

T/A Mr Pallet Racking

ABC Shelving Ltd

Data Protection Impact Assessment

Company Name:	ABC Racking UK Ltd	Date Document Downloaded:	n/a
Registered Address:	B7 5EA	Point of Contact:	Andrew Price
Premises Address:	B7 5EA	Assessment Carried Out By:	Andrew Price
Description:	Sales and accounts	Assessment Date (or Period):	24 x months
Project:	n/a		

Part 1: Business and Project Summary

Question Ref.	Question	Answer	Answer Date
1.1	What are the business's aims and objectives?	sales	2018
1.2	Provide a brief summary of the project.	sales	2018
1.3	What are the aims and objectives of the project?	sales	2018

Part 2: Is a Data Protection Impact Assessment Required?

Question Ref.	Question	Answer	Answer Date
2.1	Will the project involve the collection, storage, and/or use of personal data?	Yes minimal	2018
2.2	Will the personal data used in the project be: a) Newly-collected data; or b) Existing data used for a new purpose or in a new way?	Newly collected	2018
2.3	Will the personal data collected be obtained: a) From data subjects directly; or b) From other sources?	direct	2018
2.3.1	If personal data is to be obtained from other sources, will this be done without providing the individual with a privacy notice? ('invisible processing')	n/a	2018
2.4	List the type(s) of personal data that will be used in the project.	Emails and addresses	2018
2.4.1	If any of the personal data listed above is sensitive personal data, note that here, providing a brief description of how it will be used.	sales	2018
2.4.2	If any of the personal data listed above is biometric or genetic data, note that here, providing a brief description of how it will be used.	n/a	2018
2.4.3	Is sensitive personal data (or criminal offence data) being processed on a large scale? If yes, provide a brief	no	2018

Question Ref.	Question	Answer	Answer Date
	description.		
2.4.4	Is sensitive personal data to be used to decide on individuals' access to services? If yes, provide a brief description.	no	2018
2.4.5	Will any personal data (and/or sensitive personal data) concerning vulnerable individuals be processed? If yes, provide a brief description.	no	2018
2.5	Will the project utilise new technology that may be considered high-risk or otherwise intrusive to privacy?	no	2018
2.5.1	If yes, provide a brief description of the technology.	n/a	2018
2.6	Will the project use personal data for automated decision-making or profiling?	no	2018
2.6.1	If yes, provide a brief description.	n/a	2018
2.6.2	Will profiling be used to decide on individuals' access to services? If yes, provide a brief description.	no	2018
2.7	Will individuals be profiled on a large scale?	no	2018
2.7.1	If yes, provide a brief description.	n/a	2018
2.8	Will the project involve the systematic monitoring of publicly accessible places on a large scale?	no	2018

Question Ref.	Question	Answer	Answer Date
2.8.1	If yes, provide a brief description.	n/a	2018
2.9	Will the project involve the matching or combination of datasets from different sources?	no	2018
2.9.1	If yes, provide a brief description.	n/a	2018
2.10	Will the project involve tracking individuals' location or behaviour?	no	2018
2.10.1	If yes, provide a brief description.	n/a	2018
2.11	Will the project involve profiling children or targeting services to them?	no	2018
2.11.1	If yes, provide a brief description.	n/a	2018
2.12	Will the project involve processing personal data that may endanger individuals' physical health or safety in the event of a security breach?	no	2018
2.12.1	If yes, provide a brief description.	n/a	2018
2.13	Will the project involve systematic and extensive profiling with significant effects?	no	2018
2.13.1	If yes, provide a brief description.	n/a	2018
2.14	Will the project involve the sharing of personal data with third parties?	no	2018
2.14.1	If yes, list those third parties, including their location.	n/a	2018

Question Ref.	Question	Answer	Answer Date
Is a Data Protection Impact Assessment Required?			
2.15	In light of the answers provided above in Part 2, is a Data Protection Impact Assessment required?	no	2018
2.15.1	Provide an outline of the reason(s) for the answer to 2.15.	Sales and accounts information required top process orders	2018

Part 3: Consultation n/a

Question Ref.	Name	Contact Details	How and When the Party will be Consulted	Answer Date
Provide details of the internal parties to be consulted for this Data Protection Impact Assessment (add or remove rows as required):				
3.1				
3.2				
3.3				
3.4				
3.5				
3.6				
3.7				
3.8				
3.9				
3.10				
Provide details of the external parties to be consulted for this Data Protection Impact Assessment (add or remove rows as required):				
3.11				
3.12				
3.13				
3.14				
3.15				
3.16				

