

Assessment Details

ID 798	Name DPIA_Helix Portal
Organization DXC Technology - Processor	Approver Ranko Aleksiev
Respondent manderson26@dxc.com (External),svermette2@dxc.com (External),hbusby@dxc.com (External)	Stage Completed
Very High Risks 0	High Risks 0
Medium Risks 0	Low Risks 3
Total Risks 3	Result Approved

PDPO Conclusion

The DXC Privacy and Data Protection Office (PDPO) has conducted a privacy review on the Helix Portal - a new application that will improve employee experience by providing a single interface for users to interact with their IT environment.

The PDPO has concluded that, to the best of knowledge, the new application conform to the applicable privacy and data protection requirements and may be safely deployed without any high risks for DXC, the individuals concerned and their personal data (**Privacy Sign-Off**).

Any alterations that deviate from the information provided for privacy review and reflected in the current document must be notified to the DXC PDPO at privacy@dxc.com, to ensure the changes meet the data protection and security requirements taken into consideration at the time of this review.

Assessment Questions

1 Basic Information

1.1 Organization Name:

Response

Modern Workplace

1.2 Business Unit / Division:

Response

Modern Workplace

1.3 Business Process Owner (Name):

Response

Colin Wright

1.4 Business Process Owner (Title):

Response

Mr

1.5 Business Process Owner (Telephone Number):

Response

+ 44 5603944776

1.6 Business Process Owner (Email):

Response

colin.wright@dxc.com

2 General System Information

2.1 System Name:

2.2 **System Type**

Response

Application

Other Text Box

None

2.3 **System Description**

Response

A new employee experience portal that provides Users with an interface into their IT environment, with a User focussed, data led experience approach. The portal will be fed with data from multiple backend systems and provide Users with a consumer like, personalised experience

2.4 **Objective / Purpose of System Implementation**

Response

Improve employee experience by providing a single, consumers like interface for Users to interact with their IT environment.

2.5 **Would you consider this activity to be very similar to another activity for which a DPIA has already been carried out?**

*Are the nature, scope, context and purposes of the activities very similar?
Please explain below and list the activity.*

Response

No

Other Text Box

IF there has been a DPIA for the IT Connect Portal then it is similar to that

2.6 **Will this application/process/system process personal data?**

"Personal data" is any data that can be used to identify a person - this can include name, email address, phone number, online identifier, health care records, financial records, or any other personally identifiable information.

The personal data you are processing could be the data for the client's employees, the client's customers, end-users, or subcontractors.

"Processing" means any activity performed upon personal data, such as accessing, reading, modifying, or transmitting the data. This also includes services such as backups and cloud services.

Response

Yes

Other Text Box

None

3 Threshold Questions

3.1 **What data is involved in the activity?**

Please select the groups of data subjects you are processing data about for this activity, and for each group, select the categories of data and individual data elements processed.

Response

Customers
Employment Information <div>Job title / role</div> <div>Line / Reporting manager</div> <div>Office location</div> <div>Company / entity</div> <div>Personnel number</div> <div>Business unit / division</div>
Behavioural data <div>Screen activity</div>
Personal Identification <div>Image</div> <div>First Name</div> <div>Last Name</div>
Browsing Information <div>Browsing Time</div> <div>IP Address</div>
Contact Information <div>Personal Email</div> <div>Phone Numbers</div> <div>Home Address</div>
Correspondence (Communication) <div>Work Correspondence (Communication)</div> <div>Emails</div>
Employees
Employment Information <div>Job title / role</div> <div>Personnel number</div> <div>Line / Reporting manager</div> <div>Office location</div> <div>Company / entity</div> <div>Business unit / division</div>
Personal Identification <div>Image</div> <div>Full Name</div>
Browsing Information <div>IP Address</div> <div>Browsing Time</div>
Correspondence (Communication) <div>Emails</div> <div>Instant Messaging</div> <div>Work Correspondence (Communication)</div>
Contact Information <div>Phone Numbers</div> <div>Home Address</div> <div>Contact details</div>
Behavioural data <div>Screen activity</div>

3.2 **For what purposes will each category of personal data from the previous question be used?**

Please describe in free text how the initiative will use the different types of personal information (e.g. names - for identification of the user).

