

Do I need to carry out a Data Protection Impact Assessment (DPIA)?

CHECKLIST

You should use this checklist to assess the need to carry out a DPIA. If you have any doubts, or you need more guidance, you should contact the Society's Data Protection Manager ("DPM") or, alternatively our Legal department.

You need to carry out a new DPIA – or amend an existing one - if your new project, or application, intends to:

Use systematic and extensive profiling or automated decision-making to make significant decisions about people	<input type="checkbox"/>
Process special category data or criminal offence data on a large scale	<input type="checkbox"/>
Systematically monitor a publicly accessible place on a large scale	<input type="checkbox"/>
Use new technologies, or innovative technological or organisational solutions	<input type="checkbox"/>
Use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit	<input type="checkbox"/>
Carry out profiling on a large scale	<input type="checkbox"/>
Process biometric or genetic data	<input type="checkbox"/>
Combine, compare or match data from multiple sources	<input type="checkbox"/>
Process personal data without providing a privacy notice directly to the individual	<input type="checkbox"/>
Process personal data in a way which involves tracking individuals' online or offline location or behaviour	<input type="checkbox"/>
Process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them	<input type="checkbox"/>
Process personal data which could result in a risk of physical harm in the event of a security breach	<input type="checkbox"/>
Conduct someone's evaluation or scoring	<input type="checkbox"/>
Generally process people's personal data on a large scale	<input type="checkbox"/>
Process personal data in a way that involves preventing people from exercising a right or using a service or contract	<input type="checkbox"/>

Process people's personal data where the nature, scope, context or purposes of the processing is different from that described in a previous DPIA.

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If you do need to carry out a DPIA, you should ensure that:

- You clearly describe the nature, scope, context and purposes of the processing
- Where applicable, you ask your third party data processors to help you understand and document their processing activities and identify any associated risks
- You consider how best to consult individuals (or their representatives) and other relevant party affected by the data processing
- You ask for the advice of the Society's DPM
- You check that the processing is necessary for and proportionate to your purposes, and describe how you will ensure data protection compliance
- You do an objective assessment of the likelihood and severity of any risks to individuals' rights and interests
- You identify measures your business group can put in place to eliminate or reduce high risks
- You record your decision-making in the outcome of the DPIA, including any difference of opinion with the DPM or any individuals consulted
- You implement the measures you have identified, and integrate them into your project plan
- You consult with the Society's DPM, or the Head of Legal Services, before processing if you cannot mitigate high risks
- You keep all your DPIAs under review, you save them in the Data Protection drive and revisit them when necessary.

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