



# Stress Free Data Privacy Protection

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# #2 Privacy Notices

In 10 minutes or less ....

# Purpose and outcomes

- After going through this presentation you should be able to appreciate:
  - The main principles of privacy notices
  - How to create a privacy notice at CERN
  - How to fill out the privacy notice template

# Prerequisites

- #1 The Basics

# Transparency and fairness

- Privacy notices informs the individual about:
  - Why the data are being processed.
  - How the data are being collected.
  - Who is collecting the data.
  - How it will be used.
  - How and when it will be shared.
  - How long it will be kept for.
  - Their rights.

# Processing of personal data at CERN

- Processing of personal data at CERN.
  - Services are registered in the ServiceNow service catalogue.
  - All processing of personal data will be registered as a service.
- Processing of personal data has an associated privacy notice.
  - It is created through a template builder in ServiceNow
  - The final result is attached automatically as a link to the service description page.
- Examples:
  - <https://cern.service-now.com/service-portal/privacy-policy.do?se=site-security>
  - <https://cern.service-now.com/service-portal/privacy-policy.do?se=alumni>

# What you will see in the template

- Basis for processing of Personal Data by the Service
- Processing Personal Data
- Sharing data internally at CERN
- Transfer data externally
- Automated decision making and Profiling
- Scale of service



# Legitimate basis for processing

- There are a number of legitimate reasons for processing personal data, but at CERN we will be primarily concerned with three:
  - In the legitimate interest of the organisation.
  - In the performance of a contract.
  - Consent of the individual.
- What you should consider:
  - If you think that none of these apply in your case, contact the ODPP.

# Processing Personal Data

- What personal data do you take or receive from other services, or collect from individuals? What is the source of each of these data? For which purposes are each of these data required by the service?
- What personal data are stored by the service? For how long are these data kept? And for which purposes can these data be used?
- What you should consider:
  - Look at the examples and include personal data you are processing.
  - You should only keep data for as long as the purpose requires it. It should be as short as possible.

# Sharing data internally at CERN

- What personal data is visible - sent, exposed, accessible - by which services, teams or individuals at CERN, and for what purpose?
- What you should consider:
  - Anywhere you are sending data should be included, for example to central IT services.

# Transfer data externally

- Does the service transfer personal data with entities or individuals outside CERN? What personal data is shared with whom?
- What you should consider:
  - Anywhere you are sending data to, including giving access to view data at CERN should be included.
  - Are you using cloud services? They must be included.

# Automated decision making and Profiling

- We consider profiling to mean a form of automated processing, gathering information about an individual or group of individuals and analysing their characteristics or behaviour patterns in order to place them into a certain category or group.
- What you should consider:
  - Creating a mailing list may be considered profiling if the name of the mailing list refers to any form indication of performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements

# Scale of service

- This is used to understand if the processing affects a large number of individuals and therefore represents mass processing of personal information.
- What you should consider:
  - Select an amount based on your best estimate of the volume of processing done by the service.

# Where to find the builder

The screenshot displays a web-based service catalog interface. At the top, there is a navigation bar with a search field and a user profile for 'Covid Foster'. Below the navigation bar, a sidebar on the left contains various menu items such as 'Self-Service', 'My Daily Work', 'My Work', 'My Groups Work', 'My Groups Assignments', 'Ticket Feedbacks for my FE', 'My Approvals', 'KB Pending in my FEs', 'KB Feedbacks in my FEs', 'KB Outdated in my FEs', 'My active handled tickets', and 'My last 6 months closed handled tickets'. The main content area shows a table of service elements under the heading 'All Parent Parent+ IT Services'. The table has columns for 'Name', 'Parent', and 'Updated'. The table lists various services such as 'Accelerator Database Service', 'ACRON Service', 'Administration Database Service', 'AFS Service', 'AFS Web Frontend Service', 'Backup and Restore Service', 'BAMH Service', 'BO BIC Service', 'CERNUS Network Service', 'CAS/DIS Service', 'Centralised Elasticsearch Service', 'Ceph Service', 'CERN Photoarchive Service', 'CERN Search Service', 'CERN Wiki Service', and 'CERN User Availability Service'. Each row includes a checkbox and a circular icon next to the service name.

Name	Parent	Updated
Accelerator Database Service	Database Services	10-12-2014 18:59:14
ACRON Service	IT Infrastructure Services	10-12-2014 18:07:16
Administration Database Service	Database Services	10-12-2014 18:58:24
AFS Service	Storage Services	10-12-2014 17:59:11
AFS Web Frontend Service	Web Services	06-02-2017 13:42:49
Backup and Restore Service	Storage Services	10-12-2014 18:22:01
BAMH Service	BAMH Services	11-08-2011 16:32:15
BO BIC Service	BeHd Services	15-12-2016 09:28:58
CERNUS Network Service	Network Services	03-04-2017 09:28:54
CAS/DIS Service	Storage Services	10-12-2014 17:59:04
Centralised Elasticsearch Service	IT Infrastructure Services	06-02-2016 17:06:43
Ceph Service	Storage Services	10-12-2014 18:04:17
CERN Photoarchive Service	Telephone Services	01-02-2017 16:09:19
CERN Search Service	Web Services	10-12-2014 18:24:38
CERN Wiki Service	Storage Services	01-11-2016 15:08:00
CERN User Availability Service	Computer Personality Services	10-12-2014 18:52:24

# For more information

- You can give feedback by mailing [privacy.protection@cern.ch](mailto:privacy.protection@cern.ch)
- You can consult the Office of Data Privacy Protection website: [odpp.web.cern.ch](https://odpp.web.cern.ch)
- You can pose questions or report incidents directly to the odpp service through Service Now.



