

# A new vision for S&E



Regulation 2018/1725 & Newcomers



Team building & flexibility



Refresh S&E Vision & Mission  
Develop an Action Plan for 2019

# S&E Vision and Mission



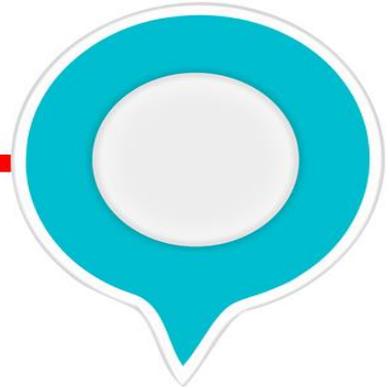
**People first:** ensure effective protection of peoples' fundamental rights and freedoms against the (mis)use of technologies, in particular in relation to the processing of personal data & promotes public awareness and understanding of the risk to people's rights and freedoms



**Expertise:** a unit of experts in data protection; a unit outward and forward looking which cooperates with all EDPS units, EUIs, their DPOs, DPAs as well as other stakeholders



**A wider EU context:** we want to be a contributor to the common good



Knowledge  
management

Communication

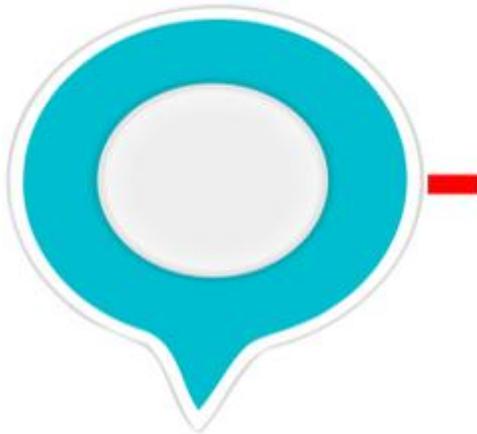
Cooperation

Enforcement



# S&E fields of action for 2019

# Key areas to expand – Knowledge management



Knowledge  
management

- S&E has a strong history of knowledge management

The screenshot shows a Confluence page titled "Commented 'EUI GDPR'" under the "EDPS Wiki" space. The page content includes an introductory paragraph and a detailed table of contents for the GDPR articles, organized into chapters.

Pages / Home / S&E work

## Commented 'EUI GDPR'

Created by LANGFELDT Owe, last modified on 27 Sep 2018

This commented version of the 'EUI GDPR' should serve as a repository for S&E knowledge. Initially, this project started from the EC proposal (updates with final text, indicated where done). Each Article is followed by a public summary of our interpretation. This public part should also be published on our website. Afterwards, an internal part explains how we reached that position, whether our doctrine changed, open questions for further discussion, etc. This part is not meant to be published access requests.

Expand all Collapse all

- ▼ Chapter I - General provisions
  - Article 1 - Subject-matter and objectives
  - Article 2 - Scope
  - Article 3 - Definitions
- ▼ Chapter II - Principles
  - Article 4 - Principles relating to the processing of personal data
  - Article 5 - Lawfulness of processing
  - Article 6 - Processing for another compatible purpose
  - Article 7 - Conditions for consent
  - Article 8 - Conditions applicable to children's consent [...]
  - Article 9 - Transmissions of personal data to [GDPR and LED recipients]
  - Article 10 - Processing of special categories of data
  - Article 11 - Processing of personal data relating to criminal convictions and offences
  - Article 12 - Processing which does not require identification
  - Article 13 - Safeguards relating to processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
- ▼ Chapter III - Rights of the data subject

- However, to further increase oversight and consistency, we created a **structural framework**.

