

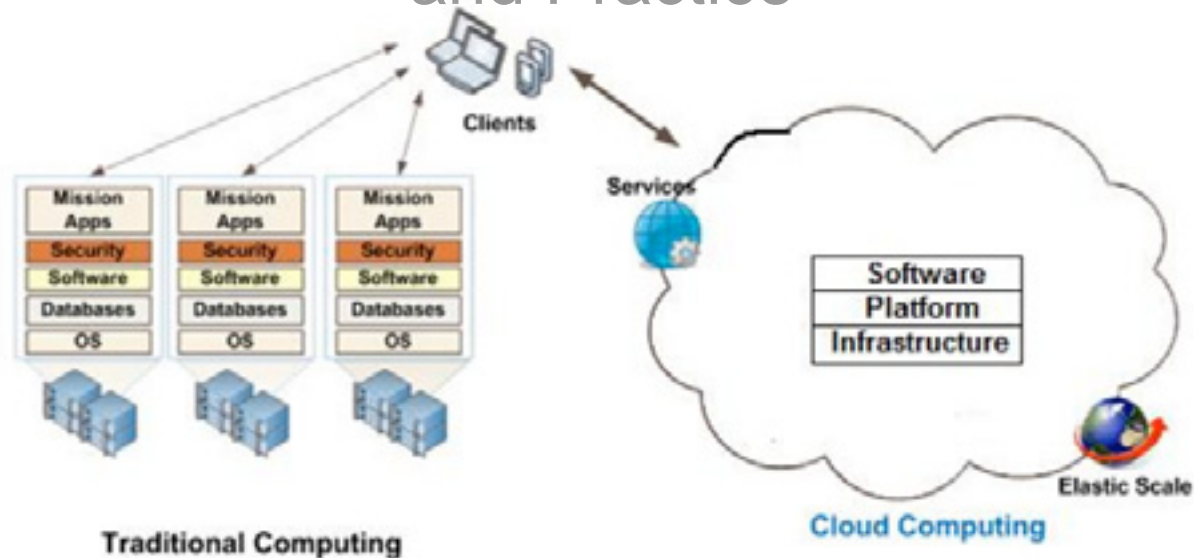


vrije Universiteit amsterdam



Privacy Regulations for Cloud Computing

Compliance and Implementation in Theory and Practice



Situation

- Webshop through Amazon AWS
- Data located in the US-East region

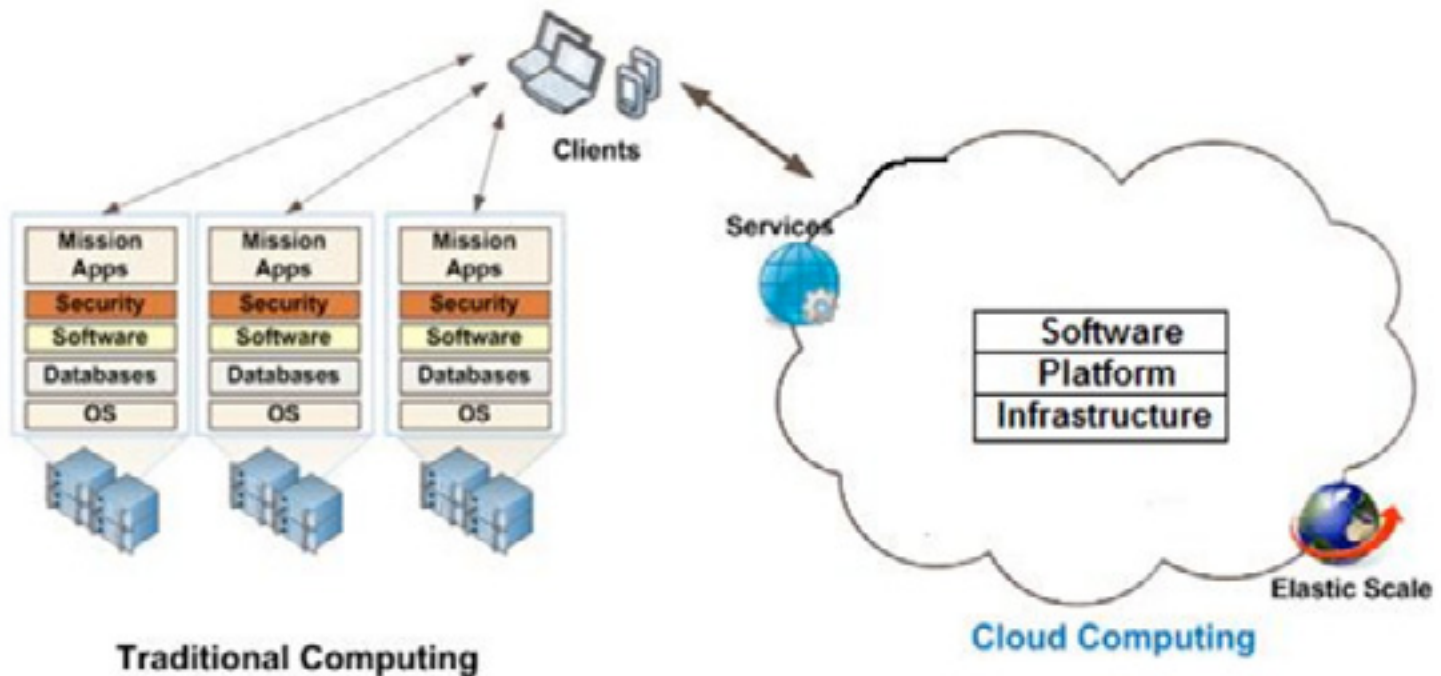


- Which privacy regulations apply?