Response

Behavioural data - used to analyse/report on usage of the system, identify key User flows to optimize future iterations of design and development

Browsing Information - used to analyse/report on usage of the system, identify key User flows to optimize future iterations of design and development. Provide context to User interactions

IP Address - used to identify User's approximate location to restrict content or provide relevant information to their location

Contact Information

Contact details - Service Desk call back and User interaction should it be required

Home Address - Processed to schedule delivery of products

Phone Numbers - Service Desk call back and User interaction should it be required

Correspondence (Communication)

Emails - Service Desk call back and User interaction should it be required

Instant Messaging - Service Desk call back and User interaction should it be required

Work Correspondence (Communication) - Service Desk call back and User interaction should it be required

Employment Information

Business unit / division - May be used to restrict content or personalize an experience

Company / entity - May be used to restrict content or personalize an experience

Job title / role - May be used to restrict content or personalize an experience

Line / Reporting manager - May be used to manage approval workflows or escalations

Office location - May be used to restrict content or personalize an experience

Personal Identification

Full Name - Used to personalize an experience

Image - Used to personalize an experience

3.3 **How long will the personal data be stored?**

Please describe the period of time during which the personal information will be kept by the initiative and if any automatic/manual data deletion routines are set.

Response

Records of user logins will be timestamped and user profiles will be deleted on a configurable schedule, or stored strictly in user's own client-side browser cache.

3.4 **Where will the personal information be stored?**

Please provide the country location of the servers, where the personal information will be hosted.

Response

Initially the data will be stored in the US, and all pilot Users will be based in the US. There are global requirements however so we need guidance on storing things for Users in more sensitive locations e.g. Germany, EU etc.

3.5 **Who will have access to the personal information?**

Please describe the individuals or group of individuals that will be granted access to the personal information as part of the initiative (Project Team, other DXC personnel, a whole DXC department, Personnel of a Subcontractor, etc.).

Response

Application access only

Admin with elevated privileges in emergency

3.6 **Are any of the data already publicly available?**

NOTE: If the data has already been collected, was it publicly available at the time of collection?

Response

☒ No

Other Text Box

None

3.7 **Does the activity involve processing data on a large scale?**

The following factors should be considered when determining whether the processing is carried out on a large scale:

- the number of data subjects concerned, either as a specific number or as a proportion of the relevant population;
- the volume of data and/or the range of different data items being processed;
- the duration, or permanence, of the data processing activity; and
- the geographical extent of the processing activity.

Examples of large-scale processing include:

- processing of patient data in the regular course of business by a hospital;
- processing of travel data of individuals using a city's public transport system (e.g. tracking via travel cards);

- processing of real time geo-location data of customers of an international fast food chain for statistical purposes by a processor specialised in providing these services; or
- processing of personal data for behavioural advertising by a search engine.

Examples that do not constitute large-scale processing might include:

- processing of patient data by an individual physician; or
- processing of personal data relating to criminal convictions and offences by an individual lawyer.

Response

Yes

Other Text Box

None

Risks



Inherent Risk Level
3.0



Residual Risk Level
2.0 - Low Impact / Low Probability

Risk Description

A DPIA may be mandatory under Article 35 of the GDPR, as the processing activity may be likely to result in a high risk to the rights and freedoms of natural persons.

Stage

Monitoring

Risk Owners

svermette2@dxs.com

Treatment Plan

Contact the PDPO if additional categories of personal data, including sensitive personal data, shall take part of the processing on a large scale.

Result

Reduced

Date Closed

03/16/2021

3.8 Which of the following allows you to use the data for this activity?

You may provide additional information in the notes field below.

If you are unsure of the answer to this question, please select "not sure" as your response and include any relevant information in the notes field below.

Response

It is necessary for the purposes of our company's legitimate interests

Other Text Box

It is necessary to fulfill the requirements set forth by the DXC IT executives for the product they are developing (Helix Portal). The data is required to personalize the User's experience as part of the "new DXC experience".

3.9 What are the legitimate interests you are pursuing?

You may provide additional information in the notes field below.

