



RFID Privacy Impact Assessment Framework

From promise to reality: steps to successful implementation

Gérald Santucci
Head of Unit
INFISO D4, European Commission

Berlin
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From RFID Recommendation to PIA Framework

Framework on privacy impact assessments and information security

A framework on privacy impact assessments should be developed at Community level within 12 months from the publication of this Recommendation in the Official Journal of the European Union.

This framework should be endorsed by the Article 29 Data Protection Working Party.



Privacy and Data Protection Impact Assessment Framework for RFID Applications

12 January 2011

Opinion 9/2011 on the revised Industry Proposal for a Privacy and Data Protection Impact Assessment Framework for RFID Applications

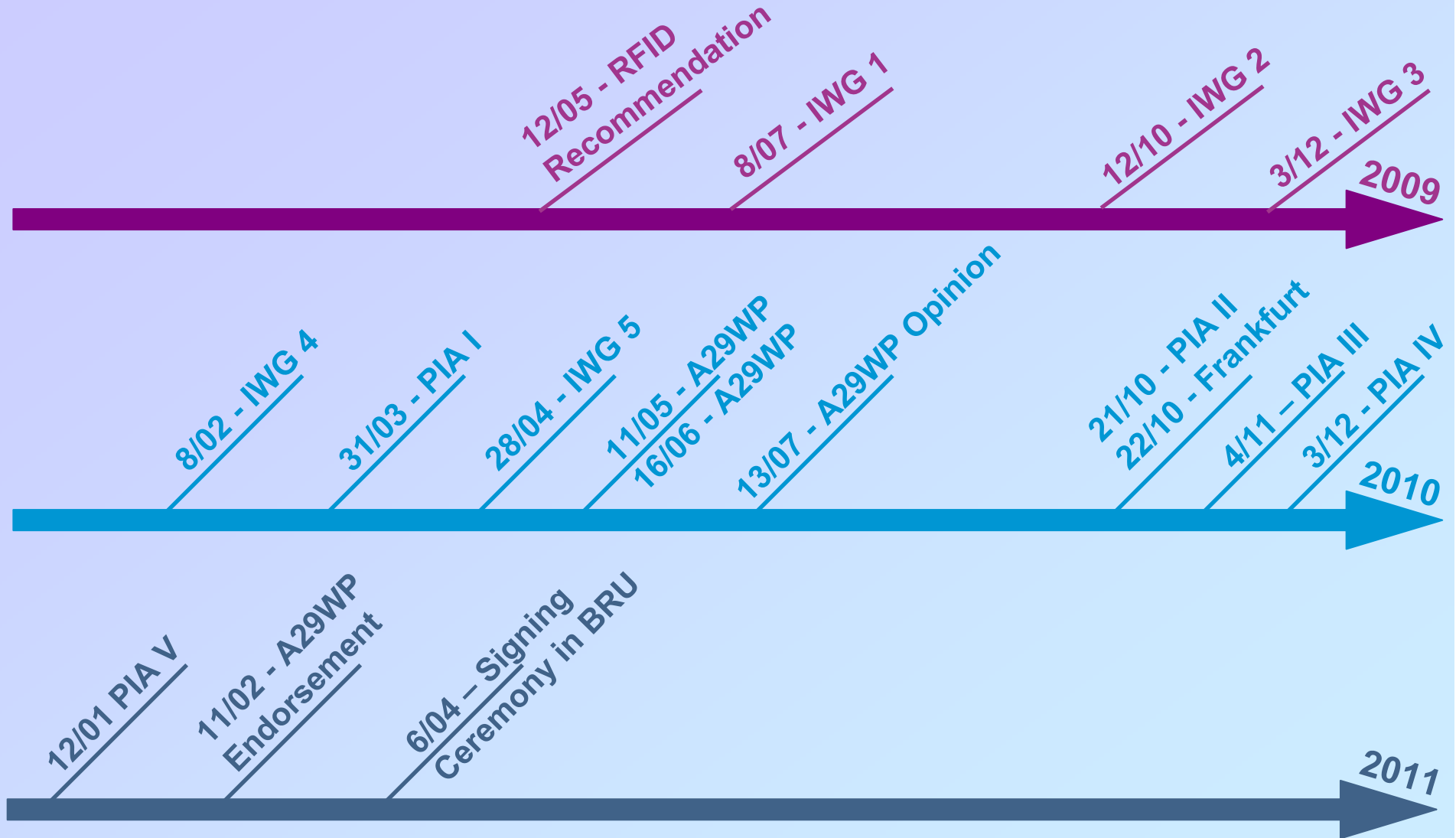
11 February 2011

Neelie KROES
Vice-President of the European Commission

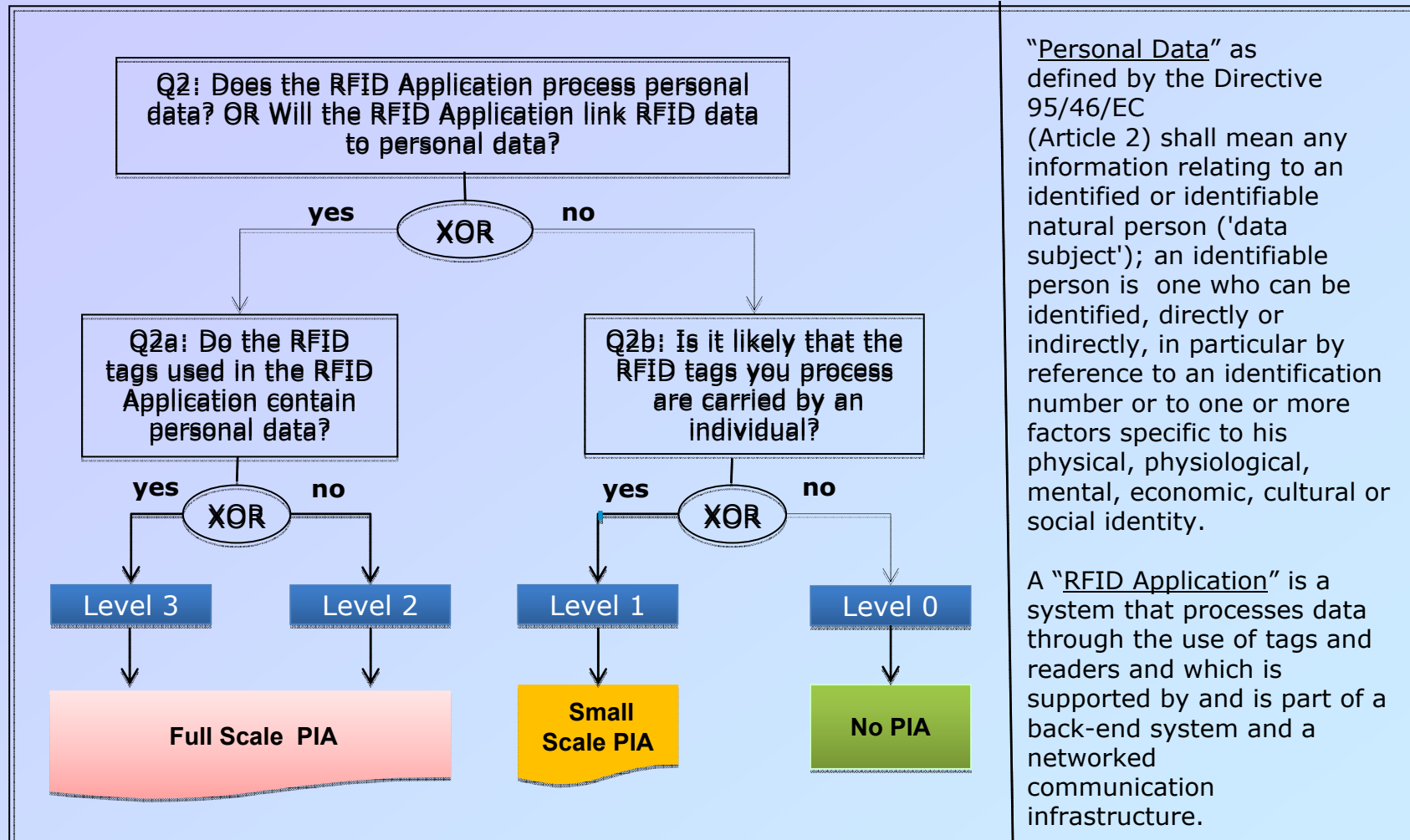


6 April 2011

RFID PIA Framework Timeline



The “decision tree” guides the initial analysis to determine the scope of the PIA

