



The steps to take

Mastering the PIA / DPIA process

April 9, 2024



Agenda

- - How to tailor a plan to secure buy-in from management
- - How to make sure that the whole organisation is aware of the importance of data protection and
- - How to best collaborate with IT, procurement and the rest of the organisation.
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This is not a masterclass in doing DPIA's from a legal perspective.

This is a masterclass on how to master and organise the process of assessments (PIA / DPIA).





We help turn fragile privacy and infosec into sustainable GRC programmes that add value through structure, overview and control.

Our promise to you

Wired Relations in numbers

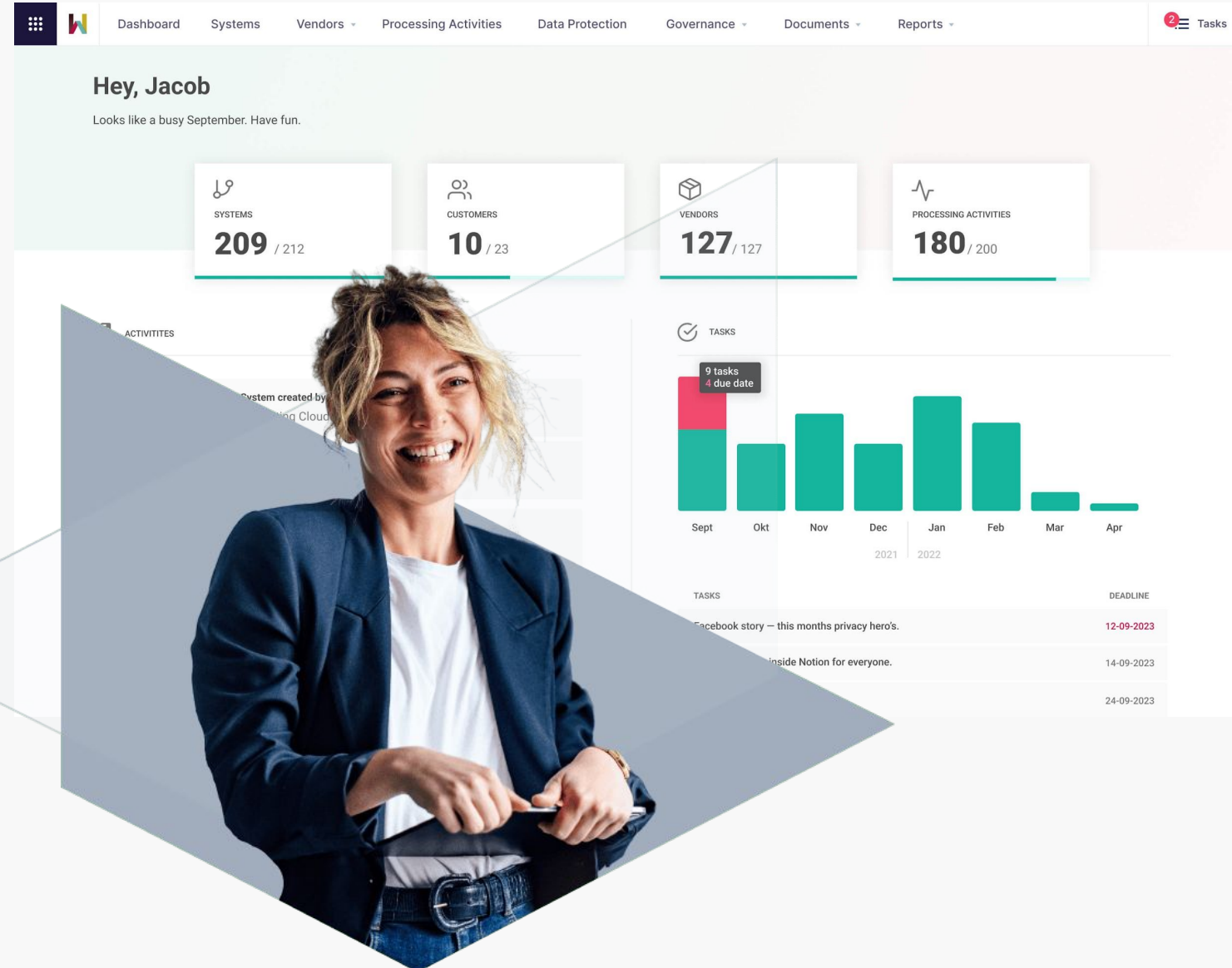
60,000+ Systems and vendors documented

