Overview

- GDPR Update
- IEEE Privacy Policy
- Terms and Conditions
- Consent Structure and Preferences
- Q&A
GDPR Update
GDPR Update

- EU General Data Protection Regulation is now in effect
- IEEE Computer Society TA GDPR effort is coordinated by Kevin Dreseley (IEEE)/Stephen Woods (CS)
  - GDPR-related revisions to IEEE CS website complete (IEEE Privacy Policy, cookie banner, etc.)

- IEEE Standards Association GDPR effort is coordinated by Yvette HoSang/Markus Plessel
- IEEE-SA GDPR/Data Use webinars have been recorded
- GDPR Compliance:
  - IEEE-SA website - complete
  - Grouper - complete
  - Public Review - complete
  - iMeet/aka Central Desktop - near completion
  - myProject - in progress

- IEEE provides compliant event tools to members
  - Vtools (http://sites.ieee.org/vtools/)
- IEEE GDPR general training being organized and more in process of development
- List consent validation/upload tool being tested
Updated IEEE Privacy Policy

https://www.ieee.org/security-privacy.html
IEEE Privacy Policy

- Consent to the IEEE Privacy Policy must be obtained where personal data is collected, unless confirmation is obtained that consent was previously granted
  - This consent is required prior to allowing the submission of personal data
  - An email notification will be sent to those who provided consent whenever there are updates to the IEEE Privacy Policy
  - Wherever personal data is captured, the purpose for capturing the data must be clearly stated so that it is understood what consent is being provided

- Several IEEE tools will be integrated with the IEEE Consent Management System, so they will automatically check for consent to the IEEE Privacy Policy before providing access, and will require consent prior to proceeding
IEEE Privacy Policy

- Since consent to the IEEE Privacy Policy is required for all instances where personal data is collected, you will need to incorporate the capture of this consent and communication of the consent to the IEEE Consent Management System in registration forms (including event registration) or web forms that collect personal data.
  - Note that email is not an appropriate mechanism for collecting personal data, and must not be used to collect sensitive personal data.

- IEEE can assist with providing code for web forms on IEEE sites.

- If data is collected on non-IEEE sites, the collection of the data must be compliant, and consent must be uploaded to the IEEE Consent Management System promptly.
  - IEEE is currently testing a tool to allow authorized Data Managers to upload consent.
  - There will be file naming and file format conventions that must be followed.
  - The data fields for consent must be provided so that IEEE retains an audit of the consent.
IEEE Privacy Policy

- For rosters or distribution lists (electronic or mail), it is preferable to obtain consent to the IEEE Privacy Policy first before adding a person.
  - IEEE will make available a consent verification tool where Data Managers can submit a list, and then a report with those who have given consent will be provided.
    - Final testing of the tool is in progress, and we will provide access to the tool and training as soon as the tool is available.
  - Alternatively, an electronic mailing list can be managed if each person is provided a welcome email with the purpose of the list and must be able to remove themselves or unsubscribe from the distribution list.

- All communications unrelated to a specific interaction with IEEE must be vetted to ensure that those on the distribution have consented to receive additional communications outside their interaction (subscription for marketability).
  - This subscription is required before information about IEEE products, services, and events unrelated to a specific interaction can be sent.
    - A specific interaction is related to a request, transaction, or participation by the person in an IEEE activity in which they agree to participate.
  - The consent verification tool will also be able to provide a list of those who have provided subscription for marketability.
Terms and Conditions
Terms and Conditions

- There may be instances where specific terms and conditions are required for use of an IEEE asset or participation in a specific IEEE activity
  - The terms and conditions would be in addition to the IEEE Privacy Policy or supporting the IEEE Privacy Policy
  - Consent to these terms and conditions must be required, so consent must be obtained prior to allowing the submission of personal data or use of the IEEE asset
Consent Structure and Preferences
Consent Structure

