



collab.dpa.gr: 10 months old

Assessment of Operation



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Pilot, operation and support



- The Platform has been operating since mid-September 2023, having:
 - a) Space for discussion and exchange of views
(for registered users – personal data protection professionals)
 - b) Digital Library with supporting material
(open to all)
- HDPa to support and operate the platform even after the end of the project (end of August 2024)
 - According to the proposal and the Grant Agreement



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Use of the platform: Discussion space



- 342 (313 on July 1st) users
 - 20 internal
- 23 forums – 220 Topics – 272 Posts
- Posts/Replies breakdown [Operation phase (till first reporting milestone)]

Topic	Posts	Replies
General discussion	7	28
Data Security	3	6
New technologies	2	2
Accountability tools	1	3
Lawfulness	2	3
Employment relations	1	15
Controllers and processors	1	4
Data subject rights	0	0
Special categories of data	0	0
Video surveillance	1	1
Principles of Data Processing	0	0



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Use of the platform: Digital Library

- Contents (typical structure)
 - Guidelines
 - EDPB /HDPAs/ SAs
 - Jurisprudence
 - EUCJ /ECHR /Hel. Council of State /Hel. Supreme Civil and Criminal Court
 - Other bodies guidelines
 - Open standards
- Records: 198
 - Operation additions: 9+8 = 17
- No user comments (!)
- Ability to download offline without registration

- Posts breakdown
(Till first reporting milestone – Feb 24)

Topic	Posts
Data Security	24
New technologies	24
Accountability tools	26
Lawfulness	19
Employment relations	10
Controllers and processors	10
Data subject rights	19
Special categories of data	24
Video surveillance	21
Principles of Data Processing	13



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[Example] Discussion space: New posts (Views)



- Data Security

- User submissions

- Differential privacy (92)
 - [HDP]: AEPD Anonymisation and pseudonymisation (II): Differential privacy
 - Image/Sound pseudonimization tool suggestion for whistleblowers (57)
 - Law 4961/2022 DPO Register clarification (158) [Solved]

- New technologies

- AEPD Artificial Intelligence: Transparency (39)
 - International Working Group on Data Protection in Technology (BfDI) Working Paper on “Smart Cities” (26)

The screenshot shows the 'Ασφάλεια δεδομένων' (Data Security) forum page. It features a navigation bar with 'Πλατφόρμα συζήτησης', 'Ψηφιακή βιβλιοθήκη', and 'Αποσύνδεση'. Below the navigation, there are tabs for 'Φόρουμ', 'Μέλη', 'Πρόσφατες Δημοσιεύσεις', 'Το προφίλ μου', and 'Αποσύνδεση'. The main content area displays a list of forum posts with the following details:

Τίτλος θέματος	Δημοσιεύσεις	Θέσεις
Ερώτημα σχετικά με εργαλεία ψευδωνυμοποίησης αρχείων εικόνας/ήχου Τελευταίες απαντήσεις ^ Τελευταία δημοσίευση από Eleni Balasorouli, πριν από 9 μήνες >	1	57
Στο πλαίσιο του ν. 4990/2022 απαιτείται η προστασία της ταυτότητας του...		Από Eleni Bal... πριν από 9 μήνες
Διαφοροποιημένη ταυτότητα ή Ανωνυμοποίηση Τελευταίες απαντήσεις ^ Τελευταία δημοσίευση από grousorouos, πριν από 10 μήνες >	2	92
Με δεδομένα, ότι η εφαρμογή differential Privacy αναγνωρίζεται από τ... Χρήσιμο θα ήταν να μελετήσετε την ανάρτησή από το blog της Ισπανικής Επ...		Από Michael T... πριν από 10 μήνες Από grousorou... πριν από 10 μήνες
Ηλεκτρονικό μητρώο υπευθύνων προστασίας δεδομένων Τελευταίες απαντήσεις ^ Τελευταία δημοσίευση από Panagiotis, πριν από 10 μήνες >	3	158
Στο άρθρο 25 του Ν.4961/2022 αναφέρονται τα εξής: «Ηλεκτρονικό μητρώ...		Από Panagioti... πριν από 10 μήνες



