DPIA ASSESSMENT

Step 1: Identify the need for a DPIA

Question	Selection	Content
To what extent is the purpose of the processing defined in your organization?	Absent	Our organization does not define the purpose of processing data.
	Basic	For this scope of service , the project lead defines the purpose of processing the data.
	Intermediate	For this scope of service , the project lead collects information from the stakeholders before defining the purpose of processing the data.
	Advanced	For this scope of service , the project lead collects information from the stakeholders and probes them on possible requirements before defining the purpose of processing the data.
To what extent is the aim of the project defined in your organization?	Absent	We do not define the aim of the project.
	Basic	The project lead defines the aim of the proejct by using purpose of processing as a reference.
	Intermediate	The project team analyzes the purpose of processing and then collectively decide the aim of the project.
	Advanced	The project team analyzes the purpose of processing and then collectively decide the aim of the project which is further approved by the project lead and other stakeholders.
To what extent is method of processing defined in your organization?	Absent	At present , method of processing the data is not defined for this scope of service.
	Basic	At present , basic research is done before finalizing the method of processing data.
	Intermediate	At present , the project team researches for possible methods and then the final method is decided after discussion with the project lead.
	Advanced	At present ,an extensive research is done by the project team for possible methods and then the final method is decided after discussion with the project lead and concerned stakeholders..
To what extent are the expected benefit(s) from the processing defined ?	Absent	Expected benefits from processing data is also not defined for this project.
	Basic	Expected benefits from processing data are assumed by the project team on the basis of the aim of the project and not documented in the report..
	Intermediate	Expected benefits from processing data is well defined by the project lead and also documented in the report..
	Advanced	Expected benefits from processing data is well defined by the project lead and is reviewed by the senior management.
To what extent is the list of departments who will benefit from this processing defined in your organization?	Absent	We do not prepare a list of departments who will be affected by this data processing.
	Basic	The project lead prepares the list of benefits for each department and documents it.
	Intermediate	The project lead sends a meassage to all the concerned departments about the benefits and documents the list of departments in the report.

	Advanced	The project lead reaches out to all the concerned departments and present them the benefits they will receive from this data processing and documents both the benefits and recommendations/suggestions from each department.
To what extent is the list of members / teams who will be involved in the processing defined in your organization ?	Absent	There is no such process to capture the list of team members involved in this data processing.
	Basic	The list of team members who will be involved in the data processing are decided by the project lead and not documented at any stage.
	Intermediate	The list of team members who will be involved in this data processing is documented during the commencement of the project
	Advanced	The list of team members who will be involved in this data processing is well prepared before the start of the project and are given a unique project code to monitor any changes in the team..

Step 3: Consultation process

Question	Selection	Content
Who all will be involved in the consultation process?		Open field
Have you designed a Consultation Process . This Consultation process will involve seeking views of Data subjects or their representatives on the intended processing ?	Yes	We have designed a consultation process which will seek views of Data subjects on the intended processing.
	No	We do not have any specific consultation process to seeks views of data subjects or their representatives.
Is there a process in your organization to choose the people for consultation on the proposed data processing?	No Process	At present , we do not follow any process to choose the data subjects to be consulted.
	Recommended	We recommed that the project lead should design a process which run consultation process efficiently.
	Important	It is important for the project team to design a process which run consultation process efficiently.
	Essential	It is necessary for the project team to design a process which run consultation process efficiently.
How matured is the process in your organization of evaluating data processors, information security experts or other staff as consultants?	No Process	Currently , we do not have any process to evaluate consultants.
	Recommended	It is recommended that we should have a process to evaluate the possible options before finalizing the consultants.
	Important	It is always important to follow the process in order to find the most suitable consultants.
	Essential	It is essential part of our process to evaluate the options based on various factors and then decide who will be designated as the consultants.
How matured is the process in your organization of reaching out to the consultants for	No Process	There is no process which defines how data subjects can reach out to any consultant.
	Recommended	It is recommended to define a process which will have all the steps on how data subjects , project teams and others can reach out to the consultants.

consultation by data subjects, project teams etc.	Important	Imporrtance is given to the process which has all the steps on how data subjects , project teams and others can reach out to the consultants. A timestamp is maintained for all the meetings.
	Essential	There is very well defined process which has all the steps on how data subjects , project teams and others can reach out to the consultants. Also , a time is set in which the consultants willhave to revert back and also a timestamp is maintained for all the meetings.
To what extent is your process defined for mapping roles of the selected consultant(s) ?	Absent	We do not have any process to mapping the roles of the consultants.
	Basic	We map the roles to the consultants on the basis of their most recent work experience.
	Intermediate	We ensure that It is ensured that experience, expertise and knowledge is considered before we map roles to the consultants.
	Advanced	It is ensured that experience, expertise, knowledge and choice of the consultants are considered before we map roles to the consultants.
Do you have a list of members, other than designated consultant, who will also involved from the organization in the consultation process ?	Yes	A list is maintained which contains the names of all the involved consultants.
	No	No list is maintained which contains the names of the involved consultants.
Do you have a process to monitor the consultation process?	Yes	Yes , we have a process to monitor the consultation process.
	No	No, we do not have any process to monitor the consultation process.
How matured is the process in your organization to deliberate on the issues raised by the consultants or data subjects?	Absent	At present , we do not have any process to deliberate the issues rasied by the consultants.
	Basic	We have a basic plan which deliberate the issues raised by the consultants.
	Intermediate	Our process to deliberate the issues raised by the consultants is well defined and ensures all compliances.
	Advanced	It is our utmost priority to ensure that we follow all the steps of the designed process which enseure that proper deliberation is done on the issues raised by the consultants.
Do you have a proper forum where these consultants can provide assurances and rasie their concerns ?	Yes	A proper forum is set up which ensures that data subjects can raise their concerns easily.
	No	Currently , we do not have any forum where data subjects can rasie their concerns.
Have you assigned a person who will be responsible for keeping a check that all the issues raised by these consultants have been resolved ?	Yes	We have assigned an associate who will be responsible for keeping a check that all the issues raised by the consultants have been resolved.
	No	We do not have assigned an associate who will be responsible for keeping a check that all the issues raised by the consultants have been resolved.
If Response to Question 10 is Yes , Please provide the nsame of the assigned personnel.		

