UNIVERSITY OF
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Privacy by design – privacy by default

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INTRODUCTION

- Aims
  - Introduce the seven principles of Privacy by Design
  - Discuss what this could mean for the University

PRIVACY BY DESIGN – PRIVACY BY DEFAULT

The seven principles

1. Proactive not reactive; Preventative not remedial
2. Privacy as the default
3. Privacy embedded into design
4. Full functionality – positive sum, not zero sum
5. End to end security – lifecycle protection
6. Visibility and transparency
7. Respect for user privacy

PRIVACY BY DESIGN – PRIVACY BY DEFAULT

Principle one: Proactive not reactive

1. Proactive not reactive; preventative not remedial
   - Aims to avoid events before occurring

PRIVACY BY DESIGN – PRIVACY BY DEFAULT

Principle two: Privacy as default

2. Privacy as the default
   - Purpose specification
   - Collection limitation
   - Data minimisation
   - Use, retention, and disclosure limitation

All privacy matters are built in to the system or are process driven

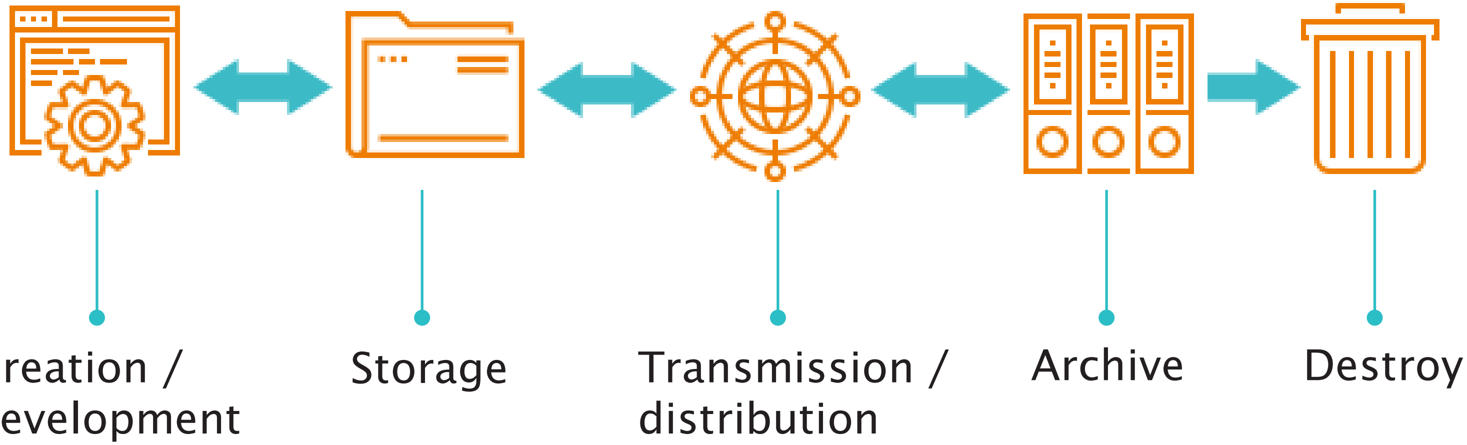
PRIVACY BY DESIGN – PRIVACY BY DEFAULT

Principle three: Privacy embedded into design

3. Privacy embedded into the design
   - Privacy by Design is embedded into the design and architecture of IT systems and business practices
   - Not “bolted on” or after the fact
   - Privacy becomes an essential component of the core functionality being delivered
   - Privacy is integral to the system, without diminishing functionality

PRIVACY BY DESIGN – PRIVACY BY DEFAULT

The information life cycle



Creation / development

Storage

Transmission / distribution

Archive

Destroy

PRIVACY BY DESIGN – PRIVACY BY DEFAULT

Principle four: Full functionality

4. Full functionality: positive sum, not zero sum
   - Privacy by Design seeks to accommodate all legitimate interests and objectives avoiding unnecessary trade-offs

PRIVACY BY DESIGN – PRIVACY BY DEFAULT

Principle five: End to end security

5. End to end security – lifecycle protection
   - Privacy by Design, having been embedded into the system prior to the first element of information being collected, extends securely throughout the entire lifecycle of the data involved — strong security measures are essential to privacy, from start to finish
   - Ensure that all data is securely retained, and then securely destroyed at the end of the process, in a timely fashion
   - Privacy by Design ensures cradle to grave, secure lifecycle management of information, end to end

PRIVACY BY DESIGN – PRIVACY BY DEFAULT

Principle six: Visibility and transparency

6. Visibility and transparency
   - Accountability
   - Openness
   - Compliance

Privacy by Design seeks to assure all stakeholders that whatever the business practice or technology involved, it is legally verifiable and subject to independent verification.

Its component parts and operations remain visible and transparent, to users and providers alike.

Principle of “trust and verify” applies.

PRIVACY BY DESIGN – PRIVACY BY DEFAULT

Principle seven: Respect for user privacy

7. Respect for user privacy
   - Consent
   - Accuracy
   - Access
   - Compliance

Privacy by Design requires architects and operators to protect the interests of the individual by offering such measures as strong privacy defaults, appropriate notice, and empowering user-friendly options.

Keep it user-centric.

WHAT THIS MEANS FOR THE UNIVERSITY

Principle	University action
1.Proactive not reactive; Preventative not remedial	Project / Programme Management Governance and initiation
2.Privacy as the default	Privacy as a standing item on business cases
3.Privacy embedded into design	Privacy by Design policy
4.Full functionality – positive-sum, not zero-sum	Data Protection Impact Assessment (DPIA)
5.End to end security – lifecycle protection	Encryption – end to end
6.Visibility and transparency	Process to make Information available – preference panels?
7.Respect for user privacy	Privacy notices and University culture

YOUR QUESTIONS