Part 4: Personal Data, Collection, Use, and Storage

Question Ref.	Question	Answer	Answer Date
4.1	Refer back to 2.4 and list the personal data that will be used in the project here (list sensitive personal data, where applicable, separately).	Emails and addresses	2018
For each item under 4.1, answer the following:			
4.2	How will the personal data be collected?	emails	2018
4.3	How will the personal data be used?	invoices	2018
4.4	How will the personal data be stored?	computer	2018
4.5	Where will the personal data be stored?	files	2018
4.6	Who will have access to the personal data and for what purpose(s)?	Sales and accounts	2018
4.7	What lawful basis (or bases) for processing the personal data is or are being relied upon?	Completion of sales act 1979 and 2015	2018
4.8	How long will the personal data be held (or, if this is not known, how will the length of its retention be determined)?	24 months	2018
4.9	When the retention period has expired, the personal data is no longer required, or is otherwise to be deleted or disposed of, how will this be done?	deleted	2018

Part 5: Impact on Data Subjects

Question Ref.	Potential Risk	Severity of Impact	Risk Likelihood	Notes / Comments	Answer Date
5.1	Personal data being used in a manner not covered by the lawful basis or bases identified under 4.7.	low	low		2018
5.2	Data subjects not being made fully (and clearly) aware of the purpose(s) for which their personal data is used.	low	low		2018
5.3	Collecting more personal data than data subjects are informed about.	low	low		2018
5.4	Collecting more personal data than is reasonably necessary for the purpose(s) for which it is to be used.	low	low		2018
5.5	Collecting personal data about vulnerable people and not sufficiently addressing their concerns about that collection.	low	low		2018
5.6	Collecting sensitive ('special category') personal data.	low	low		2018
5.7	Data subjects not being made aware of the lawful basis or bases identified under 4.7.	low	low		2018
5.8	Data subjects not being given the information required by Articles 13 and/or 14 of the GDPR (including that under 5.2, 5.7, 5.9, and information about their rights under the GDPR).	low	low		2018
5.9	Personal data being shared with third parties without data subjects' knowledge and/or consent.	low	low		2018

Question Ref.	Potential Risk	Severity of Impact	Risk Likelihood	Notes / Comments	Answer Date
5.10	Personal data being revealed to third parties accidentally as a result of insufficient controls on disclosure.	low	low		2018
5.11	The use of personal data extending beyond the purpose(s) for which it is initially collected without data subjects' knowledge and/or consent (where consent is required).	low	low		2018
5.12	Anonymity being compromised where the combination of data sets results in anonymous identifiers or pseudonymised data becoming data that is capable of identifying individual data subjects.	low	low		2018
5.13	Personal data not being checked for accuracy at or after collection.	low	low		2018
5.14	Personal data not being kept up-to-date.	low	low		2018
5.15	Personal data being retained for longer than is necessary in light of the purpose(s) for which it is collected.	low	low		2018
5.16	Personal data being used in a manner that is not permitted by the data subject (e.g. where a data subject has exercised the right to restrict processing).	low	low		2018
5.17	Data subjects' exercise of their rights under the GDPR (including but not limited to the rights of access, rectification, erasure, restricting processing, objecting to processing,	low	low		2018

Question Ref.	Potential Risk	Severity of Impact	Risk Likelihood	Notes / Comments	Answer Date
	and data portability) being impeded.				
	n/a	n/a	n/a		

Part 6: Organisational Risks

Question Ref.	Potential Risk	Severity of Impact	Risk Likelihood	Notes / Comments	Answer Date
6.1	Non-compliance with the GDPR or other data protection and privacy-related legislation resulting in damage to reputation.	low	low		2018
6.2	Further risks or issues being identified at a later stage in the project (after this assessment) or once the project has been implemented, requiring costly remedial action rather than building in preventative measures.	low	low		2018
6.3	The use of personal data in a way that causes concern among data subjects resulting in reluctance to deal with the business and/or damage to reputation.	low	low		2018
6.4	Insufficient transparency surrounding personal data use resulting in reluctance to deal with the business and/or damage to reputation.	low	low		2018
6.5	Excessive or unnecessary storage of personal data which, in addition to the risks identified under 5.3 and 5.4, may result in the data being less useful and compromising efficiency.	low	low		2018
6.6	Poor perception by data subjects about the business's use of personal data resulting in damage to reputation.	low	low		2018
	n/a	n/a	n/a		2018

Part 7: Compliance and Legal Risks

Question Ref.	Potential Risk	Severity of Impact	Risk Likelihood	Notes / Comments	Answer Date
7.1	Non-compliance with the GDPR or other data protection and privacy-related legislation resulting in fines and other possible penalties.	low	low		2018
7.2	Non-compliance with the Privacy and Electronic Communications Regulations (PECR).	low	low		2018
7.3	Non-compliance with other relevant legislation.	low	low		2018
	n/a	n/a	n/a		2018