# Seasonal approach



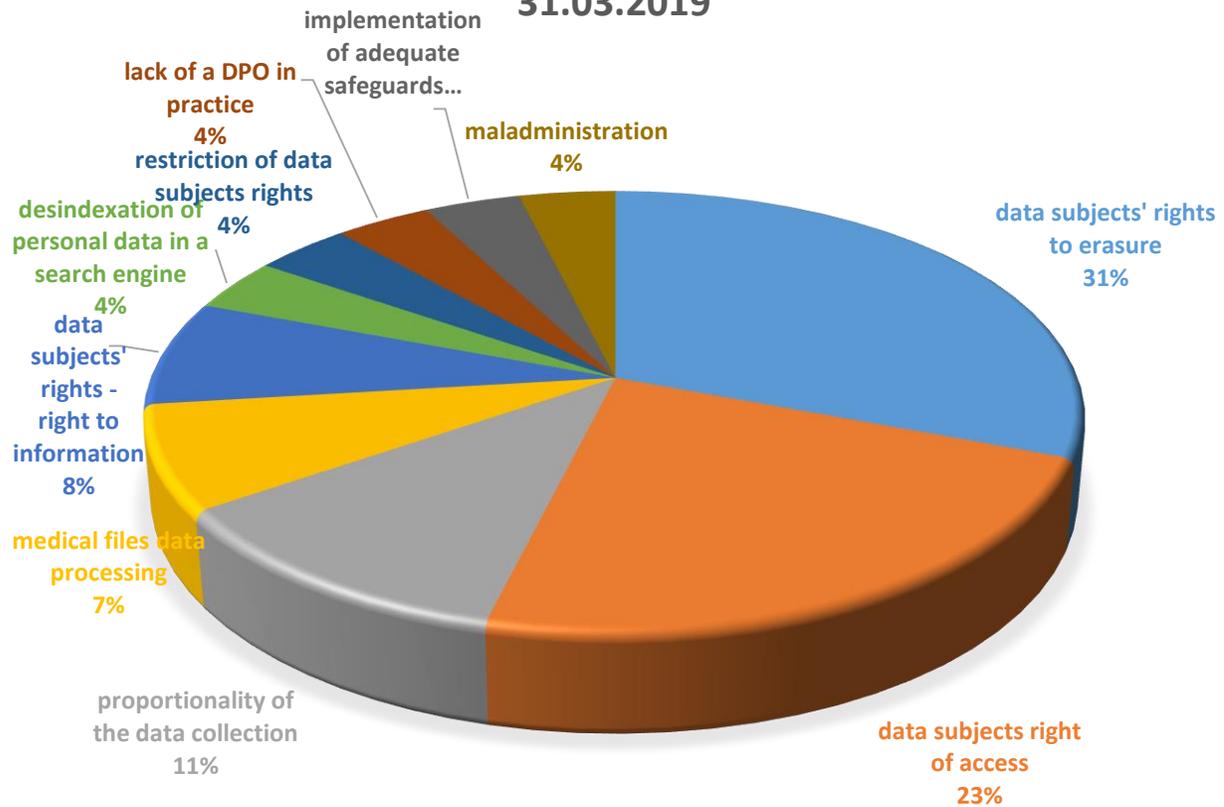
- Why?

- Changing the dynamic of knowledge management and communication.

