

Data Protection and Privacy Impact Assessment

Document Version¹	
Description of Project (i.e. new product/service/legislation)	Virtual AGM
Person(s) Responsible ²	Roisin O'Reilly
Describe the processing activity	Members logging in to view AGM on zoom
Does the proposed processing meet any of the following criteria? If so, circle same. ³	<ul style="list-style-type: none"> ✓ Data processed on a large scale ✓ Innovative use of technology ✓ Processing that will have an outcome on right to use a product/service and the associated contract
<i>Determine information to be used (Information Flows and Data Classification)</i>	
Outline the legal/regulatory basis for the collection and processing of the data i.e. what is the legitimate interest for the processing.	Legitimate interest to allow members to access the AGM meeting while the credit union adheres to public health guidelines. Standard Rules require a quorum of 15 members to validate the AGM meeting therefore members need to be identified to confirm quorum.
The credit union will collect and process the following categories of personal data. <i>List items of personal data to be collected</i>	<i>Name of the member</i>
In the interests of data minimisation and proportionality, the minimum array of data that is necessary to achieve objectives has been identified. <i>i.e. collect only what is necessary</i>	Only the member's name is provided.

¹ It is recommended that a register is kept of all DPIAs carried out by/on behalf of the credit union.

² Though one individual (e.g. the DPO) in the credit union may be assigned overall responsibility for overseeing the DPIA, it is extremely important to obtain the input of other stakeholders where relevant e.g. IT provider(s); internal audit; frontline officers etc. The DPIA must record any engagement with other parties.

³ This section is highlighted in red as it reflects processing that if identified, will lead to the **mandatory** requirement for a DPIA under the GDPR.

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How will the data be collected?	Members' names will appear as they log into the zoom meeting and the meeting will be recorded.
Who in the credit union is largely responsible for collecting the data?	Roisin O'Reilly
Will explicit consent be required? If so, how will it be obtained?	No.
How will members be informed of the uses for which the data is being collected?	Every member will receive by post a 'guide to using zoom in the AGM pack which contains the statement: 'Please note that the Virtual AGM will be recorded for minute-taking and archiving purposes'.
How will the data be stored?	Electronically.
What security measures will be taken to protect the information from loss, unauthorised access, use, modification, disclosure or other misuse, including how data is transferred?	Only the directors present at the meeting, the hardware provider and the manager and assistant manger will know the identity of the members who have logged into the meeting. The names of at least 15 members confirmed to be members of Waterside Credit Union will be provided to the Secretary to confirm a quorum was present.
Provide a brief overview of the assets used in the processing i.e. hardware, software, networking etc.	Zoom software will be used to host the meeting.
What procedures are in place for potential subject access requests?	Not applicable
What procedures are in place for a potential portability request?	Not applicable
What are the proposed uses of the information?	To verify a quorum was present at the AGM

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Will the data – or a subset of the data – be disclosed to a third party? If so, list the third party(s).	The data will be provided to the Secretary
Identify and describe the retention and destruction practice to be implemented for this data and if the applicable legislation identified above prescribes a specific retention period.	The zoom meeting will be recorded for minute-taking and archive purposes. The names of the members attending the virtual meeting will be retained.
In relation to the above, describe considerations for the ‘right to be forgotten’ and whether any such requests can be met or if not, under what contractual or legal basis must the data be retained.	Not applicable.
List the stakeholders ⁴ to be consulted for the purposes of the project: internal; external; regulatory etc. and record any feedback provided.	Chair and Secretary of the credit union, IT hardware provider, IT director
What are the procedural changes (if any) and training requirements identified for relevant officers in the credit union?	The manager and asst manager will liaise with the I.T. provider to ensure a smooth process and identify potential issues in advance of the meeting.
<p><i>Risk Assessment</i></p> <p>A formal risk assessment should be conducted to complement the DPIA. The CUCC monthly update of December 2017 provided an introduction to conducting a data protection risk assessment. The latter is outside the scope of the current template though further guidance on same from CUCC is pending. The purpose of the current template is to record the outcome of the risk assessment and to cross reference same.</p> <p>Key to compliance and accountability is the formal documenting of the risk assessment along with the DPIA.</p>	

⁴ ‘Feedback from stakeholders may identify issues that are perceptions of risk rather than actual risks. These should not be discarded but treated under wider stakeholder management issues to aid communications activity’. (ISO/IEC 29134:2017)

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The credit union should maintain a data protection risk register⁵ to describe the risks associated with a project and assess their likelihood and impact.

