

STAR II

SUPPORT SMALL AND MEDIUM ENTERPRISES ON THE DATA PROTECTION REFORM II

Report of the validation workshop

Deliverables D3.4 & 4.2 (merged)

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1 Background to the STAR II project

The EU data protection reform, largely comprised of the General Data Protection Regulation (GDPR), was only concluded in April 2016, and the GDPR became applicable across the EU on 25 May 2018. This has left a short period of time for especially small and medium enterprises (SMEs) to adapt to the new regulatory environment. The novelties it brings to the fore, such as specific provisions concerning SMEs [e.g. recitals 13, 132; Art 30(5)], data protection by design (Art 25) and data protection impact assessment (DPIA; Art 35), only add to this complication.

SMEs often need external assistance to understand the gravity of the new Regulation; they need guidance on how to follow their respective Member State national legislation giving full effect to the GDPR; they need to adapt their routine practices; they need to acquire information, solve new or hitherto unnoticed issues and follow trainings on the new legislation; they often need to create and execute an action plan to apply the new framework. In addition, a considerable number of SMEs will need to appoint a data protection officer (DPO), who should immediately become the locus of knowledge and expertise on the GDPR and assist them in the implementation of the new regulatory framework requirements.

There are pressing needs to assist EU data protection authorities (DPAs) in raising awareness among businesses, especially SMEs, on the new EU legal framework for personal data protection, particularly the GDPR, and assist these SMEs in ensuring compliance therewith. Some 22 million European SMEs – the core of EU enterprise policy – not only face distinctive challenges from data protection law, but also – despite specific, often protective regulation – rarely can afford professional legal advice. Thus they merit special support from public authorities.

The STAR II results will be prepared in consultation with stakeholders (especially via validation workshops and the External Advisory Board) and widely disseminated. The outputs will be freely available, openly accessible and copyright-unrestricted, thus easily reusable and adaptable. STAR II is addressed to 40+ EU DPAs and millions of EU SMEs. It will deliver tangible and long-term results to SMEs, directly assisting them in compliance with the GDPR (by hotline and guidance material) and – indirectly – to DPAs, to assist in their awareness-raising mission.

2 Executive summary

This document presents a summary of feedback provided during the validation workshop, entitled "**Making the General Data Protection Regulation simple for Small and Medium-sized enterprises - STAR II presents the Guidance for DPAs on good practices to run hotlines for SMEs and the Handbook on European data protection law for SMEs**" held on September 3, 2020.

Due to the ongoing pandemic, the workshop took place online.

The event was organised in partnership with the Brussels Privacy Hub, an academic privacy research centre within the Vrije Universiteit Brussel (Free University of Brussels or VUB).

The intent of the validation workshop was to engage relevant key stakeholders who in their professional capacity had been involved in various initiatives addressed to SMEs.

The main objective of the workshop was to receive feedback on two documents prepared within the scope of workpackage 4:

- The guidance for DPAs on how to run hotlines for SMEs and
- The Handbook on EU data protection law for SMEs.

Participants included representatives of DPAs, SME Associations, law firms, consultancies and academia. Moderators of two sessions led participants through a series of questions regarding the content of both documents in order to obtain feedback.

3 Overview

In order to ensure quality of STAR II reports several validation workshops have been foreseen. The main purpose of these workshops has been to review and evaluate project findings. The consortium engaged the External Advisory Board members in these workshops as well as other relevant key stakeholders, such as representatives of Data Protection Authorities, SME associations, and SME owners.

Initially, four workshops have been planned during STAR II:

- Workshop 1 in Dublin in Month 7 (February 2019) -> deliverable D2.3,
- Workshop 2 in Brussels in Month 21 (April 2020) -> deliverable D3.4,
- Workshop 3 in Dublin in Month 17 (December 2019) -> deliverable D4.2,
- Workshop 4 in Budapest in Month 23 (June 2020) -> deliverable D4.4.

