

## Virtual Conference: 'Presentation of the project "byDefault" outcomes'



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- Two-fold objective of the Platform
- √To offer the opportunity to DPOs and privacy professionals to exchange views on several topics, participating in structured online discussions.
- ✓ To provide an online Digital Library, which will include documents and digital resources that are most relevant and useful to DPOs and Professionals.





#### A. Initial Topic Selection

- ✓ Through the use **of a questionnaire**, we asked DPOs and privacy professionals to express their needs, wishes and the key issues that concern them.
- ✓ The results of the questionnaire were analysed and a set of initial conclusions and open issues were identified. One virtual workshop took place, with a limited number of selected participants in order to present and validate the conclusions drawn, followed by two larger engagement seminars, where the participants were given a presentation of the platform and were provided with examples of use. During these three events, the partners of the project got valuable input from the participants that allowed for the determination of the platform content and requirements.





- Structure of the questionnaire
- ✓ The first section was dedicated to the professional relationship with the GDPR of the participants, and included questions that serve to identify the relationship of the respondents with the regulation and help reach tailored made conclusions. There were different questions for DPOs and professionals that are not DPOs.
- ✓ **The second section** provided a presentation of 20 data protection related topics and asked the participants to evaluate the usefulness of each one of them. In that way, the project team was able to identify the topics that DPOs and Professionals consider the most important in terms of guidance needed.
- ✓ The third section contained a series of questions on the platform functionalities, which allowed the project team to determine which functional characteristics interest the respondents and include them in the Platform's design.
- ✓ At the final stage, all participants were also given the opportunity to provide their own comments and suggest, in their own words, anything that they thought it was not covered by the previous questions. On the 10th of February 2023 the Questionnaire was locked and no more submissions were accepted. By that date 371 DPOs and professionals had submitted their answers. The respondents expressed their clear preference on some topics. These results formed the basis of the subsequent analysis of the Project team that led to the determination of the Platform's requirements





- Criteria for the questionnaire's initial topic selection
- √ the HDPA's experience
- √ the questions of Data Controllers, DPOs and professionals
- ✓ the guidance available from the EDPB and the HDPA as well as the results of its previous projects.





The project team grouped the issues that are likely to concern DPOs and professionals, according to the above criteria, into 20 thematic sections:

- Definitions and scope of GDPR,
- Principles relating to processing of personal data,
- Lawfulness of processing,
- Data Subjects' rights,
- Accountability Tools,
- Data Controllers and Processors,
- Security Measures,
- Transfer of personal data to third countries,
- Direct Marketing,
- Media and Internet,

- Employment records and data,
- · Special categories of personal data
- Processing of minors' data,
- Processing of personal data in the public sector,
- Processing of personal data in the financial/bank sector,
- Processing of personal data for educational or research purposes,
- Video Surveillance,
- New Technologies (cloud computing, AI etc.)
- Automated decision-making, profiling,
- Data processing by Law Enforcement Authorities





#### **B.** Selecting the 10 Topics of Interest

According to the questionnaire's results the **10 most popular thematic sections** that were also validated and confirmed by the stakeholders in the Workshop were:

i) Security measures (90,5%) ii) New technologies (87,06%) iii) Accountability tools (86,25%) iv) Lawfulness of processing (88,41%) v) Employment relations (81,94%) vi) Data Controllers and Processors (81,94%) vii) Data Subjects' rights (79,80%) viii) Special categories of personal data (73,31%) ix) Video Surveillance (74,12%) x) Principles relating to processing of personal data (74,93%).

After the process of validating the 10 topics of interest, the project team included these topics in the Platform, both in the section of the online discussion among the participants and in the section of the online Library.





#### C. Selecting and categorizing the material of the library

- In the Digital Library, i) European and national legislation related to the processing of personal data and ii) the EDPB's and the DPA's relevant guidelines and the decisions of the higher courts (ECHR, CJEU ETC.) have been uploaded in each of the 10 thematic sections in pdf format both in Greek and English, following the relevant discussions that took place among the workshop and seminars participants and the project team .
- The uploaded material of both the Digital Library and the online Platform discussion is only indicative and not conclusive and will be enriched with the relevant new decisions and/or guidelines and further legislation.