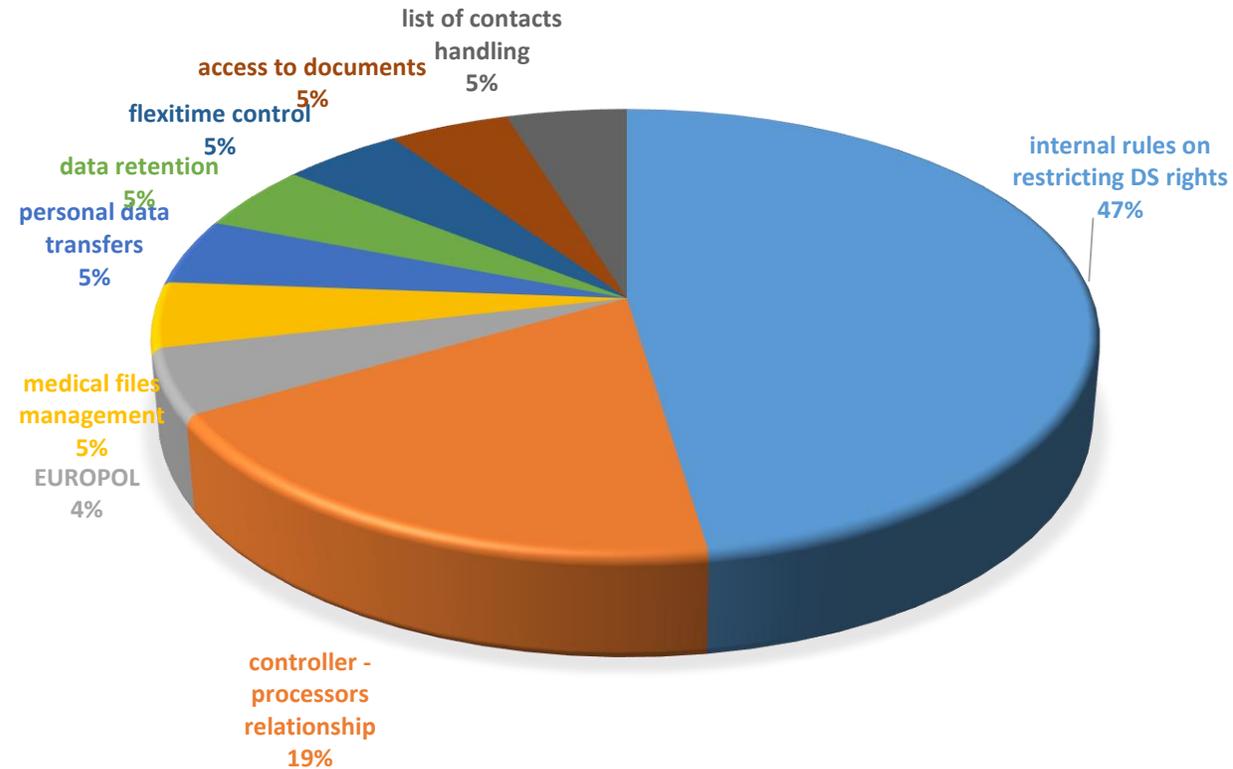
- Focused & structured approach  
- In-depth analysis of topics

# Infographics

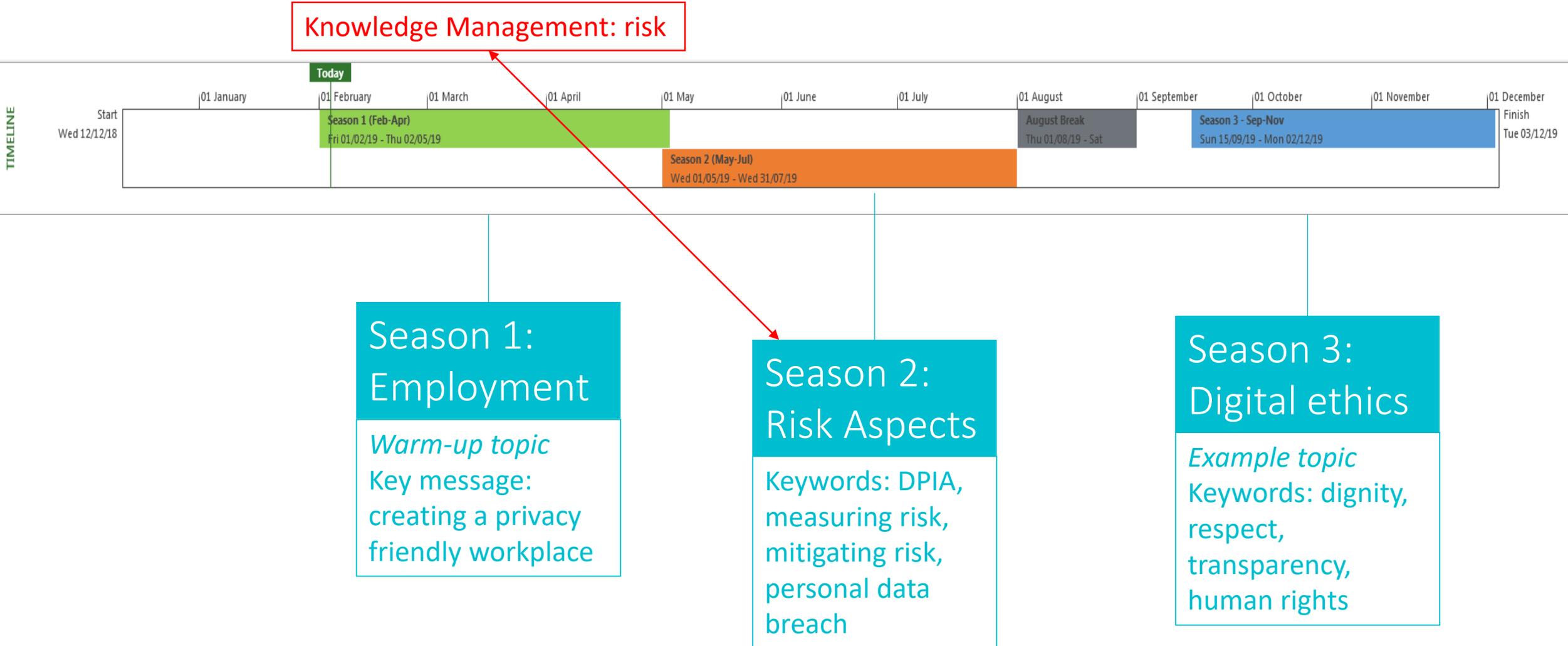
Complaints to the S&E Unit between 01.01.2019 and 31.03.2019



