# **DPIA Screening template**

## **Project information**

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| **Project:** |  |
| **PI/controller contact** |  |
| **DPO:** |  |
| **Department:** |  |

Article 35(1) EU GDPR says that you must do a Data Protection Impact Assessment DPIA where a type of data processing is **likely to result in a high risk** to the rights and freedoms of individuals:

*«Where a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall, prior to the processing, carry out an assessment of the impact of the envisaged processing operations on the protection of personal data. A single assessment may address a set of similar processing operations that present similar high risks»*

## **Assessment Criteria: Should you carry out a DPIA?**

### Criteria 1-8: from the Working Party 29 Guidelines (WP 248)

***According to the WP 29 Guidelines, a processing meeting two or more of the criteria 1-8 would normally require a DPIA. In some cases a processing meeting only one criteria can also require such an assessment***

| No. | Criteria 1-8 | Yes/no |
| --- | --- | --- |
| 1. | Evaluation or scoring including profiling and predicting, especially from *“aspects concerning the data subject's performance at work, economic situation, health, personal preferences or interests, reliability or behavior, location or movements” ,*  with at least one other criterion (1-8) |  |
| 2. | Automated-decision making with legal or similar significant effect with at least one other criterion (1-8) |  |
| 3. | Systematic monitoring with at least one other criterion (1-8) |  |
| 4. | Sensitive data or data of a highly personal nature with at least one other criterion (1-8) |  |
| 5 | Data processed on a large scale with at least one other criterion  (1-8)  Large scale may imply:  a. the number of data subjects concerned, either as a specific number or as a proportion of the relevant population;  b. the volume of data and/or the range of different data items being processed;  c. the duration, or permanence, of the data processing activity;  d. the geographical extent of the processing activity. |  |
| 6. | Matching or combining datasets 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 subject1,  with at least one other criterion  (1-8) |  |
| 7. | Data concerning vulnerable data subjects with at least one other criterion (1-8) |  |
| 8. | Innovative use or applying new technological or organisational solutions with at least one other criterion (1-8) |  |

### Criteria 9-19: Processing activities included in the Norwegian DPA’s list

### *The following criteria (9-19) includes processing activities that, according to* [*the Norwegian DPA*](https://www.datatilsynet.no/globalassets/global/regelverk/veiledere/dpia-veileder/dpialist280119.pdf)*, are likely to represent a high risk to the data subjects by default, hence require a DPIA. Any one of the activities in criteria (9-19) is likely to require a DPIA.*

| No. | Criteria 9-19 | Yes/no |
| --- | --- | --- |
| 9. | Processing of biometric data for identification purposes in conjunction with at least one other criterion. For example, processing of biometric data for identification purposes on a large scale (Sensitive data or data of highly personal nature and large scale) |  |
| 10. | Processing of genetic data in conjunction with at least one other criterion. For example processing of genetic data on a large scale, including gene sequencing (Sensitive data or data of highly personal nature and large scale) |  |
| 11. | Processing of personal data using innovative technology in conjunction with at least one other criterion. For example processing of health data using innovative welfare technology solutions like health implant aids (Innovative use and sensitive data) |  |
| 12. | Processing of personal data without consent for scientific or historical purpose in conjunction with at least one other criterion. For example processing of health data without consent for research purposes (Evaluation and sensitive data or data of highly personal nature) |  |
| 13. | Processing of location data in conjunction with at least one other criterion. For example combining data subject’s location or traffic data from telephone records in a systematic manner, or processing of personal data about the subscriber’s use of the telenet or telecom operators services. (Sensitive data or data of highly personal nature and systematic monitoring) |  |
| 14. | Processing of personal data involving measures for systematic monitoring of employee activities. For example, monitoring the employees internet activity, electronic communication or camera surveillance for the purposes of employee monitoring (Vulnerable subject and systematic monitoring) |  |
| 15. | Processing of personal data for the purpose of evaluating learning, coping and wellbeing in schools or kindergartens. This includes all levels of education, from preschool, elementary, high school to university levels. (Vulnerable data subjects and systematic monitoring) |  |
| 16. | Processing of personal data to systematically monitor proficiency, skills, scores, mental health and development. (Sensitive data or data of highly personal nature and systematic monitoring) |  |
| 17. | Processing personal data with the purpose of providing services or developing products for commercial use that involve predicting working capacity, economic status, health, personal preferences or interests, trustworthiness, behaviour, location or route (Sensitive data or data of highly personal nature and evaluation/scoring) |  |
| 18. | Collection of personal data on a large scale through the use of “internet of things” solutions or welfare technology solutions (Large scale and sensitive or highly personal data) |  |
| 19. | Data collected via third parties in conjunction with at least one other criterion. o For example collecting and combining personal data from third parties in order to decide whether the data subject shall be offered, continue to receive, or shall be denied a product service or offer. (Vulnerable data subject and evaluation/scoring). |  |

***Please note that the list above only includes processing activities that, according to the Norwegian DPA, are likely to represent a high risk to the data subjects by default. This list is non-exhaustive by nature. You still have the obligation to assess whether their processing activities are likely to represent a high risk to the rights and freedoms of the data subjects, even though the processing is not included in the list.***

Based in the above, it has been decided:

To carry out a DPIA in this project

**Head of Unite Date**

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*Role/name*

***In research projects, the DPIA is to be carried out in liaison with*** [***NSD Data Protection Services***](https://nsd.no/personvernombud/en/about_us.html)