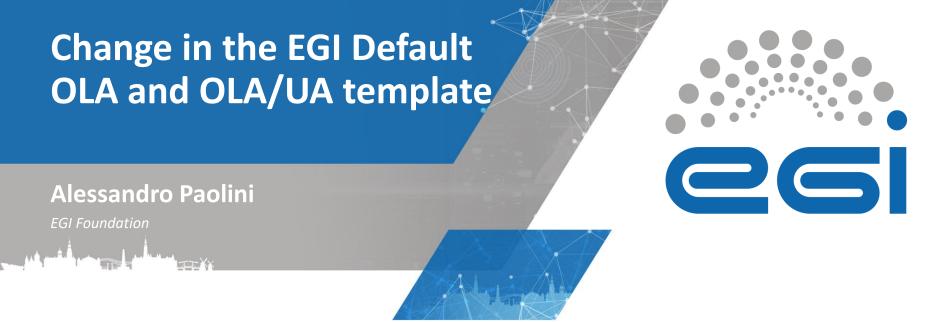
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About the GDPR roles

- Two roles defined to establish responsabilities in handling and processing Personal Data through the provided services
 - Data Controller: shall mean the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data.
 - Data Processor: shall mean a natural or legal person, public authority, agency or any other body that processes personal data on behalf of the Controller.



Assessment of the data protection roles

between EGI Foundation and its partners

- Concerning the EGI Core Services
- all the partners of EGI foundation are data Processors, because they supply their services under EGI Foundation's guidance and act on its behalf.
 - They make an accessory contribution to EGI Foundation, supporting it in its activities, as established in the different OLAs.
- EGI Foundation is the Controller due to the fact that it determines the purposes and means of the processing of personal data.



EGI (Core) Services

Concerning:

- EGI Core Services OLAs: https://documents.egi.eu/document/3254
- EGI Services OLAs: <u>CVMFS</u>, <u>EC3</u>, <u>EGI Data Transfer</u>, <u>EGI DataHub</u>, <u>FGSG</u>, <u>WS-PGRADE</u>

Roles:

- Data Controller: EGI Foundation
- Data Processor: Component Provider (the Federation Member who is providing the service)

A Data Processing Agreement (DPA) to be signed between EGI Foundation and the providers



Change in EGI Default OLA

https://documents.egi.eu/document/2752

Adding in section 6 of the EGI Default OLA:

• EGI Foundation holds the role of the Data Controller and Data Processing Agreements must be signed between EGI Foundation (the Data Controller) and Component provider (the Data Processors)

This change will be reflected in the several OLAs in place for the EGI Core Services, since all these agreements refers to the EGI Default OLA.



Federated services

i.e.HTC, cloud, ...

- For federated services the service provider is the data controller and the data processor
- No need to sign a DPA with EGI Foundation



Change in EGI Core Services OLAs

https://documents.egi.eu/document/3254

- Requirement about conducting periodic supplier process audits to OLAs
 - part of the process for improving the quality of the services provided
- Adding in section 9 (Review, extensions and termination):

EGI Foundation shall be entitled to conduct audits or mandate external auditors to conduct audits of suppliers and federation members. These will aim at evaluating the effective provision of the agreed service or service component and execution of activities related to providing and managing the service prior to the commencement of this agreement and then on a regular basis. EGI Foundation will announce audits at least one month in advance. The provider / federation member shall support EGI Foundation and all auditors acting on behalf of EGI Foundation to the best of their ability in carrying out the audits. The provider / federation member is obliged to provide the auditors, upon request, with the information and evidence necessary. Efforts connected to supporting these audits by the provider / federation member will not be reimbursed.

• EGI Service OLA/UA template: https://documents.egi.eu/document/2278



GEANT Code of Conduct compliance

- in DPAs, Privacy Policies and OLAs will be documented requirements to comply with CoCo v1.0
 - Waiting for CoCo 2.0

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