Consultations to S&E Unit between 01.01.2019 and 31.03.2019



# Linking different fields of action



# Key areas to expand – Cooperation & enforcement



Cooperation

Enforcement

Enforcement:

Free up resources  
through guidance  
and self-enforcement  
tools

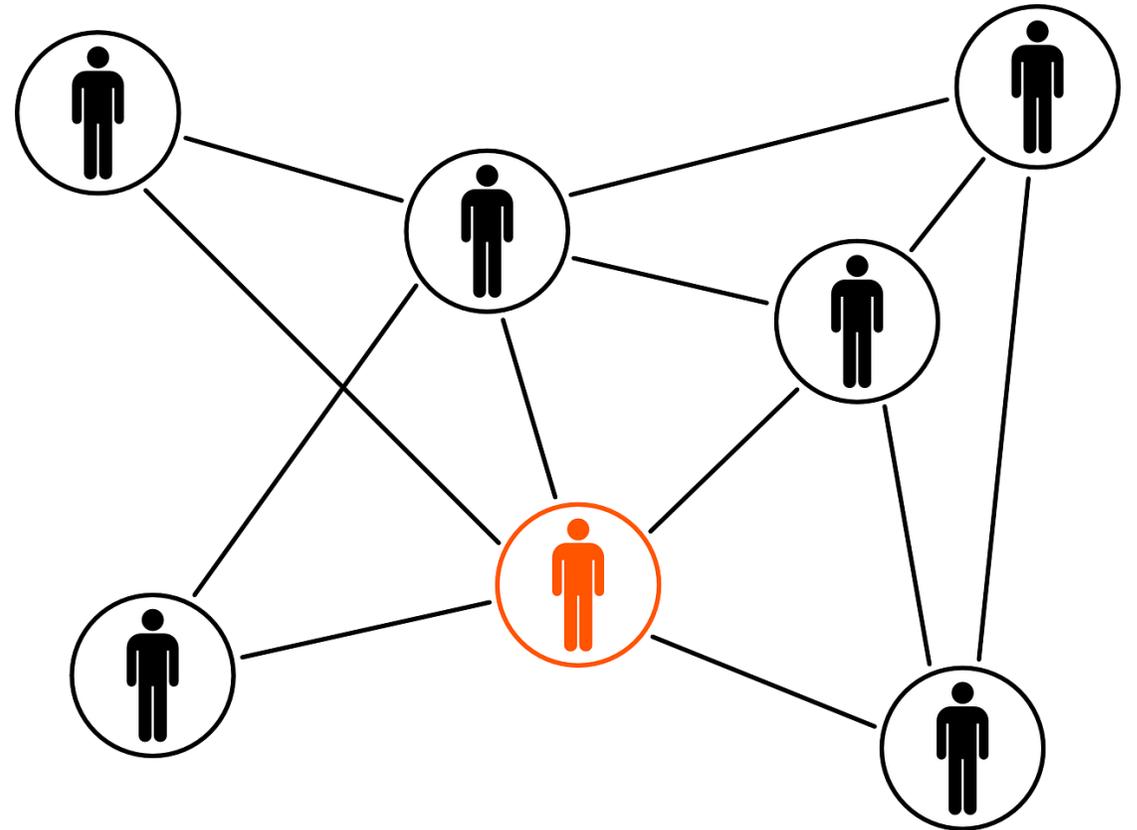
Focus on pragmatic  
approach, while  
remaining diligent