Part 8: Solutions to Identified Risks

Question Ref.	Potential Solution	Potential Risk(s) Addressed (Question Ref.)	Result	Evaluation of Solution	Answer Date
<p>Evaluate the following with respect to the Impact on Data Subjects. Under <i>Result</i>, state whether the risk is likely to be eliminated entirely, reduced (and to what degree), or accepted. Under <i>Evaluation</i>, state whether the final impact of the risk, taking into account the potential solution, is justifiable and what its final impact will be on the project from a cost/benefit perspective.</p>					
8.1	Controlling the use of personal data, limiting use to that compatible with the lawful basis or bases established under 4.7 and with the purpose(s) for which the data is originally collected.	5.1, 5.11	same	none	2018
8.2	If additional use(s) of personal data is necessary, inform data subjects and, where required, obtain their consent to the additional use(s).	5.11	same	none	2018
8.3	Collecting only the personal data that is reasonably required for the stated purpose(s).	5.3, 5.4	same	none	2018
8.4	Provide clear information about the business's use of personal data to data subjects including what is collected, for what purpose(s), on what legal basis etc.	5.2, 5.3, 5.7, 5.8	same	none	2018
8.5	Provide other important information required under Articles 13 and 14 of the GDPR in a clear, concise, and accessible manner.	5.8	same	none	2018

Question Ref.	Potential Solution	Potential Risk(s) Addressed (Question Ref.)	Result	Evaluation of Solution	Answer Date
8.6	Only collect, process, and store sensitive (special category) personal data where absolutely necessary. Question whether it is required for the stated purpose(s). Ensure that one of the conditions under Article 9 of the GDPR is met.	5.6	same	none	2018
8.7	Ensure that all data subjects, and particularly those that are vulnerable, can easily find answers to their questions about the business's use of their personal data.	5.2, 5.5	same	none	2018
8.8	Control all personal data sharing with third parties. Choose trustworthy, reputable data processors. Ensure that all sharing is documented and made subject to suitable data processing agreements.	5.9, 5.10	same	none	2018
8.9	Inform data subjects of any and all personal data sharing with third parties, obtaining consent where necessary.	5.9, 5.10	same	none	2018
8.10	Where any anonymised or pseudonymised data is used, suitable measures are taken to prevent the identification of individuals, particularly where different data sets are combined.	5.12	same	none	2018

Question Ref.	Potential Solution	Potential Risk(s) Addressed (Question Ref.)	Result	Evaluation of Solution	Answer Date
8.11	Check all personal data for accuracy, where reasonably possible, at the time of collection and at regular intervals thereafter. Provide easy, accessible means for data subjects to update their own personal data held by the business.	5.13, 5.14	same	none	2018
8.12	Establish data retention periods prior to the collection of personal data or, where a fixed period cannot be reasonably established, determine criteria upon which the retention of personal data will be decided. Review regularly.	5.15	same	none	2018
8.13	Implement (or update, as appropriate) the business's Data Retention Policy.	5.15	same	none	2018
8.14	Ensure the secure destruction (or disposal) of personal data that is no longer to be retained.	5.15	same	none	2018
8.15	Ensure that data subjects are given information about their rights under the GDPR (Chapter 3 of the GDPR) and how to exercise them.	5.16, 5.17	same	none	2018
8.16	Cooperate fully with any and all requests by data subjects to exercise their rights under the GDPR (Chapter 3 of the GDPR) and provide easy and	5.16, 5.17	same	none	2018

Question Ref.	Potential Solution	Potential Risk(s) Addressed (Question Ref.)	Result	Evaluation of Solution	Answer Date
	accessible means for them to make such requests.				
<p>Evaluate the following with respect to Organisational, Compliance, and Legal Risks. Under <i>Result</i>, state whether the risk is likely to be eliminated entirely, reduced (and to what degree), or accepted. Under <i>Evaluation</i>, state whether the final impact of the risk, taking into account the potential solution, is justifiable and what its final impact will be on the project from a cost/benefit perspective.</p>					
8.17	Ensure that the business's Data Protection Policy is followed at all times (and updated if necessary to factor in the project).	6.1, 7.1, 7.2, 7.3	same	none	2018
8.18	Ensure that all staff associated with the project are fully trained in all related aspects of data-protection (including but not limited to the legal requirements of the GDPR) and are made aware of all potential risks.	6.1, 7.1, 7.2, 7.3	same	none	2018
8.19	Implement suitable organisational security measures to protect personal data.	6.1, 7.1, 7.2, 7.3	same	none	2018
8.20	Implement suitable technical security measures to protect personal data.	6.1, 7.1, 7.2, 7.3	same	none	2018
8.21	Address data protection risks thoroughly at this part of the planning stage of the project and implement agreed solutions as the project progresses, reviewing at	6.2	same	none	2018