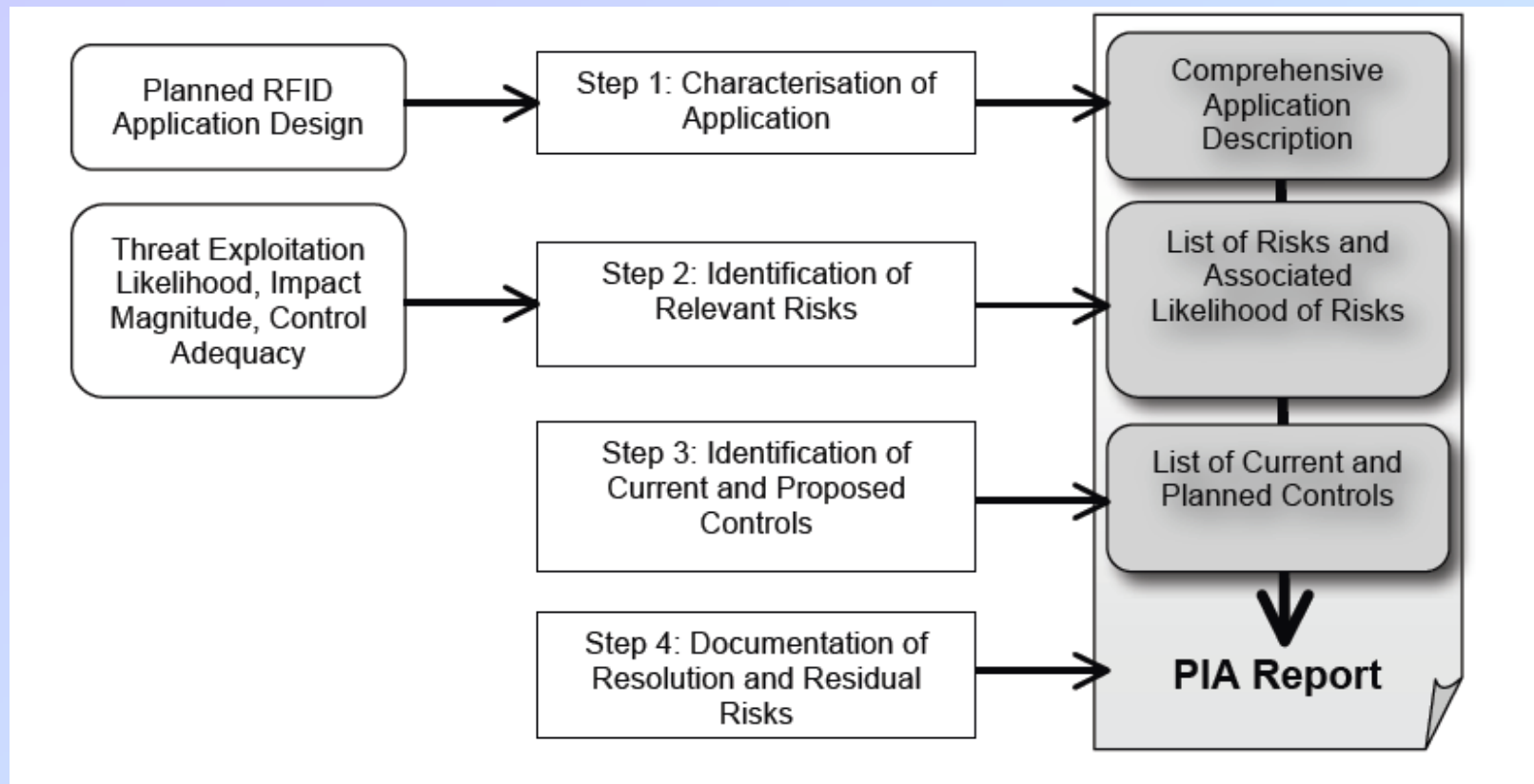


“Personal Data” as defined by the Directive 95/46/EC (Article 2) shall mean any information relating to an identified or identifiable natural person ('data subject'); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

A “RFID Application” is a system that processes data through the use of tags and readers and which is supported by and is part of a back-end system and a networked communication infrastructure.

The Risk Assessment Methodology

Risk Assessment Methodology for RFID as outline in the PIA Framework



The virtues of the PIA approach

- PIA automatically ensures legal compliance for industry with the EU Data Protection Directive.
- Global scalability is feasible if regions take their local privacy legislation or practices as privacy targets.
- The methodology can be translated into and facilitated by a technical tool.
 - e.g. GS1 PIA Tool (November 2011)
- The methodology is independent of any application, industry, sector, or even technology.

The challenges of the PIA approach

- Lack of awareness
 - In EU countries
 - In companies
- Lack of formal standardisation
 - Mandate M/436 2nd phase
- High degree of genericity
 - But also high degree of adaptability
 - From “general framework” to “sectorial templates”
- Self- and co-regulation vs. legislation?



EC Conference on RFID PIA Framework

The Commission will organise **a conference in Brussels on 8th February 2012** to consolidate the results of on-going national consultations and reach consensus on a common European approach PIA Framework implementation

