

# GDPR minutes

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# Doptim – Professional Services

## Digital Transformation with data

Position data in the strategy

Get skills

Choose the right technologies

## Data processing

Qualify data

Develop algorithms and models

Automate solutions

# Doptim – R&D activities

Geneafinder.com

Big Data

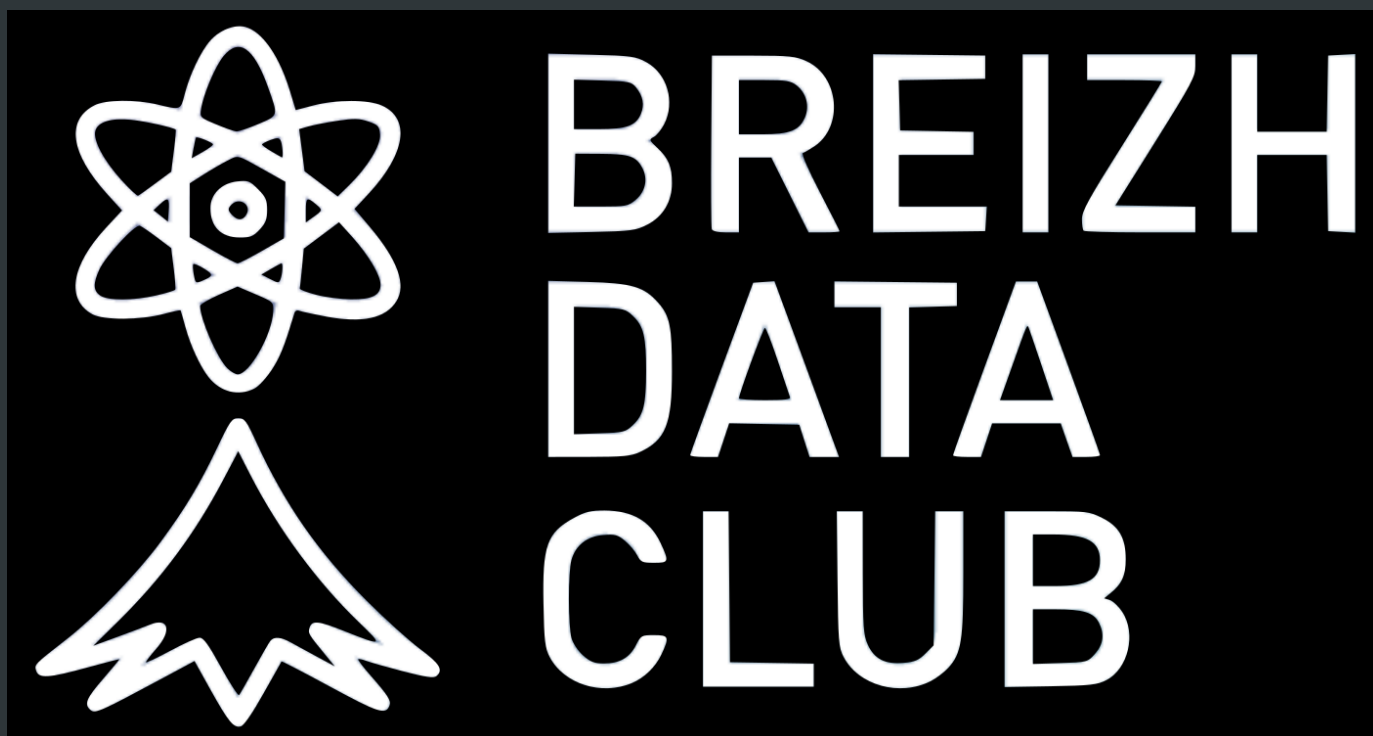


Leasure  
Culture

The need to search easily and more  
ancestors data

Personal data to protect and to share

# Doptim – volunteering



# General Data Protection Regulation



Into effect on 25 May 2018

For all  
European Union  
residents



For all  
Products and  
Services  
delivered in  
Europe

# Personal Data

# Personal data

Any discriminating information

Any information relative to a natural person  
directly or indirectly



# Personal data



## in GEDCOM

<b>Identity, identification</b>	Personal Name, Address, Birth information, age gender
<b>Personal life</b>	Family, Occupation
<b>Financial or economic information</b>	Properties, residences

## in online software

<b>Communication data</b>	Messaging, internet connection logs
<b>Location data</b>	Geolocation of mobile or fixed user terminal

