RMB Automotive

GDPR Privacy Impact Assessment

Last updated 30/04/2018

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Privacy Impact Assessments (PIAs) are a tool which can help organisations identify the most effective way to comply with their data protection obligations and meet individuals' expectations of privacy. An effective PIA will allow organisations to identify and fix problems at an early stage, reducing the associated costs and damage to reputation which might otherwise occur. PIAs are an integral part of taking a privacy by design approach.

A Privacy Impact Assessment is a process which helps an organisation to identify and reduce the privacy risks of a new policy or project. An effective PIA will be used throughout the development and implementation of a policy or project, enabling an organisation to systematically and thoroughly analyse how a particular policy, project or system will affect the privacy of the individuals involved.

The ICO uses the term project in a broad and flexible way – it means any plan or proposal in an organisation. PIAs are often applied to new projects, because this allows greater scope for influencing how the project will be implemented. A PIA can also be useful when an organisation is planning changes to an existing system. A PIA can be used to review an existing system, but the organisation needs to ensure that there is a realistic opportunity for the process to implement necessary changes to the system.

If no changes or projects are planned then there is no need to carry out a PIA. Examples of projects that might require a PIA are:

- A new Bodyshop management system
- A data sharing initiative where two or more organisations seek to pool or link sets of personal data
- A proposal to identify people in a particular group or demographic and initiate a course of action
- Using existing data for a new and unexpected or more intrusive purpose
- A new surveillance system (for example adding automatic number plate recognition capabilities to existing CCTV)
- A new database which consolidates information held by separate parts of an organisation
- Legislation, policies or strategies which will impact on privacy through the collection or use of information, or through surveillance or other monitoring

Overview of PIA Process:

1. Identify the need for a PIA
2. Describe the information flows
3. Identify the privacy related risks
4. Identify and evaluate privacy solutions
5. Record and sign off PIA outcomes
6. Integrate the PIA outcomes back into the project plan

RMB Automotive has considered a PIA and has determined it is not needed at this stage, but will review based on above as part of our compliance programme.

Version History

01 – Privacy Impact Assessment 30/04/2018 – initial document approved by Chris Jennings