

**Who am I?**

- Jeroen van Puijenbroek
- External PhD student
- Legal & IT consultant

**Radboud University**  
Institute for Computing and Information Science

Jeroen van Puijenbroek MBA LLP EMITA  
PhD Student

Toernooiveld 212, 6525 EC Nijmegen,  
The Netherlands  
M: +31 (0)6 3849 8919 E: J.vanPuijenbroek@cs.ru.nl

**PRIVACYSOLUTIONS4U**

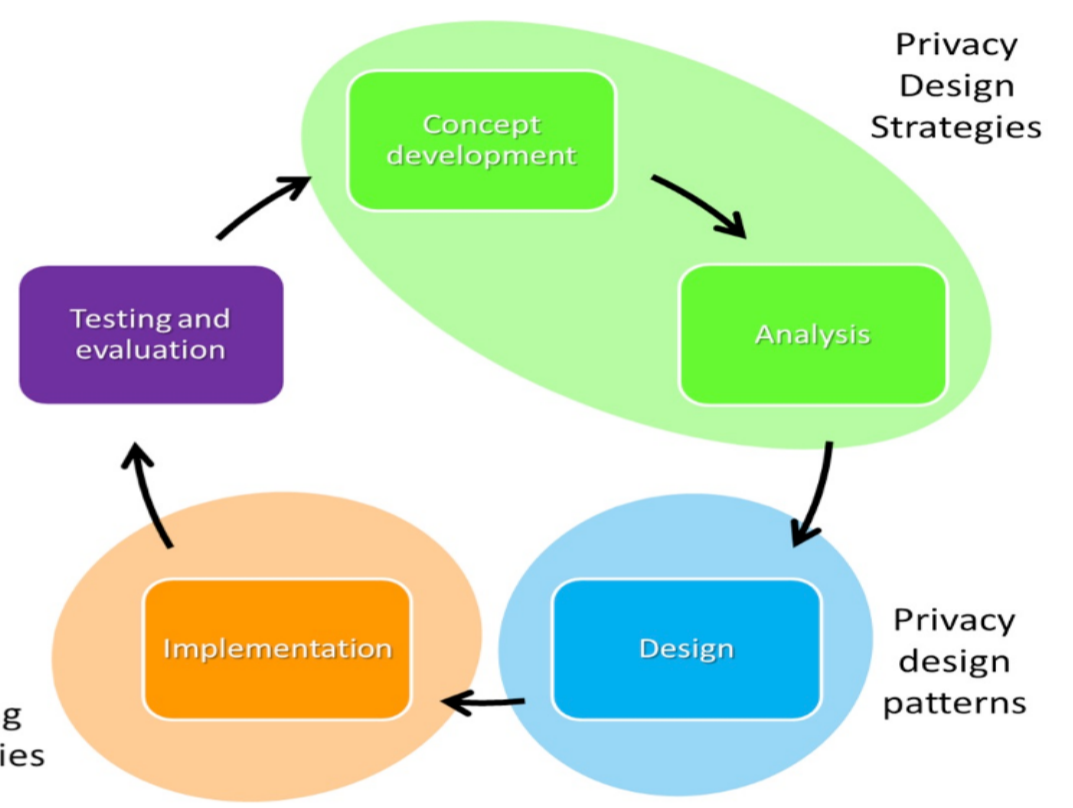
Jeroen van Puijenbroek MBA LLP EMITA  
Legal & IT Consultant

Laanpart 29  
5467 HK Veghel  
The Netherlands  
+31 (0)415 281 855  
+31 (0)6 3849 8919  
J.vanPuijenbroek@PrivacySolutions4U.com

