

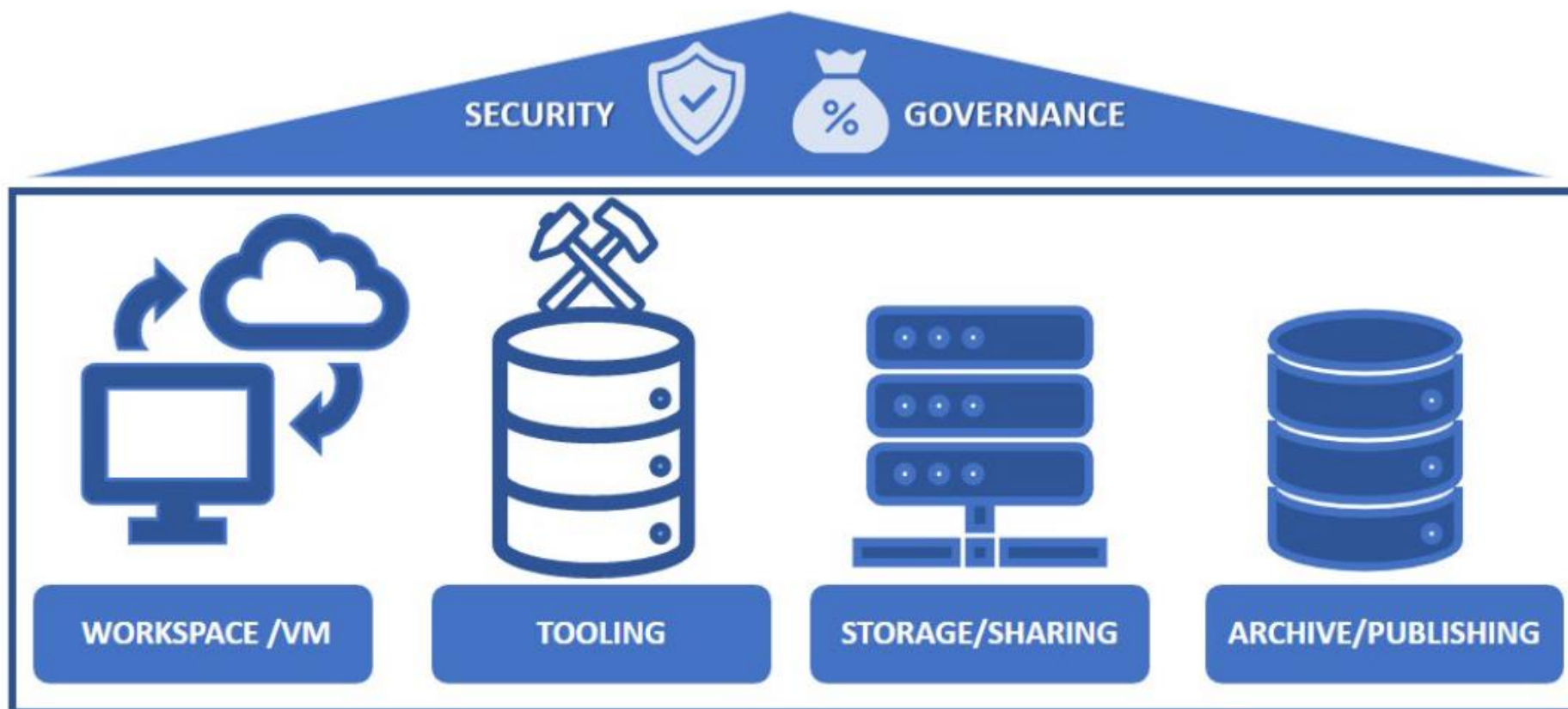
MIAO MIAO ZHOU

AVANS HOGESCHOOL

Data in Privacygevoelig Praktijkgericht Onderzoek (DPPO)

- Miaomiao Zhou m.zhou1@avans.nl
- Antal Derene aajmj.derene@avans.nl
- Bas van der Heijden b.vanderheijden11@avans.nl
- Leon van Ekeren lm.vanekeren@avans.nl
- Sjef Ollers mjh.ollers@avans.nl

Which service to choose? (GDPR sensitive data)



WORKPACKAGES

WP	Task
WP1	Collection of “big” and “small” GDPR-sensitive data examples/requirements
WP2	1. Request analysis 2. Tool construction
WP3	Comparison of data management infrastructures from different resources.
WP4	Project management and dissemination

Major results: 7 data sets, 2 tooling, 4 interviews

Heading	GDPR Section	Control measure	Exclude?	Audit Score	Scoring	Commentary
---------	--------------	-----------------	----------	-------------	---------	------------

Governance

This section relates to decisions and broad direction from the Senior Management Team and includes broad policy status detailed policy management may be included elsewhere within the privacy information management system (PIMS) and information security management system (SIMS) areas.

Governance	Management structures	How does the organization's governing body (Board/Leadership Team) oversee information governance, data protection, record management and information security?		0	0 - No evidence of any information governance activities 1 - Heads of Department responsible for compliance with the Information Governance Policy	
Governance	Management structures	Which committees or groups have been established to take active oversight of information governance, data protection, record management and information security?		0		

