



WP3 – Open, secure and flexible architecture, data privacy and standards

Privacy and data protection

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13-14 June 2018 First Project Review



This project has received funding from the European Union's Horizon 2020 research and innovation programme under the grant agreement No 731205.

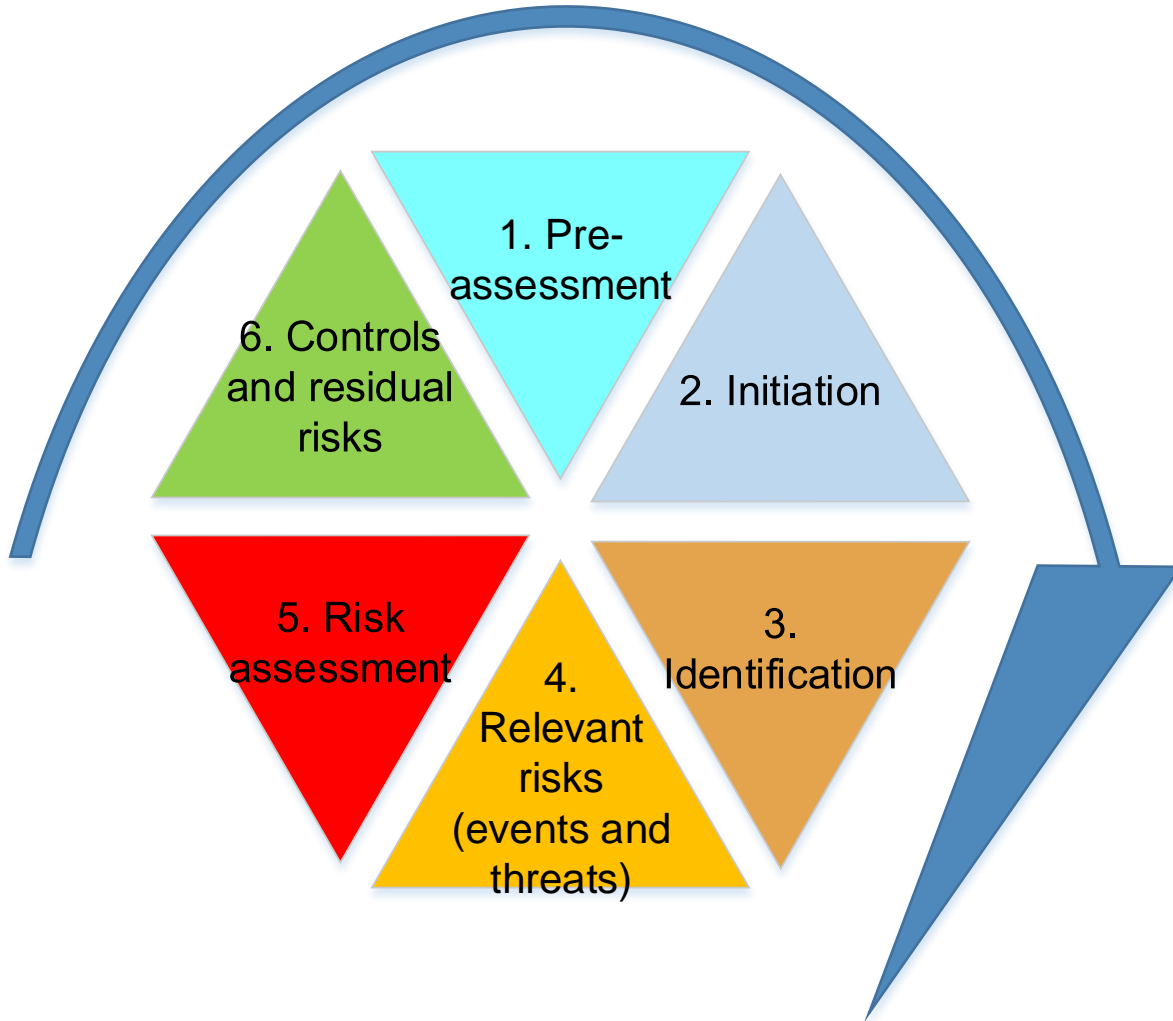


Privacy and data protection within WiseGRID Project

PRIVACY
BY
DESIGN

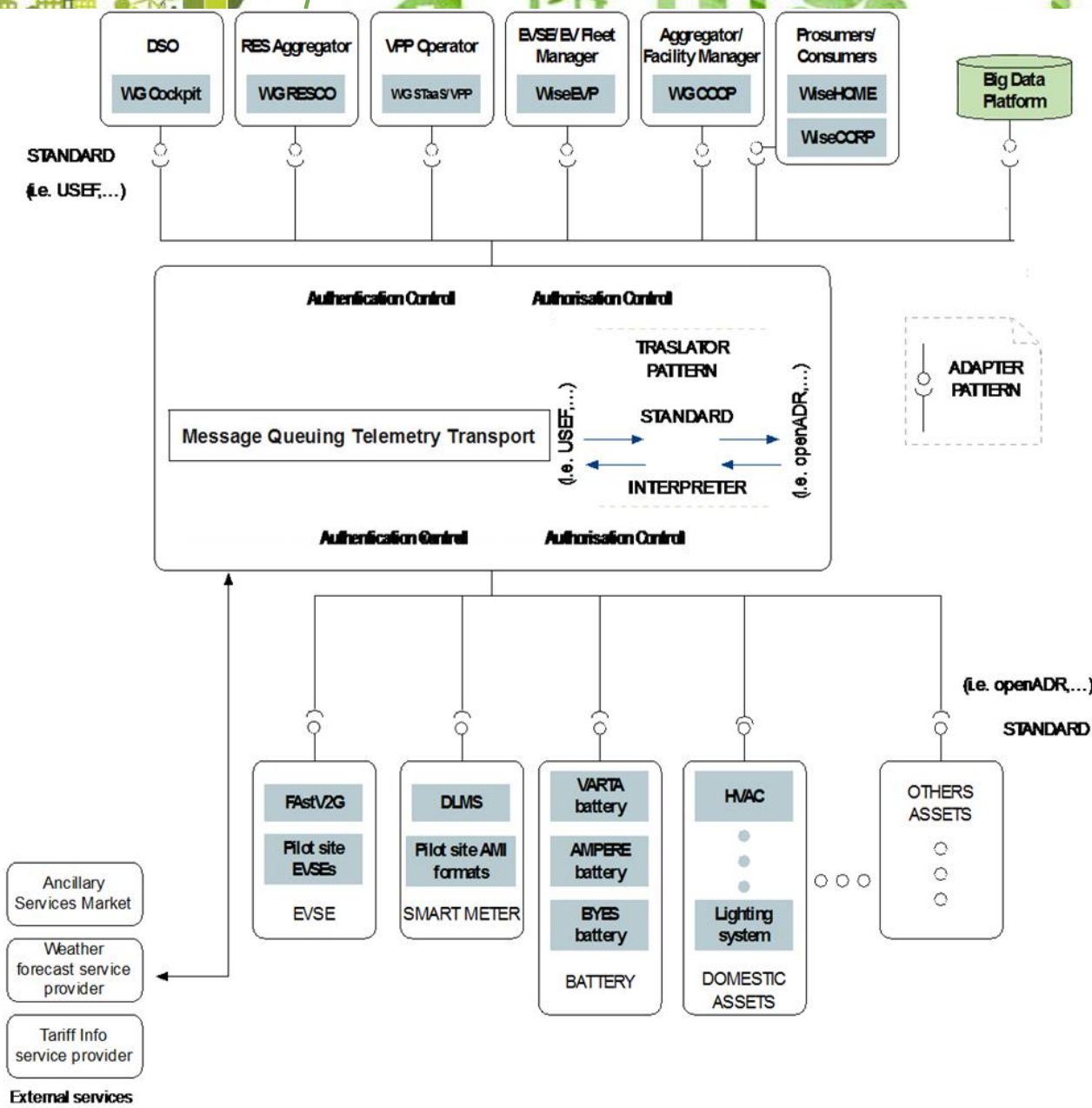
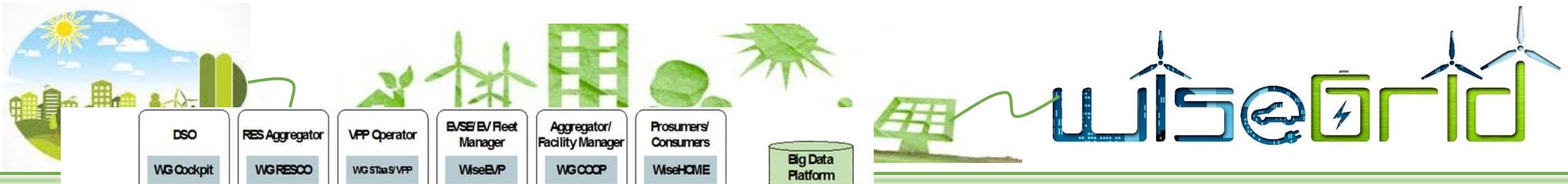
Assessment
DPIA

