

# Tryggve Code of Conduct

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## Introduction

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People or organisations being in possession of and legally responsible for the handling of sensitive personal data are considered to be data controllers, and they need to be certain that any external service they utilise is acting responsibly and according to national and international laws and regulations.

Service providers adhering to this Code of Conduct effectively state that, to the best of their knowledge, they comply with the requirements on hosting personal or otherwise sensitive data.

This Code of Conduct has been prepared within the Nordic Tryggve project. Tryggve aims to develop Nordic services for collaboration on sensitive data, and is funded by NeIC and the ELIXIR nodes in Denmark, Finland, Norway and Sweden. The Code of Conduct is the result of efforts to establish ethical principles to support the uniform application of data protection rules among the adhering service providers.

## Purpose of the Code of Conduct

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The purpose of the Tryggve Code of Conduct (hereafter, Code) is to make it simpler for a data controller to assess that the service provider's services are suitable for processing of personal data. The transparency created by the Code will contribute to building an environment of trust between the data controller and a service provider.

The Code consists of a set of principal commitments for a service provider in handling the sensitive data. The Code is a voluntary instrument, allowing a service provider to evaluate and demonstrate its adherence to the Code's requirements. This may be either through self-evaluation and self-declaration of compliance, or by relying on third-party certification. By declaring its adherence to this Code, a service provider commits to complying with the principles of the Code. Any declaration of adherence to the Code relates to all parts of the Code, and not only to select parts of the code. A service provider adhering to the Code ensures that its legal or contractual obligations do not contradict any part of the Code.

The Code does not replace or constitute a contract between a service provider and the data controller, but it may be used as a part of a written contract, e.g. as an appendix.

## The principles of the Trygve Code of Conduct

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The Code is based on a set of principles listed below. Service providers adhering to the Code agree with the entire set of principles, and are able to verify the measures that have been taken to enforce them, if so requested.

In this Code, terms “we”, “us” and “our” refers to a service provider offering a service to a client.

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### **Confidentiality**

*Confidentiality of information refers to protecting the information from disclosure to unauthorised parties*

We commit to maintaining the highest degree of confidentiality with the data stored with us. To ensure confidentiality, we enforce measures to guarantee that the data is available to authorised persons only, according to the decisions of the client, i.e. the data controller. In addition, business confidentiality will be applied for all the information received before, in the course of, and after providing the service.

### **Integrity**

*Integrity of information refers to protecting the information from being modified by unauthorized parties*

We commit to ensuring that data is kept preserved and is not tampered with. To ensure integrity, we commit to adopting current best practices for data preservation and security controls.

### **Availability**

*Availability of information refers to ensuring that authorized parties are able to access the information when needed*

We commit to ensuring the availability of the data stored with us according to the defined availability in the service agreement. To ensure availability, we commit to adopting strictly defined operational routines to rigorously maintain, operate and repair hardware and software components involved in providing the service.

### **Sustainability**

*Sustainability of service refers to a service being maintained at a certain rate or level*

We commit to working consistently to ensure that our service will be provided sustainably with undiminished quality in the long term. This will be achieved by using economic and organizational measures and by aligning with evolving policies and infrastructures.

### **Agreements**

*Agreements refers to legally enforceable understanding between two or more legally competent parties*

We commit to honouring all our agreements with clients to the fullest, and to notifying our clients immediately of changes in circumstances that could put an agreement in jeopardy.

### **Intellectual property and moral rights**

*Intellectual property refers to inventions, literary and other works being created*

We commit not to claim any ownership of, or moral rights to, the data and works that our clients create, store or process using our services, unless agreed otherwise.

### **Quality assurance**

*Quality assurance refers to ways of preventing mistakes or defects and avoiding problems when delivering services*

We commit to providing continuous and high-quality service for our clients, in accordance with the agreed service levels. We take precautions to avoid unexpected service breaks and are able to react to incidents or potential issues through service monitoring and established recovery processes. We will work actively with our clients, partners and other best-in-class services, sharing best-practice knowledge from research and infrastructure communities.

### **Ethics**

*Ethics refers to the moral principles that govern a person's behaviour or the conducting of an activity*

We commit to conducting our own service honestly and honourably. We strive to avoid causing any adverse effect on the human rights of individuals affected by the use of our service, on the local and wider environments, and on the well being of society at large.

### **Professional conduct**

*Professional conduct refers to personal, organisational, and corporate standards of behaviour*

We are committed to *doing the right thing* in any dealings with our clients, their data and how we operate our systems. We will respond to any change of circumstances without delay, through appropriate channels and according to the highest possible professional standard. We shall respect all applicable laws in all our actions and advice.

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