The Consortium discussed that Workshop 2 and Workshop 3 (and consequently D3.4 and D4.2) could be joined and instead of two workshops and deliverables only one workshop would be organized (in Brussels) and one deliverable would be submitted in the period between December 2019 and April 2020. The reason for that was that WP3 (*Hotline & awareness-raising campaign for SMEs*) and WP4 (*Guidance for DPAs & handbook for SMEs*) are closely related and by joining two workshops financial resources could have been released and travel costs available for the Partners could have been optimized. This arrangement should have allowed to cover travel expenses of the External Advisory Board (EAB) members.

After the Kick off Meeting the Co-ordinator contacted the temporary Project Officer (PO) through the Participant Portal (PP) and asked her whether it is possible to join the two workshops and whether the travel (and maybe the accommodation) costs of the members of the EAB could be financed from project-money. On 12 September 2018 the PO confirmed that it is possible to merge the two workshops.

3.1 Contingency plan due to Covid-19

The validation workshop aimed to gather feedback on both the Guidance for DPAs on how to run hotlines for SMEs and on the Handbook on EU data protection law for SMEs. It was scheduled for 22 April 2020. It was envisioned as a full day in person event (see Annex I, Initial agenda). Unfortunately, due to the Coronavirus (COVID-19) outbreak, the workshop was cancelled.

Since at that time it was not possible to anticipate the length and impact of the global health crisis, to gather a preliminary feedback on the draft Guidance and Handbook, the STAR II Consortium consulted various stakeholders for feedback by email.

In May 2020, the partner NAIH invited counterparts of DPAs across the European Union to provide feedback on the Guidance and on the Handbook. In the meantime, the partner VUB consulted the External Advisory Board members to obtain feedback on the Handbook.

The Consortium gathered feedback from DPA representatives from Romania, the Czech Republic, Belgium, Latvia and United Kingdom. Two members of the External Advisory Board shared their views as well.

Overall, the stakeholders consulted expressed appreciation concerning the Guidance and the Handbook. For the Guidance, it was suggested to include in the document examples of questions and answers provided via the hotline.

For the Handbook, it was recommended to simplify the theoretical part and to include more examples and practical advice.

The feedback gathered through the written procedure allowed the consortium to further advance the Guidance and the Handbook during the summer months.

In the meantime, the Consortium decided to reschedule the workshop for early September.

In view of risks associated with travelling and in person indoor meetings, the Consortium opted for organising the workshop online.

A revised, yet not final, version of the Guidance and of the Handbook, incorporating the feedback gathered through the written consultation, was published on the Brussels Privacy Hub's event webpage before the workshop.¹

3.2 Objectives of the workshop

The main objective of the workshop was to receive feedback from relevant stakeholders on two documents foreseen in WP4:

The guidance for DPAs on how to run a hotline for SMEs

The guidance for DPAs on good practices in raising awareness, especially of SMEs about GDPR issues, was prepared on the basis of the NAIH's experience. NAIH ran an e-mail hotline service dedicated to SMEs during the period of March 2019 and March 2020. Based on this experience, the guidance puts forward a step by step explanation on how to set up and manage an e-mail hotline. It pays a special attention to the required infrastructure and resources required. It also discusses issues related to the engaged personnel, internal policies, legal implications, evaluation and monitoring and ethical considerations.

The Handbook on EU data protection law for SMEs.

The Handbook addresses topics that emerged during STAR II interviews with representatives of 18 DPAs, 22 SME association and 11 SMEs. Some observations about the topics that should be included in the Handbook were extracted from a further 52-60 SME responses to an online survey. Further substantive input was provided by the NAIH's hotline dedicated to SMEs, which took in real-world queries concerning GDPR compliance.

The Consortium, in particular, welcomed feedback from the representatives of DPAs and SMEs associations, with a view to their validation of output produced by the consortium.