### **Platform Regulation**



#### Interaction Rules

- ✓ For each Thematic Section there will be: i) **Digital Library Material** open to the public, ii) **Discussion forum** for registered users only
- ✓ Users: DPOs and personal data protection professionals
- ✓ The Platform will operate under **the guidance and supervision** of the HDPA. Its purpose **is not** the provision of advice/answers in individual cases, the substitution of the role of DPOs by the Authority or the validation of any scientific opinion of users on matters not decided by the Authority
- ✓ The Authority may receive **feedback** from the forum discussions in order to provide more specific guidance when deemed necessary.
- ✓ Access to the discussion requires user registration. Registration process: Username, e-mail
- ✓ Opening a new discussion topic by i) Searching any existing topics with various keywords or ii) Searching with tags
- ✓ As long as the issue has not been raised again, the user may choose an appropriate topic
- ✓ In each topic it appears as a sign of usefulness: i) the number of replies (Posts) and ii) the number of views



## **Platform Regulation**



#### Notifications

- ✓ Each discussion topic can be answered
- ✓ Each user can subscribe to the Topics that interest him/her or to a Discussion Topic
- ✓ Notifications through the Platform for each new answer to a question / another user's reaction to answers / reference (mentioning)
- ✓ By following a user you receive notifications for each new activity







#### Rules of Conduct

- ✓ Purpose of the Platform: Scientific dialogue between professionals
- > Accuracy, decency, moderation in responses, no offensive / inflammatory expressions
- ➤ Unfair use of the platform is prohibited: for advertising purposes, posting/sending offensive, malicious, defamatory, fraudulent, harmful content, sending spam / harassing other users, misrepresentation regarding the user's identity / relationships, posting/disseminating confidential (eg trade secrets) content

#### √ Role of Administrators

- > They do not check proactively or continuously
- > They do not endorse the content posted
- ➤ Administrators can be referred by other users
- ➤ Administrators may delete at their discretion content or limit the access of the user who violates the Rules of Conduct temporarily or permanently
- > Possible request to review a decision by a 3-member committee: 2 administrators + 1 Moderator

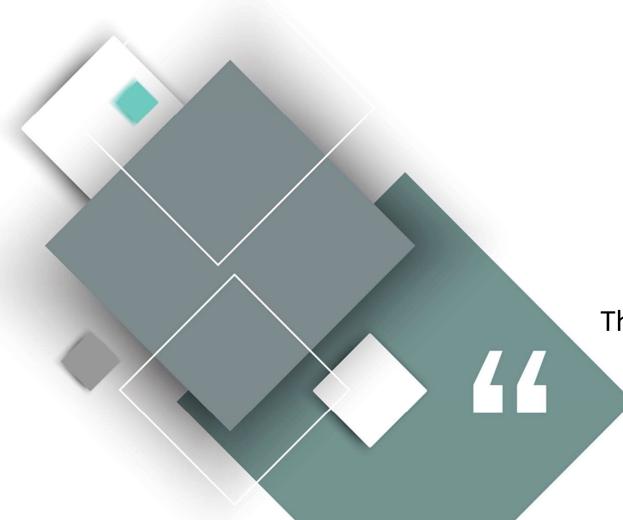


### **Platform Regulation**



- User roles and responsibilities
- Moderator(s) may be appointed for each Thematic Section (Expression of interest from active users and subsequent selection by Administrators)
- The Moderators have the possibility to intervene in the Topic of their competence:
- preemptively checking any answers,
- ➤ locking issues,
- modifying or deleting answers, at their discretion.
- In case of failure to respond they contact the Administrators







## Thank you for your attention



Το έργο byDefault χρηματοδοτείται από την Ευρωπαϊκή Ένωση (Πρόγραμμα Πολίτες, Ισότητα, Δικαιώματα και Αξίες – CERV). Ωστόσο, οι ιδέες και οι απόψεις που εκφράζονται είναι αυτές του συντάκτη/των συντακτών μόνο και δεν εκφράζουν απαραίτητα εκείνες της Ευρωπαϊκής Ένωσης ή της Ευρωπαϊκής Επιτροπής. Οὐτε η Ευρωπαϊκή Ένωση οὐτε η Ευρωπαϊκή Επιτροπή μπορούν να θεωρηθούν υπεύθυνες για αυτές.