

Data Protection Impact Assessment (DPIA)

Data Protection Impact Assessments (DPIAs) are mandated by GDPR where there is high risk processing. From identifying the need for a DPIA to assessing criteria, defining scope, context, purpose and nature of processing, assessing proportionality, identifying and assessing privacy risks and mitigations, NCC Group can assist your organisation's compliance.

Aligned to ICO guidance for repeatability and validation

To ensure repeatability and consistency, NCC Group aligns DPIA process with ICO guidelines, which gives it validity. This ensures all relevant data is captured and third parties consulted where required and the completed DPIA can be shared with the regulatory body if necessary, to demonstrate compliance.

Demonstrate and ensures compliance with data protection legislation

Article 35 of GDPR requires a DPIA to be conducted particularly when processing high risk data, but it is good practice to complete an assessment for every new project or process involving personal information. NCC Group screens new and changed initiatives to identify whether a DPIA is required or not.

Validate lawful basis and purpose for processing

NCC Group's privacy experts will assist you in documenting your organisation's activity and the information you will be handling. Under GDPR and other data protection legislations you must have a specific purpose and legal basis for processing any personal and special category data, and NCC Group will help you capture this within the DPIA.

Identify international transfers and third parties

In addition to documenting privacy risk, a DPIA will identify information leaving the organisation that may go to third parties or overseas. Prioritising and understanding privacy risks and mitigations will inform other data protection work including information mapping or third-party due diligence reviews.

DPIA can be delivered remotely or on site

With flexible working becoming more popular, NCC Group is able to support your organisation with onsite or remote workshops to complete DPIA reviews through telephone or video calls and secure messaging for follow-ups and information gathering. NCC Group can meet your needs to ensure the assessment takes place within your required timeframe.

Key Benefits

- Aligned to ICO guidance for repeatability and validation
- Demonstrate and ensure compliance with data protection legislation
- Validate lawful basis and purpose for processing
- Identify international transfers and third parties
- DPIA can be delivered remotely or on site

Conducting Data Protection Impact Assessments (DPIAs) is a process which helps an organisation identify and reduce the privacy risks of a project or process. An effective DPIA will be used throughout development and implementation of an activity in addition to being updated throughout the activity's life cycle.

A DPIA enables an organisation to systematically and thoroughly analyse how a particular project or system will affect the privacy of individuals impacted. DPIAs can be used for example for:

- IT systems storing and accessing personal data
- Data sharing initiatives where organisations seek to pool or link sets of personal data
- Surveillance systems (monitoring members of the public) or the application of new technology (e.g. automatic number plate recognition).

NCC Group's approach is to review documentation, conduct workshops with stakeholders, understand the processing of data including how it is managed by the technology and manual controls from entry through to exiting (or destruction) the organisation. NCC Group documents the privacy risks and propose actions to mitigate those risks.

DPIAs are a mandatory requirement under Article 35 of GDPR where the processing is a high risk. There are, however, benefits to organisations including:

- DPIAs are the most effective way to demonstrate to regulatory bodies that personal data processing complies with the requirements of the GDPR and other privacy legislation
- Individuals gain assurance that organisations using their information follow good practice
- Initiatives having DPIAs should be less privacy- intrusive and less likely to affect individuals in a negative way
- DPIAs may also improve transparency to individuals making it easier to understand how and why their information is processed
- Identifying privacy risks early in a project will reduce the costs of managing privacy risks as opposed to when security is added later to a project
- Conducting and publicising a DPIA helps an organisation build trust with those that it has data about
- Actions taken during and after the DPIA process can improve an organisation's understanding of and relationship with those it has data about

NCC Group has significant experience in identifying where DPIA's are required (screening) in addition to performing these across many technologies and sectors.



NCC Group's approach to DPIAs is:

Evidence Gathering

- NCC Group reviews documentation (e.g. development and procedures documents), and holds workshops with relevant stakeholders (including IT staff who understand the infrastructure, data storage and transmission, Subject Matter Experts [e.g. system owners], Legal, Compliance, HR and Data Protection where required)
- NCC Group identifies and consults with third-party groups of stakeholders as required.

Analysis

- NCC Group identifies relevant privacy risks from the understanding gained and align these to GDPR principles
- The potential impact to the organisation is also documented should a risk materialise
- Through understanding the activity and the risks involved, NCC Group identifies potential actions that should be undertaken to mitigate the risk.

Reporting

- NCC Group reports on the privacy risks and the proposed actions within the DPIA in a prioritised manner
- A de-briefing session is held with the organisation to walk through the privacy risks and proposed actions.

Data Protection Impact Assessments (DPIAs) are a mandatory requirement for processing certain types of personal information, but should be used as good privacy practice for all new and changing projects and initiatives involving personal information across the organisation. They help to inform projects from the start, building privacy by design and giving all parties involved an understanding of privacy requirements.

The DPIA will help you to understand and reduce the privacy risk of new initiatives and can also be used for existing processes and systems that handle personal information. Used retrospectively, a DPIA will help you to understand current risks and potential mitigations, as well as how data is processed by your organisation and where it may be coming from and going to.

NCC Group will guide you through the DPIA process and help you to understand privacy requirements and risks across your projects and processes.



About NCC Group



NCC Group is a global expert in cyber security and risk mitigation, working with organisations to protect their brand, value and reputation against the ever-evolving threat landscape.

With our knowledge, experience and global footprint, we are well placed to help organisations identify, assess, mitigate and respond to the risks they face.

We are passionate about making the Internet safer and revolutionising the way in which organisations think about cyber security.





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