PRIVACY
BY
DEFAULT



DPIA steps:

1. Survey for data sources (type of data)
2. Survey with questionnaire
3. Evaluate if DPIA is necessary
4. Defined the team
5. Identify applications and systems (for this we made a generic architecture as this will be further developed)
6. Identified risks and events (going through the questionnaire answers for each tool).
7. Risk assessment
8. Defined controls and find residual risks
9. Issued the resolution



Identify applications and systems



Threats identification (all)

Generic threats	Explanation of threats	Specific Energy industry examples of supporting asset vulnerabilities	Questions for guidance	Controls
Abnormal use of software	Unwanted modifications to data in databases; erasure of files required for software to run properly; operator errors that modify data, etc.	Unauthorized changes of personal data, metering data, etc. make the system unreliable.	Are the processing operations documented? How is the documentation of the processing operations maintained? Are there considered for instance logs to memorize these operations?	Reducing software vulnerabilities

Threats and feared events
(found as expected for each tool)

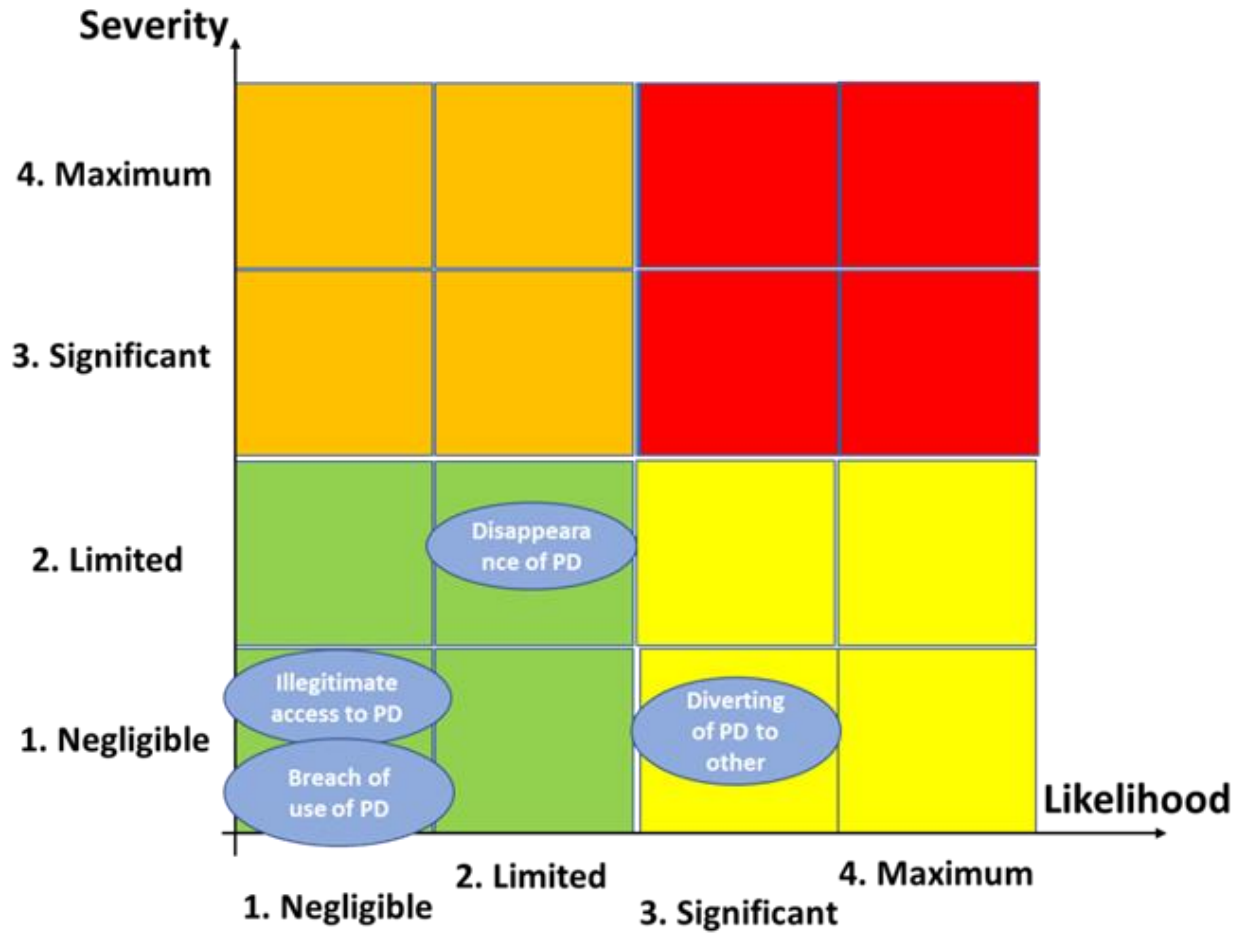
Feared events	Threat ID	Threat name	Brief explanation why relevant
Change in processing: it deviates from what was originally planned (diversion of the purpose, excessive or unfair collection)	II	Incomplete information	The information provided to the data subject on the purpose and use of data is not complete



