

Data Protection Impact Assessment Policy For MicroGuide

Project Background:

MicroGuide is a cloud-based publishing platform. Publically accessible information, (usually medical guidelines) is entered into a content management system (CMS) by the staff of a medical organisation. These members of staff are system users and access the system via an email address and password. Once the user has populated the CMS they can then publish the data to a mobile app and web app. The mobile app is publically downloadable and the web app (accessed via a URL) can be found via a link in the CMS.

Personal Data Stored in the System:

The name of the user, email address and organisation name is stored within the system. The Lawful Basis for Processing of this data is Article 6(1)(b) - contract. We process this data in order to carry out our contractual obligation.

DPIA Screening Checklist:

We consider carrying out a DPIA in any major project involving the use of personal data.

No major use of personal data is used in this project.

We consider whether to do a DPIA if we plan to carry out any other:

evaluation or scoring; **This does not take place**

automated decision-making with significant effects; **This does not take place**

- systematic monitoring; **This does not take place**
- processing of sensitive data or data of a highly personal nature; **No sensitive or highly personal is used**
- processing on a large scale; **This does not take place**
- processing of data concerning vulnerable data subjects; **This does not take place**
- innovative technological or organisational solutions; **This is not relevant**
- processing that involves preventing data subjects from exercising a right or using a service or contract. **Our processing is required in order to carry out a contracted service**

None of the above is relevant to the system.

- We always carry out a DPIA if we plan to:
 - use systematic and extensive profiling or automated decision-making to make significant decisions about people; **This does not take place**
 - process special-category data or criminal-offence data on a large scale; **This does not take place**
 - systematically monitor a publicly accessible place on a large scale; **This does not take place**
 - use innovative technology in combination with any of the criteria in the European guidelines; **This does not take place**
 - use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit; **This does not take place**
 - carry out profiling on a large scale; **This does not take place**

- process biometric or genetic data in combination with any of the criteria in the European guidelines; **This does not take place**

- combine, compare or match data from multiple sources; **This does not take place**

- process personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines; **This does not take place, the privacy notice is available on the company website**

- 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; **This does not take place**

- process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them; **This does not take place**

- process personal data that could result in a risk of physical harm in the event of a security breach. **This does not take place**

None of the above is relevant and is not carried out in the system.

- We carry out a new DPIA if there is a change to the nature, scope, context or purposes of our processing.

We will review this checklist if there is any change in processing circumstances.

- If we decide not to carry out a DPIA, we document our reasons.

We have reviewed the checklist and provided answers to all points raised. As there were no positive replies to any of the points we consider the system to be low risk and thus a DPIA is not required.

Data Protection officer notes and recommendations:

I agree with the above. We have complied with the ICO screening recommendation and concluded a DPIA for MicroGuide is not required.