ODRA Legal Issues Substance

Enabling Environment

- Anonymization
- FolA
- Licensing
- Reuse
- Fees

Safeguards

- Anonymization
- Data Protection/Privacy
 - limits on the collection of data
 - Specifies purpose for which data is collected at the time of collection
 - Use of the data specified
 - security to protect the data
 - Rights of individuals to know whether the government has data about him/her
 - Use of information must be relevant, necessary, accurate and complete

ODRA Legal Issues Process

- ? Bank-Executed vs Recipient-executed ?
- ? Level of Review?
- ? "Recommendations"?

► If B-E...

- All usual articles-based restrictions
 - no "design"
 - no "implementation"
- Disclaimer
 - not "due diligence"
 - not "legal advice"