

**ENISA Workshop:**  
***Security of Personal Data Processing***  
**Monday 8.10.2018**



HELLENIC REPUBLIC  
**National and Kapodistrian  
University of Athens**

— EST. 1837 —

Law School  
Laboratory of Law & Informatics  
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**Panel discussion:**

***Data Protection by Design for SMEs***

Georgios Yannopoulos,  
Assistant Professor for IT Law & Legal Informatics,  
Director of Laboratory of Law & Informatics, Law School, University of Athens  
[gyannop@law.uoa.gr](mailto:gyannop@law.uoa.gr)



# Need to adjust the system?

[25§1 GDPR] the Controller shall, both

- i) at the time of the determination of the means for processing and
- ii) at the time of the processing itself,
  - **implement** appropriate technical and organisational measures
  - which are **designed** to implement DP principles and
  - to integrate safeguards

[25§2 GDPR] ATOM: ensuring that, **by default**, only personal data which are necessary for each specific purpose of the processing are processed

# Privacy *by design* principles (1995)

1. Proactive not Reactive;  
Preventative not Remedial
2. Privacy as the Default Setting
3. Privacy embedded into design
4. Full Functionality - Positive-Sum, not  
Zero-Sum
5. End to end security
6. Visibility and transparency
7. Keep it user-centric



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# How to?



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**1. Pseudonymisation**

**2. Data Minimisation**

**3. Integrate safeguards (cf. Athens, electronic ticket)**

**The importance of**

- **data mapping**
- **data inventory**

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