Privacy Policy Template

When using the Privacy Policy template text below, the text colored blue should be replaced with information specific to the Service, in line with the indications in the text. Other text should not be changed.

The Privacy Policy is designed to fulfill the GDPR requirements:
- *Who or what is your Data Controller?*
- *Will your Research Community have a Data Protection Officer?*
- *Which information do you need to collect on the user? Is this minimised?*
- *Specific data collected by each service may vary. Can your Infrastructure provide a template statement for all services?*

This policy is effective from <insert date>.

1 Privacy Policy

1. Name of the Service	SHOULD be the same as mdui:DisplayName
2. Description of the Service	SHOULD be the same as mdui:Description
3. Data Controller and a contact person	You may wish to include the Data Controller defined for the Infrastructure, rather than per-service
4. Data Controller's data protection officer (if applicable)	
5. Jurisdiction and supervisory authority	The country in which the Service Provider is established and whose laws are applied. SHOULD be an ISO 3166 code followed by the name of the country and its subdivision if necessary for qualifying the jurisdiction. How to lodge a complaint to the competent Data protection authority: Instructions to lodge a complaint are available at…
6. Personal data processed and the legal basis	A. Personal data retrieved from your Home organisation: • your unique user identifier (SAML persistent identifier) * • your role in your Home Organisation (eduPersonAffiliation attribute) * • your name * • … B. Personal data gathered from yourself • logfiles on the service activity * • your profile • … * = the personal data is necessary for providing the Service. Other personal data is processed because you have consented to it. Please make sure the list A. matches the list of requested attributes in the Service Provider's SAML 2.0 metadata.
7. Purpose of the processing of personal data	Don't forget to describe also the purpose of the log files, if they contain personal data (they usually do).

8. Third parties to whom personal data is disclosed	Notice clause of the Code of Conduct for Service Providers. Are the 3rd parties outside EU/EEA or the countries or international organisations whose data protection EC has decided to be adequate? If yes, references to the appropriate or suitable safeguards.
9. How to access, rectify and delete the personal data and object to its processing	Contact the contact personal above. To rectify the data released by your Home Organisation, contact your Home Organisation's IT helpdesk.
10. Withdrawal of consent	If personal data is processed on user consent, how can he/she withdraw it?
11. Data portability	Can the user request his/her data be ported to another Service? How?
12. Data retention	When the user record is going to be deleted or anonymised? Remember, you cannot store user records infinitely. It is not sufficient that you promise to delete user records on request. Instead, consider defining an explicit period. Personal data is deleted on request of the user or if the user hasn't used the Service for <period of time> (e.g., 18 months).
13. Data Protection Code of Conduct	Your personal data will be protected according to the Code of Conduct for Service Providers [1], a common standard for the research and higher education sector to protect your privacy

REFERENCES

[1] GÉANT Data Protection Code of Conduct - http://www.geant.net/uri/dataprotection-code-of-conduct/v1