

### **PRIVACY IMPACT ASSESSMENT:**

Project Name	

#### **DOCUMENT APPROVAL SIGNATURES**

Role	Name	Date agreed
Project Manager		
Project Sponsor		21/03/2019
FINAL APPROVAL		

#### **VERSION CONTROL**

Version Number	Date	Change Description
1	28/08/2018	Initial document

#### **GUIDANCE**

To help complete this Privacy Impact Assessment you may want to refer to the 'Conducting privacy impact assessments code of practice' published by the Information Commissioner's Office. This document is available using the following link: <a href="https://ico.org.uk/media/for-organisations/documents/1595/pia-code-of-practice.pdf">https://ico.org.uk/media/for-organisations/documents/1595/pia-code-of-practice.pdf</a>

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#### 1 BACKGROUND

Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties. You may find it helpful to link to other relevant documents related to the project, for example the Project Management Plan (PMP) or Project Proposal. Also summarise why the need for a Privacy Impact Assessment was identified (this can draw on your answers to the screening questions).

Migrate a number on on-premises IT services to	××××××××××××××××××××××××××××××××××××××	alternatives.	

#### 2 DESCRIBE THE INFORMATION FLOWS

The collection, use and deletion of personal data should be described here. It may also be useful to refer to a flow diagram or another way of explaining data flows.

This project replaces the sto	orage platform and do	es not directly colle	ect data about customers. I	Гһе
exception to this is a	,	and	will be	
	No other personal infostems.	rmation is stored a	bout the users. The core d	ata

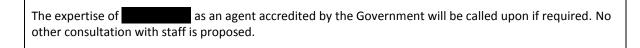
#### 2.1 WHO WILL BE IMPACTED?

Who will be impacted? You should also say how many individuals are likely to be affected.

This project will migrate the storage platform for email, file storage and backups. While the project itself does not directly involve the collection of data, other business processes do store this type of information and these will ultimately rely and use the platform being replaced in this project. Therefore, security and risk does need to be monitored closely.

#### 2.2 CONSULTATION REQUIREMENTS?

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted, internally and externally? How will you carry out the consultation?





#### **3 PRIVACY RISKS AND MITIGATION**

Identify the key privacy risks and the associated corporate risks. Describe the actions you could take to reduce the risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

Privacy Issue	Risk to individuals	Compliance risk	Associated corporate risk
Access to end users data through respective users own password, malware or phishing.	Access to own data and business data resulting in loss of data and confidentiality.	General Data Protection Regulations 2018	GDPR Fine  Damage to Service image
Access to end users data through administrative user's password, malware or phishing	Access to all data across the platform resulting in loss of data, confidentiality, malware infection across other platforms and further data loss.	General Data Protection Regulations 2018	GDPR Fine  Damage to Service image
Physical access to data	Access to data stored in by un-authorised people resulting in loss of data, confidentiality, malware infection across other platforms and further data loss.	General Data Protection Regulations 2018	GDPR Fine  Damage to Service image
Access through Man-In-The-Middle attack	Access to own data and business data resulting in loss of data and confidentiality.	General Data Protection Regulations 2018	GDPR Fine  Damage to Service image
	Access to own data and business data resulting in loss of data and confidentiality and	General Data Protection Regulations 2018	GDPR Fine  Damage to Service image



#### **3.1 IDENTIFY PRIVACY SOLUTIONS**

Describe the actions you could take to reduce the risks, and any future steps which would be necessary

(E.g. the production of new guidance or future security testing for systems).

Risk	Solution(s)	Result Is the risk eliminated, reduced, or accepted?	Evaluation  Is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?
Access to end users data through respective users own password, malware or phishing.	of on	Risk is reduced	Justified through mitigation of risk of threat to Authority, and the rights and freedoms of the individual, through data losses
Access to end users data through administrative user's password, malware or phishing	, policies ,	Risk is reduced	Justified through mitigation of risk of threat to Authority, and the rights and freedoms of the individual, through data losses
Physical access to data	are , and	Risk is reduced	Justified through mitigation of risk of threat to Authority, and the rights and freedoms of the individual, through data losses
Access through Man-In-The-Middle attack	Access to data stored	Risk is reduced	Justified through mitigation of risk of threat to Authority, and the rights and

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		freedoms of the individual, through data losses
The	Risk is eliminated	Justified through mitigation of risk of threat to Authority, and the rights and freedoms of the individual, through data losses



# 4 SIGN OFF AND RECORD OF THE PRIVACY IMPACT ASSESSMENT OUTCOMES

Who has approved the privacy risks involved in the project? What solutions need to be implemented?

Privacy Risk	Approved Solution	Approved by

# 5 INTEGRATING THE PRIVACY IMPACT ASSESSMENT OUTCOMES BACK INTO THE PROJECT

Who is responsible for integrating the privacy impact assessment outcomes back into the project? Who is responsible for implementing the solutions that have been approved?

Action to be taken	Completion date	Owner for action

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### 6 Data Protection Officer Sign Off

Summary of review of DPIA: As DPO I am comfortable that the provisions set out in this project to protect privacy of individuals are reasonable and proportionate
Name Date