

# Advertisement no.

# 828/2019 on the register

# over

# processing operations

# which always require

# impact assessment

# privacy

## Article 1

*In general.*

The guarantor shall in certain cases always carry out an assessment of the impact of the proposed processing of personal data protection actions, before processing begins.

Privacy shall, according to para. Article 29 Act no. 90/2018, Coll. Paragraph 4 Article 35 the general person of the Protection Regulation (EU) 2016/679, prepare and publish a list of them types of processing of actions that require an assessment of the impact on privacy. Such an assessment shall be carried out before the processing of the personal data begins.

It is the opinion of the Data Protection Authority that the types of processing of personal information that specified in Article 3. are of such a nature that they are likely to cause a great deal risk to the rights and freedoms of individuals. This list is based on a so-called analysis Article 29 working group of the European Union, which has been ratified by the European Union the European Data Protection Board (EDPB), no. WP-248, as seen has existed as a fundamental element to ensure uniform implementation within European Economic Area.

It is the nature of a list like this that it is not exhaustive about the types of processing that is likely to pose a significant risk to the rights and freedoms of individuals. Af therefore, it is the responsibility of the controller to assess each and every processing entails such a risk, whether or not specified in Article 3. or not.

## Article 2

*Criteria in the guidelines of Article 29 of the working group no. WP-248.*

In most cases where an assessment of the impact of the proposed processing operations is required protection of personal data, as referred to in the guidelines of Article 29. of the working group no. WP-248, is the processing of personal data involving two or more categories listed below. In certain cases, however, it is sufficient for the processing to fail under one category to call for such an assessment.

1. Evaluation or grading / scoring.

2. Automatic decision-making that affects the rights of the data subject.
3. Systematic monitoring.

Sensitive personal information or other sensitive personal information.  
Extensive data processing.

6. Synchronization and integration of databases.
7. Information on persons with disabilities.
8. Processing using new technology or organizational solutions or older technology in a new way.
9. Processing of personal information that prevents the data subject from enjoying it rights, receive for payment, service or contract.

## Article 3

*A list of processing operations that always require an impact assessment on privacy.*

Data collection from third parties in the context of at least one of the above categories in Article 2.

For example, the collection and integration of personal information from third parties in order to decide whether the registered person should be summoned, receive it, or be denied product, service or offer. (Parties who are lame and food or rated gift / points gift)  
or systematic integration of information from remote switching devices, e.g. location, other data, or the processing of personal information about the user's use on the services of an electronic communications company. (We provide personal information or others information of a sensitive nature and systematic monitoring).

Extensive systematic surveillance, including camera surveillance, in areas open general ingi. (Systematic processing and extensive processing).

Electronic monitoring of schools or kindergartens during school / placement time. (Systematic monitoring and people with disabilities).

4. Processing of personal information in order to assess performance, well-being or well-being students in school or kindergarten. This applies to all levels of education, such as in kindergartens, primary schools, secondary schools and universities. (Parties standing sluggish legs and systematic monitoring).
5. Processing of biometric information for the purpose of identifying or confirming the identity of an individual unequivocally, while the processing involves at least one of them categories specified in Article 2.

For example, extensive processing of biometric information. (Sensitive personal information or other information of a sensitive nature and extensive processing).

6. Processing with genetic information, at the same time as the processing relates to at least one of the categories specified in Article 2.

For example, extensive processing of genetic information, including sequencing of genetic contaminants. (Sensitive personal information or other information delicate nature and extensive processing).

7. Processing of personal information which involves monitoring of work returns or behavior employees.

For example, to monitor, systematically, employees' internet use, their electronic communication or to monitor employees camera surveillance. (Persons with disabilities and systematic supervision).

8. Processing of personal data where new technology or older technology is applied in a new way, while the processing relates to at least one of the categories that specified in Article 2.

For example, the processing of health information obtained with a new one health technologies, such as implantable medical devices. (Processing where applied is new technology and sensitive personal information or other information sensitive nature).

9. Processing of personal data for the purpose of evaluating, in a systematic manner skills, abilities, test results, mental health or development. (Sensitive personal information or other information of a sensitive and systematic nature monitoring).
10. Processing of personal information that takes place without the consent of the data subject for scientific or historical purposes, in addition to the processing at least one of the categories referred to in Article 2.

For example, the processing of health information in connection with scientific research without consent of the data subject. (Evaluation or grading / scoring and sensitive personal information or other sensitive information).

11. Processing of personal information for the purpose of providing services or developing products intended for business use, where work capacity is forecast, economic status, health, beliefs or concerns, reliability, behavior, location or travel routes, while the processing involves at least one of the categories specified in Article 2. (Sensitive personal information or other sensitive information and evaluation or grading / scoring).

Extensive processing of sensitive personal information, or others personal information of a sensitive nature, in order to develop an algorithm. (Extensive processing and sensitive personal information or other sensitive information nature).

13. Extensive collection of personal information, which takes place through the "Internet of the objects "or solutions that monitor the condition and movement of individuals, e.g. as a smartwatch. (Extensive processing and sensitive personal or other information sensitive information).
14. Processing of personal information that prevents the data subject from enjoying it certain rights or receive a facility, service or contract, in parallel with processing relates to at least one of the categories specified in Article 2.

For example, when a financial institution looks at a person's credit rating information in it for the purpose of deciding whether to grant him a loan facility. (Evaluation or rating / scoring and sensitive personal or other information of a quasi-nature).

## Article 4

*Entry into force, etc.*

This advertisement is published on the basis of the second paragraph. Article 29 Act no. 90/2018, Coll. Paragraph 4 35. gr. of the General Privacy Regulation (EU) 2016/679.

This advertisement will take effect immediately. At the same time, advertisement no. 337/2019 um a list of processing actions that require an impact assessment on privacy.

*On behalf of the Data Protection Authority, 29 August 2019,*

Björg Thorarensen.