<p>Factors to take into account to determine risk level (i.e. likelihood and severity of risk)</p> <ul style="list-style-type: none"> • Nature • Scope • Context • Purposes of processing 	<p>Low risk as only member's name will be available. Members have been provided with login details in the AGM pack so the meeting is accessed via an online link (members' e-mail address is not used or known). Therefore minimal risk.</p>
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<p>What types of processing may result in "high risk"?</p> <p><i>Examples of risks include but are not limited to:</i></p> <ul style="list-style-type: none"> • <i>Inappropriate disclosure of data</i> • <i>Cyber fraud</i> • <i>Personal data not being used for the purposes for which it was intended</i> • <i>Data retained longer than is necessary</i> • <i>Compliance risks</i> • <i>Data breaches</i> • <i>Poor security measures</i> • <i>etc.</i> <p><i>In this section, detail the outcome of the risk assessment including the proposed controls to mitigate the risks. Determine the residual risk where applicable with details on the proposed solution(s).</i></p>	<p>Instructions on how to access the meeting are being posted to each member individually therefore only members can join the AGM. The meeting will be shorter than usual as only urgent matters will be covered.</p>
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Outsourcing Considerations i.e. Data Processors

<p>Are assurances and controls in place where it is envisaged that an outsourced service provider is processing data on behalf of the credit union?</p> <p><i>For example, the credit union could consider the following:</i></p> <p><i>Outsourced service providers processing data on behalf of the credit union will only carry out processing once all of the following conditions are met:</i></p> <ul style="list-style-type: none"> • <i>clause(s) on the</i> 	
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⁵ Note the Legal Department in the ILCU issued a template Data & Information Register, available in the Members' Area of the ILCU website. Credit unions may wish to consult same.

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<p><i>processing of personal data have been included in the relevant service level agreement;</i></p> <ul style="list-style-type: none"> • <i>service providers have been informed to perform personal data processing in accordance with the directions received from the credit union as data controller</i> • <i>processors are aware of their enhanced responsibility under the GDPR</i> • <i>processor and controller have a procedure in place when a breach occurs i.e. in the event of a data breach, the data processor must notify the credit union in the first instance</i> 	
<p>GDPR Principles</p> <p>Whilst many of the questions in this template indirectly address the principles under the GDPR, it is important to <i>explicitly</i> demonstrate awareness and consideration of <i>each</i> of the principles contained in the GDPR. This section of the DPIA template has been added to facilitate same so that it can be demonstrated that the processing in question has been considered under each of the GDPR principles.</p>	
<p>Transparency Data will be processed in a lawful, fair and transparent manner</p>	Yes
<p>Purpose Limitation Collected for only one or more specified purpose(s)</p>	Yes
<p>Data Minimisation Only data relevant to the specified purpose is collected</p>	Yes
<p>Accuracy Keep accurate and up-to-date</p>	Yes
<p>Storage Limitation Keep for no longer than is necessary and in line with specific retention period</p>	Yes
<p>Integrity and Confidentiality Data is processed in a manner that ensures appropriate security using appropriate technical and organisational measures</p>	Yes
<p>Accountability The credit union is committed to assessing and documenting all processing activities, associated risks, remedial action, and relationships as they pertain to said</p>	Yes

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<p>processing activity. Documentation – including the current DPIA - is created, maintained and stored in a manner suitable for subsequent inspection by a third party.</p>	
<p>(Also) Data Subject Rights Acknowledgement of the members’ rights e.g. right to be forgotten (where applicable), right to portability etc.</p>	<p>Yes</p>
<p>(Also) Prohibition on Transfer (in the absence of a legitimising mechanism) Consider data transfers where applicable, particularly those that may be necessary to third countries i.e. countries outside the EEA</p>	<p><i>N/app</i></p>
<p>Conclusion and ratification</p>	
<p>Summary of key findings</p>	
<p>Will the project proceed? Is the project viable? <i>Yes/No</i></p>	<p>Yes, the AGM will be held virtually on zoom and will be recorded under legitimate interest.</p>
<p>The ICO was consulted on the DPIA⁶. <i>Yes/No</i> Outcome of the consultation with the ICO was: <i>Summarise outcome where applicable.</i></p>	<p>No – guidelines on electronic AGMs have been provided by ILCU.</p>
<p>The board and senior management team have been appraised of the outcome of the DPIA and the data protection requirements/implications associated with the project going forward. <i>Yes/No</i></p>	<p>Yes.</p>

⁶ If during the DPIA the credit union has identified risks and taken measures to mitigate those risks, the ICO does not need to be consulted. If the DPIA identifies high risks for which no mitigants have been determined or where the residual risk remains high, the credit union must consult with the ICO before proceeding with the project. Even if consultation is not required, the credit union **must retain a record of the DPIA** should it be required for audit purposes on the future.

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If the project is to proceed, arrangements are in place to include the DPIA outcome in the project plan with DP considered on an **ongoing basis**.

Yes/No

Include details on the project

Yes.