20,000 Processing activities

18,000+ Recurring tasks planned

15,000+ Users

2,000+ Paying customers and free users



OVERVIEW

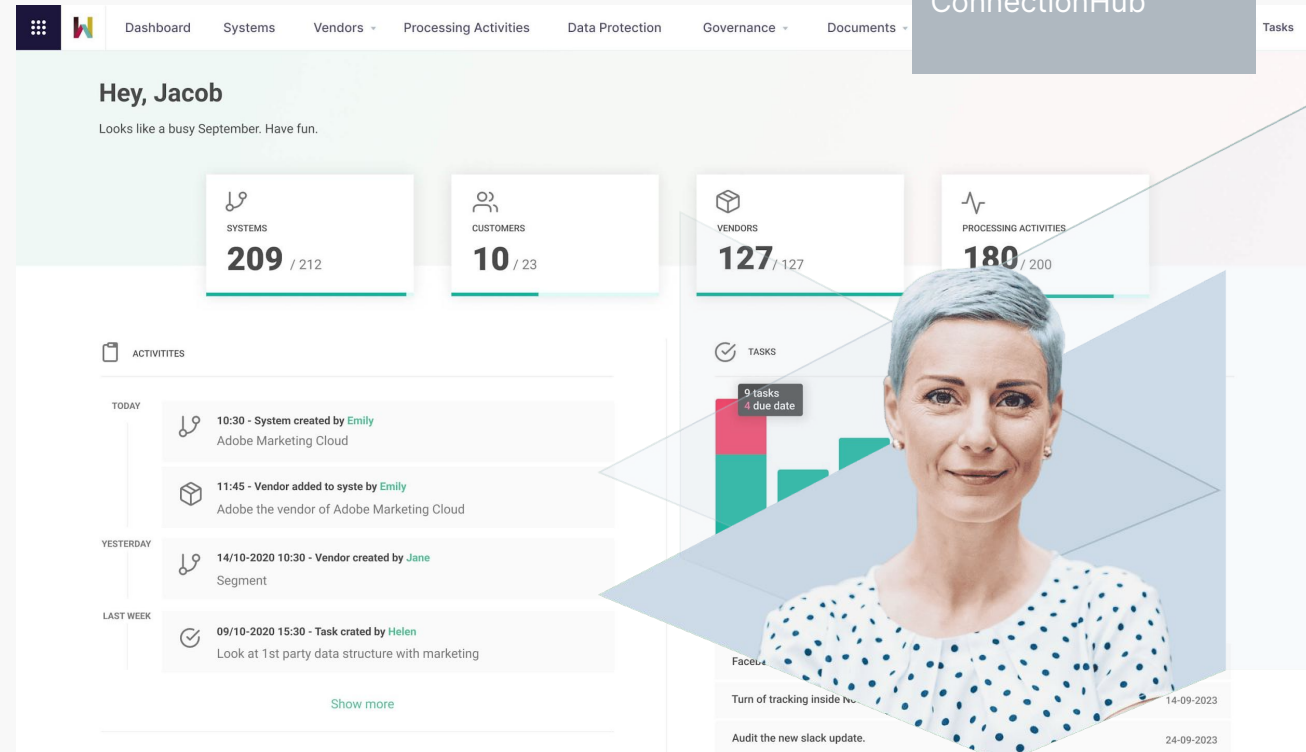
GRC workflows

Work faster than ever, involve everyone and minimise your workload. Utilise best practise to create robust workflows to make your programme sustainable.

- Link information between GDPR and information security to optimise efforts.
- Visualise the monthly workload and take back control.
- Anchor compliance knowledge in a system, not people.
- Delegate for better information and faster execution.
- Implement new frameworks at lightning speed by importing standard frameworks and utilising existing data.
- Create a great compliance overview with dashboards.
- State-of-the-art Task Manager build for compliance teams.

