

# How does the Code of Conduct for Cloud Service Providers help you as a customer?

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18th of May 2017

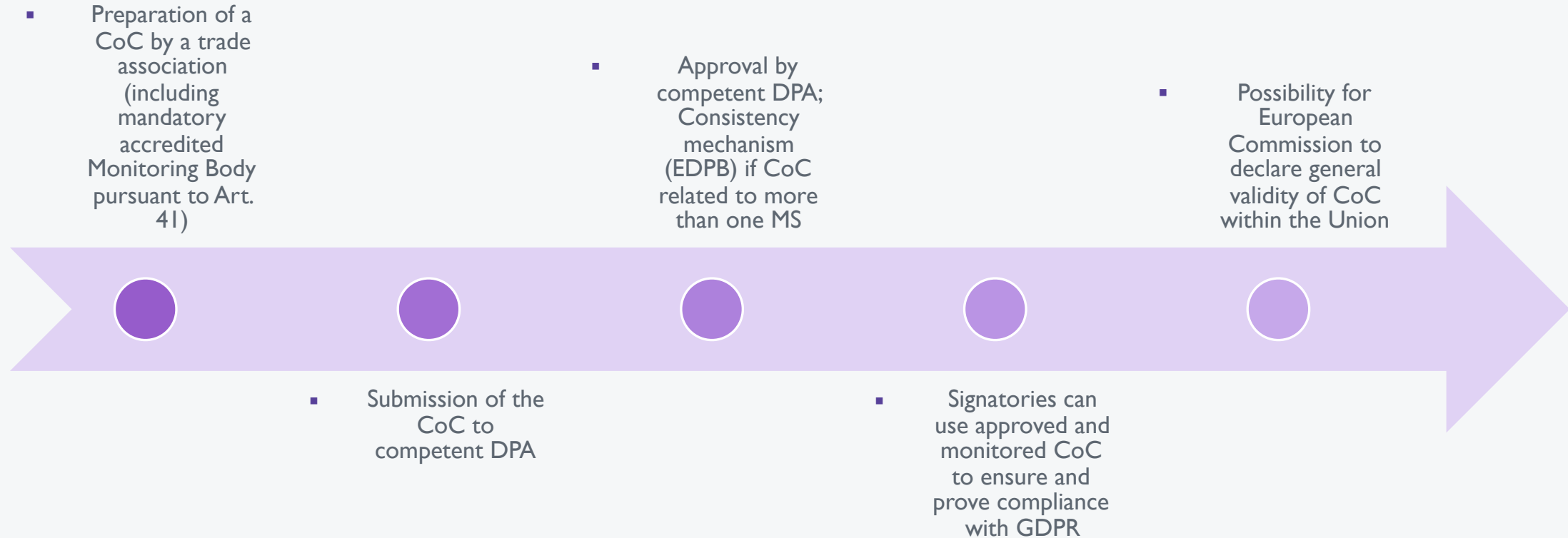
# What is SCOPE Europe?

- New entity specifically established to host and administer Codes of Conduct and foster their development on European Level
- Structure was created to meet the requirements of a GDPR-Monitoring Body (Art. 41)
- Based in Brussels
- Will host the General Assembly of the Cloud CoC and perform the tasks of the Secretariat and Monitoring Body (if wished so by the industry)
- Benefits from experience of German based SRIW (administering and monitoring CoCs for nearly 6 years now) – <https://sriw.org>

# Why a Data Protection CoC?

- **General Data Protection Regulation (GDPR) is a one-size-fits-all solution** for the whole EU
  - Vague provisions which create a **high level of legal uncertainty**
- Possibility to **concretise vague provisions of GDPR** by approved CoCs and thereby **create legal certainty**
- On top of that: GDPR offers signatories of an approved CoC the **legal benefit to proof their compliance** much easier
  - e.g. sufficient guarantees of a data processor, IT-security of processing, legal data transfer outside of EU, etc.

