PAN EUROPEAN ROUTINES FOR MASTER KEY SYSTEMS DATA PROTECTION

INTRODUCTION AND BACKGROUND

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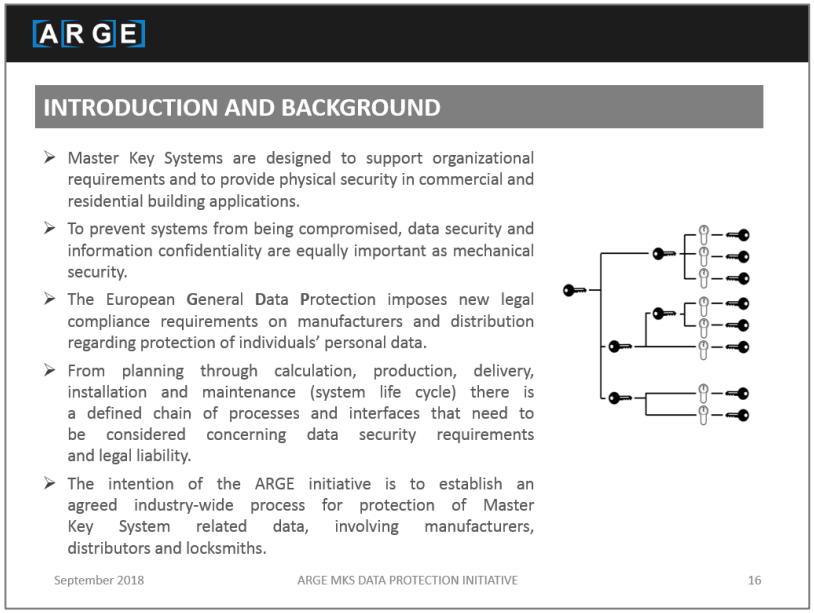
Our intention

- To establish an agreed industry-wide process for protection of Master Key System related data, involving manufacturers, distributors and locksmiths
- To help our customers become GDPR compliant
- An initiative that covers the **complete MKS life cycle** from planning through calculation, production, delivery, installation and maintenance

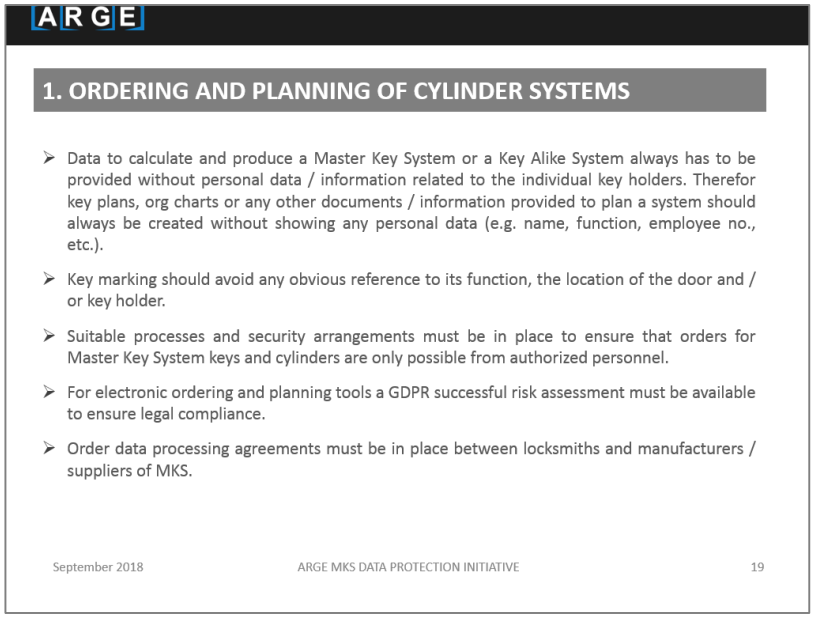


SCOPE

1. Ordering and planning of cylinder systems
2. Transmission of lock-charts
3. General Data handling requirements
4. Calculation of Master Key Systems
5. Manufacturing of Master Key Systems
6. Shipment of Master Key Systems
7. Locksmith key cutting
8. Installation of Master Key Systems
9. Master Key Systems data lifetime management

ORDERING AND PLANNING

- No personal data
- Neutral key marking
- Orders through authorized personnel
- GDPR risk assessment for electronic ordering and planning tools
- Order data processing agreements between locksmiths and suppliers



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1. ORDERING AND PLANNING OF CYLINDER SYSTEMS

- Data to calculate and produce a Master Key System or a Key Alike System always has to be provided without personal data / information related to the individual key holders. Therefor key plans, org charts or any other documents / information provided to plan a system should always be created without showing any personal data (e.g. name, function, employee no., etc.).
- Key marking should avoid any obvious reference to its function, the location of the door and / or key holder.
- Suitable processes and security arrangements must be in place to ensure that orders for Master Key System keys and cylinders are only possible from authorized personnel.
- For electronic ordering and planning tools a GDPR successful risk assessment must be available to ensure legal compliance.
- Order data processing agreements must be in place between locksmiths and manufacturers / suppliers of MKS.