FEATURES

Dashboards
Task Manager
System Manager
Vendor Manager
Documents Manager
User Control
Mechanism
Group Structure
Customer Manager
ConnectionHub



**Why the process is
important**





Businesses and organisations impact society in many ways. When we produce, we impact our environment. When we choose how to treat our employees, we impact the lives of families. When we process personal information, we impact the lives of people.

The latter, the processing of personal data, has grown over the last 20 years or so.

What we do is both:

1. Invasive and
2. Economically important.



When we significantly impact people and society, we are **accountable** in the original sense of the word.

We should be able to **explain, justify and document** our actions.

Moreover, we must have a robust process which ensures that we make **sound decisions** when implementing new technologies or processing personal information.

What the process does

- Supports good decision-making,
- Good governance
- Compliance
- Often no DPIA is required – documents the non-action
- It is also good practice to do a DPIA for any other major project which requires the processing of personal data. (ICO)

**What prompts the
process?**



- New system
- New feature / old system
- New process / old system
- New laws and regulations
- Retiring systems that holds personal information





**THE PROBLEM:
HOW DO WE KNOW?**

When we don't know - we get in too late

- No negotiation power
- Pressure from organisation
- Already implemented
- Loss of money
- Risk



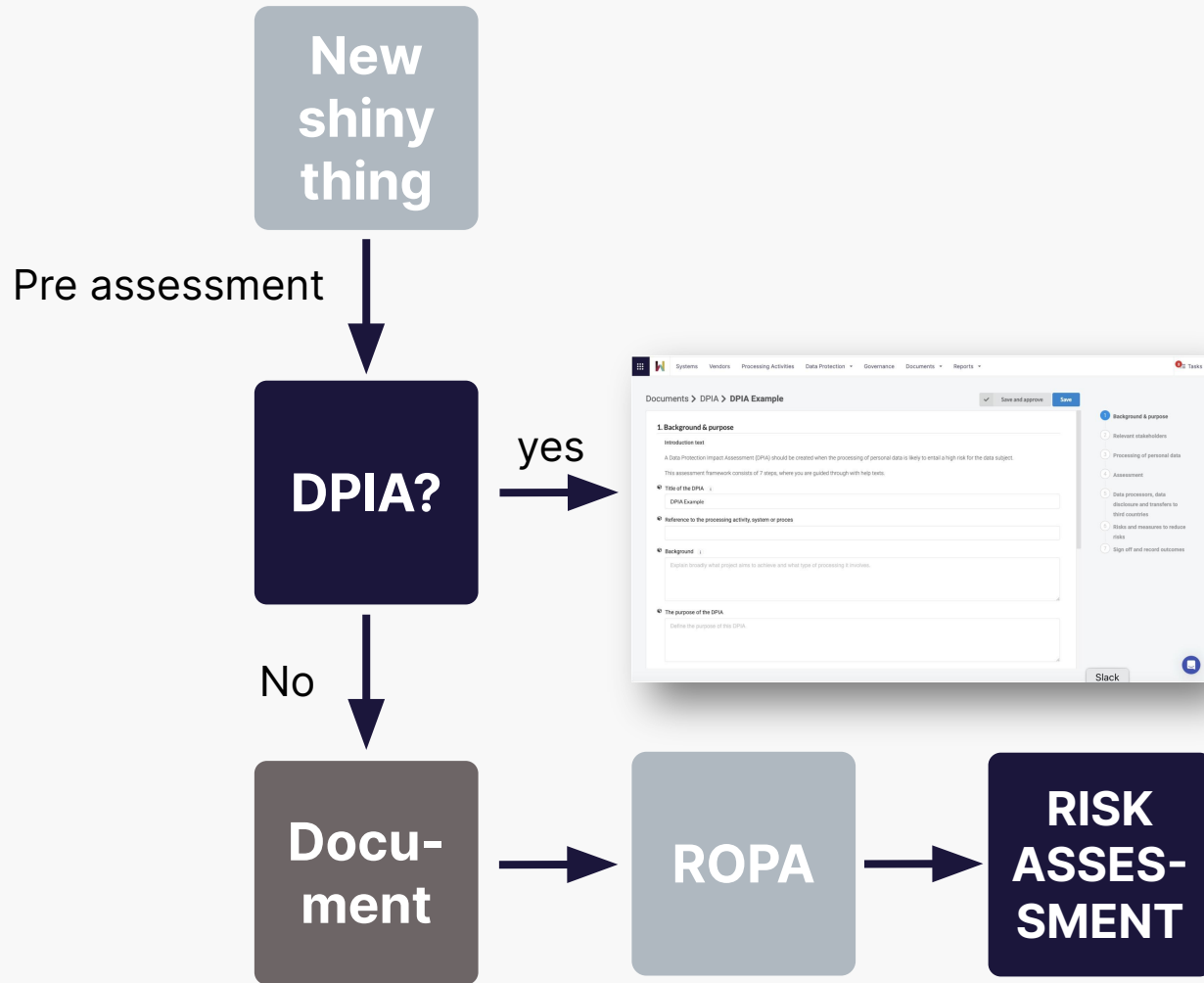
Getting to know is a cultural issue

- Training and awareness
 - Don't forget VIP's
- Let's put it in a policy (and get it out there)
- Hybrid organisation and ambassadors
- We have a process (or more)
- We have buy-in
- Ask...



**The process - and why
it's really THE process**





- 1 Background & purpose
- 2 Relevant stakeholders