Question Ref.	Potential Solution	Potential Risk(s) Addressed (Question Ref.)	Result	Evaluation of Solution	Answer Date
	regular intervals where necessary.				
8.22	Controlling the use of personal data, limiting use to that compatible with the lawful basis or bases established under 4.7 and with the purpose(s) for which the data is originally collected. (See 8.1)	6.3, 6.6	same	none	2018
8.23	Only collect, process, and store sensitive (special category) personal data where absolutely necessary. Question whether it is required for the stated purpose(s). Ensure that one of the conditions under Article 9 of the GDPR is met. (See 8.6)	6.3, 6.6	same	none	2018
8.24	Provide clear information about the business's use of personal data to data subjects including what is collected, for what purpose(s), on what legal basis etc. (See 8.4)	6.3, 6.4, 6.6	same	none	2018
8.25	Ensure that all data subjects, and particularly those that are vulnerable, can easily find answers to their questions about the business's use of their personal data. (See 8.7)	6.3, 6.4, 6.6	same	none	2018
8.26	Ensure that data subjects are given information about their rights under the GDPR	6.3, 6,4 6.6	same	none	2018

Question Ref.	Potential Solution	Potential Risk(s) Addressed (Question Ref.)	Result	Evaluation of Solution	Answer Date
	(Chapter 3 of the GDPR) and how to exercise them. (See 8.15)				
8.27	Cooperate fully with any and all requests by data subjects to exercise their rights under the GDPR (Chapter 3 of the GDPR) and provide easy and accessible means for them to make such requests. (See 8.16)	6.3, 6.4, 6.6	same	none	2018
8.28	Collecting only the personal data that is reasonably required for the stated purpose(s). (See 8.3)	6.5	same	none	2018
8.29	Establish data retention periods prior to the collection of personal data or, where a fixed period cannot be reasonably established, determine criteria upon which the retention of personal data will be decided. Review regularly. (See 8.12)	6.5	same	none	2018
8.30	Implement (or update, as appropriate) the business's Data Retention Policy. (see 8.13)	6.5	same	none	2018
8.31	Ensure the secure destruction (or disposal) of personal data that is no longer to be retained. (See 8.14)	6.5	same	none	2018

Question Ref.	Potential Solution	Potential Risk(s) Addressed (Question Ref.)	Result	Evaluation of Solution	Answer Date
	n/a		n/a	n/a	2018

Part 9: Approved Solutions n/a

Risk (Include Question Ref.)	Approved Solution (Include Question Ref.)	Approved By	Notes / Comments	Approval Date
<<Add further risks as required>>	<<Add further solutions as required>>			

Part 10: Integration of Data Protection Impact Assessment Outcomes into Project Plan

Action to be Taken	Completion Date (or Frequency)	Responsibility for Action	Notes / Comments
Integrate the outcomes of this Data Protection Impact Assessment into the main project plan, updating additional project documentation as necessary.	2018	Andrew Price	none
Implement approved privacy risk solutions.	2018	Andrew Price	none
Review this Data Protection Impact Assessment and the project plan regularly.	24 months	Andrew Price	none
Update this Data Protection Impact Assessment and the project plan as required.	2018	Andrew Price	none
Conduct internal and external consultations as required.	2018	Andrew Price	none

Action to be Taken	Completion Date (or Frequency)	Responsibility for Action	Notes / Comments
		<<insert name>>	
		<<insert name>>	
		<<insert name>>	
		<<insert name>>	
		<<insert name>>	
		<<insert name>>	
		<<insert name>>	
		<<insert name>>	
		<<insert name>>	

Part 11: Approval and Sign-Off

[I] hereby confirm that [I] have reviewed and approved this Data Protection Impact Assessment. In particular, [I am] satisfied that:

- 1) The proposed project complies with the core principles set out in Article 5 of the GDPR;
- 2) The proposed collection, processing, and holding of personal data meets at least one of the conditions set out in Article 6 of the GDPR;
- 3) [The proposed collection, processing, and holding of sensitive (special category) personal data, in addition to the above, meets at least one of the conditions set out in Article 9 of the GDPR;]
- 4) The proposed project and approved solutions complies with the rights of data subjects as set out in Chapter 3 of the GDPR;
- 5) All relevant privacy risks and approved solutions have been documented and arrangements have been made to monitor the same at regular intervals throughout the proposed project; and
- 6) The approved solutions set out herein represent a targeted, appropriate, and proportionate response to the privacy risks identified herein.

Name[s]: Andrew Price

Position[s]: Director

Date: 2018