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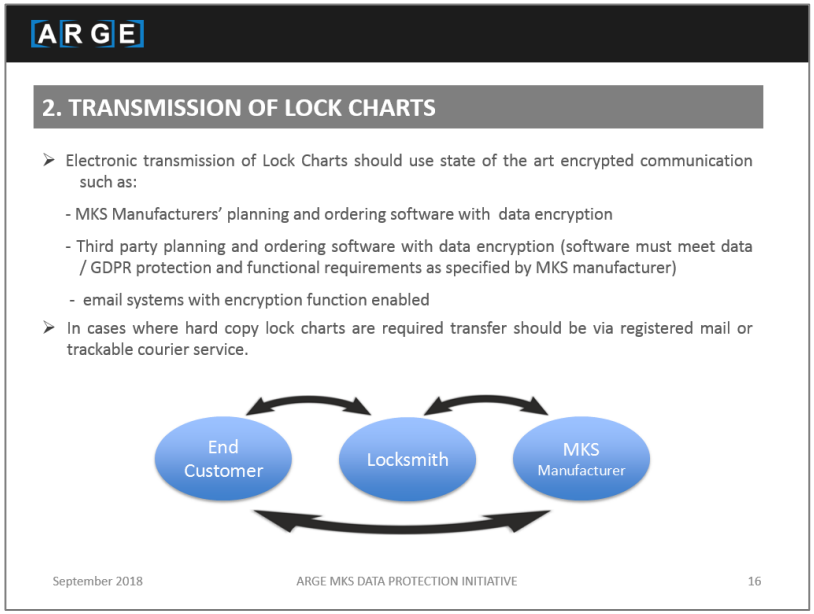
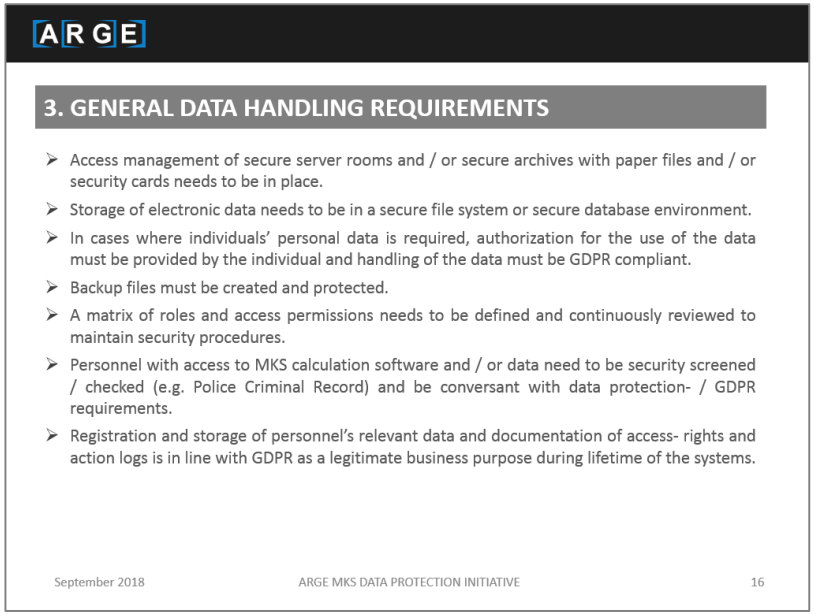
TRANSMISSION OF DATA

- **MKS planning and ordering software using data encryption**
- **Encrypted transmission of data**
- **Hard copies transferred via registered mail or trackable courier service.**



DATA HANDLING REQUIREMENTS

- **Definition of physical and electronic data protection**
- **Consideration of GDPR requirements**
- **Security screening for involved personnel**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3. GENERAL DATA HANDLING REQUIREMENTS

- Access management of secure server rooms and / or secure archives with paper files and / or security cards needs to be in place.
- Storage of electronic data needs to be in a secure file system or secure database environment.
- In cases where individuals' personal data is required, authorization for the use of the data must be provided by the individual and handling of the data must be GDPR compliant.
- Backup files must be created and protected.
- A matrix of roles and access permissions needs to be defined and continuously reviewed to maintain security procedures.
- Personnel with access to MKS calculation software and / or data need to be security screened / checked (e.g. Police Criminal Record) and be conversant with data protection- / GDPR requirements.
- Registration and storage of personnel's relevant data and documentation of access- rights and action logs is in line with GDPR as a legitimate business purpose during lifetime of the systems.