# Personal Sensitive Data

## Sensitive Data in GEDCOM

<b>Data revealing racial or ethnic origin</b>	CAST
<b>Data revealing religious or philosophical beliefs</b>	Events
<b>Data on sexual orientation</b>	Marriage

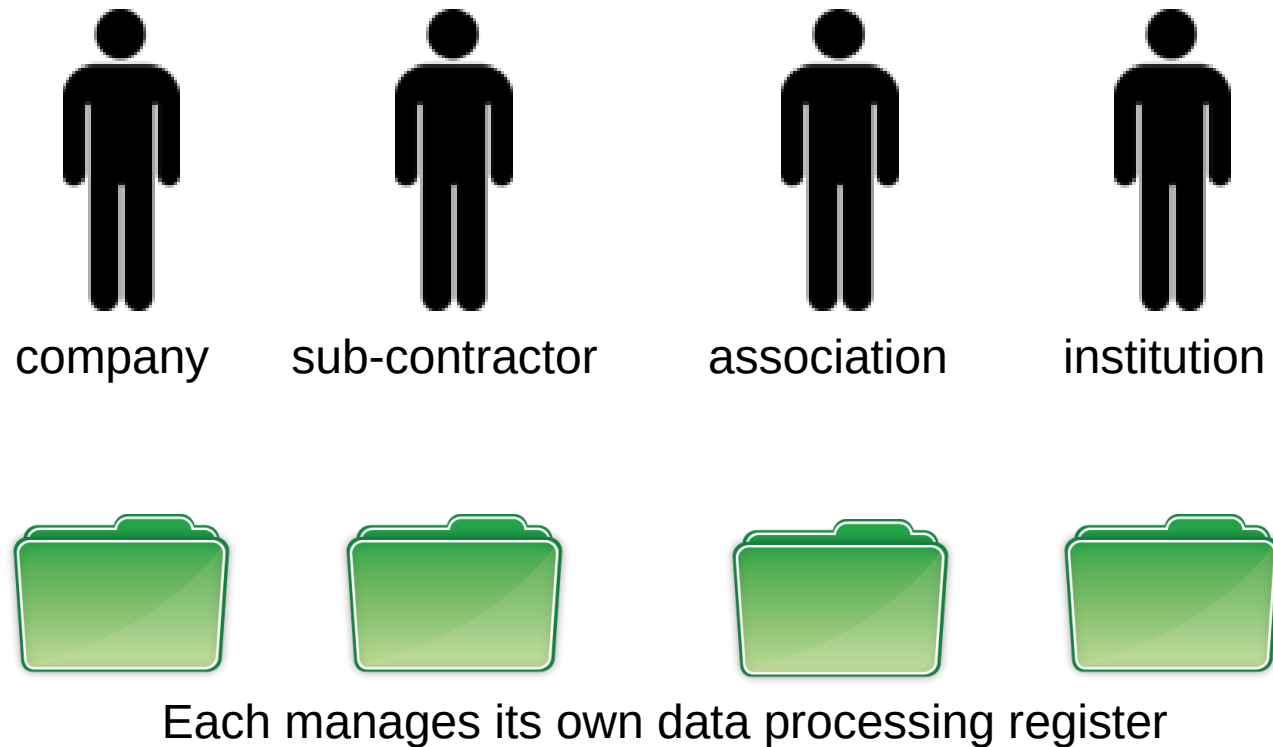
## Other sensitive Data

<b>Genetic data</b>	DNA test
<b>Biometric data</b>	
<b>Health data</b>	

<b>Data revealing political opinion</b>	
<b>Data revealing Union membership</b>	

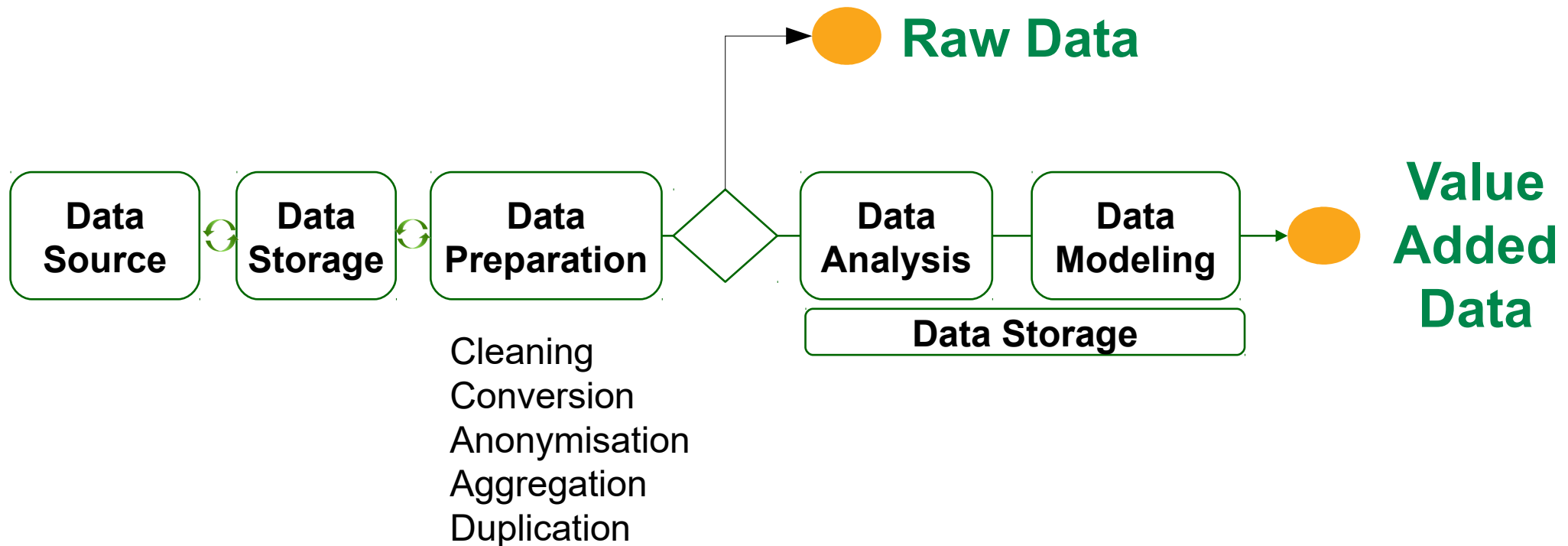
# Governance changes

# You process data = you are responsible



# DATA PROCESSING

Multiple steps for defined purposes



# Rights for people

You can accept (or not)  
the processing of your data  
presented in an intelligible and  
transparent way

