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| |  |  | | --- | --- | |  | **Aalborg University** Postboks 159 DK-9220 Aalborg  Case officer:  [Name 1] [Name 2]  Telephone: [Tel. no.]  Email: [Email]  Date: [Letter date] Case no.: [Case no.] | |

**Tool for screening of whether a data protection impact assessment is to be conducted**

You must fill in the following form so that it can be evaluated whether it is necessary to conduct a data protection impact assessment in your project. The form will also subsequently be used as documentation that such a necessity evaluation has been made.

In the first part of the form, you need to answer four questions. If you can answer yes to **one of these questions**, it is likely that a data protection impact assessment must be conducted.

If you answer no to all four questions in the first part, you must continue your evaluation by answering the following questions in the second part of the form. If you can answer yes to **two or more of the questions**, it is likely that a data protection impact assessment must be conducted.

If you are unsure about whether to answer yes or no, tick ‘yes’ and elaborate on your uncertainty in the right column. The GDPR Unit or the Contract Unit will then evaluate the matter based on your information. You are also welcome to contact the units if you have any questions.

The document is AAU’s documentation that AAU has assessed whether there may be a risk for the data subjects.

Once the screening document has been filled in, please send it to the below email address. On the basis of the screening document, a case officer from the Contract Unit’s personal data team (research) and the GDPR Unit (administration) will evaluate whether a data protection impact assessment is to be performed. In any circumstance, you will be contacted about the result.

If you have other questions about the screening, you can simply write an email to the address below, and you will be contacted as soon as possible.

**Email address**

konsekvensanalyse@aau.dk

**Screening**

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| --- | --- |
| Project title |  |
| Project manager |  |
| Section/department |  |
| Date of evaluation |  |
| Short project description |  |

