

# A solid privacy and security approach

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## *Summary*

For privacy and security these are turbulent times. Organizations are confronted with increasing security related incidents and their serious consequences. At the same time privacy seems to be taken more serious within the European Union, resulting in more stringent unified data protection regulation within the EU. A third development is that organizations are moving towards cloud-computing. A changing environment where privacy and security safeguards often need to be enforced. To support the SURF member organizations to face those challenges a coherent set of instruments is developed with enhancements and improvements still under way.

## *Abstract*

SURF has a long tradition in defending privacy, ensuring security and building trust for their community of students, teachers and researchers. Increasing security related incidents in combination with a growing impact and serious consequences of those incidents asks for tools and best practices to overcome weaknesses in information security policies and practices.

At the same time privacy seems to be taken more serious within the European Union, resulting in more stringent unified data protection regulation within the EU. The adoption of this regulation is aimed for in 2014 and is planned to take effect in 2016. Organizations need to adjust their privacy policy and practice to this regulation.

A third development is that organizations are moving towards cloud-computing. To ensure privacy and security in this environment a legal contractual framework that sets a high standard is needed.

To cope with the turbulence in the area of privacy and security SURF has chosen for an integrated approach containing of:

1. a framework Information Security for Higher Education including SURFaudit
2. a community wide participated program that leads to privacy compliance for the upcoming European privacy regulation
3. a framework of legal standards for cloud services

Key success for this approach is continuous and broad involvement and commitment of the SURF member organizations, board members and IT management as well the security and privacy professionals.

1. With SURFaudit the education sector in the Netherlands can show it is compliant with rules and regulations from government. By using a common control framework based on international standards SURF and her member organizations can show they are compliant with these regulations and prove they are "in control". These methods enable universities to implement essential controls for security and privacy in a efficient and effective way, using a comprehensive framework of guidelines, dedicated sample policies and peer experience.

2. In the area of compliance with the new European privacy regulation it seems wise to pull up together. The new EU regulation does impose strict conditions for the processing of personal data and will strengthen individual rights. Implementation will lead to a high standard of protection everywhere in the EU. There are many aspects that can be addressed collectively like model policies for handling incidents, job profiles and training for the privacy officer, sector specific policies for handling data about minors, risk analysis and privacy impact assessments, impact assessment for research data. In this way, higher education can make their joint "privacy settings" transparent to all stakeholders and also to the Dutch Data Protection Agency. Working together on this subject leads to more transparency, less costs and a better quality of data protection within the education and research community.

3. SURF's Cloud Taskforce made a framework of legal standards for cloud services in higher education that will enjoy commitment by administrators throughout the sector. That support is crucial in order to have a strong negotiating position vis-à-vis with providers of cloud services. In many cases, providers supply useful applications at attractive prices – sometimes even free of charge – but it are their legal conditions that apply and it is a matter of "take it or leave it". In many cases, conditions are imposed regarding such aspects as privacy, confidentiality, and data availability that are extremely unattractive for higher education institutions. SURF drew up best-practice clauses regarding privacy, confidentiality, ownership and availability of data stored in the cloud for contracts and SLAs with providers of cloud services.

These 3 "programs" together constitute a powerful tool for the SURF member organizations in their need to secure the privacy of their users and a safe IT environment.

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### *Author Biographies*

Alf Moens is a security coordinator at SURF and is responsible for coordinating compliance and control efforts for higher education in the Netherlands.

Alf studied information engineering at Fontys and has a master degree in information security management from TIASNimbas. After working at the TUDelft for more than 8 years as a security officer he joined SURF in 2010. Alf is the driving force behind SURFaudit. See also <http://www.linkedin.com/in/alfmoens>

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