

**Initial assessment of whether an impact assessment concerning data protection is needed**

This form is used to assess whether the planned processing of personal data poses risks to the rights of natural persons (people), for the management of which an impact assessment concerning the data protection should be made.

**Guidelines for the initial assessment:**

When you are planning a new activity or process or a system procurement or a change of the existing system, first assess:

Will personal data be processed in the planned activity or system?

*Data that can be used to identify a person directly or indirectly, such as by combining an individual data item with some other piece of data that enables identification, are personal data. Personal data are, for example, name, address, personal identity code, IP-address, patient records, photographs etc.*

|  |  |
| --- | --- |
|  | No |

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| --- | --- |
|  | Yes |

If you answered Yes, continue with filling in this initial assessment. I you answered No, then the initial assessment and the impact assessment are not necessary.

Fill in the background information:

|  |  |
| --- | --- |
| Short description of what kind of processing of personal data is planned: |  |
| Maker(s) of the assessment: |  |
| Organisation: |  |
| Time of the assessment: |  |

Answer all questions both in part A and in part B with Yes / No by ticking the box.  
 Provide the required additional information for the Yes answer.

**Part A**:

If you answered Yes on even one question, then the impact assessment must be conducted.

**Part B**:

If you answered Yes on two or more questions, then the impact assessment must be conducted. The more Yes answers you gave, the bigger the risk that the processing may pose is.

**If the answers of the initial assessment show that the impact assessment is not necessary**, then the data protection requirements must be acknowledged by using the Data protection checklist.

**Part A, questions:**

1. Are you introducing new technology that has not been used previously at the City?

*For example combining fingerprint and face recognition to improve the access control etc. The personal and social consequences of the use of new technology are not necessarily known.*

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|  | No |

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| --- | --- |
|  | Yes, short description of what is being done: |

1. Is sensitive or otherwise very personal data processed?

*This includes certain personal data groups (for example, health data, genetic and biometric data, criminal convictions, racial or ethnic origin), social services data and personal documents, such as e-mails.*

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| --- | --- |
|  | No |

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| --- | --- |
|  | Yes, short description of what is being done: |

1. Is biometric data processed?

*Biometric data are personal data that is obtained through specific processing relating to physical, physiological or behavioural characteristics of a person, such as facial images or dactyloscopic data, which allow or confirm the unique identification of that natural person.*

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|  | No |

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| --- | --- |
|  | Yes, short description of what is being done: |

1. Is genetic data processed?

*Genetic data are data relating to the inherited or acquired genetic characteristics of a natural person, which give unique information about their physiology or health and which result from the analysis of a biological sample from the natural person in question.*

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|  | No |

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|  | Yes, short description of what is being done: |

1. Is location data of a natural person processed?

*Such data are, for example, map and coordinate data, network base stations, Wi-Fi data.*

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|  | No |

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|  | Yes, short description of what is being done: |

1. Is personal data used for whistleblowing purposes, i.e. in connection to a so-called ethical channel or tip-off line?

*Whistleblowing systems give organisations’ staff or other parties an opportunity to report unethical conduct, practices that are contrary to the organisation’s values or internal infringements anonymously.*

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| --- | --- |
|  | No |

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| --- | --- |
|  | Yes, short description of what is being done: |

1. Are special personal data groups processed for scientific or historical research purposes?

*When processing special personal data groups (for example, data concerning health, genetic data and biometric data, criminal convictions, ethnic origin) for scientific or historical research purposes, a data protection impact assessment shall always be drafted. The written data protection impact assessment shall be submitted to the Data Protection Ombudsman for information before the processing is started.*

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|  | No |

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|  | Yes, short description of what is being done: |

**Part B, questions:**

1. Is the personal data used for assessment and analyses, such as profiling and anticipation?

*Is the data that is being processed related especially to the data subject’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements?*

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| --- | --- |
|  | No |

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|  | Yes, short description of what is being done: |

1. Is it automated decision-making with legal effects concerning the natural person or similarly significantly affects the natural person?

*Automatic decision-making is e.g. utilising robotics or artificial intelligence in the decision-making. Can the processing lead to the person being left outside or discriminated?*

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|  | No |

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|  | Yes, short description of what is being done: |

1. Is it about systematic monitoring, where the processing is used to observe, monitor or control people?

*Processing used to observe, monitor or control data subjects, including data collected through “a systematic monitoring of a publicly accessible area”. Data subjects may not be aware of who is collecting their data and how it will be used. Additionally, it may be impossible for individuals to avoid being subject to such processing in frequent public or publicly accessible spaces.*

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|  | No |

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|  | Yes, short description of what is being done: |

1. Is data processed on a large scale?

*The large scale can concern the number of data subjects, the duration, or permanence, of the data processing activity or the geographical extent of the processing activity.*

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| --- | --- |
|  | No |

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|  | Yes, short description of what is being done: |

1. Has the personal data been matched or combined, for example originating from two or more data processing operations performed for different purposes and/or by different data controllers in a way that would exceed the reasonable expectations of the data subject?

*Is it possible that data are used for purposes outside of what has been told to the data subject?*

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| --- | --- |
|  | No |

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| --- | --- |
|  | Yes, short description of what is being done: |

1. Is the personal data related to vulnerable persons?

*Vulnerable data subjects implies, for example, children, workers, other vulnerable persons and especially population groups in need of protection (persons with mental problems, asylum seekers, or the elderly, patients etc.) or in any case where an imbalance in the relationship between the position of the data subject and the controller can be identified.*

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|  | No |

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|  | Yes, short description of what is being done: |

1. Is data transferred across borders outside the European Union?

*Personal data may be transferred outside the European Union, for example, if technical maintenance is performed outside the European Union.*

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|  | No |

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|  | Yes, short description of what is being done: |