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Update: ISOC's GDPR Compliance Efforts

Todd M. Tolbert

David Frolio

What is GDPR?

- The European Union's new data protection regulations take effect in May of 2018 after a two year transition.

- The new rules impose comprehensive restrictions on the " processing" of personal data of EU citizens, which is broadly defined to include any use, transfer or sharing of personal data.

- The lynchpin of the regulations involves the consent of the individual.

- Since ISOC offers membership to citizens of the EU, it is required to comply with GDPR.

- ISOC is choosing to extend GDPR rules to all of our membership as they represent most of the best practices we advocate for in data privacy.

High Level Plan

What we are aiming for

Overall Plan

Development of action plan

Privacy Policy Review and Update

Consent Process Review

New Consent Process

Personal Data Inventory and Review

Vendor Contract Review

Data Subject Inspection Right Process

Trans-Border data transfers

Data Security Breach Response

Disposition of Personal Data not consented to or not used.

Post Implementation – Process Reviews

Status To Date

What has been accomplished and is in process

Status - Completed and Underway

Development of action plan – Completed and Documented

Privacy Policy Review and Update – First Round Completed and Deployed August 2017, further update (clarification and FAQ) in March 2018

Consent Process Review – Completed in mid 2017, findings documented and used to develop New Consent Process

New Consent Process – Completed and rolled out with new Privacy Policy

Personal Data Inventory and Review – Review of Aptify Data underway, further inventory underway

Vendor Contract Review – Underway, collecting and will propose language updates to those who don't already have Data Processing Amendments (DPA)

What is left

Actions left to undertake

Left to Start and Accomplish

Data Subject Inspection Right Process – All members can view / change all personal data on portal. Reviewing to see if we need to be able to show all observational data and how to accomplish.

Trans-Border data transfers – As our staff is in 24 countries, we inevitably cross borders, our Privacy Policy denotes this, further work is underway to see what else we need to do.

Data Security Breach Response – Identifying resource to create a specific breach plan and then have review by appropriate consultants / experts.

Disposition of Personal Data – At some point, we will have to delete (right to be forgotten) all data not consented to or not found to be needed for business purposes.

Post Implementation – Process Reviews – We will need to setup operations reviews, data audits and adjust processes accordingly to maintain GDPR compliance.

Challenges

Opt-in for members – currently at 30,000+ specific opt-ins and have a continual email and notification campaign via Connect.

Chapter access of data – Chapters are independent organizations (3rd Party) and their access to the data stored in Aptify could be considered as "processor", user of "Legitimate Interest" or illegal. Members opt-in and are giving consent to ISOC the global organization, not an individual Chapter.

— Can we setup a way that consent applies to Chapters as well?
— Can we setup an agreement with the Chapters that defines them as processors and thus a third-party under which our Privacy Policy applies?
— Are the Chapters doing their own GDPR work?

Leadership communication – Chapter Leaders, OMAC Leaders, we require them to be in elists due to their governance relationship with ISOC. But is that Legal if they opt-out for email communications?

Disposition of Data – our intent is to target full deletion of appropriate data within six months of the GDPR date giving ourselves enough time to fully understand it and create processes to maintain appropriate records of the disposition. Modern Systems don't allow for easy FULL Deletion.

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Galerie Jean-Malbuisson 15,
CH-1204 Geneva,
Switzerland.
+41 22 807 1444

1775 Wiehle Avenue,
Suite 201, Reston, VA
20190-5108 USA.
+1 703 439 2120

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