

Ruoli e Responsabilità nelle Cloud Private

GIUSEPPE ATTARDI

Dipartimento CSD, Consortium GARR

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Workshop GARR 2018

Google Cloud Platform

- When using a processor like Google Cloud, complying with the GDPR will be a **collaborative effort**. Partner with Google Cloud and we will support your efforts by:
 - Committing in our contracts to **comply with the GDPR** in relation to **our processing of customer data** in all Google Cloud Platform
 - Offering **additional security features** that may help you to better protect your most sensitive personal data
 - Giving you what's needed to perform a meaningful **privacy assessment of our services** with documentation and reporting requirements Continuing to evolve our capabilities as the regulatory landscape changes

Sicurezza e Fiducia

- Sicurezza dell'infrastruttura
 - Sicurezza fisica
 - Sicurezza di rete
 - Sicurezza dei servizi
- Trasparenza
 - Fornire dettagli su:
 - Infrastruttura
 - Operatività
- Privacy
 - Chiarezza sul trattamento dei dati



GARR è un Data Processor

GDPR Article 4:

Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

- A Data processors need to assist controllers in various circumstances where relevant, for example in a potential [personal data breach notification](#) or in considering a [Data Protection Impact Assessment](#)
- The controller calls the shots on how and why personal data are used, as long as this of course happens in a GDPR compliant way.
- Both controllers and processors have their duties with regards to customers, supervisory authorities and more in the scope of the GDPR.

Compliance GDPR della Piattaforma Cloud GARR

Tre fronti:

- Trasparenza
 - Pubblicata la politica di privacy: <https://cloud.garr.it/terms/privacy/>
 - Modalità di funzionamento: Appendix 1 a Data Processing Agreement: <https://cloud.garr.it/terms/data-processing-agreement/>
- Impegni del GARR:
 - Nuovi Terms of Service:
 - Istruzioni al personale per il trattamento dei dati personali
- Responsabilità come Data Processor:
 - Data Processing Agreement



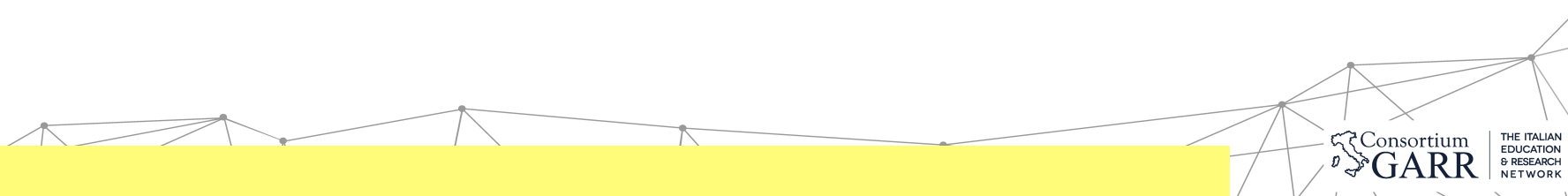
Politica della Privacy

Gli unici dati personali che la Cloud Platform raccoglie direttamente, forniti dagli utenti, o dal loro Identity Provider, sono:

- nome, e-mail, affiliazione
- log di accesso (cancellati dopo 6 mesi)

sono utilizzati esclusivamente per erogare il servizio o per comunicazioni di servizio

non sono in nessun modo divulgati a terzi



Responsabilità come Data Processor: Ruoli

- *2.2 Role of the Parties.* **User is the Controller** of Personal Data and **GARR** shall process Personal Data only as a **Processor on behalf of User**. Nothing in the Agreement or this DPA shall prevent GARR from using or sharing any data that GARR would otherwise collect and process independently of User's use of the Services.



Responsabilità come Data Processor: Obblighi dell'Utente

- *2.3 User Obligations.* **User agrees** that (i) it shall **comply with its obligations as a Controller** under Data Protection Laws in respect of its processing of Personal Data and any processing instructions it issues to GARR; and (ii) **it has provided notice** and obtained (or shall obtain) **all consents and rights necessary under Data Protection Laws for GARR to process Personal Data** and provide the Services pursuant to the Agreement and this DPA.

L'utente è responsabile del trattamento dei dati di terzi che effettua tramite la Cloud Platform

Responsabilità come Data Processor

- *GARR Processing of Personal Data.* As a Processor, GARR shall process Personal Data only for the following purposes: (i) processing to perform the Services in accordance with the Agreement; (ii) processing to perform any steps necessary for the performance of the Agreement; and (iii) to comply with other reasonable instructions provided by User to the extent they are consistent with the terms of this Agreement and only in accordance with Use's documented lawful instructions. ...



Annex 1

- Data Center Security
- Networking
- Access Control
- Data Preservation and Destruction
- Personnel Security



Data Processing Activities

- *2.5 Nature of the Data.* GARR handles User Data provided by User. Such User Data may contain special categories of data depending on how the Services are used by User. The User Data may be subject to the following process activities: (i) storage and other processing necessary to provide, maintain and improve the Services provided to User; (ii) to provide User and technical support to User; and (iii) disclosures as required by law or otherwise set forth in the Agreement.



Google Cloud Security Command Center

- Cloud Security Command Center, provides a dashboard that allows one to:
 - view and monitor an inventory of one's cloud assets
 - scan storage systems for sensitive data
 - detect common web vulnerabilities
 - review access rights to one's critical resources.
- Cloud Security Command Center integrates security tools like:
 - [Cloud Security Scanner](#)
 - [Cloud Data Loss Prevention \(DLP\) API](#)
 - third-party security solutions from Cloudflare, CrowdStrike, Dome9, Palo Alto Networks, Qualys, and RedLock.

Collaborative Effort in GARR

- Dato che siamo una comunità, possiamo sperare di coinvolgerla?
- GARR è disponibile ad accogliere proposte di:
 - Costruire una suite di strumenti (OpenSource) di analisi di sicurezza
 - Partecipare a indagini di vulnerabilità
Ringrazio Francesco Palmieri di Napoli che già lo sta facendo
 - Organizzare hackaton per coinvolgere studenti
Leonardo Mariani organizza un hackaton a Milano Bicocca il 25-26/6
 - Utilizzo di Machine Learning in Intrusion Detection Algorithm
Mettiamo a disposizione la Container Platform for AI

Conclusioni

- Il GARR mette il suo impegno per un servizio di alta qualità
- Invito alla comunità ad aiutarci a migliorarlo. Intervenite su:

<https://cloud.garr.it/community/>