**Tool1: service governance evaluation
(don't blindly believe in ISO certificates!)**

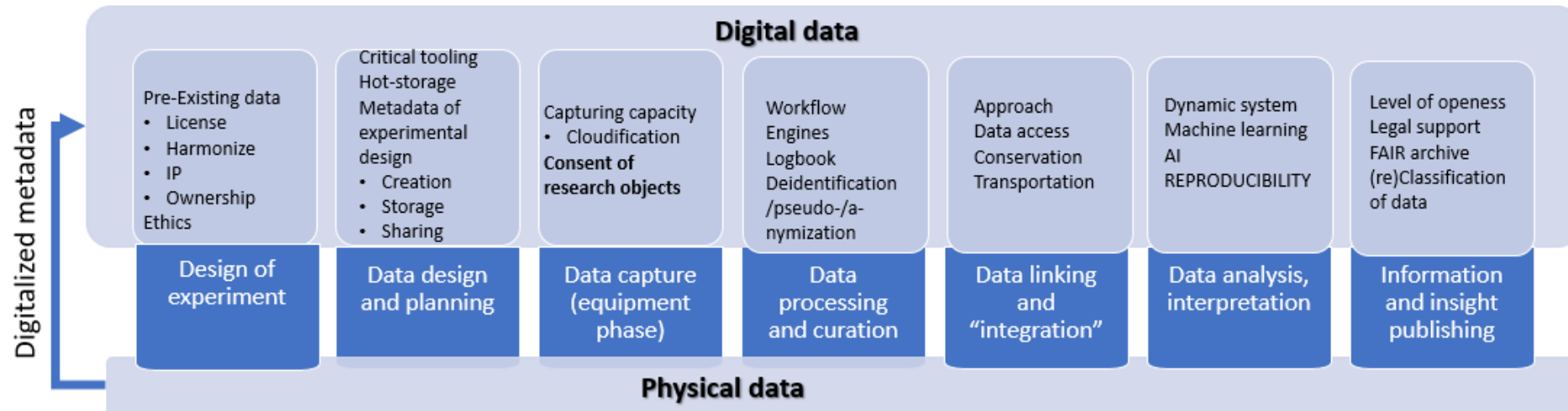
Risk Management

This section relates to the formal ongoing process for risk evaluation documentation and mitigation. Risks relate to both Security and Data Protection and the privacy information management system (PIMS) and information security management system (ISMS) sections therefore have risk assessment removed.

Risk Management	Information risk management framework	How does the organization keep track of risks related to the infrastructure?		1	0 - No Risk Register 1 - Heads of Department are responsible for managing risks in their own areas with no central control 2 - The Risk Register is updated on an ad hoc basis 3 - The Risk Register is maintained but there is no formal process to regularly review it 4 - The Risk Register is maintained and regularly reviewed at Board level	...related to the infrastructure
Risk Management	Information asset risk assessment	How does the organization keep track of its data protection risks?		1	0 - No Risk Register 1 - Heads of Department are responsible for managing risks in their own areas with no central control 2 - Data protection risks could be identified with some effort 3 - Data protection risks are clearly identified 4 - The Board has received external assurance that the data protection risks in the Risk Register have been correctly identified and the risk assessment is appropriate	
Risk Management	Information asset risk assessment	How often are risks formally assessed?		1	0 - No process to assess risks 1 - Heads of Department are responsible for managing risks in their own areas with no central control 2 - Risks are assessed in an ad hoc way 3 - Risks are assessed at least annually 4 - Risks are assessed at least annually and when processes change	
Risk Management	Policies and Procedures	How well developed is the organization's Information Risk Policy?		2	0 - There is no Information Risk Policy 1 - Heads of Department are responsible for managing information risks in their own areas with no central control 2 - There is an Information Risk Policy but it has not been reviewed in the last three years 3 - There is an Information Risk Policy but it has not been reviewed in the last year 4 - There is an Information Risk Policy and the Policy Owner actively monitors compliance	
Risk Management	Policies and Procedures	How well developed is the organization's Incident Reporting Policy?		2	0 - There is no Incident Reporting Policy 1 - Heads of Department are responsible for receiving Incident Reports for their own areas with no central control 2 - There is an Incident Reporting Policy but it has not been reviewed in the last 12 months 3 - There is an up to date Incident Reporting Policy 4 - There is an Incident Reporting Policy and the Policy Owner actively monitors compliance	
					0 - The organization has not identified its critical and high risk personal data processes	

Tool 2: data life cycle analysis-based service request questionnaire

systems	SP/RIS	VM/hot storage	Physical/digital/VM	VM	VM	VM	Dataverse/surfarchive
requirement	Sharable Limited access Long term storage Secured MS Office/adobe Limited downloadable	Sharable Limited access Secured Not local downloadable <u>Specific tooling</u>	Sharable Limited access Can it handle all types? Storage limitation? Secured/ delete right limited downloadable <u>Specific tooling</u>	Sharable Limited access Secured limited downloadable Collaborative working <u>Specific tooling</u>	Sharable Limited access Secured Not downloadable Collaborative working Synchronized code of conduct amongst services <u>Specific tooling</u>	Sharable Limited access Secured Not downloadable Collaborative working <u>Specific tooling</u>	Sharable Open when possible Secured Collaborative working Cold/long-term storage Able to delete parts
Type	Research documents: • Consortium agreement • Contracts • Privacy policy paper • DMP • begrotingsformular	Executable Quantitative Qualitative Metadata Physical data	.jpg, .mp4, docs, pdfs ... Paper based DNA analysis Dietary diary (excel)	.py (python based script) .r, .sav, Excel, doc, txt, Executables Zip, .exe, .sql	.py (python based script) .r, .sav, Excel, doc, txt, Executables Zip, .exe, .sql	.py, AI scripts .r, .sav, Excel, doc, txt, Executables Zip, .exe, .sql	.py, AI scripts .r, .sav, Excel, doc, txt, Executables Zip, .exe, .sql



Results: example evaluation outputs

- SURF research cloud + research drive (www.surf.nl)
- AnDRE (www.mydre.org)
- Data availability:
 - DataverseNL
- Tooling availability:
 - DataverseNL : only upon request, only for research/education purpose
- Disclaimer: the data represented in the example outputs are from Feb. 2023. Due to rapid system updates, please request new information from SURF and/or AnDRE when you use the data.