# CoC General Approval Process Overview



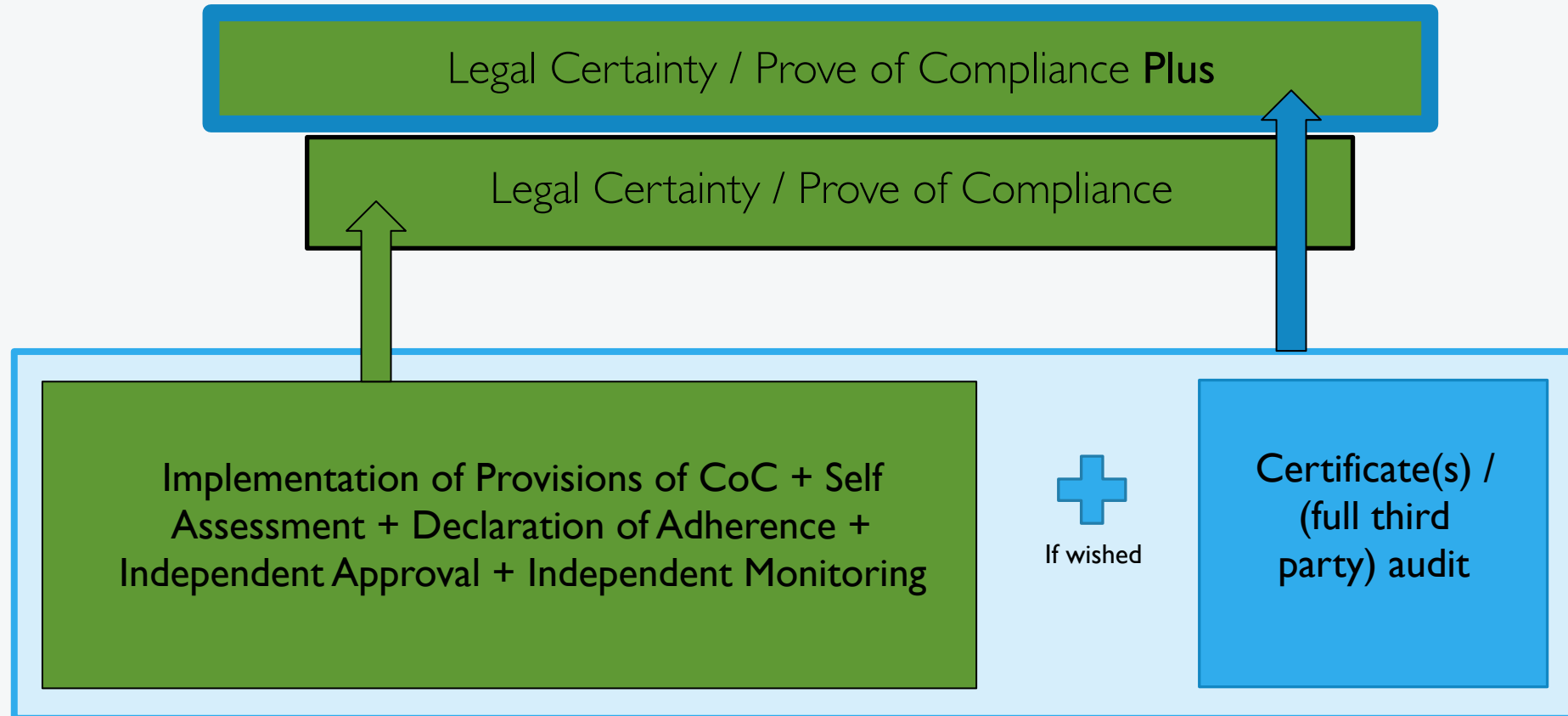
# Why a Cloud Code of Conduct?

- For cloud providers? Supporting compliance
- For cloud customers? Transparency and enforcement
- For governments and DPAs? Working with industry, streamline resources (see last bullet)
- GDPR? Compliance with a Code “may be used as an element by which to demonstrate compliance”
- Backed under the GDPR by an independent monitoring body

# What exactly is the EU Cloud CoC?

- Part of the implementation of the European Commission's cloud strategy
- The Cloud Select Industry Group (C-SIG) was established by the EU Commission, with representatives from major European and multinational companies and organizations with significant involvement in cloud computing
- The Code has the purpose to ensure that personal data is processed by CSPs in accordance with the EU Data Protection law system
- The intention of the CoC is also to make it easier and more transparent for cloud customers to analyze whether cloud services are appropriate for their use case in regard to data protection requirements
- In development since 2013 / It has already been developed with regard to the European Data Protection Regulation

# Tiered Approach - Simplified Overview



# Where to find the EU Cloud Code of Conduct?



A screenshot of the EU Cloud COC website homepage. The header includes the logo and navigation links: Home, Our Goals, Our Tool, Why Certify, Latest News, and Contact. A search icon is also present. The main content area has a dark background with the text 'YOUR PATH TO TRUSTED CLOUD SERVICES IN EUROPE.' and three buttons: 'GET IN TOUCH', 'GET THE CODE', and 'READ OUR PRESS RELEASE'. Below this, it says 'FUTURE-PROOF BY FLEXIBILITY AND PARTICIPATION'. A green bar at the bottom contains a home icon and the text '/ Home'.



