitat Autònoma de Barcelona

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GENERAL DATA PROTECTION REGULATION

Agustí Verde Parera
Data Protection Officer UAB

Xavier Rubiralta Costa
IT Responsible for Data Protection UAB

GENERAL DATA PROTECTION REGULATION

- Principles relating to processing of personal data
- Lawfulness of processing
- Consent
- Data protection by design
- Processing of personal data in research

PERSONAL DATA

Name

DNI / NIF / ID number


Phone Number


Address

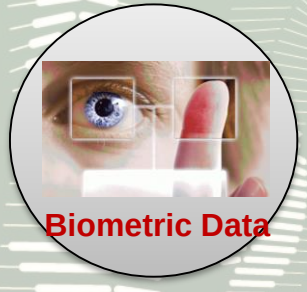

Image

Plate Number

IP Address


Geolocation


Genetic Data


Biometric Data

PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

- Lawfulness, fairness and transparency
- Purpose limitation
- Minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

LAWFULNESS OF PROCESSING

- Consent
- Performance of a contract
- Compliance of a legal obligation
- Protection of vital interests
- Public interest or exercising of official authority
- Purposes of legitimate interest

CONSENT

- Freely given
- Specific
- Informed
- Unambiguous

DATA PROTECTION BY DESIGN

- Risk Analysis
- Data Protection Impact Assessment
- Technical measures
- Organisational measures

PROCESSING OF PERSONAL DATA IN RESEARCH

- Principles relating to processing of personal data
- Purpose limitation
- Publication
- Information reuse

Balanced protection measures: organisational and technological

- All the measures are important. Not balanced ones means a weak protection
- All the protection measures should be based on the identified and analyzed risks
- Knowledge and awareness of policies and procedures and the use of tools
- Multidisciplinary teams: different visions

Privacy from design and Privacy by default

- Data protection should appear in the first step of any project, not later
- Data protection is not optional, it is compulsory
- Privacy and Security policies
- Risk analysis: identify threats, analyze risks and manage risks
- Risk = impact * likelihood

Risk analysis: relevant scenarios in research environments

- People of different institutions, countries, legislations, cultures, etc
- People rotation in the projects
- Access control: people authorization and authentication
- Data with bigger risk according to the country
- Physical location of data and devices
- Tools for data treatment and conservation
- De-identification and encryption

Data de-identification (anonymize)

- Is it possible to de-identify data in any case?
- Orientations and warranties in de-identification procedures of personal data of the Spanish Data Protection Agency:
  - https://www.aepd.es/media/guias/guia-orientaciones-procedimientos-anonimizacion.pdf
- List of 18 identifiers of the Health Insurance Portability & Accountability Act (HIPAA)
- Guide to Protecting the Confidentiality of Personally Identification Information (PII) by the National Institute of Standards & Technology (800-122)

Data processors

- Data processors selection: key task
- Audit processes on data processors
- Accreditation certifications
- Contract: should detail the data protection issues

Consent and traceability

- Obligation to be able to prove the reception of the consent
- Obligation to be able to prove the protection measures on the data
- Traceability of the accesses to data
- Validity of the evidences in case of litigation