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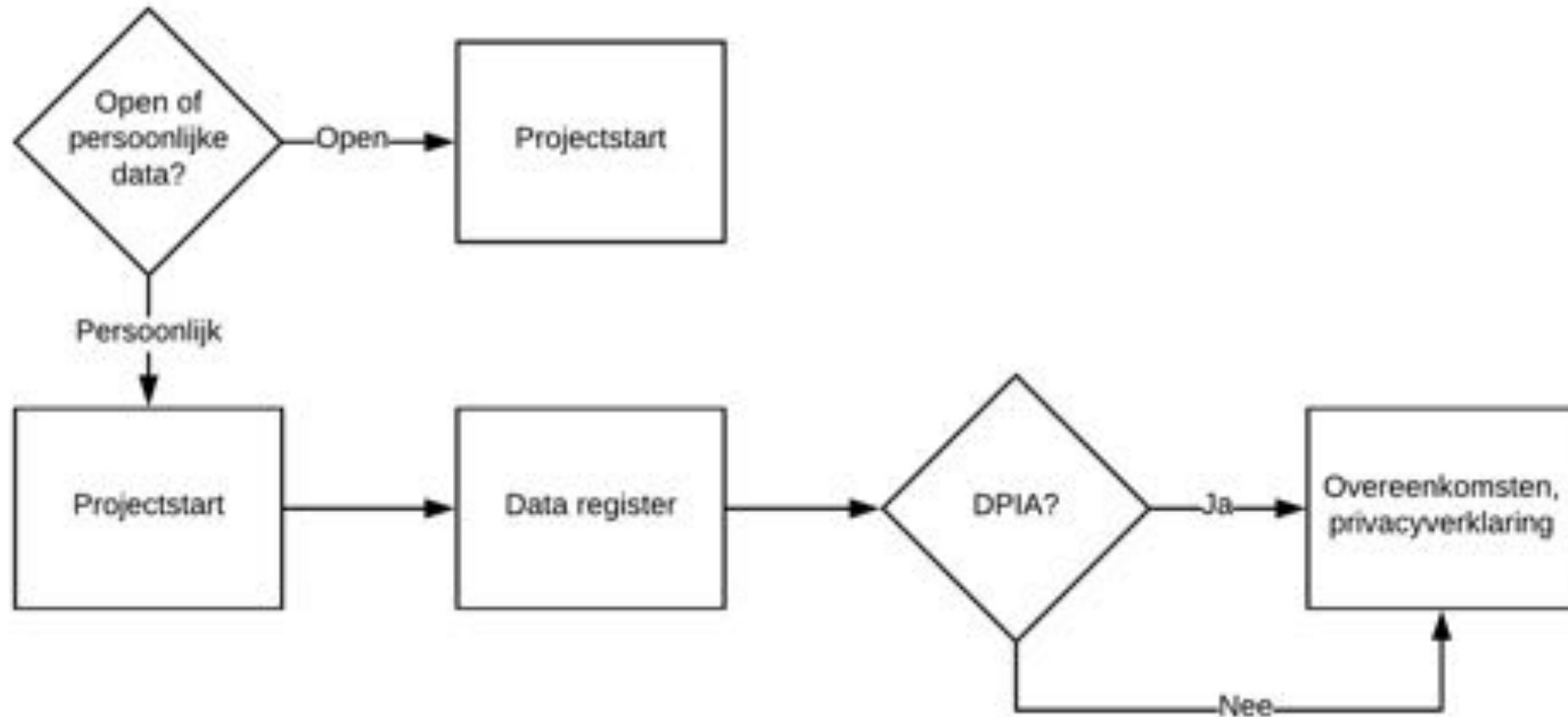
Privacy in projecten, waar en hoe?

