



1. EXECUTIVE SUMMARY

During the general assembly of EIP-SCC on October 11th 2017, the EIP-SCC initiative *citizen approach to data*¹ presented the conclusions of two GDPR workshops organised by the Sharing Cities project² and proposed to extend these workshops to other cities.

EUROCITIES³, through its Green Digital Charter⁴ initiative, proposed to organise an event on GDPR privacy impact assessment practice. One of the tasks of the GuiDanCe project⁵, supporting the implementation of the Charter for the period 2015-2018, is to provide technical training events to city experts on challenges and barriers met by cities in the implementation of their digital strategies or initiatives. As from May 2018, the new EU General Data Protection Regulation (GDPR) will take effect and impact all EU cities, asked to appoint a data protection officer (DPO) and to implement a series of new rules and practices. Sharing good practices related to the implementation of the GDPR has been identified as a priority in the frame of the Data Working Group of the Knowledge Society Forum.

This training was designed to help cities' data experts to understand the concepts and processes necessary for the data management chain within a city administration to deal with citizens' privacy while delivering smart services. Cities were invited to propose use cases. Four use cases were selected:

- ▶ a specific application (smart energy sensors in social housing), proposed by the royal borough of Greenwich, London;
- ▶ a specific application (using non-motorised traffic metrics for optimising traffic flow), proposed by Eindhoven;
- ▶ the general case of open data, proposed by Espoo; and
- ▶ the general case of building a roadmap for GDPR compliance, proposed by Barcelona.

The workshop took place on January 22nd, 2018 in Brussels, with the participation of 21 attendees from 13 cities. A briefing was given on GDPR compliance, on the privacy impact assessment (PIA) practice session, and the four use cases were described. The break-out sessions then focused on discussing four items, (1) an architecture description of the use case, (2) the identification of threats, resulting breaches, and consequences, (3) a risk map, and (4) resulting measures. The break-out session produced the following observations and recommendations:

- ▶ the importance of supplier relationship, the problem of linkability of the collected data set with other data sets, the need to have an application rescue mode (when data is not collected), and the importance of extensions to other applications;
- ▶ the need for trusted party audit to verify what kind of treatment was really taking place, and the complexity of managing multiple applications data life cycle;
- ▶ the problem of anonymizing data while keeping data quality, the problem of handing consent (for collecting personal data before anonymization), the need for suitable business models; and
- ▶ the fact that a major breach would have a strong impact on the city administration rather than on the city reputation itself.

These guidelines could be proposed to the upcoming ISO standard project (ISO/IEC 27570 Privacy guidelines for smart cities).

¹ <http://eu-smartcities.eu/initiatives/2/description>

² <http://www.sharingcities.eu/>

³ <http://www.eurocities.eu/>

⁴ <http://www.greendigitalcharter.eu/>

⁵ GuiDanCe has received funding from the European Union's Horizon 2020 research and innovation programme under Grant Agreement N°653640.