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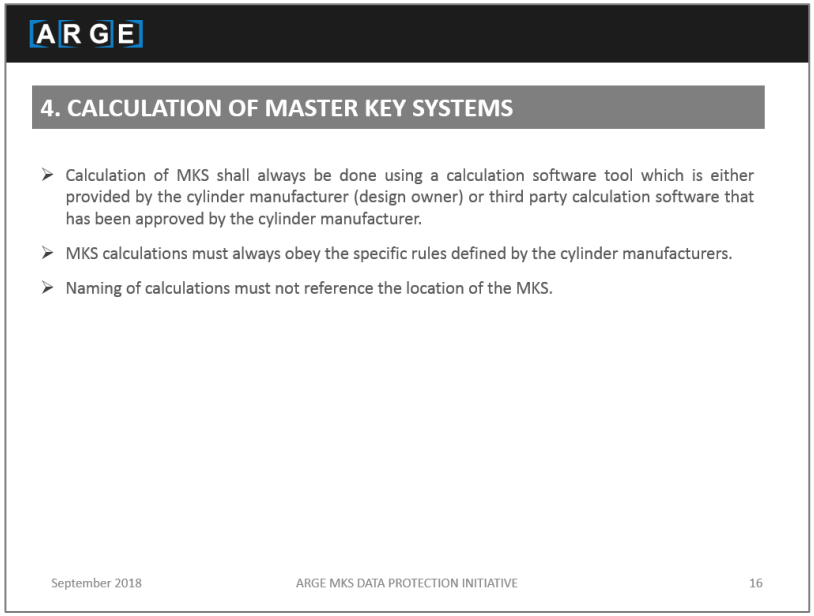
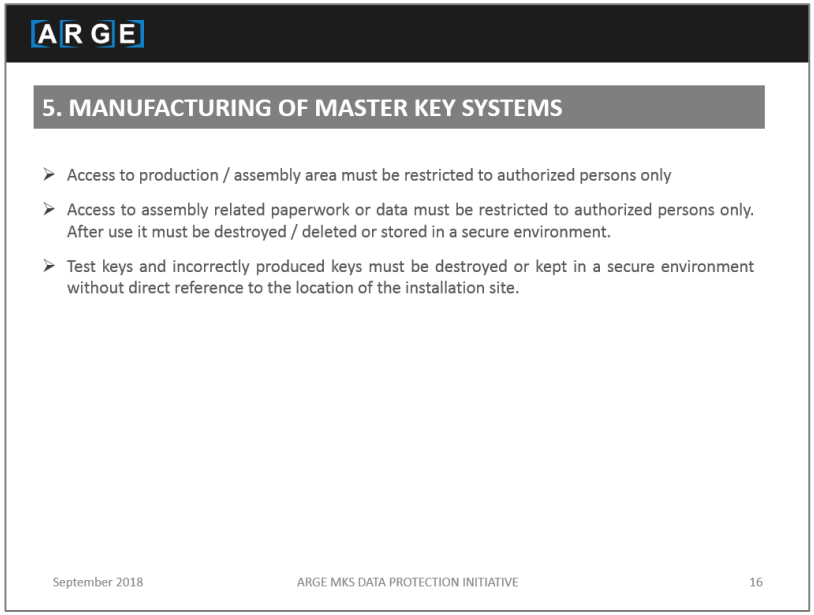
CALCULATION OF MASTER KEY SYSTEMS

- **Approved and GDPR compliant calculation SW only**
- **Specific rules for MKS calculations to ensure data security**