- 3 Processing of personal data
- 4 Assessment
- 5 Data processors, data disclosure and transfers to third countries
- 6 Risks and measures to reduce risks
- 7 Sign off and record outcomes

Pre-assessment



Likely to result in high risk to individuals



Always when... black list



Consider when ...

1

Likely to result in high risk to individuals



2

Always when... black list



3

Consider when ...

Reference to the processing activity, system or process

Background

Explain broadly what project aims to achieve and what type of processing it involves.

Please answer the following question to clarify whether a full DPIA should be carried out.

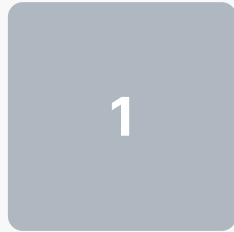
We should carry out a full DPIA if we plan to:

- use systematic and extensive profiling or automated decision-making to make significant decisions about people
- process special-category data or criminal-offence data on a large scale
- systematically monitor a publicly accessible place on a large scale
- use innovative technology in combination with any of the criteria in the European guidelines
- use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit
- carry out profiling on a large scale
- process biometric or genetic data in combination with any of the criteria in the European guidelines
- combine, compare or match data from multiple sources
- process personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines
- process personal data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines
- process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them
- process personal data that could result in a risk of physical harm in the event of a security breach
- if there is a change to the nature, scope, context or purposes of our processing
- We do none of the above

Is a full DPIA required?

Yes No Not sure

Pre-assessment



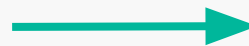
Likely to result in high risk to individuals