If you are unsure of the answer to this question, please select "not sure" as your response and include any relevant information in the notes field below.

Response

Sharing employee data within the corporate group for internal administrative purposes

Other Text Box

None

3.10 Does the activity involve any of the following sensitive data?

If the activity does not involve any of the following, then select "not applicable."

Response

Not Applicable

Other Text Box

None

3.11 Which of the following allows you to process this sensitive data?

The processing of this type of data is prohibited, unless one of the following applies.

Response

Skipped

Other Text Box

None

3.12 Does the activity involve the use of evaluation or scoring?

For example:

- a financial institution that screens its customers against a credit reference database or against an anti-money laundering and counter-terrorist financing (AML/CTF) or fraud database;
- a biotechnology company offering genetic tests directly to consumers in order to assess and predict the disease/health risks; or
- a company building behavioural or marketing profiles based on usage or navigation on its website.

Response

Yes

Other Text Box

There are 2 levels of evaluation being performed as part of the project:

1. Users will be profiled so they can have a targeted experience, e.g. if they use Excel a lot we may target Excel specific content
2. We are building an "Experience Score" for a User based on their employee experience

Risks



Inherent Risk Level

2.0 - Low Impact / Low Probability



Residual Risk Level

2.0 - Low Impact / Low Probability

Risk Description

A DPIA may be mandatory under Article 35 of the GDPR, as the processing activity may be likely to result in a high risk to the rights and freedoms of natural persons.

Stage

Monitoring

RiskApprovers

Ranko Aleksiev

Risk Owners

svermette2@dxc.com

Treatment Plan

The risk level is reduced since the conditions of art.35 (3) point a of the GDPR are not met and the processing activity is not likely to result in a high risk to the rights and freedoms of natural persons.

Result

Reduced

Date Closed

03/18/2021

3.13 Does the activity involve the use of automated decision-making?

For example:

- when an individual applies for a personal loan online and the website provides an immediate decision based on algorithms and a credit search;
- when a worker's pay is automatically adjusted according to automated monitoring of his productivity; or
- processing that may lead to exclusion or discrimination against individuals.

This does not include processing that has little or no effect on individuals.

Response

No

Other Text Box

None

3.14 Which of the following allows you to use the data for automated decision-making?

Response

Skipped

Other Text Box

None

3.15 Does the activity involve systematic monitoring of a publicly accessible area?

"Systematic monitoring" means processing used to observe, monitor or control individuals.

A "publicly accessible area" is any place open to any member of the public.

For example, CCTV of:

- a piazza;
- a shopping centre;
- a street; or
- a public library.

Response

No

Other Text Box

3.16 **Does the activity involve matching or combining datasets?**

For example:

- a university combining student academic records with student athlete records;
- an insurance company combining health records and claims data;
- law enforcement matching and combining facial recognition data with fingerprint scans; or
- gathering of public social media data for generating profiles.

Response

☒ Yes

Other Text Box

We will be combining data sets from multiple different environments and consolidating them to improve the experience of an End User.

For example, we may take ITSM data such as User support tickets and combine it with User Device telemetry data so we can correlate issues with a User's laptop. These data sets are ingested and combined to identify the correlations and fixes to ensure the User has a good experience.

Risks

Inherent Risk Level
2.0 - Low Impact / Low Probability



Residual Risk Level
2.0 - Low Impact / Low Probability

Risk Description

A DPIA may be mandatory under Article 35 of the GDPR, as the processing activity may be likely to result in a high risk to the rights and freedoms of natural persons.

Stage

Monitoring

RiskApprovers

Ranko Aleksiev

Risk Owners

hbusby@dxc.com

Treatment Plan

The PDPO reduced the risk level to low since the processing activity is not likely to result in a high risk to the rights and freedoms of a natural persons and does not meet the conditions under article 35 of the GDPR.

Result

Reduced

Date Closed

03/18/2021

3.17 **Does the activity involve new, or innovative uses of, technological or organisational solutions?**

For example:

- combining the use of fingerprint and facial recognition for improved physical access controls; or
- certain "Internet of Things" applications, such as connected (or "smart") devices, homes or cities.

Response

☐ No

Other Text Box

None