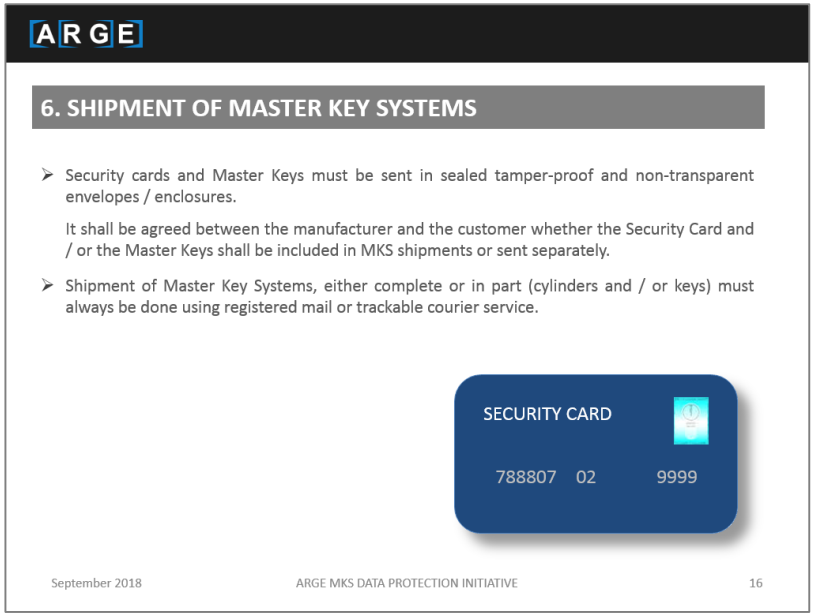
MANUFACTURING OF MASTER KEY SYSTEMS

- **Restricted access to data and production of MKS to authorized persons only**
- **Test keys and incorrectly produced keys must be destroyed or kept in a secure environment**
- **No direct reference to installation sites**



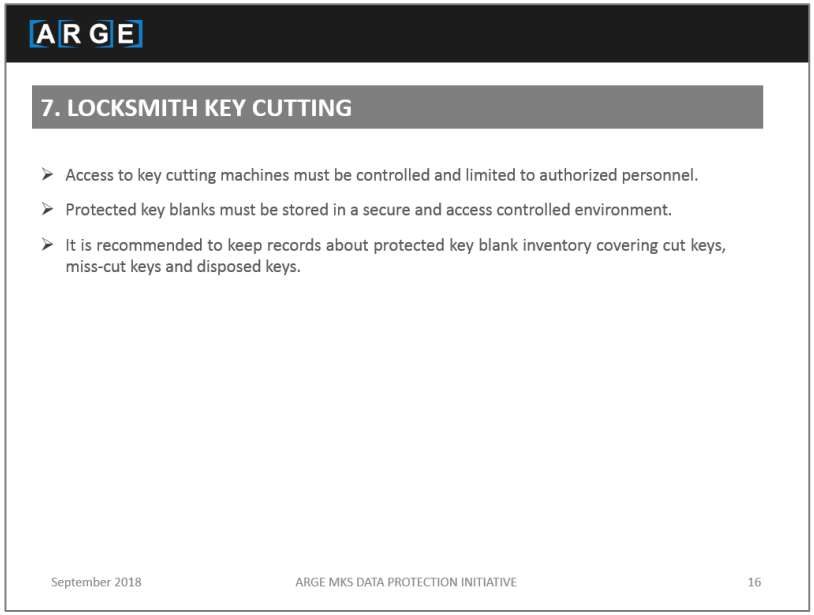
SHIPMENT OF MASTER KEY SYSTEMS

- **Security cards and Master Keys must be sent in sealed tamper-proof and non-transparent envelopes / enclosures**
- **Agree whether Security Card and Master Keys shall be included in MKS shipments or sent separately**
- **Shipments only with registered mail or trackable courier service**



