Το έργο χρηματοδοτήθηκε από το
Πρόγραμμα Δικαιώματα,
Ισότητα και Ιθαγένεια 2014-2020
της Ευρωπαϊκής Ένωσης

Data protection by default – Guiding questions for defining the defauls

Το έργο χρηματοδοτήθηκε από το Πρόγραμμα Δικαιώματα, Ισότητα και Ιθαγένεια 2014-2020 της Ευρωπαϊκής Ένωσης

Guiding questions

- What are the specific purposes of the data processing? Are the data subjects informed about the purposes and the data processing?

- For any built-in functionality:
    - Are there situations conceivable where users would prefer or need a different functionality? In which way?
    - Does the built-in functionality implement the data protection principles of the GDPR? Which data-protection principles are supported by this functionality, which are not?

Source: ENISA Report, Exploring the notion of data protection by default, 2018

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Guiding questions *(Cont.)*

- For any configuration option:
  - Which are the possible settings/options?
  - Which are the settings/options that minimise the amount of personal data, the extent of processing, the storage period and the accessibility taking into account each specific purpose? Is this the default pre-setting?
  - If more than one setting may come into question, are there specific criteria for preferring one setting? (This could be the case for different target groups, e.g. different pre-settings for children.)
  - How are the alternative choices presented so that the user can make a privacy-aware decision?
- For any configuration option <u>without</u> a default pre-setting: What is the reason for not using a pre-setting?

Source: ENISA Report, Exploring the notion of data protection by default, 2018

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Guiding questions *(Cont.)*

- For any configuration option with a default pre-setting:
  - Does the default setting realise that only personal data which are necessary for each specific purpose of the processing are processed? With respect to:
    - the amount of personal data collected (can there be less personal data, e.g. fewer attributes, aggregated information, less sensitive data, no (temporary) copies?),
    - the extent of their processing (can the processing be reduced, e.g. less analysis, less transfer, less linkage with other data?),
    - the period of their storage (can the storage period be shortened?) and
    - their accessibility (can the amount of people or parties or machines that will or may have access to the personal data can be decreased, e.g. by local storage, limited access rights, encryption, secure erasure without any traces?)

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Guiding questions *(Cont.)*

- For any configuration option with a default pre-setting:
  - Does the default setting work for achieving the purpose (at least with basic functionality)?
  - Does the change of the pre-setting increase or decrease the user's privacy? To what extent? Are gradual changes possible?
  - How are users supported in changing the settings, e.g. explanation of the effects, offering typical combined settings profiles (e.g. appropriate for a chosen risk level), allowing for specific individual customisation?
  - Can the user conveniently reset the configured setting and go back to the pre-setting?
  - How is the handling of pre-settings and settings changed by the users when the system is updated? Are the previous settings maintained? How are users informed about new settings, new options, new functionality or privacy risks?

Source: ENISA Report, Exploring the notion of data protection by default, 2018