ROB HEYMAN & NILS WALRAVENS

# Content

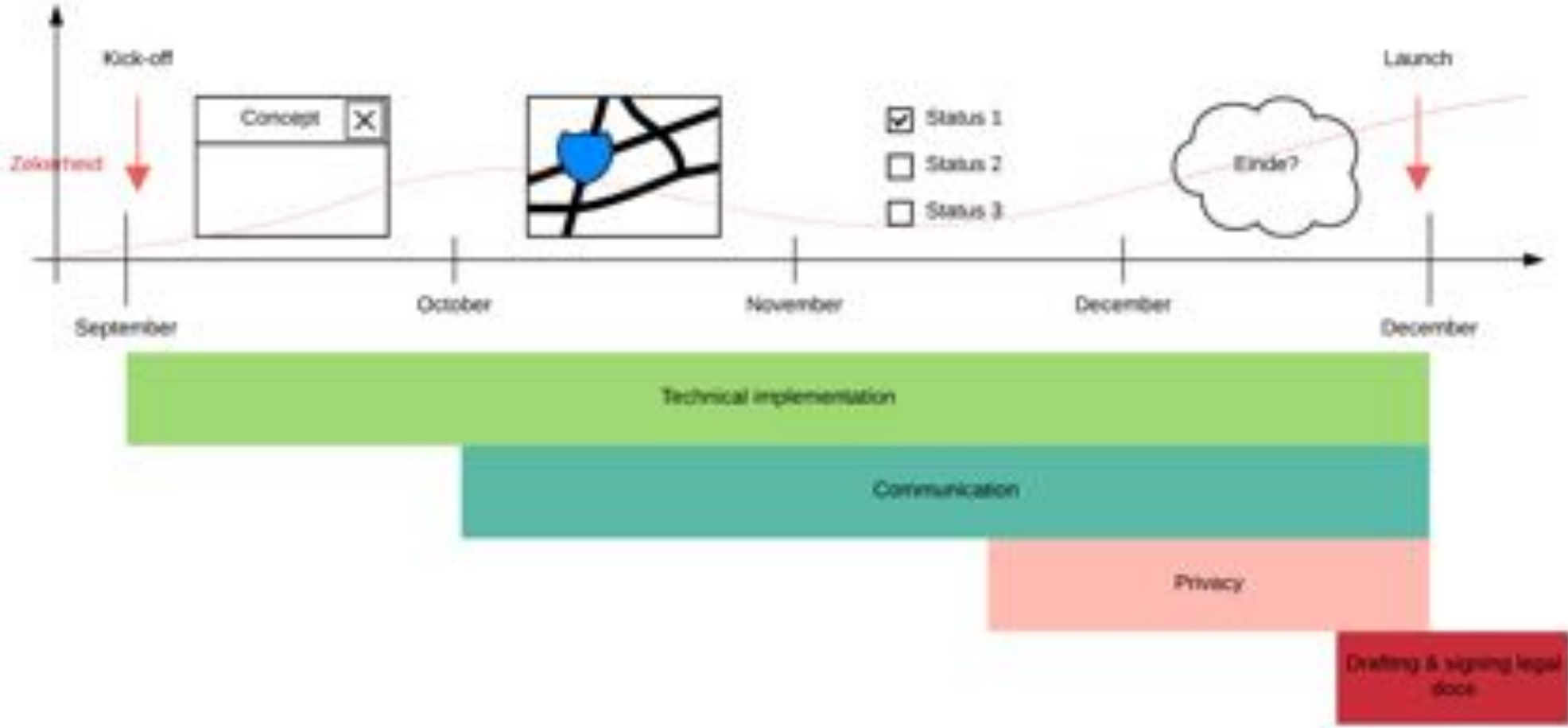
- Open data or privacy?
  - Most projects are either about personal OR open data, but usually it is a little bit of both
- All (smart city) projects are vague at the start
  - Vagueness hides potential (privacy) challenges
  - Vagueness slows down, so why not create transparency while using GDPR templates?
- Fictional case: City Business

# So open or private data?



# Project vagueness

## PUTTING COMPLIANCE AT THE END



# PROJECT TITANIC Iceberg

- Nobody wants to drown
- Privacy risks, other challenges not critical to implementation are downplayed/ignored
- Iceberg spotting depends on:
  - Your informational awareness
  - Your background knowledge (GDPR, Information security, ...)