Obtaining feedback from SMEs and attracting them to the online workshop proved to be difficult in previous phases of the project. The reasons for this mirror the situation for regulators in this sector. Based upon the research findings from WP2, data protection is simply not on the radar of the majority of SMEs, and many are not yet at a position where they intend to engage with sources of support on GDPR compliance. Those that are aware of GDPR obligations still lack capacity, and the ability to dedicate time to investigating these matters further, little more to provide feedback to researchers. Only a few SME representatives agreed to be interviewed. Additionally, the SME sector is not an experienced consumer of research outputs. In this manner, the STAR II project takes on-board the advice that it gives to DPAs of trying to reach and understand SMEs through their chosen intermediaries such as SME associations, chambers of commerce, and sectoral representative bodies.²

In order to overcome this difficulty and to involve a diverse and broad audience, the Consortium organised the validation workshop in partnership with the Brussels Privacy Hub, which has a wealth of experience in organising and promoting events to the data protection community.

The Brussels Privacy Hub is an academic privacy research centre with a global focus. As an entity of the Vrije Universiteit Brussel (Free University of Brussels or VUB), it uses its location in Brussels, the capital of Europe, to engage EU policymakers, data protection regulators, the private

¹ <https://brusselsprivacyhub.eu/events/03092020.html>

² Cochrane, L., Jasmontaite-Zaniewicz, L., & Barnard-Wills, D. Data Protection Authorities and their Awareness-raising Duties under the GDPR: The Case for Engaging Umbrella Organisations to Disseminate Guidance for Small and Medium-size Enterprises
European Data Protection Law Review, Volume 6, Issue 3, 2020, pp. 352 - 364

sector, and NGOs, and to produce innovative, cutting-edge research on important questions of data protection and privacy law and policy.³

The event was disseminated via the Brussels Privacy Hub website,⁴ twitter account,⁵ LinkedIn page,⁶ and mailing list, that counts over 3.000 subscribers. The event was also promoted through Trilateral Research's data protection newsletter, social media and further disseminated through the various SME associations and industry bodies the project contacted and interviewed in WP2 who then advertised the event to their membership networks.

Consortium partners and speakers were invited to further disseminate the event among their network.

Based on the feedback received during the online workshop, adjustments and edits were made in the two documents.

3.3 Adjustments made for the online workshop

Based on the experience of other online events, the Consortium decided to revise and adjust the programme of the event for the online setting. The length of the event was cut down and the original program adapted to the new format. The draft guidance was circulated to participants in advance. The workshop commenced at 12.00 and went on until 14.30 Brussels time. It consisted of three parts:

- 1) A keynote speech about awareness-raising duties under the GDPR.

The keynote speech was given by Hielke Hijmans (Chairperson of the Litigation chamber and member of the Board of Directors of the Belgian DPA).

- 2) A first panel aimed at discussing the Guidance for DPAs.

Renáta Nagy (NAIH) briefly presented the Guidance. After that, the discussants Jelena Burnik (Slovenian DPA), Basile Guley (French DPA) and Luc Hendrickx (SMEUnited), expressed their views on the document, provided suggestions and shared their experiences. Then, the Q&A with the audience was opened. Leanne Cochrane (TRI) moderated the panel.

- 3) A second panel aimed at discussing the Handbook for SMEs.

Alessandra Calvi (VUB, LSTS) briefly presented the Handbook. After that, the discussants Annika Linck (European DIGITAL SME Alliance), Jasmina Trajkovski (TP Consulting) and Pavlina Peneva (Belgian DPA, BOOST project) provided feedback and recommendations. Then, the Q&A with the audience was opened. David Barnard-Wills (TRI) moderated the panel.

Finally, Prof. Paul De Hert (VUB, LSTS) gave concluding remarks.

3.4 Date and platform

As mentioned above, the validation workshop was to take place on April 22 but it was postponed due to the global health crisis.

To boost attendance and ensure the participation of the invited speakers, the consortium deemed appropriate to wait until the end of the summer holiday period to schedule the new event.

The timeframe was chosen to ensure participation of audience coming from different time zones.

Scheduling the event on 3 September allowed STARII consortium to implement the feedback on the Guidance and Handbook received via the written consultation. Prior to the event, the organisers shared revised versions of the two documents.