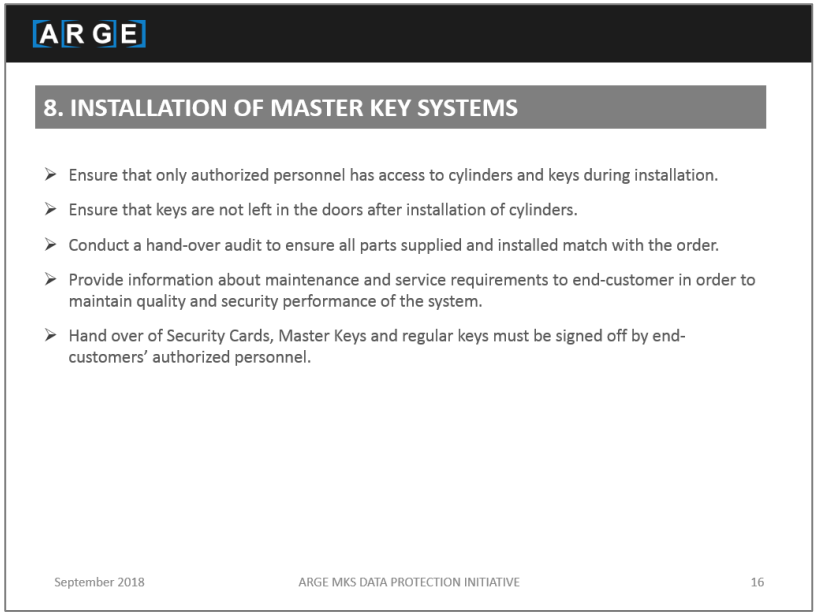
LOCKSMITH KEY CUTTING

- **Restricted access to key cutting machines**
- **Protected key blanks to be stored in secure and access controlled environment**
- **Records about protected key blank inventory covering cut keys, miss-cut keys and disposed keys.**



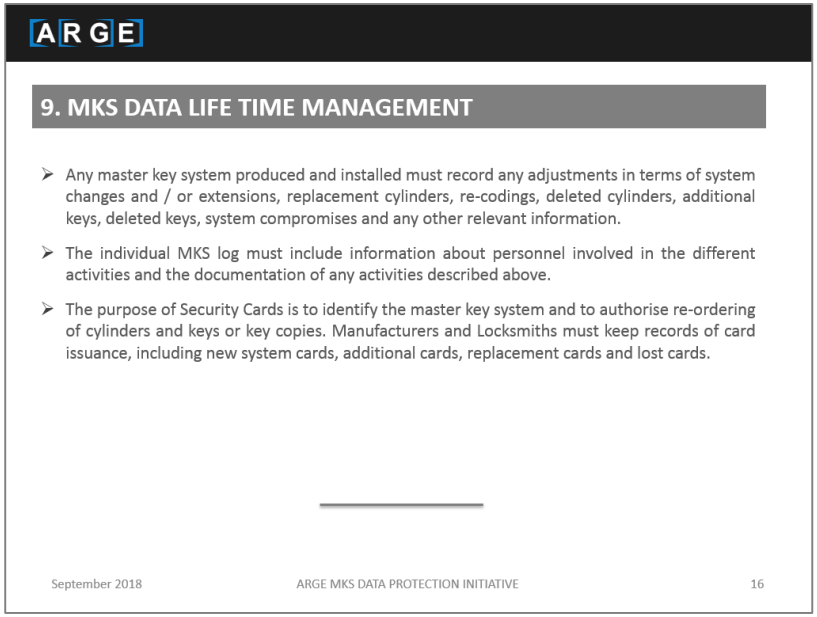
INSTALLATION OF MASTER KEY SYSTEMS

- **Authorized personnel only**
- **Key management**
- **Hand-over audits**
- **End-customer education**
- **Hand over of Security Cards, Master Keys and regular keys to be signed off by end-customers' authorized personnel.**



MKS DATA LIFE TIME MANAGEMENT

- **Any adjustments of MKS must be recorded in MKS log files**
- **Manufacturers and Locksmiths to keep records of card issuance, including new system cards, additional cards, replacement cards and lost cards**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9. MKS DATA LIFE TIME MANAGEMENT

- Any master key system produced and installed must record any adjustments in terms of system changes and / or extensions, replacement cylinders, re-codings, deleted cylinders, additional keys, deleted keys, system compromises and any other relevant information.
- The individual MKS log must include information about personnel involved in the different activities and the documentation of any activities described above.
- The purpose of Security Cards is to identify the master key system and to authorise re-ordering of cylinders and keys or key copies. Manufacturers and Locksmiths must keep records of card issuance, including new system cards, additional cards, replacement cards and lost cards.

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CONCLUSIONS AND RECOMMENDATIONS

ARGE MKS Data Security Guideline

- Publish the content of the presentation as an agreed ARGE guideline on MKS Data Security to increase MKS security and achieve GDPR compliance
- Share new ARGE guidance with ELF to encourage the regional associations to adopt this within their members handbooks

Standardisation

- Incorporate most relevant elements of the guideline into the next revision of EN1303

GDPR Compliance

- ARGE to agree a template for a common data processing agreement that can be used between MKS manufacturers and distributors / locksmiths in order to achieve GDPR compliance

Common MKS Data Exchange Format

- Initiate a new ARGE working group with the aim of providing a (voluntary) common data structure for the exchange of MKS data.

THANK YOU