- The following is the format of consent/subscriptions for interactions with IEEE
  - I have read and accept the IEEE Privacy Policy <https://www.ieee.org/security-privacy.html> (ensure consent is mandatory, unless provided previously)
  - I accept these Terms and Conditions <link to T&Cs> (include acceptance of terms and conditions if they are required, link to the terms and conditions, and ensure acceptance is mandatory)
  - Yes, I would like to obtain information about <additional> IEEE products, services, and events (optional to include this subscription, and agreement is also optional; the text can be customized to the additional information that would be provided)
Communication Preferences

- Communication preferences can be captured for a specific activity in which a person is involved
  - Communication preferences should be captured in the database where the contact information is stored; it will not be captured in the IEEE Consent Management System
  - Communication preferences can include mode and frequency of communication

- Communication preferences must be honored once defined, so the database must be able to manage differences in preferences
Questions?

privacy@ieee.org

For standards-specific questions: sa-dataprivacy@ieee.org
Appendix
Meetings, Conferences, and Events
IEEE-SA Meetings

- Meetings are ongoing activities with participants or group members (not conferences or one-off events).

- Beginning 25 May, invitations to potential meeting participants shall be vetted against the IEEE Consent Management Database to determine whether they have consented to the IEEE Privacy Policy, and are therefore eligible to be included in meeting correspondence or distribution lists.

  - As mentioned previously, IEEE will provide a verification tool by which lists can be vetted against consent to the IEEE Privacy Policy
  - Additional information on mailing lists is provided later in this presentation
Conferences and Events

- Conferences and Events requiring registration shall have all applicable consent components as a part of the registration process (see Consent Structure):
  - IEEE Privacy Policy (consent mandatory)
  - Terms and Conditions (if applicable, consent mandatory)
  - Additional IEEE products, services, and events (consent optional)

- Conference/Event participants can receive communication about the conference/event and activities related to that conference/event.

- Information about newly developed conferences/events can only be sent to those who have provided consent to IEEE products, services, and events (subscription for marketability), or expect this as a part of the purpose of an existing mailing list. Event organizers can request a compliant list from IEEE Staff.
Conferences and Events

- IEEE MCE tools will be compliant
- IEEE provides compliant event tools to members
  - Vtools (http://sites.ieee.org/vtools/)
- Non-IEEE event tools must comply with all data privacy regulations and must be contracted with using the IEEE contract process
  - The IEEE Master Services Agreement (MSA) has been updated to address data privacy
  - A GDPR addendum will be required if an agreement other than the IEEE MSA is used
  - Check Terms of Use of the event tool provider for compliance with data privacy regulations (including GDPR)
- Consent to the IEEE Privacy Policy that is collected in non-IEEE event tools must be uploaded to the IEEE Consent Management System promptly
Mailing Lists
Mailing Lists

- All existing active mailing lists in IEEE databases should have been included in an outreach for consent to the IEEE Privacy Policy.

- Current Listserv lists will have an outreach to list members to notify them of the lists they are on, the purpose of the lists where available, and provide the opportunity to unsubscribe from mailing lists.

- Beginning 25 May, it is preferable to construct lists where consent to the IEEE Privacy Policy and any Terms and Conditions is obtained before the personal data can be submitted. Alternatively, if it is not possible to obtain consent, each person on or added to the list must receive a Welcome email that explains the purpose of the list and how their personal data was obtained, and provides the ability to unsubscribe.

- Communication to the mailing list must map to the purpose of the list.

- All mailing lists shall have the option to “unsubscribe from this mailing list”, and all requests to unsubscribe must be honored promptly.
Lists Downloaded from IEEE systems

- All IEEE systems that permit volunteer Data Managers to download personal data will now require that the Data Manager accept the IEEE Data Access and Use Policy, or if the policy was previously accepted, may remind the Data Manager that the policy will apply to the download.
  - The IEEE Data Access and Use Policy will be made available on the IEEE website

- IEEE data must be held and maintained in IEEE systems

- If a list is downloaded from an IEEE system, it must be used promptly or a new list must be downloaded and the old list deleted immediately.
  - This will help ensure that changes in consent are reflected in the download

- Lists that are downloaded must be saved to an IEEE Google drive
  - https://www.ieee.org/membership/products/google-apps.html

- Lists on personal computers, personal databases, personal servers, or personal drives must be deleted

- If information downloaded from IEEE systems contain personal data, the personal data must be removed or hidden before it can be shown publicly
IEEE Data

- When the necessity to hold and/or use IEEE Data has concluded (e.g. end of a volunteer term of service, termination of a contract, IEEE Data is no longer required for a project, or there is a written request from IEEE) the IEEE Data Manager must either delete or return the IEEE Data in accordance with the IEEE Data Retention Program.

