

Gas Network Innovation Competition Full Submission
Supplementary Answer Form

Project: Real-Time Networks

Tick if this answer has been provided verbally: ☐

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| Project code | SGN_GN_03 | Question Number | 24 |
| Question date | 22/09/15 | Answer date | 24/09/15 or 27/09/15 |
| Submission section question relates to | Appendix 3 | | |
| Topic | Data protection | | |
| Question | SSL defines encryption between client and server and AES256 defines encryption of data on the server. However, these standards do not relate to the use of the data, how it will be anonymised and the level of access that various parties would have to the data. These should be defined in advance both for data protection and to allow proper engagement with customers about the use of their data. | | |
| Notes on question | | | |
| Answer | <p>Both SGN and DNV GL will have access to non-anonymised data throughout the project. However, any published information from the project will have all specific consumer data redacted.</p> <p>Techniques employed to anonymise the data, if required, will be based on the document "Anonymisation: managing data protection risk code of practice"¹ produced by the ICO (Information Commissioner's Office). Reference to the additional ICO document "Determining what is personal data"² identifies that gas usage data that will be collected is classified as "Personal Data" as far as the Data Protection Act is concerned.</p> <p>'Tokenisation' will be used within the project to anonymise consumer data. The Real-Time Networks project would replace addresses with a mapped value, which refers to a table containing the range of new values and addresses. This data would be held within the real-time gateway, protected by encryption in the first instance and additionally would only be accessible</p> | | |

¹ <https://ico.org.uk/media/1061/anonymisation-code.pdf>

² <https://ico.org.uk/media/1554/determining-what-is-personal-data.pdf>

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| | <p>in its raw state by authorised individuals. A fuller description of tokenisation can be found in the "Anonymisation" document referred to earlier.</p> <p>Should the project submission be successful this information will be fully described in the required Ofgem documentation:</p> <ul style="list-style-type: none"> • Customer Engagement Plan • Data Protection Plan <p>Any subcontractors put in place by DNV GL will work under terms no less onerous than DNV GL but will have access to personal data at various stages of the project. DNV GL will apply provisions to achieve the required level of encryption.</p> |
| Attachments | |