# BOUNDARY OBJECTS Iceberg spotting

- Boundary objects may occur where work is done between different social worlds and as a result becomes ill structured
  - There are different worlds (administration, researcher, engineer, lawyer)
- Groups that work on an object keep it vague to keep its common (shared) identity, while at the same time making it more specific to their social world
  - Open ended and simple becomes more complex as expert information is added (and then retranslated to become more accessible)
- If there is no consensus a back and forth process takes place about the form of the object
  - For example, the mapping is wrong, lacks data and has to be updated

Facebook mobile  
Server  
# transactions  
in the app

Facebook web  
Server  
# transactions  
in the app

IP based  
location  
# requests

API  
HTTPS

Web  
Server  
# transactions  
# pushing  
# etc.

Mobile  
Server  
# transactions  
# etc.

Verkeerscentrum  
Server X  
# transactions  
# etc.

Vlaams  
network  
B?

IP based  
# requests

HTTPS

?



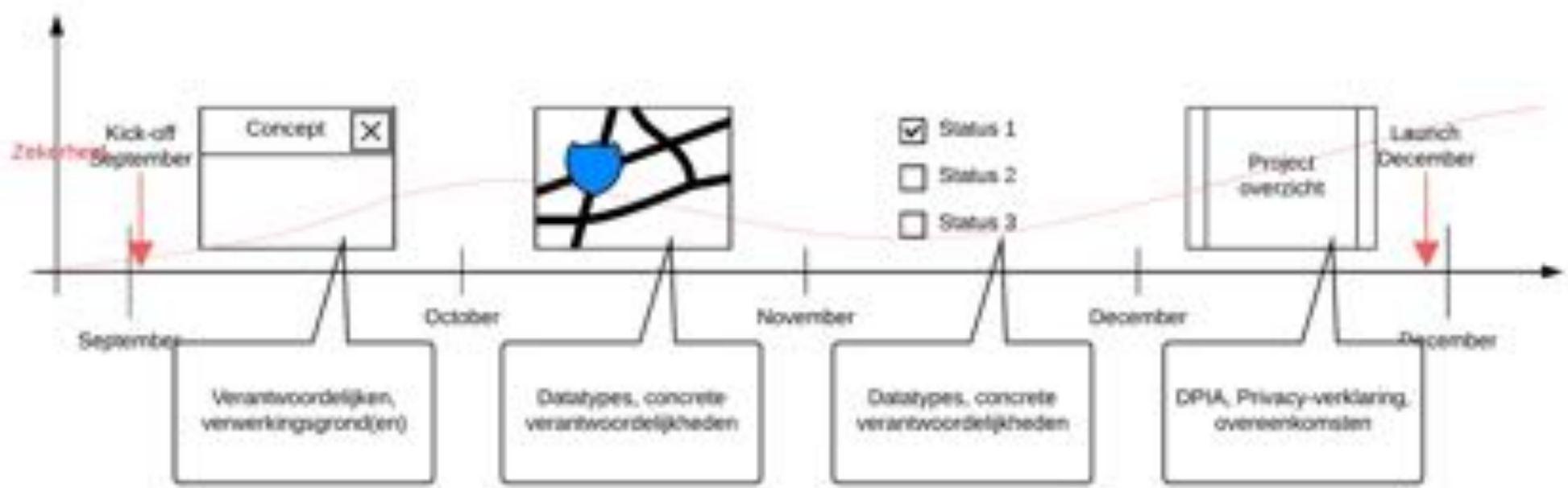
<b>businessproces/verwerking</b> Identificatie van het businessproces naam, eigenaar proces (In de kolom hieronder wordt (b) de leesbaarheid van de elektronische versie van het register, de naam van de verwerkings-terminen)	<b>functionele omschrijving verwerking</b> Identificatie en informatie over de verwerking nummer, functionele omschrijving, finaliteit, verwerkingsgrond, type verwerking en functionele beschrijving	<b>gebruikte gegevens en betrokkenen</b> details over de gegevens die verwerkt worden en de betrokkenen van wie gegevens verwerkt worden functionele categorie, gevoelige categorie, gegevensverwerking, categorie betrokken, classificatieniveau, bewaartijd, authenticatie bron	<b>verwerker</b> Identificatie van de verwerker (intern een organisatie) die betrokken is bij de verwerking naam, nr gegevensverwerkingscontract	<b>gegevensuitwisseling</b> informatie over eventuele gegevensuitwisseling met derde partijen categorie(n) gegevens, categorie(n) ontvangers, derde land/internationale organisatie, documenten passend waarborgen	<b>technologie</b> beschrijving van de gebruikte technologie, applicaties, software bij de verwerking
Bancontact	1, aantal transacties tellen, gerechtvaardigd belang	Klanten Bancontact, geaggregeerde aantallen, anoniem	Bancontact, nvt	Geaggregeerde aantallen	API Bancontact
Verkeerscentrum	Meter wegdek meet aantal passanten op de rijweg, p	Verkeerscentrum	Verkeerscentrum, nvt	Geaggregeerde aantallen	Verbinding nog op te zetten
Parkingbedrijf	nummerplaat en tijdstempel, gerechtvaardigd belang	Parking/klant, getelde nummerplaat	nvt	Geaggregeerde aantallen	HTTPS naar server stad