**How can I support you?**

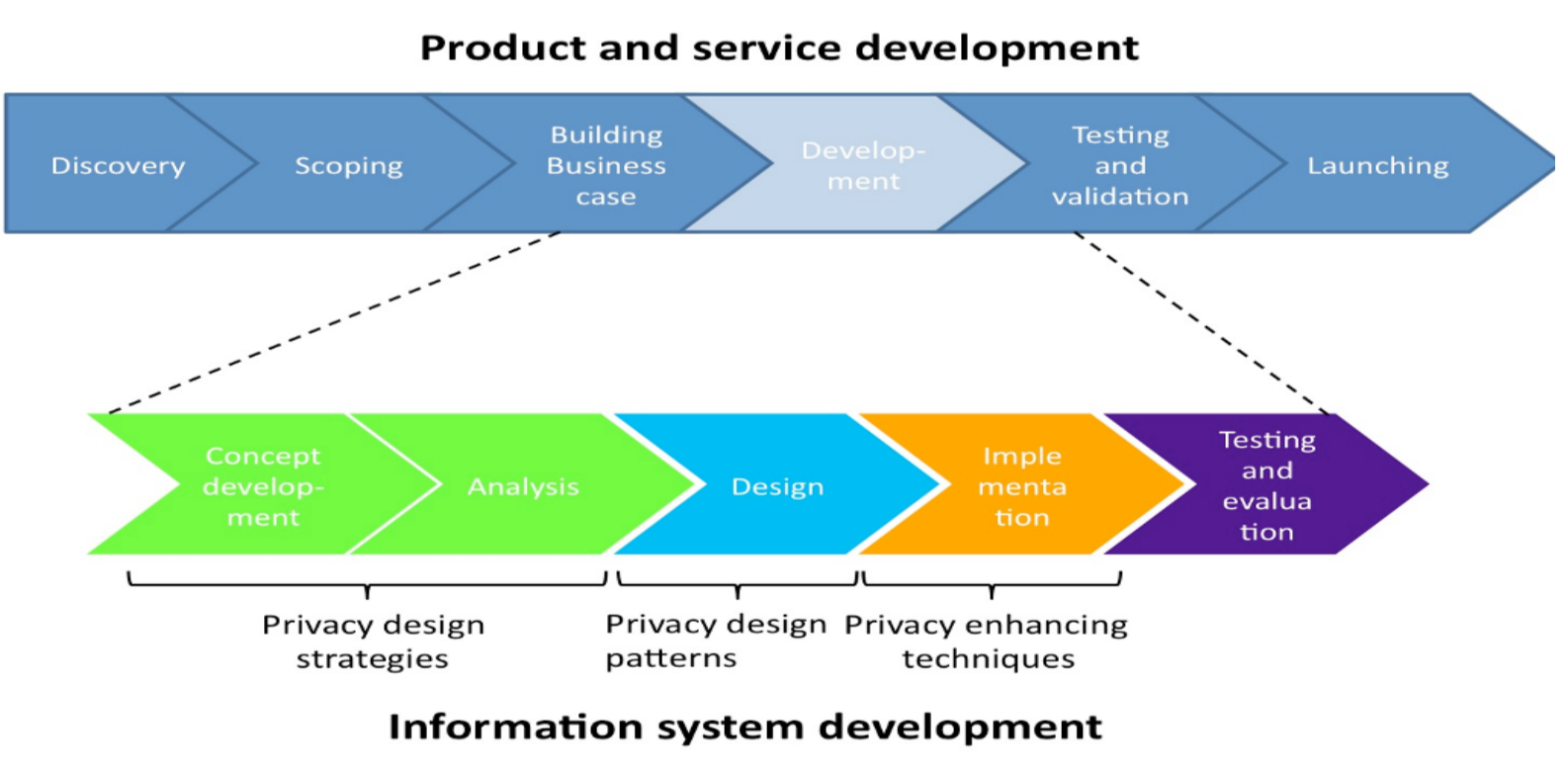
- Share first results of field research PIA
- Discuss impact on PbD

The aim is to develop a framework which helps to determine *on forehand* if the developed *information system* fulfills demonstrably the privacy by design and by default obligations from the *GDPR*



**Research**

- On forehand
- Information system
  - Too late (LATE icon)
  - Already decisions made
  - End to End approach
  - Must be part of business case
- GDPR
  - Open standards GDPR
  - Can PIAs bridge the gap?



**First Results field research**

- When Who Where Why?**
  - Since when conducting PIA**
    - Mainly 2 / 3 years ago
    - Less earlier, up to 9 years
  - Reason conducting PIA**
    - Mainly compliance driven
    - Less Data subject driven
  - Used PIA frameworks**
    - PIA Dutch National Government
    - NOREA
    - SURFnet
    - Own framework/ law firm
    - One questionnaire
  - Way of conducting PIA**
    - Teams
    - Project / Line manager
    - Bila (C)PO
  - When conducting**
    - In early stages of development
    - Incorporated in product development
  - Who are stakeholders**
    - Mainly Internally focused
    - Sporadic Data subject
  - Determining Privacy risk?**
    - Mainly Controller perspective
    - Less Data subject perspective
  - Mitigating risks**
    - No homogeneity
    - Role of (C)IO big
- Privacy risks** (Icon: people on stairs)

**Field research "PIA in practice"**

- 15 Organisations
  - Public
  - Professional
  - Financial and insurance
  - Human health
  - Industry
  - Transportation
  - Information and Communication
- 7 Different Sectors
  - Citizens
  - Customers
  - Patients
  - Students
- Different Data subject
  - Employee
  - Financial
  - CRM-data
  - Health
- Different Data
  - Employee
  - Financial
  - CRM-data
  - Health