**How to Make Your Event Registration Process GDPR Compliant:

A Guide for IEEE Event Organizers**

By: IEEE Meetings, Conferences & Events | 21 June 2018 | v.1

*This document communicates general information only, and serves as a starting point in your understanding of issues relating to GDPR. This document is not legal advice, nor does it convey legal facts or opinions. Do not rely on the content of this document for any particular situation, and always consult IEEE’s regulatory experts at* *privacy@ieee.org* *and* *dpo@ieee.org* *to discuss your specific legal, compliance, and GDPR-related issues.*

Table of Contents

[Introduction 4](#_Toc517359316)

[The Impact of GDPR on Events 4](#_Toc517359317)

[What does “Consent” mean under GDPR? 5](#_Toc517359318)

[What Do I Need to Do? 5](#_Toc517359319)

[Registration Form Set-up 6](#_Toc517359320)

[Registration Form Questions: Required and Optional 7](#_Toc517359321)

[Reporting Access 8](#_Toc517359322)

[Onsite Registration Process 8](#_Toc517359323)

[Post-Event Compliance 8](#_Toc517359324)

[Conclusion 10](#_Toc517359325)

[Appendix 11](#_Toc517359326)

[General Data Protection Regulation (GDPR) 11](#_Toc517359327)

[Data Processor vs. Data Controller 12](#_Toc517359328)

[Data Breach 12](#_Toc517359329)

# Introduction

Without a doubt, IEEE events involve the transfer of attendee personal information, from event registration to onsite lead capture, to follow-up.

Receiving and documenting an attendee’s consent to store and use their personal information is at the center of the General Data Protection Regulation (GDPR). Consent must be an active and traceable action of the individual rather than passive acceptance through pre-ticked boxes or opt-outs.

When asking people to fill out registration details, you will need to make sure that you are GDPR-ready.

# The Impact of GDPR on Events

If you are an event organizer, chances are you may have at least one attendee who is an EU citizen, even if your event occurs in the U.S. or another non-European location.

GDPR means you will have to go to greater lengths to gain consent to hold, use and share people’s data. The law stipulates that you must clearly explain how you will use people’s data, and that they must provide “active” consent.

And it’s not just about attendee data – the personal information of any individual should be stored in an encrypted format. This includes everything including but not limited to: contact information, gender, and disabilities. Essentially, you are responsible for protecting the privacy of every individual at your event.

For any activity in which you collect personally identifiable information via a data collection process (registration form), you will be required to implement an appropriate consent acknowledgement process to do so.

Some examples of the types of events that capture attendee information include, but are not limited to:

|  |  |
| --- | --- |
| * Meetings
* Conferences
* Webinars
* Virtual events
* Seminars
 | * Tradeshows
* Receptions
* Awards Ceremonies
* Retreats
 |

# What does “Consent” mean under GDPR?

One of the fundamental changes introduced by GDPR is the need for organizations to obtain consent from individuals prior to processing personal data in certain situations. Elements of consent include:

* **Opt-in**: Consent must be opt-in; implied consent or opt-out is no longer viable.
* **Unambiguous**: Consent to use personal data must be “freely given, specific, informed, and unambiguous”.
* **Clarity**: Consent must be made in an intelligible and easily accessible form where legalese terms and conditions are not acceptable.
* **Sharing**: If personal data will be shared with third parties, it must be disclosed to the individual in order to gain effective consent.
* **Withdrawn**: Consent must be as easy to withdraw as it is to give.

How does all this relate to your registration environment? When events collect personally identifiable information, we have to ensure we capture consent from our attendees. As organizers, you cannot provide pre-checked boxes indicating attendees consent. Consent cannot be hidden in terms and conditions and it cannot be set as a default response.

# What Do I Need to Do?

When asking people to fill out registration details, you will need to make sure that you are GDPR-ready.

To help, IEEE has revised the IEEE Privacy Policy and created a newly released IEEE Event Terms and Conditions for implementation across all IEEE events to help meet GDPR compliance through a proactive consent capture process:

* IEEE Privacy Policy: <https://www.ieee.org/security-privacy.html>
* IEEE Event Terms and Conditions: <https://www.ieee.org/conferences/event-terms-and-conditions.html>

**IEEE Privacy Policy** - This privacy policy applies to all personal data processed by full-time and part-time employees, volunteers when acting on behalf of IEEE, contractors and partners doing business on behalf of IEEE, as well as all legal entities, all operating locations in all countries, and all business processes conducted by IEEE.

