0. Launching a new processing

Every day in the digital realm, numerous services are created. Those services usually rely on the processing of personal data aiming at fulfilling the needs of organisations or their users. The supporting assets used to store the data have different levels of vulnerabilities toward feared events such as illegitimate access, unwanted change, or disappearance of personal data. Those risks are likely to have significant impacts on the users’ privacy.

1. Considering the processing

For the data processor as well as the data subjects, those risks are unwelcome. Before carrying out a processing, it is essential to analyse it to understand its inherent risks. Several factors affect the riskiness of a processing, as the kind of data processed.

Generally speaking, if a processing meets two of the criteria listed, then it is likely to present high risks and would require to carry out a privacy impact assessment.

2. Evaluating the privacy risks

The assessment first establishes the context in which the processing is carried out, including its purpose and technical features.

In addition to studying the fundamental principles, made up of the necessity and proportionality of the processing, each risk has to be analysed to evaluate its severity and likelihood according to its potential impacts on the rights and freedoms of data subjects, the data processed, the risks sources and the supporting assets.

3. Addressing the risks

Once the risks have been identified, it should be determined if they are acceptable given the existing and planned technical and organisational measures. If it doesn’t seem possible in regard of the foreseen measures, the data protection authority has to be consulted.

In any case, it is mandatory to implement the planned controls before carrying out the processing.