The PIA Framework is part of the context of other information assurance, data management, and operational standards that provide good data governance tools for RFID and other Applications. The current Framework could be used as a basis for the development of industry-based, sector-based, and/or application-based PIA templates. As in the implementation of any theoretical document, the PIA Framework may require clarification of its application of terms, as well as guidance on practices that should be based on practical experience, that may help in its implementation.

PIA Templates may be developed based on the Framework to provide industry-based, application-based, or other specific formats for PIAs and resulting PIA Reports.

PIA Framework on the Europa website

http://ec.europa.eu/information_society/policy/rfid/pia/index_en.htm

POLICY :: RFID :: Events :: Past Events  

The Privacy Impact Assessment Framework for RFID Applications

PIA FRAMEWORK (12 January 2011)

1) ORIGINAL TEXT

- The "**Privacy Impact Assessment Framework for RFID applications**" has been endorsed by the Article 29 Working Party on 11 February 2011 successfully completing a task that started nearly two years ago.

2) TRANSLATIONS

- This document is also available in the official EU languages **BG, ES, CS, DA, DE, ET, EL, EN, FR, IT, LV, LT, HU, MT, NL, PL, PT, RO, SK, SL, FI, SV** from this page.

OPINION OF THE A29WP (11 February 2011)

- **Opinion 9/2011 of the Article 29 Data Protection Working Party** on the Privacy Impact Assessment Framework on RFID applications.

SIGNING CEREMONY (6 April 2011)

PRESS RELEASE OF THE EUROPEAN COMMISSION

PRESS RELEASES OF SOME STAKEHOLDERS

CONCLUSION

The RFID PIA Framework marks the success of a co-regulatory approach to manage potential privacy risks.

Companies are encouraged to adopt the methodology and embed privacy into the design of their systems.