**WP7** 

#### **Data Protection Strategy**





# SYNCHRONICITY HOME CITIES OPEN CALL - NEWS EVENTS DOCS ABOUT O

Synchronicity is a global IoT marketplace where cities and businesses create and trade common digital services to improve the lives of citizens and grow local economies. Find out which cities are already participating in achieving this goal.

These are the participating cities.

Dati manpa @2018 Google\_INEGI\_\_Termini e condizioni d'uso

This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 732240



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#### **PROJECT'S DATA PROTECTION OFFICER**

COORDINATE

NOT A DATA CONTROLLER

FACILITATE



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#### **Relevant issues**

- Data controllers
- Data processors
- DPOs
- Sanctions for breaches and relevan mitigation plans

- Privacy by design
- Privacybdy default
- Privacy Impact Assessment



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#### **HOW THE STRATEGY WORKS**

1) identify the data sets that are collected

identify the corresponding data controller(s);

identify the Data Protection Officer(s) of each data controller;

request each DPO to perform a **Data Protection Impact Assessment (DPIA**)





#### HOW THE STRATEGY WORKS

1)organize and coordinate the work among the data controllers involved in the research project;

ensure that a clear information is provided on the website regarding the DPOs and the data protection policy of the project

Data Protection Principles binding on data controllers and data processors in the cities





#### **METHODOLOGY AND TOOLS**

Regular DPO Telcos to follow up on the strategy (we have also foreseen individuals follow up calls)

Privacy by Design and PIA methodology Spreadsheet to map the stakeholders in the city

Spreadsheets to map the data sets Data Protection Principles binding on data controllers and data processors in the cities





#### **REGULAR DPOs TELCOS**







#### DATA PROTECTION PRINCIPLES BINDING ON DATA **CONTROLLERS AND DATA PROCESSORS IN THE CITIES**

Binding commitments for data controllers and data processors within the context of the Synchronicity project

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#### **PRIVACY BY DESIGN AND PIA METHODOLOGY**





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#### **IMPLEMENTING THE PRIVACY IMPACT ASSESSMENT**



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#### 'Living laboratories': the Dutch cities amassing data on oblivious residents

In Eindhoven and Utrecht smart tech is tackling traffic, noise and crime. But with privacy laws proving futile and commercial companies in on the act, are the plans as benign as they seem?



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**Privacy App** 

#### **Privacy App**





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← Device details		
Category :	Noise sensor	
Purpose :	Street noise monitoring in three dimensions.	
Description :	Noise sensor measuring the sound level [dBA].	
Data controller :	City of Carouge	
Retention period :	6-12 months	
Location :	46.190125 latitude 🎦	
Legitimate interest :	Public health	
Recipient :	Internal use only	
Crossborder transfer :	None	
Picture :		
• -	$\Box  \leftarrow$	

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