Welcome to Participants

Adoption of the minutes of the Technology Subgroup meeting (23.04.2018)

The minutes of the last Technology Subgroup meeting were approved.

Outline and adoption of the Agenda

The draft agenda was revised to include a short discussion on the Coordinators Meeting on the 16th of June. The revised Agenda was then adopted.

Update from the plenary

The Coordinator provided a short summary on the outcome of the last plenary on the 24th and 25th of May 2018.

Introduction by the Secretariat

The Secretariat informed the participants that are the contact persons of the EDPB secretariat for the technology subgroup.

Regarding the communication between the EDPB Secretariat and the participants, the secretariat explicitly asked people sending emails to the TECH subgroup mailing list to mention the name of the subgroup ([TECH]) in the subject of each e-mail.

In line with the GDPR and the ROP, the EDPB Secretariat is responsible for and available to:

- cooperate with the Coordinator of the technology subgroup and assist him in finding an appropriate date of meeting;
- liaise with the Coordinator for the preparation of the agenda of meetings and to communicate it to the subgroup members by email at least 10 days ahead of the meeting (in line with the current draft EDPB Rules of Procedure art 26.2),
- communicate any relevant documents to the subgroup members;
- Attend the meetings and draft the **minutes** that will be submitted to the Coordinator before a circulation to the SG members for approval.
- Other actions might be provided by the EDPB secretariat (e.g. acting as rapporteur, providing translations).
- Any invitation of experts, guests, or external parties has to be done by the Coordinator via the EDPB secretariat (current RoP, Art. 9.2).

**Coordinators’ meeting on 15.06.2018**

The Coordinator provided information that the certification / accreditation topic currently handled by the TECH subgroup might be transferred to another subgroup in the future. The opinion of the participants was divided on this point, some agreeing with the current state, some favouring a decrease of the workload.

The Coordinator noted that

a. although the Agendas are packed, the Technology subgroup is delivering.

b. the EDPB needs to avoid discussing the same issue in multiple subgroups to not recreate work.

**ICANN**

The draft letter to ICANN was discussed. The discussion revolved around the issues of the qualification of employees’ email addresses as personal data, the logging of who accessed information in the non-public WHOIS entries and which data should be included in the public WHOIS. The rapporteur will update the draft.

DG JUST and DG CNECT mentioned that there might be need for additional guidance in the forthcoming months.

**Deadlines:**

- 18 June: the rapporteur sends the updated version of the document to the Technology SG members
- 19 June: the members give their feedback
- 20 June: the final document will be sent to the Secretariat for uploading on Circa

Members are also asked to provide at a later date answers to following:

a) Does your national legislation provide for a specific legal basis which requires registrars/registries to disclose personal data concerning registrants to third parties upon request, under certain conditions or otherwise?

b) Does your national legislation impose any restriction on logging of access maintained by registrars/registries (or in general) in case access is sought by a law enforcement or other agency?

**Google Task Force**
Accreditation

The rapporteur updated the guidelines based on the results of the public consultations.

Deadlines:

— 15 July: the participants will provide comments to the rapporteur.
— 31 July: the rapporteur will circulate a consolidated draft taking into account the comments to allow for discussion at the September meeting.

Facebook letter

Deadlines:

— 20 June: the rapporteur will consolidate the comments and a final document will be sent to the Secretariat for distribution
DPIA: Article 35 (4) and (5) lists

The Coordinator informed the members that various DPAs have circulated lists of processing activities requiring a DPIA. The Chair has informed the Coordinator about involving the Technology Subgroup in the assessment of these lists. The objective would be to have a substantive discussion at the next TS and adoption of opinions at the September plenary.

Many participants stated that their DPA is ready to send their list.

The Secretariat raised that the formal submission of the draft lists need to be made via the EDPB IT System (IMI) and clarified aspects of the management of the deadline.

The Coordinator will inform the members with results on the Plenary and FoP discussion on this item by email.

Data breach notification

The Coordinator asked to receive an indication of which SA received how many notifications. Participants raised that there is a need to share information on the breaches but it is not clear how this shall be done. After a discussion among members, it was agreed that the Secretariat will provide a manual on the use of IMI for communicating information about data breaches.

Secretariat explained that the procedure to follow in IMI is inherently linked with the question whether there is a cross-border processing activity (i.e. when there is a cross-border processing activity the workflows of Art. 56 / 60 may be used, otherwise the workflow of voluntary mutual assistance for informing other authorities).

Members considered whether in case a DPA envisages to inform other DPAs on occurred data breach notifications the information can be broadcasted via IMI to all DPAs.

Deadlines:

— 30 June: the Secretariat will provide a Guidance document on possible use of the IMI-System for the sharing of data breach related information.

Other topics TS members wish to share

EDPB IT Task Force

The Agenda Item was skipped.

Connected Cars

The rapporteur informed the members on the state of play and invited for comments on this document by the end of June, and will then provide an updated version in July.

Blockchain

DG JUST proposed to work on this topic and shape the discussion. The members decided to discuss this in the September meeting and, if need is, request a mandate from the Board.
Annex: List of Attendees

Members
AT, BE, BG, CZ, DE (Federal, Mecklenburg-Vorpommern, Schleswig-Holstein), DK, EDPS, EE, EL, FI, FR, HU, IE, IT, LU, MT, NL, PL, RO, SE, SI, UK

EEA
NO

Commission
DG CNECT, DG JUST

Secretariat