

GDPR Compliance for Event Registration: A Guide for IEEE Event Organizers

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This document is a fully detailed and comprehensive version of the quick guide.

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 expert at privacy@ieee.org to discuss your specific legal, compliance, and GDPR-related issues.

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What is GDPR?

The GDPR ("General Data Protection Regulation") is a European regulation that went into effect the 25th of May, 2018, which mandates rules for personal data protection. It enforces new rights for individuals whose data is collected and obligations for those responsible for the processing of this data. Personal data is considered to be all information used to identify a person (name, address, date of birth, location, IP address, etc.); the regulation applies to all event organizers and event registration platforms, mobile applications or business meeting platforms.

The Impact of GDPR on IEEE Events

IEEE is an international organization that, in some cases, collects, stores, and processes personal data of European Union (EU) citizens. While GDPR is an EU regulation, IEEE has taken on the responsibility to treat all participants of IEEE events with the same level of protection and security regarding their personal information regardless of whether they are an EU citizen or not. As an event organizer, you play a pivotal role in this responsibility.

As an event organizer, it is your responsibility to correctly manage personal data about your attendees, speakers, exhibitors, and event participants. This includes ensuring the legal basis for collecting their personal information, obtaining consent, managing data subject requests, and being able to provide auditable data regarding these details.

The regulation stipulates that you must clearly explain how you will use people's data, and that they must provide "active" consent to that use. Consent must be an active, explicit, free, specific, and informed action; a data subject (event attendee) giving permission (through consent capture questions) to the processing of their personal data (information).

Elements of consent include:

- **Opt-in:** The use of implied consent, pre-ticked responses, or requiring an individual to opt-out of consent is no longer allowed.
- **Clarity:** Ensure you offer clear explanations of how an individual's data may be used and provide them with a pathway to give you consent to use that data.
- **Sharing:** If personal data will be shared with third parties, or used for other purposes, 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.

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. 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. Systems must be designed with data privacy in mind from the outset.

What are some basic principles to GDPR in addition to consent?

- **Right to Access/Data Portability:** If requested, IEEE's Data Protection Officer (DPO) must provide individuals 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.

What Do I Need to Do?

To help meet GDPR compliance, all event organizers are required to incorporate proactive consent questions to both the [IEEE Privacy Policy](#) and [IEEE Event Terms and Conditions](#) during the event registration process, to capture and affirm active consent.

IEEE Privacy Policy - While the Privacy Policy focuses on how IEEE uses and shares personal data across all of its business processes concerning events, it also touches on how and when IEEE can contact an individual about an event.

IEEE Event Terms and Conditions - Sets out the terms and conditions between IEEE and the individual when registering for any event that is financially-sponsored by IEEE. The IEEE Event Terms and Conditions are in addition to the IEEE Privacy Policy, and cover areas such as disclosure of their personal information to event vendors supporting the event (e.g. registration, housing, and mobile application providers), photography and videography statements, as well as badge scanning during an event.

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.).

Note: Acceptance of the IEEE Privacy Policy and IEEE Event Terms and Conditions is required for an individual to successfully complete their registration process for event participation. Should an individual participant decline acceptance, they will not be permitted to complete their registration.

What Is Required On The Registration Form?

For audit purposes, the proactive consent questions regarding the IEEE Privacy Policy and the IEEE Event Terms and Conditions must remain as two separate and distinct consent questions. Regardless of the registration provider utilized, you are required to implement the following on the registration form:

1. Acceptance of IEEE policies are required to register for this event.
By submitting your registration details, you acknowledge that:
 - **IEEE Privacy Policy consent question** (required question with only one response option):
 - You have read and are in agreement with IEEE's Privacy Policy.
I accept the IEEE Privacy Policy.
 - **IEEE Event Terms and Conditions consent question** (required question 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.
2. **Hyperlinks:** Include links to 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:

Acceptance of IEEE policies are required to register for this event

By submitting your registration details, you acknowledge that:

*You have read and are in agreement with IEEE's Privacy Policy.

I accept the IEEE Privacy Policy.

*You have read and are in agreement with IEEE's Event Terms and Conditions.

I accept the IEEE Event Terms and Conditions.