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[Example] Digital library: New posts (Views)



- Data Security
 - CNIL Practice guide for the security of personal data : 2024 edition (25)
 - C-340/21 - Natsionalna agentsia za prihodite (14)
 - FDPIC Guide to Technical and Organisational Data Protection Measures (26)
 - New technologies
 - CNIL AI self assessment guide (6)
 - UN OHCHR Generative AI Human Rights Risks Taxonomy (9)
 - Dutch DPA AI & Algorithmic Risks Report (29*)
- *includes original post

The screenshot shows a web interface for a digital library. At the top, there is a navigation bar with the byDefault logo and links for 'Πλατφόρμα συζήτησης', 'Ψηφιακή βιβλιοθήκη', 'Εγγραφή', and 'Σύνδεση'. Below this is a search bar and a breadcrumb trail: 'Ψηφιακή βιβλιοθήκη > Ασφάλεια δεδομένων >'. The main content area is titled 'Ασφάλεια δεδομένων' and includes an RSS feed link 'ΤΡΟΦΟΔΟΣΙΑ RSS' and a 'Δημιουργία θέματος' button. Below this is a table of search results with columns for 'Τίτλος θέματος', 'Δημοσιεύσεις', and 'Θεάσεις'. The results are as follows:

Τίτλος θέματος	Δημοσιεύσεις	Θεάσεις
Οδηγός της Γαλλικής Αρχής για την ασφάλεια δεδομένων <small>Τελευταίες απαντήσεις > Τελευταία δημοσίευση από Iroussos, πριν από 3 μήνες ></small>	2	25
<small>Η νέα έκδοση του οδηγού της Γαλλικής Αρχής αντικαθιστά την προηγούμενη... Στην διάθεσή σας, πλέον, ο ενημερωμένος οδηγός της Γαλλικής Αρχής για ...</small>		<small>Από grousorou... πριν από 12 μήνες Από Iroussos πριν από 3 μήνες</small>
Τεχνικά και οργανωτικά μέτρα στην επεξεργασία προσωπικών δεδομένων (Ελβετική Αρχή) <small>Τελευταίες απαντήσεις > Τελευταία δημοσίευση από Iroussos, πριν από 6 μήνες ></small>	1	25
<small>Ο Οδηγός Τεχνικών και Οργανωτικών Μέτρων Προστασίας Δεδομένων (TOM) πα...</small>		<small>Από Iroussos πριν από 6 μήνες</small>
C-340/21 - Natsionalna agentsia za prihodite <small>Τελευταίες απαντήσεις > Τελευταία δημοσίευση από Iroussos, πριν από 7 μήνες ></small>	1	14
<small>Το Δικαστήριο εξέτασε πολλαπλά ερωτήματα και έκρινε ότι μια άνευ αδεία...</small>		<small>Από Iroussos πριν από 7 μήνες</small>



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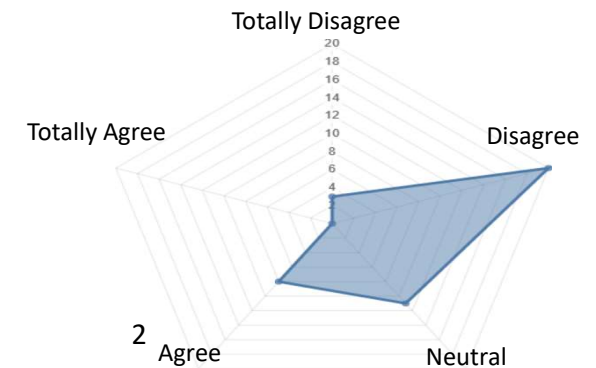
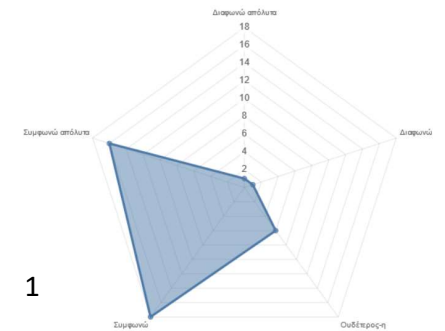
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Users Evaluation Feedback (1)