# What's in EU Cloud Code of Conduct?



Introduction – Structure – Purpose – Scope – Adherence

Data protection - substantive rights and obligations

Security requirements – defining security objectives ('what', not 'how')

Governance - management, application and revision, including bodies

Transparency annex

Security annex

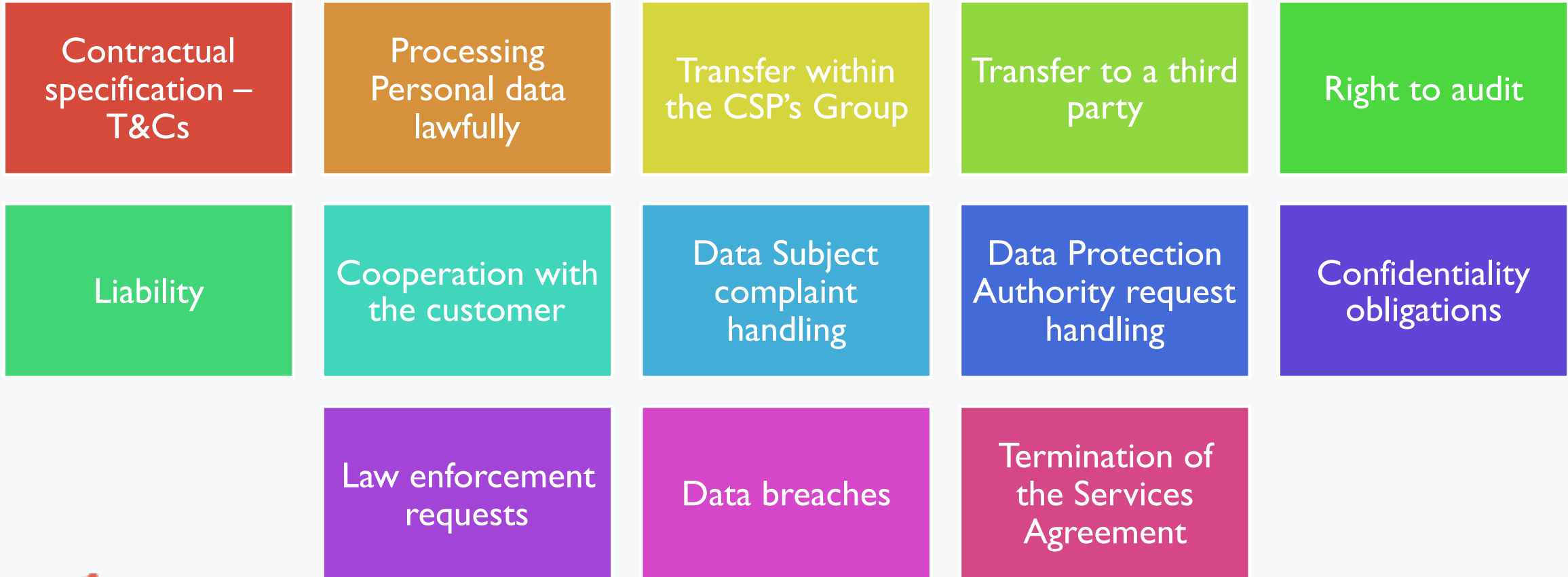
Declaration of adherence

Checklist



**SCOPE**  
EUROPE

# What issues are covered by the EU Cloud CoC?



# Current Status of EU Cloud CoC

- Significant number of companies representing a significant share of the cloud market already became members of the General Assembly of the CoC
- First CoC on the market with a Governance and set-up for an independent monitoring in accordance with GDPR
- First companies already declared adherence; others already declared to follow soon
- Broad participation of the cloud industry has the potential to let the Cloud CoC and its infrastructure and governance system become a role model project for future CoCs under the regime of the GDPR

## Ongoing Activities

- Further development/improvement of implementation guidelines
  - Implementation of the provisions at the CSPs
  - Declaration of Adherence & Approval
  - Monitoring
  - Mapping of existing certificates to the provisions of the CoC
- Preparation of the official approval of the CoC by the competent DPA
  - e.g. continuation of the talks with the DPAs/Working Party 29
- Go for the official approval when GDPR is applicable law (mid 2018)

# Costs & Invitation to join the EU Cloud CoC



- Costs of the infrastructure will be covered by a mixture of GA membership fees and service related fees
- Regular memberships for companies offering Cloud Services and supporter memberships possible
- In case a high level of participation is reached, the costs per company can be reduced (cost-based approach)
- Expressions of interest to participate in the General Assembly are welcome at SCOPE Europe (<https://scope-europe.eu>); membership application form will be finalized this summer at <https://eucoc.cloud>
- The more companies are involved in the further process, the more it can be guaranteed that the provisions of the CoC and its guidelines meet the expectations of the different market players

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