

## Action Plan - EReg Topic Group

<b>Topic Group</b>	Topic Group XX GDPR in international data exchange															
<b>Chairman Topic group</b>	EReg (Mr Servi Beckers)															
<b>Secretariat Topic Group</b>	RDW/ The Netherlands (Ms Esme Houtman) EReg Secretariat (Ms Liza Abrahamse)															
<b>Participating members</b>	BE	DK	EE	ES	FI	FR	DE	GI	HU	IS	IE	IM	JE	LV	LT	
	LU	MT	NIE	NO	PL	PT	RO	SI	SK	SE	CH	NL	UK	...		
<b>Reading members</b>	BE	DK	EE	ES	FI	FR	DE	GI	HU	IS	IE	IM	JE	LV	LT	
	LU	MT	NIE	NO	PL	PT	RO	SI	SK	SE	CH	NL	UK	....		

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<b>Date/version</b>	September 2017

<b>I. Problem definition</b>	
<i>Description of the actual situation and the current state of affairs, including a description of the problem(s) and the needed changes.</i>	
<b>Short historical description</b>	On 15 May 2017 the first EReg Academy was organised on the new General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). The Academy focused on (the impact of) the implementation of the GDPR for EReg members. It was suggested that a code of conduct on the GDPR with the scope on international data exchange could be of interest for EReg members.(see also Article 40-42 of the GDPR).
<b>Actual state of affairs</b>	The requirements of the GDPR have to be implemented before 25 May 2018. Many EReg members have already started with the implementation. As EReg members are dealing with the same processes, it is helpful to further specify the GDPR into a code of conduct. The creation of codes of conduct are also stimulated based on Article 40-42 of the GDPR which states that “the drawing up of codes of conduct intended to contribute to the proper application of this Regulation, taking account of the specific features of the various processing sectors and the specific needs of micro, small and medium-sized enterprises” is encouraged. A code of conduct helps associations and other bodies representing categories of controllers or processors specifying the purpose of application of the Regulation on matters such as fair and transparent processing and the collection of personal data.
<b>Current problems/ bottlenecks</b>	In international data exchange, the GDPR does not fully harmonize the different legal systems that are in place, since different national interpretations of the requirements of the GDPR prevail. The creation of a code of conduct for the GDPR in international data exchange can help the EReg members. In addition it helps the European

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	Commission and European Data Protection Supervisor (EDPS) to better formulate guidelines when dealing with the international scope of data exchange and data protection. This contributes to the necessity of the creation of such a code of conduct for the vehicle and registration authorities in Europe.

<b>II. Action Plan</b>	
<i>Description of the intended goal(s), the suggested approach in order to achieve the desired results, including the planning of the topic group and a concrete description of the products and the deadlines.</i>	
<b>Intended goal(s)</b>	The goals of this Topic group are to: <ol style="list-style-type: none"> <li>1) Define the scope of the GDPR in international data exchange. Which parts of the GDPR are posing chances and problems when dealing with international data exchange</li> <li>2) Draft guidelines / codes to be used when dealing with international data exchange</li> <li>3) Realise acceptance of the drafted code of conduct</li> <li>4) Recommend this code of conduct to the European Commission</li> </ol>
<b>Approach/ description of the activities</b>	<ul style="list-style-type: none"> <li>- Share the developments and knowledge within the countries of the EReg Members and experiences with the implementation of the GDPR</li> <li>- Agree on an outline of main elements that should be incorporated into the code of conduct</li> <li>- Formulate and discuss a draft code of conduct</li> <li>- Finalise the code of conduct and recommend the outcome to the EU policy makers</li> <li>- Actively promote the code of conduct to EReg members and relevant stakeholders</li> </ul>
<b>Planning</b>	2017/ 2018 The (preliminary) results of the work of this EReg Topic Group will be presented at the EReg General Meeting and it is aimed to finalise it before the deadline of implementation of the GDPR (May 2018). It is foreseen, that the EReg Topic Group will meet at least three times.
<b>Results</b>	
<i>Description product</i>	<i>Deadline (dd/mm/yyyy)</i>
- Code of Conduct	April 2018

<b>Reporting progress</b>	
<i>Reporting on (dd/mm/yyyy)</i>	
EReg General Meeting & Annual Conference 2018	