- Volunteers other than Officers and Directors are encouraged to provide documents significant to the business of the IEEE to the appropriate staff person on an ongoing and contemporaneous basis.
Marketing Material
Marketing Material

- Information can be sent to persons in the context of their existing interaction with IEEE.

- Marketing to persons about products or activities unrelated to their existing interaction with IEEE will have to be vetted against the IEEE Consent Management System for consent to hearing about additional IEEE products, services, and events (subscription for marketability).

- All mailing lists shall be vetted against the IEEE Consent Management System. IEEE will make available a tool to allow vetting of your lists against the subscription allowing communication about IEEE products, services, and events.

- An email campaign can be sent only to the validated list. Securely stored IEEE Data that has been replicated to an approved third party campaign tool must be purged within 30 days.
Your Personal Data and Data Privacy
Your Personal Data and Data Privacy

- IEEE respects your privacy and your right to determine the use of your personal data where applicable.

- IEEE will reach out to you to ensure that we can
  - Communicate with you;
  - Provide you with options to receive information on products, services, and events;
  - Inform you of how we collect and use your data; and
  - Grant access to IEEE tools and services you need in your volunteer role.

- You will be asked to accept the IEEE Privacy Policy in order to use IEEE applications or access IEEE tools.

- **IEEE also needs your help.** If you access personal data of others who interact with IEEE (members, volunteers, participants, customers), you will be asked to first agree to the IEEE Data Access and Use Policy that outline procedures for protecting that personal data.

- As volunteers, you will be required to protect personal data used for IEEE activities so that IEEE can continue to meet expectations with regard to data privacy.
Your Personal Data

- IEEE Standards captures your personal data to comply with IEEE standards development policies and procedures, legal and accreditation requirements, and for patent review by patent offices.

- Your name and affiliations must be retained and made publicly available to document participation in standards development meetings and other IEEE-SA activities.

  - Membership rosters
  - Attendance lists
  - Ballot lists
  - Participant lists
  - Contributors to IEEE standards projects and activities

- Your personal information is required to perform your role
  - Governance volunteers are listed for governance committees to which they are appointed or elected, and contact information is provided in the IEEE-SA Pocket Directory
  - Sponsors and WG Officers are listed as contacts for IEEE-SA work items for which they are responsible, including on the PAR
  - Working group members and baloteers are listed in the front matter of IEEE standards
Your Personal Data

- If you are an IEEE member and would prefer not to have your personal email listed, you can request an IEEE personal email alias

  - [https://www.ieee.org/membership_services/membership/join/update_profile.html](https://www.ieee.org/membership_services/membership/join/update_profile.html)
GDPR 1-2-3’s

How to be GDPR Compliant...The 1-2-3s

1. Always use a fresh list:
   Your list must be recently vetted or recently downloaded from a GDPR-compliant database.

2. Always collect acceptance of the IEEE Privacy Policy:
   Use required checkbox and text with a hyperlink to the Policy:
   [Checkbox] I have read and accept the IEEE Privacy Policy

3. Always ensure you are providing an unsubscribe or opt-down option:
   Include ability to "Unsubscribe from this mailing list" and honor unsubscribe requests promptly.

Contact privacy@ieee.org with your questions on IEEE Data Privacy policies.
GDPR 1-2-3’s

Events Initiated Prior to Implementation of IEEE Consent Database

1. Event Invitations:
   Submit your event invitation recipient list to IEEE as soon as possible and prior to initiation of registration. Contact IEEE Staff <dataprivacy> for assistance.