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| ***If you can answer ‘yes’ to one of the three points below, a data protection impact assessment must be conducted*** | |
| Do you need to perform a systematic and comprehensive assessment of specific personal circumstances concerning natural persons which is based on automated processing, including profiling, and which forms the basis of decisions that have a legal effect on the natural person or significantly affects the natural person in a corresponding manner?  **Systematic and comprehensive**: This may be the number, but it may also be a large volume of different personal data combined with the number and/or the duration of the processing activity.  **Personal circumstances**: Work performance, financial situation, health, personal preferences/interests, reliability, behaviour, geographical position or movements  **Automated processing and profiling**: Data processing without human involvement in the evaluation/analysis/prediction, but where the processing is based solely on algorithms or calculations  **Decisions with legal effect**: The processing affects the natural person by resulting in the natural person not acquiring rights or losing rights, e.g. exclusion from study programme/course/exam, discrimination, employment or notice of termination, or allocation of financial grant | Yes  No  If yes, elaborate: |
| Do you need to process a large volume of sensitive personal data, see Article 9(1) of the General Data Protection Regulation, or of personal data relating to criminal convictions and offences, see Article 10?  **Large volume***:* This may be the number, but it may also be a large volume of different personal data combined with the number and/or the duration of the processing activity.  **Sensitive personal data**:   * Racial or ethnic origin * Political opinions, religious or philosophical beliefs * Trade union membership * Genetic data * Biometric data * Health * Sex life or sexual orientation * Criminal convictions and offences or related security measures | Yes  No  If yes, elaborate: |
| Do you need to engage in systematic monitoring of a publicly accessible place on a large scale?  **Monitoring:** Monitoring can be in public places, but it may also be online monitoring or other digital surveillance. This applies particularly to cases in which the registered persons may not be aware of and cannot avoid being monitored.  **Publicly accessible place**: I.e. places to which there is general public access, e.g. parks, roads, coasts, but also unlocked buildings or buildings with general public access such as libraries.  **Large volume:** This may be the number, but it may also be a large volume of different personal data combined with the number and/or the duration of the processing activity. | Yes  No  If yes, elaborate: |
| Can a security breach have a direct effect on individuals’ physical health or safety?  **Direct effect on individuals’ physical health or safety:** In the event of a breakdown, so that data cannot be accessed, the data are altered or a third party gains unintentional/unauthorised access to the data, this may be of a direct importance to individuals’ health or safety, e.g. that incorrect medical treatment is provided | Yes  No  If yes, elaborate: |
| ***If you answer ‘yes’ to one of the questions below, this does not automatically mean that a data protection impact assessment is to be performed. However, if you can answer ‘yes’ to two or more of the points, it is likely that a data protection impact assessment must be performed*** | |
| Are personal data processed about vulnerable natural persons?  **Vulnerable natural persons**: In cases in which there is an increased imbalance in the power distribution between the data subject and the data controller, the data subjects will be vulnerable. E.g. children, employees, persons with mental illness, asylum seekers, elderly persons, patients. | Yes  No  If yes, elaborate: |
| Does the processing involve a large volume of personal data and affect a large group of data subjects?  **Large volume/large group:** This may be:   * The number of data subjects * The volume of different personal data * The above combined with the number and/or the duration of the treatment. | Yes  No  If yes, elaborate: |
| Can the treatment give rise to differential treatment, identity theft or fraud, financial loss, damage to reputation, loss of confidentiality of personal data covered by professional secrecy or other duty of confidentiality, unauthorised termination of pseudonymisation or other significant financial or social consequences? | Yes  No  If yes, elaborate: |
| Can the data subjects be deprived of their rights and freedoms or be prevented from using a service or a contract?  **Deprivation of rights/prevention of use of a service or a contract**: The processing affects the natural person by resulting in the natural person not acquiring rights or losing rights, e.g. exclusion from study programme/course/exam, discrimination, employment or notice of termination, or allocation of financial grant | Yes  No  If yes, elaborate: |
| Does the processing involve personal data about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and processing of genetic data, data concerning health or data concerning a natural person’s sex life or sexual orientation or criminal convictions and offences or related security measures, or processing of personal data of a *very* private nature?  **Personal data of a *very* private nature**: Confidential data such as financial/economic details, private emails/calendars/notes, divorce information, matters pertaining to adoption, alcohol test, major social problems and family affairs, disciplinary proceedings, reasons for summary dismissal, secret address. | Yes  No  If yes, elaborate: |
| Do you need to perform an evaluation or analysis of personal matters relating to natural persons based on automated processing, including profiling?  **Systematic and comprehensive**: This may be the number, but it may also be a large volume of different personal data combined with the number and/or the duration of the processing activity.  **Personal circumstances**: In particular, work performance, financial situation, health, personal preferences/interests, reliability, behaviour, geographical position or movements  **Automated processing and profiling**: Data processing without human involvement in the evaluation/analysis/prediction, but where the processing is based solely on algorithms, calculations, profiles and the like. | Yes  No  If yes, elaborate: |
| Does the processing involve automated decision-making, including profiling, with legal or correspondingly binding effect?  **Automated processing and profiling**: Data processing without human involvement in the evaluation/analysis/prediction, but where the processing is based solely on algorithms, calculations, profiles and the like.  **Decisions with legal effect**: The processing affects the natural person by resulting in the natural person not acquiring rights or losing rights, e.g. exclusion from study programme/course/exam, discrimination, employment or notice of termination, or allocation of financial grant | Yes  No  If yes, elaborate: |
| Is monitoring to be performed in a publicly accessible place?  **Monitoring:** Monitoring can be in public places, but it may also be online monitoring or other digital surveillance. This applies particularly to cases in which the registered persons may not be aware of and cannot avoid being monitored.  **Publicly accessible place**: I.e. places to which there is general public access, e.g. parks, roads, coasts, but also unlocked buildings or buildings with general public access such as libraries. | Yes  No  If yes, elaborate: |
| Are biometric data processed for the purpose of identifying a natural person?  **Biometric data**: Data for authentication, i.e. identification and verification of human beings, based on human physiological or behavioural characteristics, e.g. fingerprints, speech, facial and iris recognition | Yes  No  If yes, elaborate: |
| Are genetic data processed?  **Genetic data**: Data concerning a natural person’s inherited or acquired genetic characteristics obtained after an analysis of a biological sample from the natural person in question | Yes  No  If yes, elaborate: |
| Are location data processed?  **Location data**: Data that can establish the location and movement of natural persons | Yes  No  If yes, elaborate: |
| Are personal data processed using new technology or a new, innovative way of using older technology?  **New technology**: The term ‘new technology’ must be understood in a wide sense and be seen in the light of the achieved level of technological knowledge. It must objectively be new technology. I.e. simply replacing one IT system with another on the market does not constitute ‘new technology’  **New organisational solutions/innovative use**: In situations in which the technology itself is not new, but it is to be used in an objectively new way, this will entail innovative use | Yes  No  If yes, elaborate: |
| Matching or combination of data sets  **Matching/combination**: A situation in which there is matching/combination of data sets originating from two or more personal data processing activities for different purposes and/or performed by different data controllers in a way that would exceed the data subject’s reasonable expectations. For example, this will be the case in correlation of data from one administrative purpose with another administrative purpose for a third non-administrative purpose which the data subjects could not reasonably expect when they provided their data for the other two administrative purposes. | Yes  No  If yes, elaborate: |