InCommon and Global Federation Update

InCommon

- Growth in use and robustness
- Robustness of infrastructure and beginnings of self-service federation management
- Agency use – NSF (CC*) and NIH
- Carefully expanding the trust model – the balance of more trust vs. higher barriers
  - MFA
  - Baseline Expectations
- Dynamic metadata slowly rolling out; affects discovery interface
- Attribute release and R&S continue to be vexing problems
- Other activities – IdP of Last Resort, Steward program – moving forward but needing business models

INTERNET 2

International Dimensions

- EduGAIN and interfederation growth/issues
- SirTfi for Security and Incident Handling
- Snctfi Activity for Collaboration-scale authorization
- Bridging cultures and regulatory regimes
  - Compensating controls
  - GDPR

Snctfi and VO authorization policies

- Allows a cluster of related resources to present a consistent management of the cluster to the federated R&E world.
  - Each of members of the cluster can be assumed to adhere to assertions about the cluster (e.g. incident handling, data minimization, etc.)
  - Requires a set of internal policies for compliance
- https://wiki.geant.org/display/AARC/Snctfi

Federated OIDC

- OIDC (and Oauth) were developed as bilateral protocols for mobile and light trust apps
- Now showing value in multilateral situations
- Client registration becomes the key step

INTERNET 2

GDPR (General Data Protection Regulation)

- Created by EU to manage data protection uniformly across the EU
  - Is binding for every member EU nation
  - With many global impacts
- Passed in 2016, becomes operational May 25, 2018.
- Covers a vast waterfront of issues from tracking to attribute release to right to be forgotten to data breaches to . . .
- Consists of a set of rules (Articles) and then example interpretations of the rules in key areas (Recitations)
- Penalties of up to 4% of global revenue
- Identifies six reasons for attribute release, including contract, consent, national security, legal actions, etc.
  - Specifies when consent is not to be used, when it should be used, the quality of the consent, etc.
- It affects many, perhaps most, US institutions.

INTERNET 2

Solove One-Pager

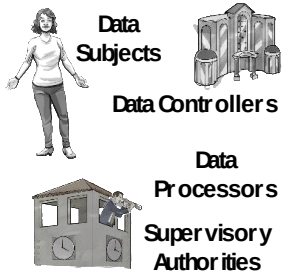
GDPR

TERRITORIAL SCOPE

EU Establishments

Non-EU Established Organizations
Offer goods or services or engaging in monitoring within the EU.

THE PLAYERS



Data Subjects

Data Controllers

Data Processors

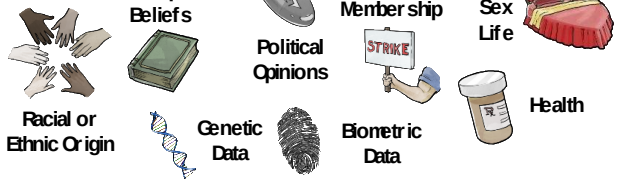
Supervisory Authorities

PERSONAL DATA

Identified

Identifiable

SENSITIVE DATA



Religious or Philosophical Beliefs

Trade Union Membership

Political Opinions

Sex Life

Racial or Ethnic Origin

Genetic Data

Biometric Data

Health

RESPONSIBILITIES OF DATA CONTROLLERS AND PROCESSORS

Security

Data Protection Officer (DPO)
Designate DPO if core activity involves regular monitoring or processing large quantities of personal data..

Record of Data Processing Activities
Maintain a documented register of all activities involving processing of EU personal data.

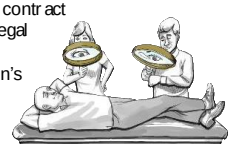
Data Impact Assessment
For high risk situations

Data Protection by Design
built in starting at the beginning of the design process

LAWFUL PROCESSING

Collection and processing of personal data must be for "specified, explicit and legitimate purposes" – with consent of data subject or necessary for

- performance of a contract
- compliance with a legal obligation
- to protect a person's vital interests
- task in the public interest
- legitimate interests



CONSENT

Consent must be freely given, specific, informed, and unambiguous.

DATA BREACH NOTIFICATION

A personal data breach is "a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed."

If likely to result in a high privacy risk → notify data subjects

Notify supervisory authorities no later than 72 hours after discovery.

RIGHTS OF DATA SUBJECTS

Transparency

Automated Decision- Making

"Right not to be subject to a decision based solely on automated processing, including profiling."

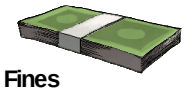
Right to Erasure

Access and Rectification

Purpose Specification and Mnimization

Right to Data Portability

ENFORCEMENT



Fines
Up to 20 million euros or 4% of total annual worldwide turnover. Less serious violations: Up to 10 million euros or 2% of total annual worldwide turnover.

Effective Judicial Remedies:
compensation for material and non-material harm

INTERNATIONAL DATA TRANSFER

Adequate Level of Data Protection

Binding Corporate Rules (BCRs)

Privacy Shield

Model Contractual Clauses

TEACHPRIVACY

www.teachprivacy.com

Workforce awareness training by Prof. Daniel J. Solove

Some gnarly details

- PII and Sensitive PII
  - Almost everything is PII – from IP address to persistent identifiers
    - Some identifiers are not e.g. ePTID
  - Sensitive PII
    - Religious, ethnic, sexual, health, trade- union membership, etc.
    - Requires special handling in everything from protection to presentation
- Research data use
- Right to be forgotten
  - Cloud based backups
- “This call may be recorded…”
- Data breach notifications
  - 72 hours
- Data protection officer and individual data protection training