³ <https://brusselsprivacyhub.eu/home-2/about.html>

⁴ <https://brusselsprivacyhub.eu/events/03092020.html>

⁵ https://twitter.com/privacyhub_bru

⁶ <https://www.linkedin.com/company/brussels-privacy-hub/?viewAsMember=true>

Jit.si was chosen as platform for the event because it can accommodate up to 75 participants. It is free of charge; the layout is intuitive for both speakers and participants; it enables the audience to interact with the speakers; and it does not require any registration or creation of account to be used.

3.5 Participants

The workshop was open to the public, but registration was required.

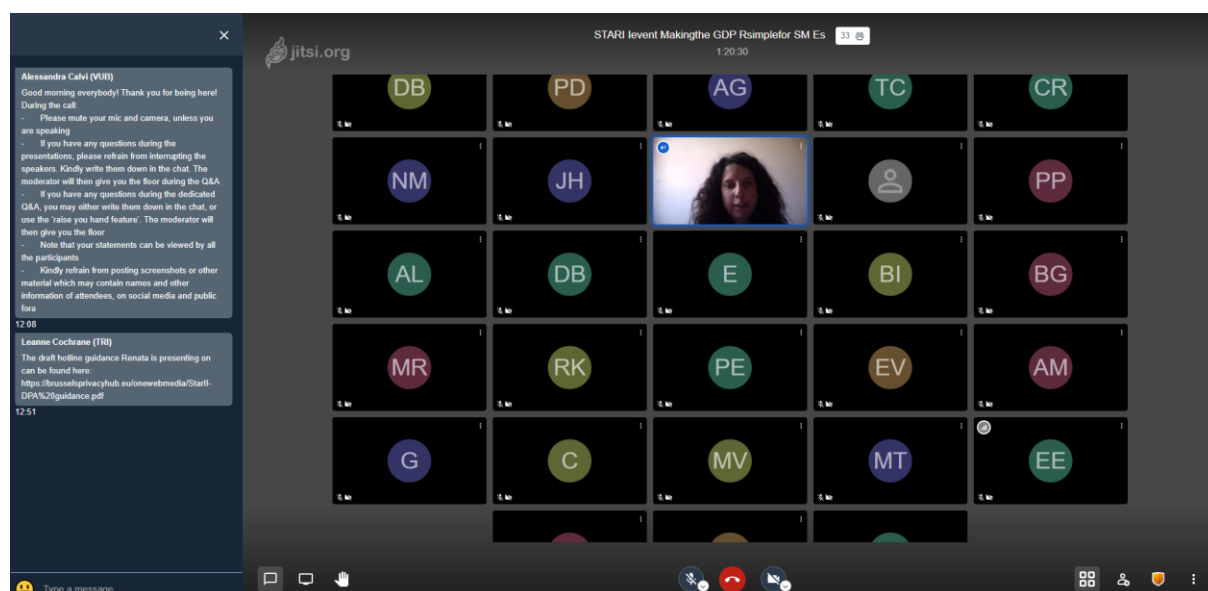
Recognising the special focus of this workshop, the Consortium proactively sought to obtain contributions from representatives of DPAs and SME associations.

To ensure a meaningful participation of the audience, the registration cap was fixed to 50 people. 48 people registered for the event.

During the workshop the number of participants ranged between 30-35.

Participants included representatives of DPAs, SME Associations, law firms, consultancies and academia.

Figure 1 A screenshot of Jitsi platform



3.6 Agenda

The detailed agenda was prepared by VUB in consultation with the Consortium partners. Mainstreaming gender equality and ensuring diversity of backgrounds among the speakers were priorities for the Consortium. Consequently, the majority of speakers were women. Taking into account the online format, we strived to ensure geographical and professional diversity of the panelists (See Annex II).

To promote synergies with other EU projects, a speaker involved in project BOOST⁷ was invited.

⁷ <https://www.law.kuleuven.be/citip/en/research/projects/ongoing/boost>

4 Feedback

4.1 Project concept

The speakers reflected on the importance of the cooperation between academics and practitioners for a better understanding of EU data protection law and enhancing compliance with the GDPR. They recognized that there is a pressing need for projects, like STAR II, that would focus on raising awareness about data processing obligations for SMEs, and that would further explore the role that DPAs could play in this regard.