Assessment of WG STaaS

Risk evaluation for WG STaaS

Feared events	Threat ID	Related Privacy targets	Affected assets	Impact (Severity)			Likelihood			Risk Level (Impact+Likelihood)
				level of identification (how easy?)	prejudicial effect (how much damage?)	I	vulnerabilities of the supporting assets	capabilities of risk sources	L	
Illegitimate access to personal data	VPD	Legitimacy of processing personal data	Personal data	2	2	4	2	2	4	
Breach of use of personal data	LT	Privacy by default	Personal data	2	2	4	1	2	3	
Disappearance of personal data	ED	Compliance with data retention requirements	Personal data	2	2	4	2	2	4	
Diverting of personal data to other users	DoS	Legitimacy of processing personal data	Personal data	1	2	3	3	2	5	
	CDEEA	Legitimacy of processing personal data	Personal data	2	2	4	3	3	6	



Risk map for WG STaaS

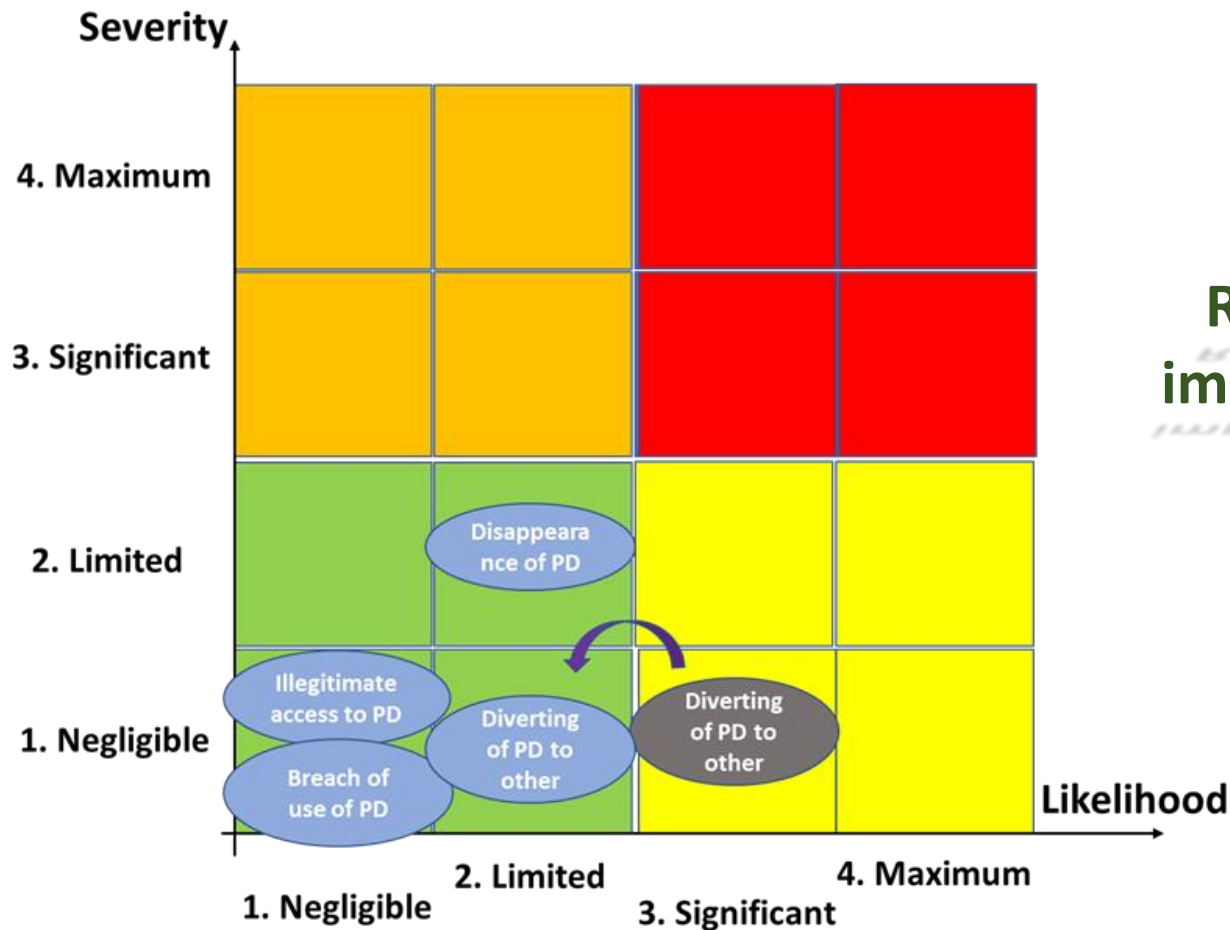
RISK MAP FOR WG STaaS



Controls to be applied within WiseGRID tool STaaS

Risk treatment and residual risk for WG STaaS

Feared events	Threat ID	Related Privacy targets	Controls planned or implemented	Risk level	Risk treatment (including implementation of privacy targets)	Residual risk
Illegitimate access to personal data	VPD	Legitimacy of processing personal data			Risk Retention	
Breach of use of personal data	LT	Privacy by default			Risk Retention	
Disappearance of personal data	ED	Compliance with data retention requirements			Risk Retention	
Diverting of personal data to other users	DoS	Legitimacy of processing personal data	Limiting personal data transfer to countries that provide inadequate level of protection according to REGULATION (EU) 2016/679 of THE EUROPEAN PARLIAMENT		Risk Modification	
	CDEEA	Legitimacy of processing personal data			Risk Modification	



Risk map for WG STaaS with implemented/planned controls



General controls:

Beside detailed controls as presented above (see D3.2 for detailed controls within each WG tool), it is pointed out that common controls shall be applied for all tools where “personal data” are involved:

1. Take written consent from all customers involved in the usage of designated tools (the form of the consent will be developed in due time, before launching the implementation on pilot sites).
2. Data will be anonymized as soon as affordable within the process, with no influence in the functionality.
3. Due to lack of “personal data breach reaction plan” and “reporting protocol”, each tool developer shall consider “Reducing hardware vulnerabilities” as a control.



RESOLUTION



REASSESSMENT

The following resolution is considered at the end of current DPIA process for WiseGRID applications:

WiseGRID applications are still under design:

- ***The updated DPIA is positive:*** risks have been assessed and controls addressing those risks properly defined and tuned. Any residual risks are acceptable, and no further controls have been identified as necessary. The system implementation proceeds. It is important to note that due to design development some of former risks have already been significantly diminished even without anymore foreseen need of controls.
- ***This DPIA report shall be rechecked*** after implementation on Pilot Sites of demonstrating WiseGRID tools or whenever there would be changes in risk evaluation.



INNOVATION @ CRE - EU PROJECTS IMPLEMENTATION



Renewables in a Stable
Electric Grid



SUCCESS - Securing
Critical Energy
Infrastructures



Wide scale demonstration of
Integrated Solutions and
business models for European
smart GRID



Enabling Smart Energy
as a Service via 5G
Mobile Network
advances



CROSS BORDER management of variable
renewable energies and storage units
enabling a transnational Wholesale market



SOGNO - Service
Oriented Grid for the
Network Of the Future



EXPERIENȚE ÎMPREUNĂ.

Thank you!

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