# Cooperation

**EUIs & DPOs:** bi-monthly, newsletter, wiki, training strategy, job shadowing...

Support the data protection community within EUIs.

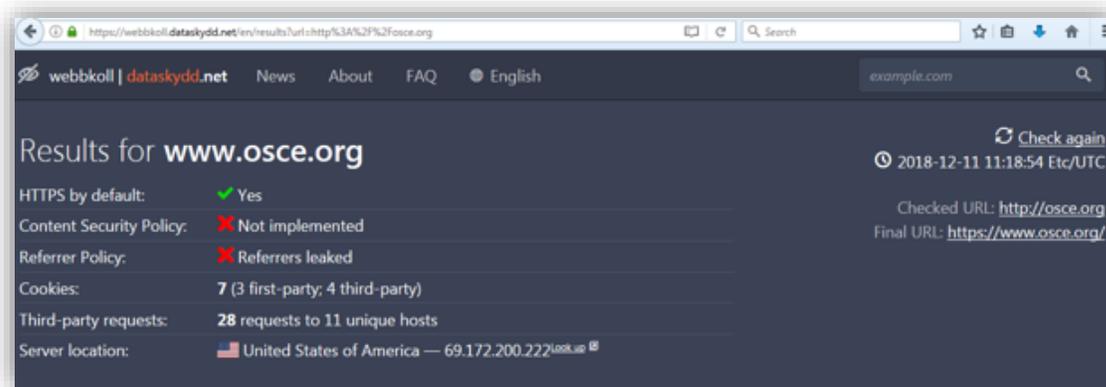
**DPA & international:** EDPB coordinator, Case handling workshop, IO workshop...



# Guidance & self-enforcement tools

With (the publicity of) the GDPR and Regulation 1725/2018, many more data subjects are finding their way to EDPS and S&E.