Considering that SMEs represent the vast majority of all businesses in the EU, supporting them in their compliance journey with the GDPR is essential not just for the economy, but for the society as a whole. Citizens remain entitled to full protection of personal data even when their data is processed by very small organisations.

While there is no doubt as to whether the GDPR applies to SMEs when processing personal data, GDPR provisions do not take into consideration the SME perspective. Certainly, SMEs do not form a homogenous group. For many of them personal data processing is an auxiliary activity; they face structural barriers (e.g. lack of human and financial resources) to attain compliance with the GDPR.

The speakers recognized valuable findings of STAR II interviews with SME representatives that demonstrate that being aware of GDPR obligations does not equate to full comprehension of their content. The issue of the lack of awareness about the requirements concerning personal data processing has become even more prominent in the ongoing health crisis. Following up on the governments' recommendations, small businesses (e.g. cafes, beauty and barber shops) have been obliged to keep records of their customers to facilitate track and trace initiatives. Typically, no training was offered to such enterprises.

The speakers repeatedly stressed that in the future codes of conduct and certification could be particularly valuable tools for SMEs. No such tools have been approved by EU DPAs. However, several initiatives have been developed.

4.2 Guidance for DPAs

During the session devoted to the guidance for DPAs on how to run a hotline for SMEs, representatives of DPAs and SME associations shared the following comments.

While it is important to develop a knowledge base at the time of setting up the hotline, it is the continuous improvement of such knowledge base that is essential for providing high quality and timely hotline services. Based on their experience, speakers agreed with the recommendation to keep records of each request to facilitate this process.

It was pointed out that the Guidance was well structured, consistent and that its language was accessible for DPA representatives. In particular, it was highlighted that this document could be useful for new DPA employees. In the aftermath of GDPR, there is a high turnover of employees at DPAs and their quick training is crucial.

It was suggested that the guidance could emphasise the need to build interpersonal communication skills of the staff working in hotlines. Having these skills would allow DPA personnel handling enquiries to respond to them in a way that would be easy to understand for individuals that are not acquainted with legal terminology. Interpersonal communication skills include empathy and active listening to make communication more pleasant and effective. It was reported that one of the DPAs organised an internal training on such interpersonal communication skills.

Some of the participants agreed that the guidance rightly highlights the connection of the platform with other means of communication, such as websites on GDPR compliance devoted to SMEs, and

face-to-face meetings with organisations and professional networks that could represent different SMEs realities. DPAs should use multiple mediums because it is important that they reach out to different kinds of audience.

NAIH's approach on having a hotline dedicated to SMEs was considered to be a welcome initiative by the representative of an SME association.

Finally, it was suggested that the guidance should emphasise the need for DPAs to develop tools that could facilitate GDPR compliance and could be shared with SMEs (e.g. templates for data protection impact assessment reports, privacy notices, and data processing contracts). Where DPAs develop knowledge bases for operating hotlines or answering queries it can be useful to also make these available to the public, to allow them to self-service access to more advice and guidance.

It was also suggested that DPAs could collaborate more closely with organisations representing SME interests as this could improve DPAs' understanding of most pressing needs of small businesses and the contexts in which they operate. One area for this collaboration could be certification and codes of conduct - whilst certification can be challenging for SMEs, codes of conduct for particular sectors were seen as quite promising. While DPAs can support these efforts, the drive for this must come from the business themselves.

In many cases, DPAs receive questions from the public that are not actually about data protection (for example, consumer protection, employment law), suggesting that it would be a good idea to build relationships between DPAs and other public institutions with legitimacy in those areas, so as to point questioners in the correct direction for support.

4.3 Handbook on EU data protection law

During the session devoted to the Handbook, participants shared the following comments.

The Handbook can be useful for SMEs that seek to comply with GDPR obligations. It takes an important multi-sector approach and while doing so, it addresses the most important GDPR provisions that concern SMEs.

