



Privacy Impact Assessments

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Learning objectives

- Why conduct a PIA
- When to conduct a PIA
- What are you assessing
- How to conduct a PIA

Why conduct a PIA?

- Prevent harm and distress
- Compliance assurance
- Protect reputation
- Avoid enforcement action
- Improve adoption rates
- Avoid re-design & retrofit

When to conduct a PIA?

- Collecting new confidential/sensitive data
- Unexpected change to the way existing data are used
- A change in the law
- Use of new (and potentially privacy invasive) technologies to improve data analytics

What are you assessing?

- Individual risks (e.g. harm, injury, distress)
- Corporate risks (e.g. regulatory, financial, reputational)
- Physical security (e.g. private space, technical security, estate security)
- Informational privacy (e.g. unlawful or excessive processing, disclosure without consent)

Key questions to ask

- What data is being processed?
- Will data subjects be compelled?
- Is the data particularly sensitive?
- What is the lawful basis for processing?
- Will the project involve contacting people in a way that they may find intrusive?



- Are you using the data for a new purpose?
- What are the data flows?
- Will data be disclosed to new organisations?
- What are the security measures?

key questions continued

- What is the impact on data quality?
- What do the data subjects think?
- Will potentially privacy invasive technology be used?
- Will excessive amounts of data be processed?
- Will it result in decisions that will have a significant impact on individuals?

Scenario A

Your organisation recently issued a tender, as it wishes to move its email exchange server to the cloud. The organisation is currently considering proposals from three technology companies (one based in Ghana, one in the USA and one in North Korea).

- 1. What impact might this have on privacy?**
- 2. What mitigating controls should be implemented?**

Scenario B

A doctor wants to install bedside camera's, in order to remotely monitor the movements and conditions of stroke patients. This will enable them to detect important early warning signs and risks.

- 1. What impact might this have on privacy?**
- 2. What mitigating controls should be implemented?**

Scenario C

- A local authority (council/district) wants to pool all of its citizens data into a single repository and to provide access to that data, on need to know basis, for primary and secondary uses, via a web-based portal. This is in order to improve the effectiveness and efficiency of the services it provides.
- 1. What impact might this have on privacy?**
 - 2. What mitigating controls should be implemented?**