**IEEE Event Terms and Conditions** - The Event Terms and Conditions set out the terms and conditions between IEEE and the individual when registering for any event organized by IEEE. They are in addition to the IEEE Privacy Policy and cover areas such as disclosure of their personal information to event vendors supporting the event (i.e. registration, housing, and mobile application providers) photography and videography statements, as well as badge scanning during an event to name just a few.

These policies are required for all IEEE financially-sponsored events and are in addition to your general event policies (e.g. refund/cancellation/substitution policies, administrative fees, etc.).

# Registration Form Set-up

All events are required to incorporate proactive consent to both the IEEE Privacy and IEEE Event Terms and Conditions as part of the event registration process to capture and affirm active consent. Acceptance is mandatory as a condition of registration for any IEEE event. For audit purposes, they must remain as two separate questions and cannot be combined.

Regardless of the registration provider, you are required to implement the following on the registration form:

1. **Information Introduction**. Acceptance of IEEE policies are required to register for this event. By submitting your registration details, you acknowledge that:
2. **IEEE Privacy Policy consent question**. This question is mandatory with only one response option:

You have read and are in agreement with IEEE’s Privacy Policy.
 I accept the IEEE Privacy Policy.

1. **Event Terms and Conditions consent question**. This question is mandatory with only one response option:

You have read and are in agreement with IEEE’s Event Terms and Conditions.
 I accept the IEEE Event Terms and Conditions.

1. Hyperlink both the IEEE Privacy Policy and the IEEE Event Terms and Conditions

Below is an example of how these requirements should appear on your registration form:



*Note: To ensure the attendee has full attention on the questions, present them on a separate page before the registrant provides any personally identifiable information.*

# Registration Form Questions: Required and Optional

You may be thinking, ‘*May I still include more generalized questions to gather further information about my event attendees for our needs?*’ and the answer is ‘*Of course!*’ Customized questions are a great way to find out more information about your event participants and we encourage you to collect further important points of information that would be helpful to your needs.

We recommend you organize your registration form into multiple pages of questions for ease of the attendee. As a best practice, incorporate each grouping of questions below into your form on their own page.

* 1. Required: Consent Questions (GDPR compliance)
		1. You have read and are in agreement with IEEE’s Privacy Policy.
		2. You have read and are in agreement with IEEE’s Event Terms and Conditions
	2. Required: Standard Questions (Logistic-specific needs)
1. Dietary restrictions
2. Disability requirements
3. Optional: Event Specific Questions (Event Survey questions)
4. How did you hear about this event?
5. What is your main reason for registering?
6. Is this your first time attending this event?

# Reporting Access

After building your registration environment, you will likely want to grant reporting access to your organizing committee. Only grant report access to those engaged in the event planning activities on a **‘need-to-know’** basis. As a member of the organizing committee, you have the opportunity to obtain, access, and process personal data of individuals who interact with IEEE. To maintain GDPR compliance:

* Only use attendee information for its intended purpose (i.e. planning your event)
* Grant reporting access only to authorized users of the information
* Promptly dispose of all attendee data post-event (i.e. shred remaining name badges and printed reports)

# Onsite Registration Process

The event has finally arrived and you are ready to open onsite registration. There are a couple of things to keep in mind as you staff the registration area for an event:

* Verify all event personnel (i.e. student volunteers handing out name badges) who may have access to attendee personal data understand GDPR and the implications of mishandled data
* Never hand out badge credentials to anyone other than the registered attendee
* Always lock laptops and never leave them unattended
* Shred any uncollected name badges after the registration system has been reconciled

# Post-Event Compliance

**IEEE’s Centralized Consent Management System**

One of the requirements of GDPR as it relates to consent is record keeping. As part of the event closing process, you will now be required to submit your final attendance list along with the individual consent capture question responses to IEEE’s centralized management system for storing of this information.