The layout of the Handbook and the distinction between the theoretical and practical parts were deemed to be appropriate and user-friendly.

The content was considered exhaustive enough. The added value of this Handbook is its attempt to combine theoretical and practical aspects. Such mix can facilitate a better understanding of the GDPR provisions.

Participants welcomed sections with tips and practical examples as they allow SMEs to realise that the GDPR apply to them too. Also, participants welcomed additional references to DPA guidance documents and academic sources. Having an easy access to such resources can allow SMEs to advance their knowledge to the extent they choose to do so.

The participants agreed that while the risk-based approach is not a novelty, its definition in the GDPR remains vague. This notion favours big business and it is tricky for SMEs to assess it. However, risk-based approaches do offer some scope for appropriate scaling of data protection activities for SMEs primarily engaged in low-risk processing.

It was suggested the Consortium in the final version of the Handbook emphasizes that national peculiarities about the GDPR implementation remain. For example, the age of children's consent and the data processing employment context are the topics that should be addressed.

The DPIA section was particularly appreciated, as suitable to guide SMEs step-by-step in performing an impact assessment process.

Also, it was proposed that the Handbook should explicitly state that in certain sectors the risk of data processing operations is higher. Examples in this regard would include app-developers, data brokers and the medical sector.

Many SMEs make use of platforms such as Facebook to engage their customers, and the data processing roles and responsibilities can be quite unclear. Understanding and clarifying the respective roles of controllers and processors is vital for SMEs, who can be in both roles in different contexts.

It was recommended that the Handbook is translated in all languages of the Member States. However, it was noted that similar initiatives and guidance have already been published in Danish, Dutch, French, Icelandic, Latvian, Lithuanian, and Slovenian.

5 Concluding remarks

Following up on a very constructive feedback concerning the Guidance and the Handbook received at the validation workshop, the Consortium revised the two documents.

The Guidance has been enriched with practical examples of the questions and answers received by NAIH in the hotline. The need to consider the knowledge base as a living instrument and to keep track of the questions and replies was further emphasised, as well as the importance of using different means of communication to reach out to SMEs.

The Consortium also has revised the Handbook. It now includes more references to national peculiarities, such as issues concerning children's consent and the processing of personal data in the employment context. The Handbook lists the sectors considered highly-risky from a data protection perspective.

Due to limited funding, the Consortium cannot translate the document in all the languages of the European Union. Nevertheless, to ensure the widest dissemination of this Handbook, the Consortium negotiated with the contracted publisher a license allowing the translation of the book in several languages. NAIH has been responsible for translating the Handbook into Hungarian and for the publishing of the Hungarian-language version.

6 Annexes

6.1 Initial agenda

22 April 2020

Brussels

**DPAs' awareness raising campaigns for SMEs:
A challenge of facilitating GDPR compliance**

09:30 – 10:00

Reception

10.00 – 10:05 **Opening word and recap of STAR II**

10:05 – 10:25 **DPA awareness raising duties under the GDPR**

10:25 – 11:15 **Available DPA guidance for SMEs: Country studies**

11:15 – 11:25

Coffee break

11:25 – 11:45 **Introduction of STAR II handbook**

11:45 – 12:30 **Work in groups: How useful is the STARII handbook?**

12:30 – 13:00 **Feedback on STAR II handbook**

Interactive session with the audience (with sections of the handbook); possibly facilitated by EAB members

13:00 – 14.15

Lunch

Part II – Awareness raising practices by DPAs

14.15 – 14.35 **DPAs practices concerning hotlines**

14:35 – 15:00 **How to run a hotline for SMEs?**

15.00 – 15:15 **Q&A**

15:15 – 15:25

Coffee break

15:25 – 16.15 **Emerging best practices for raising data protection awareness among DPAs**

16:15 – 16:30 **Closing remarks**

6.2 Final agenda

Making the General Data Protection Regulation simple for Small and Medium-sized Enterprises:

STAR II presents the Guidance for DPAs on good practices to run hotlines for SMEs and the Handbook on European data protection law for SMEs

Online Workshop, 3 September 2020

On 3 September 2020, the STAR II consortium – composed of the Hungarian National Authority for Data Protection and Freedom of Information (NAIH), Trilateral Research (TRI) and the Vrije Universiteit Brussel (VUB) –, in collaboration with the Brussels Privacy Hub, will present and discuss the (draft) *Guidance for DPAs on good practices to run hotlines for SMEs* and the (draft) *Handbook on European data protection law for SMEs*.