You can modify, transfer,  
suppress definitively your data



Free of charge

# Obligations for data processors

Limit and justify your usage of personal data

Guarantee the security of data

Notify any security breach within 72 hours

Document all data processing in a register

Organize yourself to respond to controls



Your Data  
Protection  
Officer

# Penalties, control means

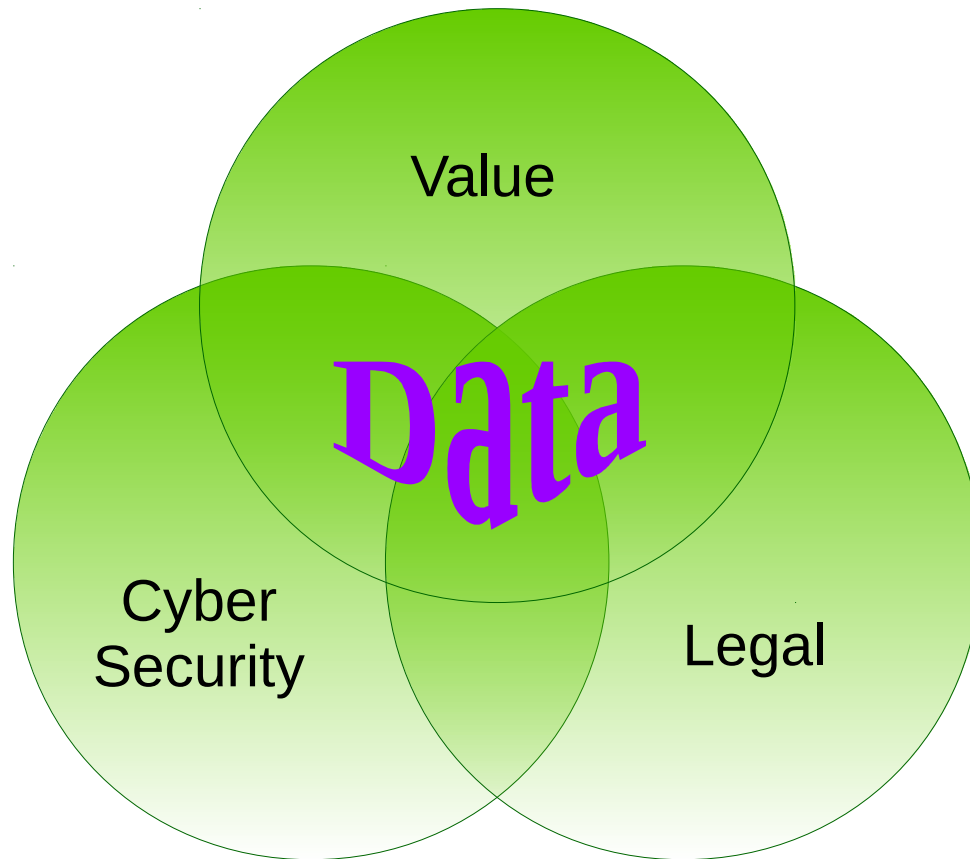


- ◆ Online control with false identity
- ◆ Financial penalty up to 4 % of the revenues, up to €20 million
- ◆ In case of response delay, up to €100,000 per day
- ◆ Cut of data flows to third countries or international entities
- ◆ Public notice
- ◆ Certification or agreement cancellation



# GDPR as an opportunity

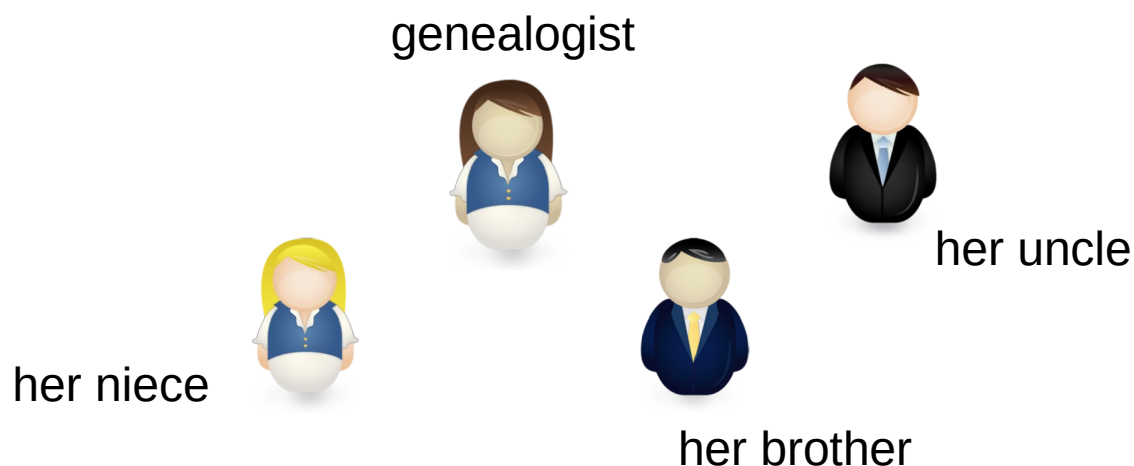
Audit your own data resource



# Impact on Genealogy Software

## The consent

Obtain and demonstrate  
person's consent  
to process his/her data



# Impact on Genealogy Software

## Information to share before consent

- ◆ Company controller's identity and contact information
- ◆ Purpose of each of the processing operations
- ◆ What data will be collected and used
- ◆ The existence of the right to withdraw consent
- ◆ Information about the use of the data for decisions based on automated processing
- ◆ Possible risks of data transfers to third countries

# Impact on Genealogy Software

Processing of sensitive personal data  
Not authorized by default

Privacy Impact Assessment  
As a prerequisite for exceptional authorization

# Impact on Genealogy Software

Secure

Secure

Secure

Merci de votre  
attention

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# Questions & support

Contact :  
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Question :  
How is it applied in each country ?

Answer :  
Each European country (including UK) is adapting its own laws to apply the GDPR. We may see some nuances in the concrete how-to but the rules will remain the same. In France, the CNIL will have reinforced means.



## Question :

How does GDPR concern died persons?

## Answer :

GDPR concerns living persons. Archives will still have the right to keep administration records for history purposes with the rules we already have not to expose recent records publicly.

Where genealogists shall pay attention, is when died persons' data help to discriminate living persons. Typically the religion is probably the same for grand-parents, parents and children.

In this case, Privacy Impact Assessment shall detail how such risk of discrimination is managed.

Controlling and securing access to data will be keys in this case.

## Question :

If we provide PIA to CNIL, is it OK?

## Answer :

PIA is the tool to elaborate your plan in order to protect personal non-sensitive and sensitive data.

It is mandatory but it is not an authorization.

Detailing the purposes of data collection and data processing is the first step.

If private company collects data and does not know why or stores personal data for “possible” purposes not known yet, the collection would be considered as illegal.