Privacy by Design for Local Energy Communities

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GDPR

The new European privacy legislation *GDPR* **requires** *Privacy by Design*.

Neglecting Privacy by Design makes GDPR compliance expensive and time-consuming.

But how do you **apply** Privacy by Design to a **Local Energy Community**?

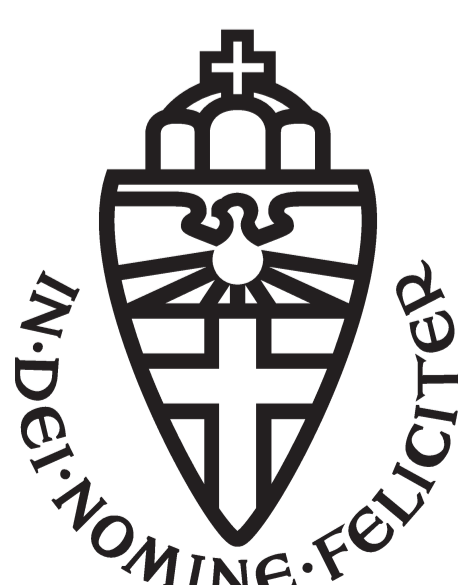## GridFlex Heeten

Local Energy Community in NL

GridFlex Lessons for PbD:

- All parties in the project need to participate.
- Developer engagement is important.
- Pseudonymization is not anonymization!
- Copper is a Privacy Enhancing Technology.

pi.lab
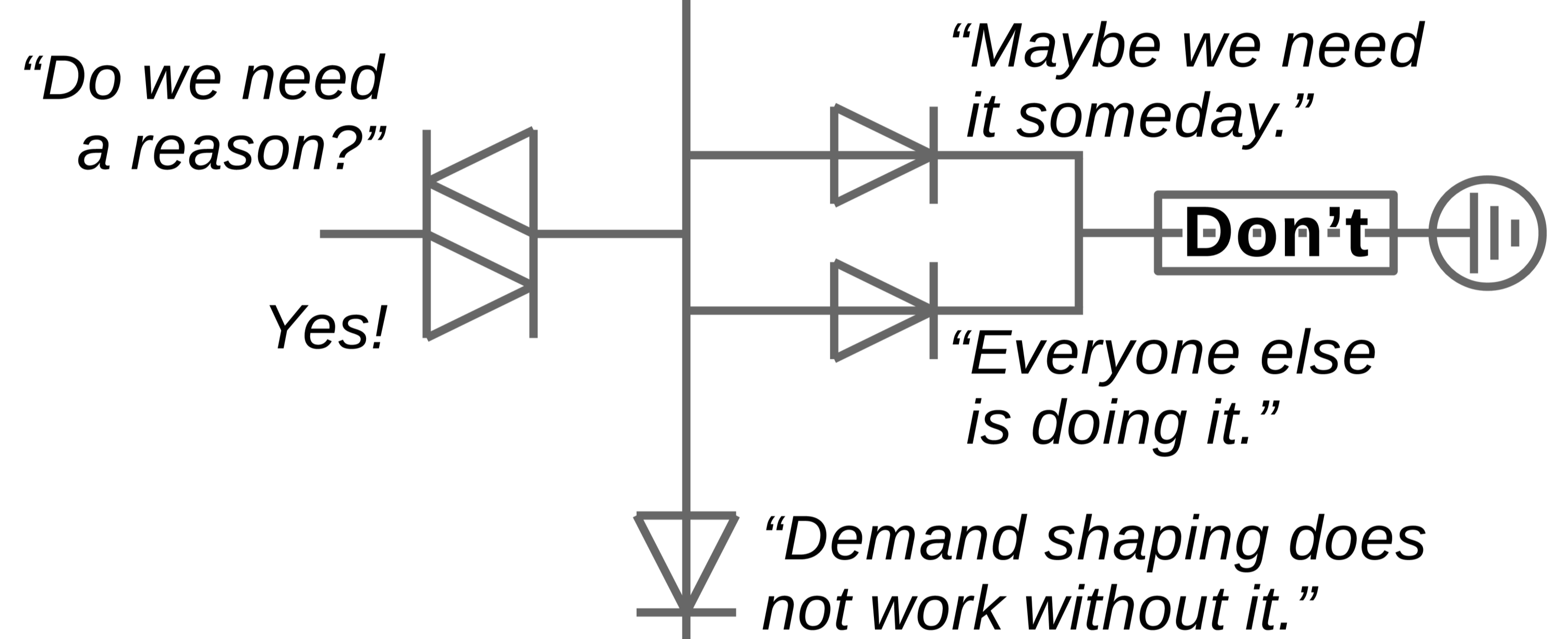Privacy & Identity Lab

GRIDFLEX heeten

ENEXIS

Radboud University
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Scan for paper:

Privacy by Design Process

"We want to manage supply and demand."

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A. What are the Data Requirements?

"We want fine-grained measurements."

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B. Why?

"Do we need a reason?"

Yes!

"Maybe we need it someday."

Don't

"Everyone else is doing it."

"Demand shaping does not work without it."

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C. Apply Privacy Design Strategies

1. Minimize
Only collect energy usage, nothing else. Remove data when no longer required.

5. Inform
Informational meetings before signup, clauses in contract.

2. Hide
Pseudonymize and encrypt before transfer.

6. Control
Customer portal for updating and withdrawing.

3. Abstract
1-minute instead of 1-second measuring.

7. Enforce
Authentication, authorization and access logging.

4. Separate
Keep data only where processed, separate contact information.

8. Demonstrate
System logs, proof of contract and consent, PbD documentation.

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D. GDPR Compliance

Hic sunt advocatorum

"Are we allowed to?"   *"Not yet!"*

Life/Death   Public Interest
Law   Contract
Consent   Other Interest