- Questionnaire compiled and sent to the Platform users, referring to the:
 1. Willingness to use the Platform
 2. Platform complexity
 3. Ease of use
 4. Technical competencies implied
 5. Thoroughness
 6. Uniformity
 7. Anticipated field reach
 8. Platform Complexity
 9. User Confidence
 10. Prerequisites of its use



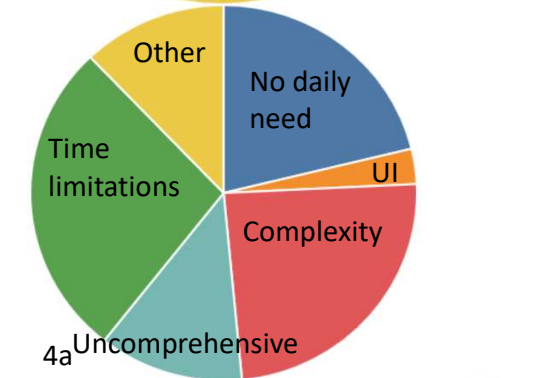
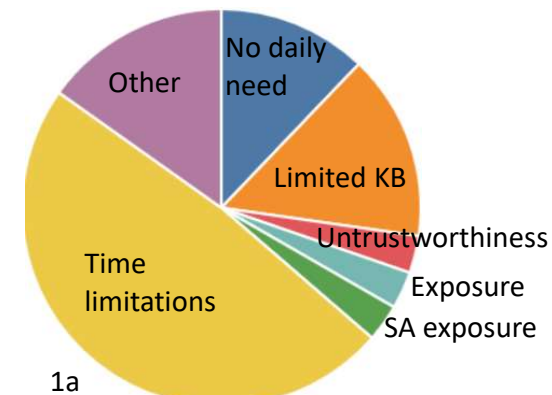
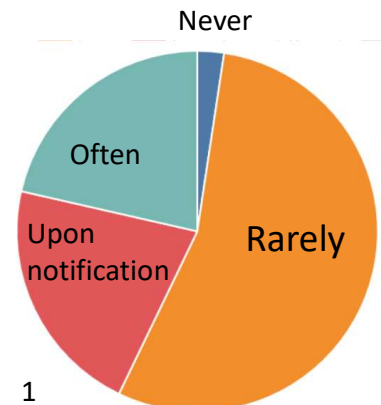
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Users Evaluation Feedback (2)

- Also, referring to user's:
 1. Discussion space visit rate
(Reason for low)
 2. Posts made
Experience
 3. Posts replied
Experience
Information acquired?
 4. Digital library use rate
(Reason for low)



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Platform evaluation results

- Based on 42 users' feedback on the targeted questionnaire
- The technical implementation
 - particularly positive evaluation
 - simple and easy to use, uncomplicated, with sufficiently comprehensive functions
- Users recognize that they are not making enough use of the platform
- Users cite lack of time as the main reason for underutilizing the platform and digital library
 - not needed in their professional daily life
 - easy to find information in another way
- Nevertheless, they state that they would like it to be enriched with more thematic sections.



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Output



- Given that the Platform has low participation, is it useful to retain it, to modify it or should it be replaced by another solution?
 - a) it is useful as it is (45%)
 - b) it should be enriched with other functions (31%)
 - c) It should have been implemented differently (~25%)
- It should be promoted more by the Authority
 - individual comments' dominant view



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Internal understanding

- Limited number of field professionals that are constantly and actively engaged in the field
- Part-time occupation leads to lack of resources allocation/utilization
- Minimum engagement of moderators
- DPOs' participation at a low level
 - Unexpressed unwillingness to expose Controller/Processor(employer) or even DPO shortcomings
 - Limited training/awareness
- HDPA need to promote the tool as the standard & 'authorized' means of feedback amongst the relevant stakeholders



Next steps

- Platform promotion
in the HDPa website as the **primary means** of field guidance
- Platform establishment
as the basic means of communication/interaction amongst DPOs
- Debate
 - requirements analysis via international engagement
- Moderators review



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Your thoughts/ideas (?)

- on proposed/recommended field guidance
- on ways to pursue & accomplish active engagement/participation in field collaboration



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Thank you for your attention