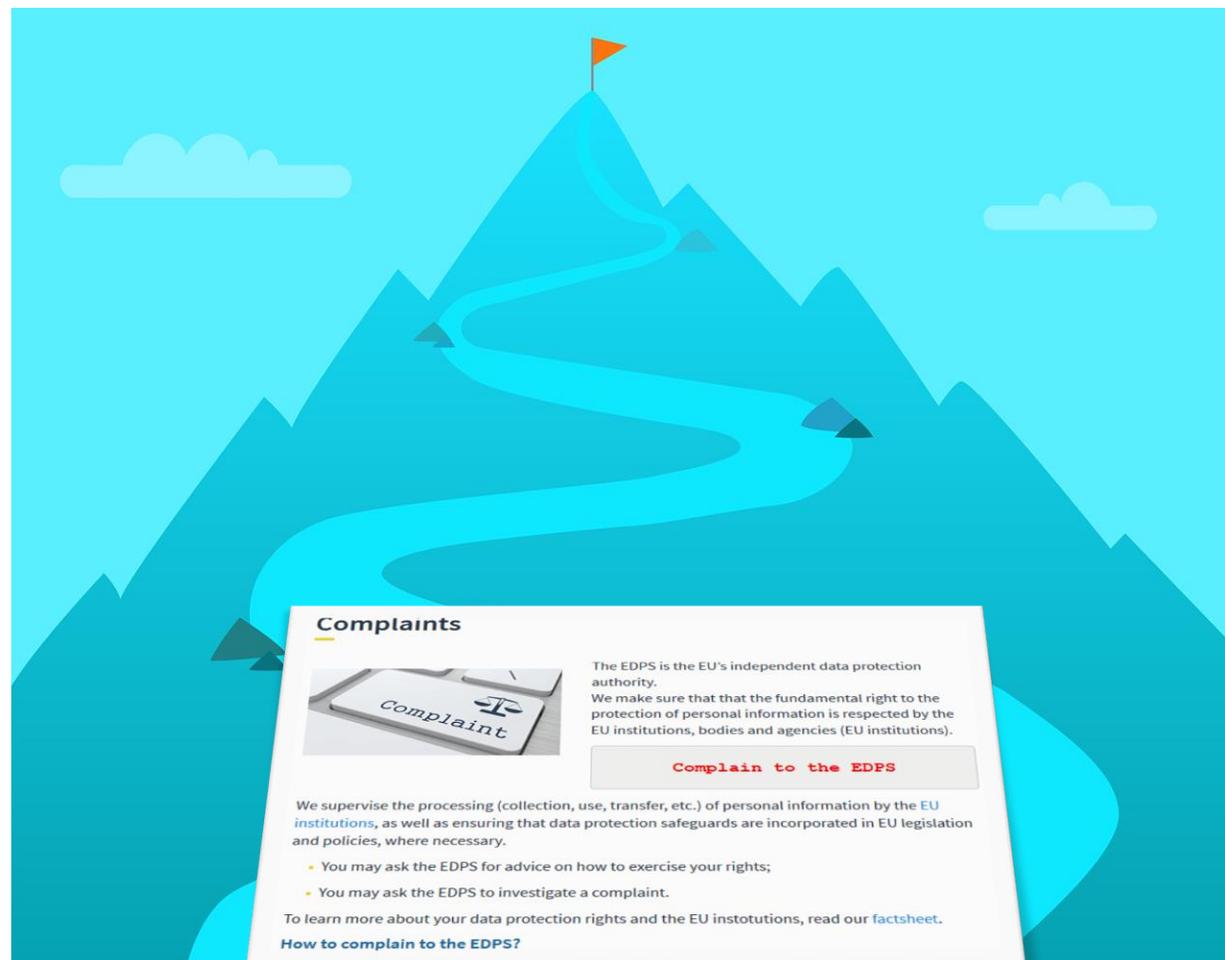
Need for more filtering & navigation tools such as the new complaint wizard.



The screenshot shows a web browser window with the address bar displaying <https://webbkoll.dataskydd.net/en/results?url=http%3A%2F%2Fosce.org>. The page title is "Results for www.osce.org". The browser's address bar shows "example.com" and a search icon. The page content includes a "Check again" button and a timestamp "2018-12-11 11:18:54 Etc/UTC". Below this, there are several security checks:

HTTPS by default:	✓ Yes
Content Security Policy:	✗ Not implemented
Referrer Policy:	✗ Referrers leaked
Cookies:	7 (3 first-party; 4 third-party)
Third-party requests:	28 requests to 11 unique hosts
Server location:	United States of America — 69.172.200.222 <a href="#">look up</a>

Additional information shown includes "Checked URL: <http://osce.org>" and "Final URL: <https://www.osce.org/>".



The illustration features a stylized mountain range in shades of blue and teal. A winding path leads from the foreground up to a peak where a small orange flag is planted. The sky is a light blue with a few white clouds. Overlaid on the bottom right of the illustration is a white card titled "Complaints".

**Complaints**

The EDPS is the EU's independent data protection authority. We make sure that the fundamental right to the protection of personal information is respected by the EU institutions, bodies and agencies (EU institutions).

[Complain to the EDPS](#)

We supervise the processing (collection, use, transfer, etc.) of personal information by the EU institutions, as well as ensuring that data protection safeguards are incorporated in EU legislation and policies, where necessary.