# How to start mapping data

- Use paper (post-its) and pens, or better let others use pen and paper
  - Diagram software is structured and limits access and looks more definitive
    - If you use software, print your diagram and add post-its
- Be vague and ask to see everything of a data flow
  - Definitions such as personal data, processing, data controller are of one world instead use broad containers, like all data
  - The same for technologies, create boxes where something happens
- Remember that you are doing it wrong if you only have one contributor and no contestation
- Uncertainty is your friend, label it and get to the bottom of it
  - Adding wrong post-its is good to check if people are involved or to challenge them in correcting you

# REPORT ON HOW SOMETHING WILL BE INSTEAD OF WHAT ALREADY IS



# SPECTRE

## SMART CITY PRIVACY: ENHANCING COLLABORATIVE TRANSPARENCY IN THE REGULATORY ECOSYSTEM \*

*\* An SBO project funded by FWO for 2018-22. Between CiTiP (KU Leuven), imec-SMIT & BUSI/APEC (VUB)*

- GDPR and data protection impact assessments (DPIA) in cities
  - We develop a method that provides more relevant outcomes for cities:  
Guarantee citywide data privacy, facilitate participation to legitimize smart city innovations
- Economic impact measurement
  - Smart cities have an impact beyond privacy:  
Competition, concentration
  - DPIAs entail costs and are seen as innovation barriers. Just how costly are they?
- Solution/challenge
  - Creating DPIAs as part of the public procurement process



SOCIAL SCIENCES &  
SOLVAY BUSINESS SCHOOL



SMIT



Starting this October, there will be a VUB Chair at imec-SMIT on

# Data Protection On The Ground

The VUB Chair “Data Protection On the Ground” (DPOG) promotes

- the investigation into actual practices of data privacy in organizations, and
- the dissemination of best practices.

The focus of research will be on four sectors: **Smart Cities, Health, Media, and Banking.**

The DPOG Chair will regularly organise lectures, workshops, roundtables and webinars on personal data protection practices in these sectors.



[www.dpogchair.be](http://www.dpogchair.be)



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ask Ine Van Zeeland