

Hong Kong Access Federation (HKAF) Data Protection Profile

Version 1.0

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This work is based on the "GÉANT Data Protection Code of Conduct", available at https://www.geant.org/uri/Documents/GEANT_DP_CoC_ver1.0.pdf ©2012 Dante ©2013 GÉANT, ©2017 JUCC (Joint Universities Computer Centre Ltd.), used under a Creative Commons Attribution-ShareAlike license: <https://creativecommons.org/licenses/by-sa/3.0/>.

1. Document Control

1.1 Document Status

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1.2 Document History

Version Number	Revision Date	Summary of Changes	Authored By	Approved By
1.0	15-Jun-2017	Official release	AFWG	JUCC Steering Committee

2. Definitions and Terminology

Section 2 - 'Definitions and Terminology' of the latest HKAF Federation Policy published on the HKAF website at <https://www.hkaf.edu.hk/federation-policy> applies to this document.

The key words "MUST", "MUST NOT", "REQUIRED", "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", "RECOMMENDED", "MAY", and "OPTIONAL" in this document are to be interpreted as described in RFC 2119, see <http://tools.ietf.org/html/rfc2119>.

3. Introduction

The HKAF Federation Policy requires that, when acting as a Service Provider Organization, Federation Member **MUST** ensure that the deployment of each of its Service Providers follows all the attribute processing principles defined in this HKAF Data Protection Profile for providing access to the protected resources or services.

This requirement is also included in the HKAF Service Provider Management Standard.

4. Attribute Processing Principles

The Service Provider Organization agrees and warrants for all of its Service Providers:

- a. **[Legal compliance]** to only process the Attributes in accordance with the relevant provisions of the Personal Data protection laws of Hong Kong, including but not limited to the Personal Data (Privacy) Ordinance (Cap. 486);
- b. **[Data minimization]** to minimize the Attributes requested from a Home Organization to those that are adequate, relevant and not excessive for enabling access to the service and, where a number of Attributes could be used to provide access to the service, use the least intrusive Attributes possible;
- c. **[Purpose limitation]** to only process Attributes of the End User for the following purposes:
 - Authorizing access to the service of the Service Provider;
 - Recording End User access, and retention of records, in order to facilitate traceability of End Users via their Home Organizations;
 - Personalization of a user interface;
 - Providing End User support; and
 - Generating aggregated anonymized usage statistics for service development and /or for other purposes agreed in writing from time to time with the Home Organization;
- d. **[Deviating purposes]** not to process the Attributes of the End User for any other purposes (e.g. selling the Attributes or selling the personalization such as search history, commercial communications, profiling). Members that wish to use Attributes supplied to their Service Providers in other ways MUST arrange this either by obtaining positive informed consent from each individual End User, or by contract with the Home Organizations, who are then responsible for informing their End Users;
- e. **[Data retention]** to delete or anonymize all Attributes as soon as they are no longer necessary for the purposes of providing the service;
- f. **[Third parties]** not to transfer Attributes to any third party (such as a collaboration partner) except
 - if mandated by the Member for enabling access to its service on its behalf, or
 - if prior consent has been given by the End User;
- g. **[Security measures]** to take appropriate technical and organizational measures to safeguard Attributes against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. These measures shall ensure a level of security appropriate to the risks represented by the processing and the nature of the data to be protected, having regard to the state of the art and the cost of their implementation.

5. Amendment

The Federation Operator has the right to amend the Data Protection Profile from time to time. Any such amendments need to be approved by the HKAF Steering Committee and shall be communicated to all Federation Members with reasonable advance notice.

The amended Data Protection Profile will become binding upon the Federation Members at the time provided in the amendment. The Federation Members MUST follow the latest set of attribute processing principles for their Service Providers within the timeframe specified by the Federation Operator. The latest version of the Data Protection Profile is made available on the HKAF website at <https://www.hkaf.edu.hk/data-protection-profile>.