Agenda

- Cloud Computing
- Privacy & Regulations
- The CSP & Privacy
- Privacy Regulations in Theory & Practice
- Conclusion

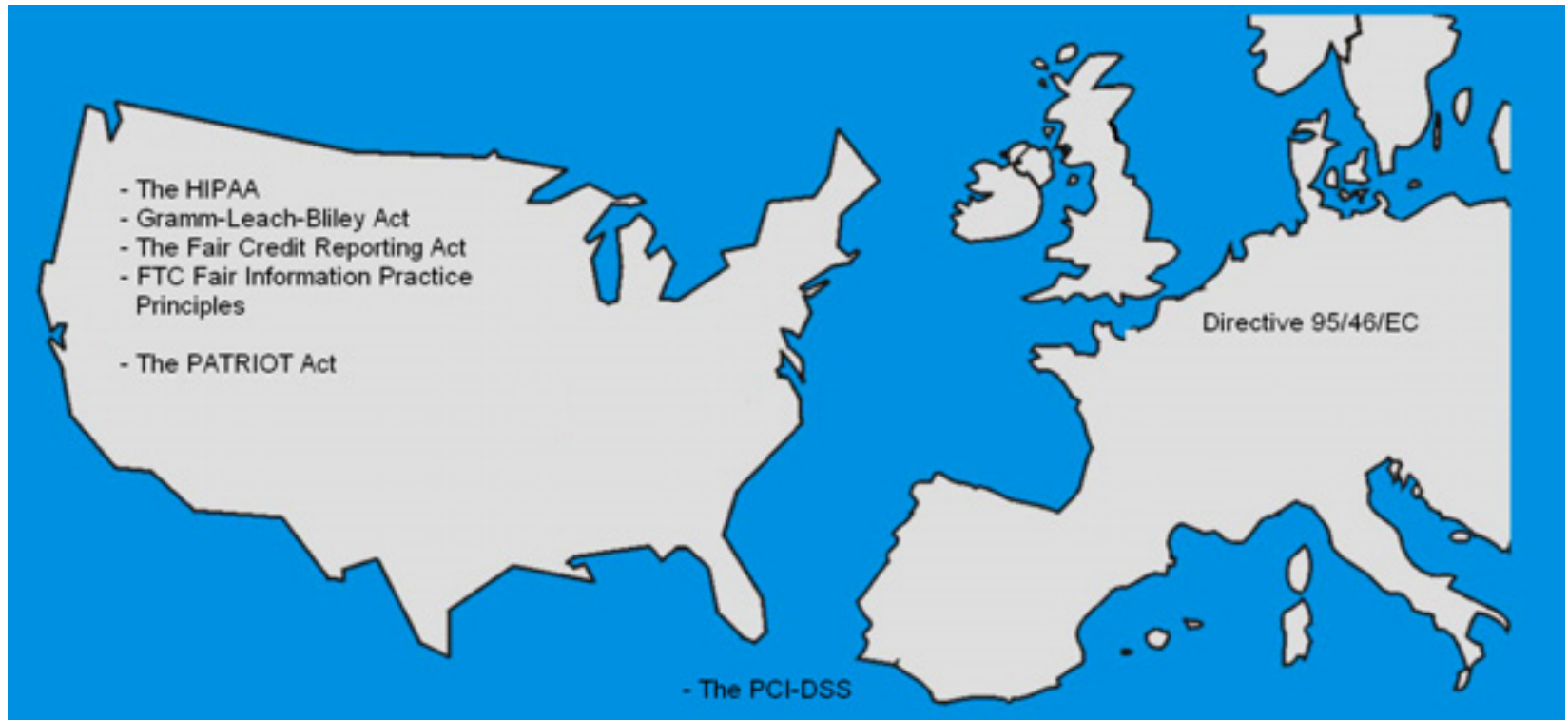
Cloud Computing



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Privacy & Regulations



Privacy & Regulations – ctd.

	FTC Fair Information Practice Principles	Directive 95/46/EC	The HIPAA	The Gramm-Leach-Bliley Act	The Fair Credit Reporting Act	P C I - DSS
Notice	√	√	√	√	√	
Choice/Consent	√	√	√	√	√	
Access	√	√	√		√	
Integrity	√	√	√	√	√	√
Security	√	√	√	√		√
Enforcement	√	√	√	√	√	√

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The CSP & Privacy

- Consequences of local legislation on data location?
- Liability in case of breach?
- Governmental access

The CSP & Privacy – ctd.

- Uncertainty surrounding legal terminology
 - CSP is not specifically mentioned
 - Subcontractor/Business Associate?
- Choice/Consent → Secondary uses
- Certified compliance: Safe Harbor/PCI-DSS Audits

Agenda

- Cloud Computing
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- **Privacy Regulations in Theory & Practice**
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Privacy Regulations in Theory & Practice

- Information security in Cloud Computing consists of established technology
- Data storage, transmission and processing depends on Cloud type and type of service
- Impact of privacy regulations more dramatic in external Cloud Computing
- Many uncertainties in Cloud Computing and Privacy Regulations

Privacy Regulations in Theory & Practice – ctd.

- Security is seen as a major issue in adaptation of Cloud Computing; compliance is not →
- Looks like organizations are not aware of privacy issues in Cloud Computing

Agenda

- Cloud Computing
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- The CSP & Privacy
- Privacy Regulations in Theory & Practice
- **Conclusion**

Conclusion

- Many uncertainties
- Future work needed