[IEEE Privacy Policy](#) | [IEEE Event Terms and Conditions](#)

Note: To ensure the attendee has their 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

Under GDPR you may still include more generalized and customized questions to gather further information about your event attendees for your needs. As a best practice, and for the ease of attendees, incorporate each grouping of questions below into their own page. Data gathered from questions under #1 and #2 qualifies as personally identifiable information.

1. Required: Consent Questions (GDPR compliance)
 - a. You have read and are in agreement with IEEE's Privacy Policy.
 - b. You have read and are in agreement with IEEE's Event Terms and Conditions.

2. Required: Standard Questions (Logistic-specific needs)
 - a. Dietary restrictions
 - b. Disability requirements

3. Optional: Event Specific Questions (Event Survey questions)
 - a. How did you hear about this event?
 - b. What is your main reason for registering?
 - c. Is this your first time attending this event?

Reporting Access

After building your event 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. 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

There are a few things to keep in mind as you staff the registration area for an event during the onsite registration process:

- Verify that all event personnel 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 registration reports have been reconciled

Post-Event Compliance

IEEE Centralized Consent Management System (CMS)

One of the requirements of GDPR as it relates to consent is record keeping. As part of the event closing process, you are required to submit your final participant list and the individual consent capture question responses to IEEE's centralized data repository. This documents IEEE's compliance with the regulation, and allows for audits as mandated. To submit your file-ready list, follow the instructions below:

1. Export the following information to a Microsoft Excel document **within 30 days after your event**:

- a. Registrant's email (lowercase only)
 - b. Registrant's first name
 - c. Registrant's last name
 - d. IEEE Member ID or Customer number (if provided)
 - e. Date and time of registration
 - f. Acceptance of IEEE Privacy Policy statement
 - g. Acceptance of IEEE Event Terms and Conditions
2. The spreadsheet layout should appear as below and must include these specific column headings:

email	firstName	lastName	Member ID or Customer Number	Date/Time of Registration	Acceptance of IEEE Privacy Policy	Acceptance of IEEE Event Terms and Conditions
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3. The column contents should be defined as noted below:

Column headings (from left to right)	Column Content Description	Column Content Example
email	The registrants email - lower case only	ieee@ieee.org
firstName	The registrants first name	John
lastName	The registrants last name	Smith
Member ID or Customer Number	IEEE's member number of provided customer number, if provided. This column may be left empty if none were provided.	9998881234
Date/Time of Registration	Required format: YYYY-MM-DDTHH24:MI:SS YYYY - 4 digit Year MM - 2 digit month DD - 2 digit day HH24 - hours as in 24 hrs MI-Minutes SS-Seconds	2019-10-08-T13:22:03
Acceptance of IEEE Privacy Policy	ieee_privacy_policy	ieee_privacy_policy
Acceptance of IEEE Event Terms and Conditions	ieee_event_tos	ieee_event_tos

4. Submit the finalized list to IEEE for upload into the centralized CMS:
<https://app.smartsheet.com/b/form/a4d56bebbba0244efa19c5b428fa41d9b>

What to do if a Data Breach Occurs?

In the event you suspect a data breach or mishandling of Personally Identifiable Information (PII), you must report the incident to IEEE immediately at privacy@ieee.org. IEEE will investigate the matter and report the data breach to regulatory authorities within 72 hours of first becoming aware of the breach.

Examples to consider:

- Laptop theft or loss
- Lost or stolen USB drive that contains PII
- Suspected IT system hacking
- Sending files containing PII to the wrong recipient

Conclusion

How event data is collected and stored, who has access, and how the data is used must all 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.

GDPR Compliance Checklist for Event Organizers

Registration Form Checklist

Did You...?	Yes or No?
Implement an introduction stating that acceptance of IEEE policies are a requirement to register for the event	
Provide an IEEE Privacy Policy consent question with one answer (an unchecked box)	
Provide a separate IEEE Event Terms and conditions consent question with one answer (an unchecked box)	
Provide hyperlinks to the IEEE Privacy Policy and the IEEE Event Terms and Conditions	
Present the above before the registrant provided any personally identifiable information	

Post-Event Compliance Checklist

Did You...?	Yes or No?
Export the required registration and consent information into a Microsoft Excel document	
Name your spreadsheet headers as required	
Confirm that the correct information is in the correct columns	
Submit the finalized list to IEEE for upload into the centralized CMS	

If you can answer yes to **ALL** of the above, then you as an event organizer have passed GDPR compliance for your event registration process.