The General Data Protection Regulation (GDPR) was expected to boost the European (digital) economy by more uniformly regulating the free movement of personal data within the European Economic Area and by increasing consumer trust in (online) services. Yet, compliance with the Regulation is still problematic for most Small and Medium Enterprises (SMEs), which represent the vast majority of all businesses in the EU. Albeit the European legislators acknowledged that SMEs deserve special attention and support from Data Protection Authorities (DPAs), small entrepreneurs still have to cope with several challenges, including misinformation about the GDPR requirements; scarcity of practical, easy to understand and targeted guidance about data protection law; uncertainty about the interpretation of certain provisions of the law; lack of internal data protection expertise and resources to invest thereto.

In this context, the STAR II consortium has undertaken research activities to examine, on the one hand, DPAs' awareness-raising efforts concerning the GDPR compliance for SMEs; on the other hand, the SMEs' experience with the GDPR.

Based on the outcomes of NAIH's hotline for SMEs and interviews conducted with 18 DPAs, 22 SME association representatives, over 50 respondents to the online survey and 11 face to face interviews with SME representatives, the STAR II consortium prepared two documents to assist both DPAs and SMEs in their respective obligations:

- ***Guidance for DPAs on good practices to run hotlines for SMEs***, containing recommendations to DPAs on how to set up and run a hotline.
- ***Handbook on European data protection law for SMEs***, built upon the questions that SMEs most frequently asked via the hotline and the responses given therein.

This workshop is aimed at presenting and seeking feedback on the two documents. Our event will be highly interactive, and we will provide participants and speakers with the opportunity to exchange and to voice their thoughts on the Guidance and the Handbook.

The feedback gathered will help STAR II consortium to further advance the draft Guidance and Handbook.

Targeted audience: DPAs, SME Associations, SME owners and employees, (perspective) entrepreneurs, DPOs in SMEs, legal practitioners in SMEs

Place: The event will be held online. The teleconference platform, together with the link to join the event, will be communicated to the registered participants via email in due time.

Time: 12.00 – 14.30 (Brussels time)

Agenda

Time	Title	Speakers
12:00 – 12:15	Welcome & recap of STAR II	Renáta Nagy, NAIH
12:15 – 12:30	Keynote on DPA awareness-raising duties under GDPR	Hielke Hijmans, APD-GBA
Part I - Guidance for DPAs on good practices to run hotlines for SMEs		
12:30 – 13:30	Discussing the “Guidance for DPAs on good practices to run hotlines for SMEs”	<p>Moderator: Dr Leanne Cochrane, TRI</p> <p>Presenter: Ms Renáta Nagy, NAIH</p> <p>Discussants</p> <p>Mr Basile Guley, CNIL</p> <p>Ms Stéphanie Mathieu, CNPD</p> <p>Ms Jelena Burnik, IP-RS</p> <p>Mr Luc Hendrickx, SMEUnited</p>
Part II - Handbook on European data protection law for SMEs		
13:30 – 14:20	Discussing the “Handbook on European data protection law for SMEs”	<p>Moderator: Dr David Barnard-Wills, TRI</p> <p>Presenter: Ms Alessandra Calvi, VUB</p> <p>Discussants</p> <p>Ms Annika Linck, European DIGITAL SME Alliance</p> <p>Ms Jasmina Trajkovski, TP Consulting</p> <p>Ms Pavlina Peneva, APD-GBA, BOOST project</p>
14:20 – 14:30	Concluding remarks	Paul De Hert, VUB