



Data Protection Impact Assessment

PART 1

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| Date of the Assessment | 02/11/23 |
| Who is carry out the assessment? | Qamar Sheikh |
| Controller Organisation | VISAV Limited |
| Assessment to be kept under review by? | Qamar Sheikh |
| Project | |
| What does the project aim to achieve? | Inform and listen to local communities |
| What type of data processing is involved? | Data is recorded by the system and is used for batch processing for analysis. Real-time Data processing is used when collating proper responses from the API for all functions. |
| Processing | |
| Nature of Personal Data? | Name/Address/Age/Contact details- email/phone numbers Special category data will be: Personal data reveal ethnic race/origin. Personal data revealing religions or philosophical beliefs. Data concerning a person's sexual orientation. Association with our information providers |
| Benefits of the processing | Widespread knowledge of community issues/ emergency announcements |
| How much personal data will be collected? | Minimal data required registration – Name/email address/address. Date of Birth and Phone Number is optional. |
| How often will it be collected? | Data is collected on Sign up and once a year we request the users to voluntarily confirm their details. |
| How often will it be used? | All Neighbourhoodalert Licenced Products reference data in real-time. |

| | Prepared by | Approved by | Issued by | Document Control |
|-------------|--------------|--------------------------------------|--------------------------------------|--|
| Signature | Qamar Sheikh | Qamar Sheikh | Qamar Sheikh | Document ID: Data Protection Impact Assessment2023 |
| Date | 26/10/2022 | 26/10/2022 | 26/10/2022 | Effective Date: 29/08/2017 |
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| How long will the personal data be kept? | See Data Deletion Policy for Alert |
| Individuals affected by the processing | All subscribed users |
| Geographical area covered | UK |
| How will: | <p>Collect the personal data? At registration, minimal data is collected, with optional demographic information updates completed after logging into the member's area.</p> <p>Use the personal data? Send personalised alerts of user's choices.</p> <p>Store the personal data? Encrypted in the database.</p> <p>Store personal data? Encrypted to AES2048 bit in the database and at rest.</p> <p>Delete the personal data? As per deletion policy or when unsubscribed</p> |
| Source of the personal data | User / PCSO collecting data |
| Will you be sharing the personal data with anyone? | Data is only shared with the user's chosen information suppliers. |
| High -risk processing Identified | <p>When PCSOs sign up subscriber's door to door</p> <p>Processing will involve the use of modern technologies or the innovative application of existing technologies including AI and Dot Net.</p> <p>Decisions are to be made about an individual's access to a product or service, opportunity, or benefit, which will be based on automated decision-making (including profiling) or will involve the processing of special category data.</p> <p>Profiling will be made on a large scale when importing data.</p> <p>Data matching and tracking will take place.</p> |

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| <p>Are there any security flaws or concerns over this type of processing?</p> <p>Is any modern technology being used or is any existing technology being used in a new way?</p> | <p>Eavesdropping/ incorrect details given /mishearing.</p> <p>No concerns over this method have been raised.</p> <p>No.</p> | |
| <p>What is the current state of technology in this area?</p> <p>Up to date and with software/hardware SLAs</p> | <p>All our equipment is current with SLAs in place.</p> <p>we have internal processes to record and implement software and firmware updates weekly, and all remediation for best practices is undertaken.</p> | |
| <p>Wider processing context</p> | <p>Certification scheme Cyber Essentials, Cyber Essentials PLUS, IASME Assurance Level1, ISO 9001/14001</p> | |
| <p>Stakeholder</p> <p>Please consult with the following stakeholder at VISAV Limited about: Data Protection queries</p> | <p>Mike Douglas</p> <p>mike@visav.co.uk</p> | |
| <p>Compliance</p> | | |
| <p>Lawful basis for processing</p> | | <p>Consent</p> |
| <p>Condition for processing- special category data</p> | <p>Explicit consent</p> | |
| <p>Processor Compliance</p> | <p>https://neighbourhoodalert.co.uk/privacypolicy/</p> | |

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| Proportionality | <p>Ways VISAV Limited will prevent function creep:</p> <p>Ways VISAV Limited will ensure data quality? Any analysis and data entry will need to be as exact as possible. We have implemented a procedure for users to report inaccurate data using a helpdesk/ticketing system and for auto email bounce parsing.</p> <p>Ways VISAV Limited will ensure data minimisation? We keep data only as long as GDPR needs it stored.</p> <p>Is there another way to achieve your? No</p> |
| | |

PART 2 -RISK ASSESSMENT

| Source of risk | Potential impact on individuals | Likelihood of harm | Severity of harm | Overall risk |
|--|--|--------------------|------------------|--------------|
| <p>A data breach occurring.</p> <p>Data subjects do not expect their personal data to be used in this way.</p> <p>Any systems not being for their intended purpose</p> | <p>Compromised personal details could lead to phishing etc.</p> <p>Confusion</p> | Possible | Significant | High |
| | | Remote | Minimal | Low |
| | | Possible | Significant | Medium |

PART 3 -MEASURES TO REDUCE RISK

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| Risk | Options to reduce/cut risk | Effect on Risk | Residual risk | Measure Approved |
|----------------|--|----------------|---------------|------------------|
| Access to data | Secure access using TLS1.2 with strong/eternally audited internal processes which are reviewed regularly. Encrypted end to end with regular pen testing. Developed to OWASP standards, and is in process to follow NIST SP 800-53, SP 800-161, SP 800-63, 800-874, NIST Cyber Security Framework, to CIS Controls 8.0/CIS Benchmarks | Reduced | Low | Yes |

SIGN OFF

| | |
|--|-------------------------------------|
| Measures approved by: | Qamar Sheikh |
| Residual risk level approved by | Qamar Sheikh |
| Qamar Sheikh /DPO's advice | |
| Qamar Sheikh /DPO's advice has been accepted | Yes |
| Consultation responses have been reviewed by | Gavin Smith Comments: |

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