2. Registration Forms:
   Include the following text on registration forms:
   Outreach for acceptance of the Privacy Policy will be sent to the recipients in Step 1 after vetting against the consent database.

3. Personal Data Consent Capture:
   Work with IEEE Staff <dataprivacy@ieee.org> to implement programming to capture consent for future event registrations.

Contact privacy@ieee.org with your questions on IEEE Data Privacy policies.
GDPR 1-2-3’s

Events to be Linked to IEEE Consent Database

1. Event Invitations:
   Submit your list to be vetted for GDPR compliance

2. Registration Forms:
   Include the text in Step 3 on registration forms
   and
   Work with IEEE Staff <sa-dataprivacy@ieee.org> to embed programming to capture required acceptance of the IEEE Privacy Policy.

3. Personal Data Consent Capture:
   [Check box optional] I consent to communication about additional IEEE products, services, and events.

Contact privacy@ieee.org with your questions on IEEE Data Privacy policies.
GDPR 1-2-3’s

Distribution Lists (excludes Marketing)

1. Determine GDPR Compliance:
   - Submit your existing list to be vetted for acceptance of the IEEE Privacy Policy
   - or
   - Construct your list as an IEEE ListServ mailing list

2. Describe Purpose of List:
   - Include in all communication a footer with the purpose of the list (or a link to that purpose) and ability to “Unsubscribe from this mailing list”

3. Additions to the List:
   - Ensure that additions to the list receive a welcome email that provides the purpose of the list and the ability to join or unsubscribe from the list

Contact privacy@ieee.org with your questions on IEEE Data Privacy policies.
GDPR 1-2-3’s

Distribution Lists for Marketing

1. Determine GDPR Compliance:
   Each time, submit your existing marketing list to be vetted for acceptance of the IEEE Privacy Policy and Marketability option
   or
   Each time, obtain a compliant list for Marketability from an IEEE database that is linked to the IEEE Connect database.

2. Include Option to Unsubscribe:
   Include in all communication a footer with the ability to "Unsubscribe from this mailing list".

3. Manage Consent:
   Ensure that all unsubscribe requests are honored promptly.

Contact privacy@ieee.org with your questions on IEEE Data Privacy policies.
GDPR 1-2-3’s

Downloading Personal Data from IEEE Databases

1. Request or Confirm Eligibility to Obtain Data:
   Access to Personal Data will be restricted to those who need to have access to the data. You may need to request permission to access IEEE data.

2. Review and Accept the Data Use and Management Policy:
   You will be required to review and accept IEEE’s Data Use and Management Policy describing expectation for volunteer use, retention, and management of personal data.

3. Store Lists on IEEE Google Drive:
   All lists downloaded from IEEE databases must be stored on the IEEE Google Drive (<https://www.ieee.org/membership/products/google-apps.html>) for a single use, then deleted. Lists stored elsewhere must be kept secure, and if left unused for more than 3 years must be deleted (unless retention required for legitimate business need or legal purposes).

Contact privacy@ieee.org with your questions on IEEE Data Privacy policies.
GDPR 1-2-3’s

Collecting and Using Personal Data for IEEE Purposes

1. Collecting Personal Data:
   Request only personal data that is needed for the IEEE activity and limit access to that personal data only to those with a need for that access.

2. Collect Consent:
   Include a required request for acceptance of the IEEE Privacy Policy [https://www.ieee.org/security-privacy.html] for all persons, unless a check for prior acceptance of that consent against the consent database is performed for each person (those who have granted prior acceptance do not have to be challenged with a request); requests for other terms and conditions are possible, but must be approved by IEEE.

3. Store Lists on IEEE Google Drive:
   All personal data must be protected and used only in the way intended (as stated at the place where data is collected, i.e., the collection point); lists must be stored on the IEEE Google Drive [https://www.ieee.org/membership/products/google-apps.html] for single use. Lists stored elsewhere must be kept secure, and if left unused for more than 5 years must be deleted (unless retention required for legitimate business need or legal purposes).

Contact privacy@ieee.org with your questions on IEEE Data Privacy policies.