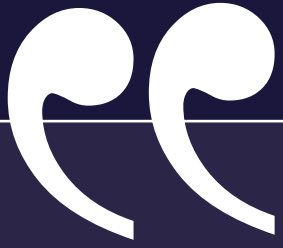
Always when... black list



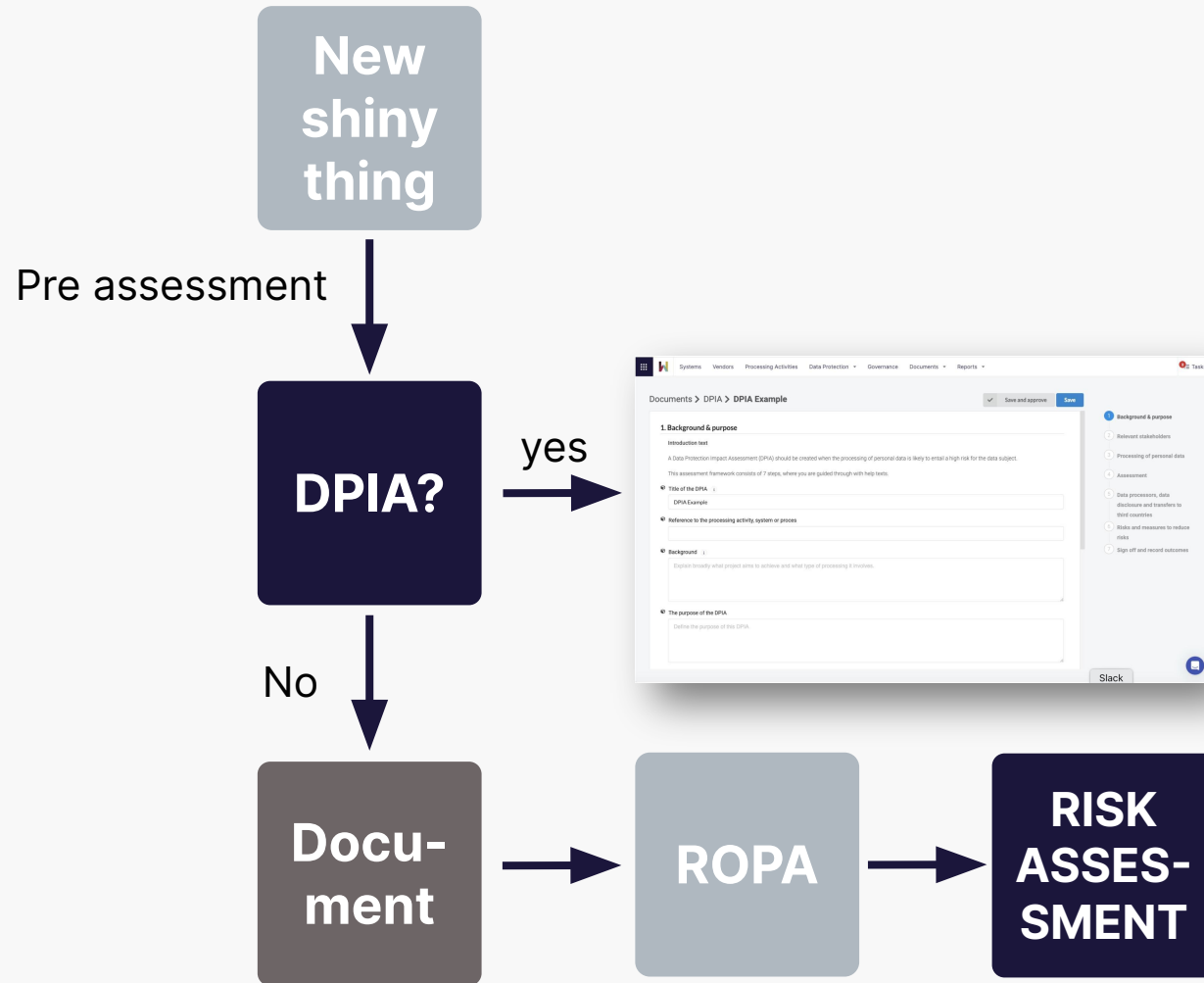
Consider when ...



- We consider whether to do a DPIA if we plan to carry out any other:
 - evaluation or scoring;
 - automated decision-making with significant effects;
 - systematic monitoring;
 - processing of sensitive data or data of a highly personal nature;
 - processing on a large scale;
 - processing of data concerning vulnerable data subjects;
 - innovative technological or organisational solutions;
 - processing that involves preventing data subjects from exercising a right or using a service or contract.



If in doubt - do a DPIA



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- A vertical list of seven steps, each in a circle, connected by a vertical line. A green arrow points from the screenshot in the flowchart to the first step. The steps are:
- 1 Background & purpose
 - 2 Relevant stakeholders
 - 3 Processing of personal data
 - 4 Assessment
 - 5 Data processors, data disclosure and transfers to third countries
 - 6 Risks and measures to reduce risks
 - 7 Sign off and record outcomes

Pre-assess your IT system or make legally-sound DPIAs in 7 easy steps with a proven ICO framework in Wired Relations.

Book a meeting with us at wiredrelations.com to learn more.



Next time...

- How to tailor a plan to secure buy-in from management
- How to make sure that the whole organisation is aware of the importance of data protection and
- How to best collaborate with IT, procurement and the rest of the organisation.



Thank you

Contact us

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