This is required for the fulfilment of IEEE’s obligation to demonstrate compliance with the requirements of the regulation, and allow for and contribute to audits as mandated. To submit your file ready list, follow the instructions below:

1. To download a formatted template, visit: [goo.gl/9t56H4](file:///%5C%5Clocker3%5Cconf-mgmnt_s%5CGDPR%5COrganizer%20Outreach%5CRegistration%20Environment%5Cgoo.gl%5C9t56H4)
2. Verify each column header is populated with the appropriate field names:
	1. email\* *(value must be lower case)*
	2. firstname\*
	3. lastname\*
	4. data *(represents the attendees Member ID or Customer Number, this is an optional field)*
	5. type\* *(value will always be “consent”)*
	6. name\* *(value is ieee\_privacy\_policy” or “ieee\_event\_tos”)*
	7. value\* *(value will always be “TRUE”)*
	8. date\* *(required format: YYYY-MM-DDTHH24:MI:SS)*YYYY - 4 digit Year

MM - 2 digit month

DD - 2 digit day

HH24 - hours as in 24 hours

MI-Minutes

SS-Seconds

i. site *(value is the location or url where consent was captured)*

*(i.e. http://www.cvent.com/d/dgq9gj/4W)*
\*All fields with a red asterisk are required for import to the content management system

1. Populate the rows of data with your attendee’s information *(note: each row of data should represent one consent question response)*
2. Below is an example of how to format the data.
3. After entering all the collected consent data, save the file in a .csv format
4. The file name must be password protected and saved with the following format: OU\_{{pattern}}\_Date\_time.csv
	1. **OU** - MGA, TA, MCE, EA, SA, FND (foundation), etc.
	2. **{{pattern}}** - A format that can make this file unique even if there are multiple files from one given OU in the same directory on the same day
	3. **Date\_time** - format should be: MMDDYYYYHH24MI *(same format as column H in your document)*
5. Submit your list to IEEE for upload into the centralized consent management system for appropriate record keeping to meet regulation guidelines.

**Please note:** IEEE’s list submission utility is currently under development and should be available by early July 2018.

# Conclusion

As this guide illustrates, GDPR compliance is not a simple matter. How events are collecting and storing data, who has access, and how the data is used must be a priority in the event planning and management process. You need to find out what your event technology providers and third-party agencies are doing to ensure GDPR compliance as well.

If you are not sure where to start or need more clarification on the steps to setting up your registration environment, we are here to help. Please reach out to gdpr-mce@ieee.org.

# Appendix

## General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) is a regulation by European Union (EU) authorities to strengthen and unify data protection for EU citizens and individuals within the European Union (EU). The primary aim of GDPR is to give EU citizens and residents control over their personal data. GDPR went into effect 25 May 2018.

**What do I need to know about GDPR?**

GDPR protects the personal data of individuals. Examples may include name, email address, IP address, and photo. IEEE is an international organization that, in some cases, collects, stores, and processes personal data of EU citizens. As a result, IEEE may be subject to GDPR. Some of the core tenets of GDPR are:

* C**onsent**: Use of personal data requires consent from individuals prior to processing.
* **Right to Access/Data Portability**: If requested, IEEE’s Data Protection Officer (DPO) must provide individuals who request a copy of their personal data in a commonly used and machine-readable electronic format.
* **Right to be Forgotten**: Individuals may require IEEE to erase their personal information from databases, unless there are legal requirements where IEEE must retain this information or other exceptions exist.
* **Breach Notification**: Data breaches must be reported to regulatory authorities within 72 hours of first becoming aware of the breach.
* **Privacy and Data Considerations**: Systems must be designed with privacy in mind from the outset.

As a standard practice, organizations should only collect and process the data necessary for the completion of their duties and limit access to only those needing this information.

Any organization that collects and processes data on European citizens falls under the regulation. So, if you are hosting events in Europe or your attendees are European citizens or residents (regardless of where your event is taking place), then this regulation applies to you. If you are using some type of event management system (i.e. registration software, mobile applications, etc.), then GDPR will apply to your technology providers as well.

## Data Processor vs. Data Controller

***The Data Processor***: Any vendor within your software ecosystem. While both parties must align on compliance, the burden of compliance rests with the controller. The data controller is responsible for building procedures with their data processor to ensure compliance.

***The Data Controller***: **This is you!** The data controller is the one that needs to ensure its GDPR compliance by defining its requirement to the data processor. As the event organizer, you own the data and the responsibility of your customers/attendee data, regardless of the technology used to manage it (event software, vendors hired to manage the event, organizers, etc.)

## Data Breach

In the event you suspect a data breach or mishandling of personally identifiable information, you must report the incident to IEEE immediately at privacy@ieee.org.

Examples of to consider:

* Laptop theft or loss
* Lost or stolen USB drive that contains Personally Identifiable Information (PII)
* Suspected IT system hacking
* Sending files containing PII to the wrong recipient

IEEE will investigate the matter and promptly notify the appropriate authorities.