- You may ask the EDPS for advice on how to exercise your rights;
- You may ask the EDPS to investigate a complaint.

To learn more about your data protection rights and the EU institutions, read our [factsheet](#).

**How to complain to the EDPS?**

# Guidance & self-enforcement tools

## Web Audience Measuring Statistics (*Web Analytics*)

### General Aspects

Though useful, *web analytics* services are not strictly necessary and consequently the informed consent of the users is required before storing or collecting any data from their devices.

Some questions the EUI should ask themselves on analytics:

- As an EUI, how can we lead by example? Is analytics really necessary? How can we embed data protection by design and default into this?
- Is it first-party or third-party analytics? If third-party, what technical, organisational and contractual safeguards will we put in place?
- How does the chosen analytics solution function and how is it implemented?
- What kind of data will be collected (e.g. user IDs, user hardware/software information, IP addresses, location, referral pages, downloads)?
- How will the data be collected (e.g. cookies, scripts, zero-byte trackers, device fingerprinting)?
- From where stems the data (e.g. client/server, across web, devices, other services such as social media, communication campaign analytics)?
- For what purposes is data collected and processed?
- Will data be pseudonymised after collection? Will it be anonymised? How? What security measures are implemented?
- For how long will the raw and aggregated data be retained?
- Occur data transfers? Outside EEA?
- Who will have access to this data, including if the data will be used by the analytics provider or other third parties for their own purposes?
- Will *Do-Not-Track* preferences be respected? Will re-identification or re-linking of users to a unique visitor be attempted?

Experimenting with additional ways of displaying our guidance documents, e.g. through complementary checklists or questionnaires

Upcoming  
example for  
Web  
Analytics

# In the pipeline

- **Guidance/guidelines**
  - Wiki
  - Review of 'old' guidelines on administrative procedures
  - (New) Event managements
  - (New) Joint controllership
  - Standard Contractual clauses + instructions
- **Communication:** newsletter to you
- **Training**

## The S&E Team



### Knowledge management

#### Owe LANGFELDT

OLAF, Records and DPIAs, SCGs, Large-scale IT systems

#### Bénédicte RAEVENS

Police & Justice  
EUROPOL, EUROJUST

#### Ute Kallenberger

Data subject rights, Data protection aspect of event management, Tax matters & banking supervision

#### Barbara GIOVANELLI

Ethics

#### Evanthia CHATZILLASI

Police & Justice  
ESA, Frontex, International transfers

#### Fanny COUDERT

Police & Justice  
EUROPOL, EUROJUST, Large scale IT systems, Frontex, International Transfers

#### Asia Maria MARTIN LOPEZ



### Communication

#### Graça COSTA

Health & Research  
EP & applicable law, Data Breaches

#### Xanthi KAPSOSIDERI

DPO Meetings  
Health, HR processing operator,

#### Françoise MAYEUR

Support  
DPO Meetings organisation  
Planning, proofreading,  
PowerPoint, internal relation, HR,  
Finance, Europol

#### Jeroen WAUMAN

Coordination Vision  
Media & Advertising, Transport systems, ePrivacy



### Cooperation

#### Petra Candellier

DPO matters  
IO

#### Stephen ANDREWS

Support  
Superuser intranet & CMS,  
Translations, AMP/AAR, Stats & Graphs, EFTA, PCs, evaluation trainings & workshops,  
Newcomers contact point

#### Guillaume BYK

Health & Research  
IT matters, Video Surveillance



### Enforcement

#### Snezana SRDIC

Procurement & outsourcing,  
ePrivacy, IT matters

#### Aikaterini POULIOU

EP Elections, European Schools,  
Big Data, Profiling & Micro targeting

#### Anne NOEL

Support  
HoU, Case researcher, Archivist,  
Libraries, Technicalities, AGM,  
Eurojust

#### Zsofia SZILVASSY

Procurement & outsourcing,  
ePrivacy, Financial matters

#### Kazimierz UJAZDOWSKI

Eurojust

First evaluation of  
the Vision plan:  
August 2019