ICDPPC Global Privacy and Data Protection Awards

2019

Entry Form

Deadline 29 July 2019

To submit an entry to the ICDPPC Global Privacy and Data Protection Awards please complete and email this form to ExCoSecretariat@icdppc.org no later than 29 July 2019.

Note: ICDPPC member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline of 29 July. Languages: the conference documentation rule 6.2[1] applies:

1. **Contact details for this entry**:
   a. Name and email address of person completing this form: Thomas Zerdick thomas.zerdick@ec.europa.eu
   b. Name of Data Protection or Privacy Authority: European Data Protection Supervisor (EDPS)

2. **Eligibility**: By submitting this entry I confirm that:
   a. The Authority is a member of the International Conference of Data Protection and Privacy Commissioners.
   b. The initiative described in this entry was undertaken since the last edition.
   c. I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the ICDPPC Secretariat.

3. Please indicate which **category** you wish to enter (delete those that do not apply; you can enter multiple categories but please use separate forms for each entry):

   d. Innovation

4. **Description of the initiative**
   a. Please provide a brief summary of the initiative (no more than 75 words):

The EDPS has developed open source software tools to support a large-scale remote privacy inspection of websites. The tools collect evidence of personal data processing, such as cookies, or requests to third parties. The collection parameters are configured ahead of the inspection and then collection is carried out automatically. The collected evidence, structured in a human- and machine-readable format, is then used to generate inspection minutes and reports, to minimise manual workload.

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[1] 6.2 Conference documents
Without prejudice to section 4.2, conference documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other conference documents such as the Conference Rules and Procedures.

b. Please provide a full description of the initiative (no more than 350 words):

> The tools control the browser for a "virtual inspection visit" on behalf of the EDPS inspector, which only provides configuration parameters, such as URLs to visit or a number of random linked web pages to include in the visit.
>
> The tools start either the browser Firefox or Chromium with a new user profile and load all web pages included in the visit one after another with no further user interaction. During the visit, the tools collect amongst others:
> 1. web page screenshots
> 2. list with HTTP links from the entry web page, categorised by
>   a. internal link (same website),
>   b. external link
>   c. link to social networks and collaboration services
> 3. list of visited web pages
> 4. information stored in HTML5 local storage
>   (including the responsible web page and component causing processing)
> 5. all cookies in the browser profile
>   (including the responsible web page and component causing processing)
> 6. the HTTP traffic between the browser and the Internet as HAR file, in particular
>   a. list of requests identified by EasyPrivacy filter list to cause behaviour tracking
>   (including the responsible web page)
>   b. list of requested first- and third-party hosts
> 7. all messages exchanged via Web Sockets (alternative transmission method to HTTP requests)
> 8. an analysis of the quality and vulnerabilities of the website's HTTPS connection using testssl.sh
>   including potential redirects from HTTP to HTTPS.
>
> The evidence is recorded in a human- and machine readable format (YAML), so that it can be reviewed by the inspection team and fed to other tools to generate audit reports in other formats (PDF, DOCX).
>
> The tools were successfully used for the inspection of the major EU institutions' websites.
> The tools have been released as open source software (*see:* https://edps.europa.eu/press-publications/edps-inspection-software_en) which should contribute to the capacity building of other data protection supervisory authorities and to kicking-off better collaboration amongst technology experts of data protection supervisory authorities.

c. Please explain why you think the initiative deserves to be recognised by an award (no more than 200 words)

> With the new EU data protection legislation applicable (e.g. GDPR), many websites have updated their privacy consent management mechanisms and rethought their personal data processing operations. This change, plus personal data breaches on websites, led to an increasing public awareness on privacy issues of websites and resulted in an increasing number of complaints to supervisory authorities.
>
> The EDPS tools allow laypersons after a brief introduction to gather evidence on personal data processing operations of websites using a reproducible, reliable, and fast method. No third-party cloud service is involved to gather evidence. The tools are self-consistent and can be used in intranets without internet access. The open software license allows experts to adapt the tools to their own needs.
>
> The tools allowed the EDPS to extend the scope of its web service inspection from just a few EU websites to potentially all websites that are covered by its mandate (>1000), which are now being inspected in groups. Since communicating the findings generated by the tools, the EDPS observed an increased privacy awareness of website controllers and data protection officials. In the future, these tools could help website controllers to carry out own audits in order to strengthen the EU's accountability principle.

d. Include a photograph or image if you wish (note this will be published with your entry on the ICDPPC website; the image can be pasted into the entry or send as an attachment or a link may be provided): .n/a...

e. Please provide the most relevant link on the authority's website to the initiative (if applicable) (The website content does not need to be in English): 1) EDPS tools : https://edps.europa.eu/press-publications/edps-inspection-software_en
    2) EDPS flags data protection issues on EU institutions' websites

f.   Please provide any other relevant links that you wish that help explain the initiative or its impact or success (e.g. links to news reports or articles): ....