

# CIRCL privacy workflow

from ticketing system to privacy-by-design



**CIRCL**

Computer Incident  
Response Center  
Luxembourg

Team CIRCL *TLP:WHITE*

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# Overall goal

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- CIRCL mission statement is described in an RFC 2350<sup>1</sup> document including mandate<sup>2</sup> reference.
- The pivotal workflow in a CSIRT is often a ticketing system. CIRCL actively uses a ticketing system to **ensure auditable actions of operators and analysts**.
- Evaluation of new processing activities are:
  - Reviewed (including **risk assessment and mitigations** if required) in the ticketing system then
  - Added in the **records of processing activities**<sup>3</sup>

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<sup>1</sup>*Expectations for Computer Security Incident Response*

<https://datatracker.ietf.org/doc/rfc2350/>

<sup>2</sup><https://www.circl.lu/mission/rfc2350/>

<sup>3</sup>A sample record: <https://github.com/CIRCL/compliance/blob/master/gdpr/json-schema/processing-activities-records-example.json>

## Records of processing activities

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- Current processing activities are up to 30+ records at CIRCL.
- Processing activities mostly include public and private services including ISAC services.
- Some software packages required additional development to support privacy-by-default (e.g. GDPR notice-list support in MISP).
- We maintain a JSON file to support automation and ensuring an up-to-date version of the processing activities.

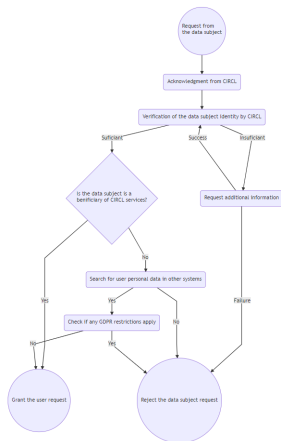
## Exercising rights - template in ticketing system

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- Acknowledgement
- **Identity verification additional information**
- Identity verification request rejection
- Identity verification request acceptance
- Data subject right request rejection
- Data subject right request acceptance

# Process workflow

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- Contact: [info@circl.lu](mailto:info@circl.lu)
- <https://www.circl.lu/>
- <https://github.com/CIRCL/compliance>
- <https://www.misp-project.org/compliance/>
- <https://www.circl.lu/privacy/>