

## PRIVACY IMPACT ASSESSMENT:

Project Name	[REDACTED]
--------------	------------

### DOCUMENT APPROVAL SIGNATURES

Role	Name	Date agreed
Project Manager	[REDACTED]	
Project Sponsor	[REDACTED]	21/03/2019
<b>FINAL APPROVAL</b>		

### 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: <https://ico.org.uk/media/for-organisations/documents/1595/pia-code-of-practice.pdf>

## 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 [REDACTED] 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 storage platform and does not directly collect data about customers. The exception to this is a [REDACTED], [REDACTED] and [REDACTED] will be [REDACTED] for [REDACTED] purposes. No other personal information is stored about the users. The core data [REDACTED] systems.

### 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?

The expertise of [REDACTED] as an agent accredited by the Government will be called upon if required. No other consultation with staff is proposed.

# PRIVACY IMPACT ASSESSMENT

PROJECT NAME: [REDACTED]



## 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 [REDACTED] 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
[REDACTED] [REDACTED]	Access to own data and business data resulting in loss of data and confidentiality and [REDACTED].	General Data Protection Regulations 2018	GDPR Fine Damage to Service image

# PRIVACY IMPACT ASSESSMENT

PROJECT NAME: [REDACTED]



## 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.	[REDACTED], policies, [REDACTED] of [REDACTED] [REDACTED], [REDACTED] on [REDACTED], [REDACTED] [REDACTED], [REDACTED], [REDACTED]	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	[REDACTED], policies [REDACTED] [REDACTED], [REDACTED] [REDACTED], [REDACTED], [REDACTED] [REDACTED]	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	[REDACTED] are [REDACTED], and [REDACTED]	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 [REDACTED] [REDACTED] [REDACTED].	Risk is reduced	Justified through mitigation of risk of threat to Authority, and the rights and

PRIVACY IMPACT ASSESSMENT

PROJECT NAME: [REDACTED]



			freedoms of the individual, through data losses
<div>XXXXXXXXXXXXXXXXXXXX</div> <div>XXXXXXXXXXXXXXXXXXXX</div>	The <div>XXXXXXXXXX XXXXXXXXXXXX</div> <div>XXXXXXXXXXXXXXXX</div> <div>XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXX</div> <div>XXXXXX</div>	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



## **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..... [REDACTED] ..... Date..... [REDACTED]