Step 4: Assess necessity and proportionality		This steps collects information which focuses on the importance and materiality of the proposed processing as required by the European Union //Regulators

What is legal bases of processing ?	*Vital interest*	*The legal basis for processing are - *** Select all from the list ; separate by comma if more than 1 ****
How matured is the process of defining the legality of data processing with respect to the data subjects in your organization?	**No Process**	*For this scope of service , we have not defined the legality of data processing.*
	Recommended	*For this scope of service , our organization recommends project lead to define the legality of data processing.*
	Important	*For this scope of service , it is important for the project lead to define the legality of data processing.*
	Essential	*For this scope of service , our organization recommends project lead to define the legality of data processing.*
Is there a process to evaluate the outcome of the processing with respect to the desired goals?	**Absent**	*Currently we do not have a process to evaluate the outcomes and check if the assessment reached the desired goals.*
	Basic	*To evaluate the outcomes fo the data processing , the project lead checks if they have reached the desired aim which was defined before the start of the assessment.*
	Intermediate	*To evaluate the outcomes fo the data processing , the project lead checks if all the requirements are met and the goals are met within the defined timelines.*
	Advanced	*To evaluate the outcomes fo the data processing , the project lead checks if all the requirements are met in each phase and the goals are met within the defined timelines.*
Will the data processing achieve the desired goal ?	**Yes**	*Yes , data processing will achieve the desired goals.*
	No	*No , The data processing will not achieve the desired goals.*
Is there an alternate approach/s to achieve the same outcome?	**Yes**	*Yes , there are alternate approaches to achieve the same outcome.*
	No	*No , we do not have any aleternate approach to achieve the same outcome..*
How mature is the process to explore the alternate approaches (less intrusive measures) in order to achieve the same results?	**Absent**	*We have not have any process to explore the alternate approaches which can be used to achieve the same results.*
	Basic	*We explore a couple of morea approaches to achieve the same results. All these approaches are documented in the final report.*
	Intermediate	*We explore all the possible approaches which can achieve the same results and measure their intrusivity , post which project team shares it with lead to finalize the final approach to process data.*
	Advanced	*We explore all the possible approaches which can achieve the same results and measure their intrusivity , post which project team check the feasibility before finalizing the final approach to process data.*
What is the maturity of defined data quality KPIs and metrics in your organization to monitor data quality and integrity?	**Absent**	*Our organization does not currently have any KPI's to monitor data quality and integrity for this specific scope of service.*
	Basic	*We have a list of KPI's in our organization which is used to monitor data quality and integrity for all data related services.*
	Intermediate	*Project lead decided the list of KPI's which will be used to monitor data quality and integrity for this specific scope of service.*
	Advanced	*Our organization has tailored a list of KPI's which will be used to monitor data quality and integrity for this specific scope of service. This list is prepared by the team and reviewed by the lead.*
	Absent	*Data Subjects are not provided any information after collection of the data.*

Question	Level	Description
To what extent is the information that will be given to the data subjects defined in your organization?	Basic	Data Subjects are informed about the intent of processing data.
	Intermediate	Data Subjects are informed about the intent of processing data and also notifed if there is any change in the scope of service.
	Advanced	Data Subjects are informed about the intent of processing data and also notifed if there is any change in the scope of service. Also , they will be notified once the processing is done and data can be archived.
How matured is the process in your organization of upholding the Data Subject Rights while processing their data?	No Process	Currently , we do not have process to uphold data subject rights while processing data.
	Recommended	Our processes related to data subject rights recommends the data processing team to uphold these rights and aim for complete compliance.
	Important	We make it essential for the team to uphod all the Data subjects rights and make sure that the team comply to it throughout the processing.
	Essential	Data subjects rights are given utmost importance while designing data processing plan. We make sure that Data Subject rights are upheld throughout the prcoessing.
How matured is the process to monitor how compliant designated processing entities are while preforming the proposed prosessing?	Absent	At present , we do not have a process to monitor the compliance of the designated entitites while data processing.
	Basic	We have a generic process to monitor the compliance of the designated processing entitities. This monitoring process considers a few of the KPI's to measure the compliance.
	Intermediate	We have a robust process to monitor the compliance of the designated processing entititie which aims to achieve full complaince..
	Advanced	Compliance of the designated prcoessing entitites is a must and aim is always to achieve 100% compliance. We have a robust process to monitor the compliance of the designated processing entitities.
How mature is your process is to ensure that data processing is not used for out of scope requirement in order to prevent function creep?	Absent	We do not have a process to ensure any out of scope data processing activities.
	Basic	We have a process which ensures that we do not deviate from the decided scope of service while processing data.
	Intermediate	We make sure that we stick to the decided scope of service and have no deviations from it while processing. We do not accept any out of scope requirements and prevent any function creep.
	Advanced	We make sure that we stick to the decided scope of service and have no deviations from it while processing. We document all the ad-hoc requirements and plan it out for second phase rather than adding it to on-going processing with aim to prevent function creep.
To what extent are the measures defined to ensure processors comply to the scope of the project during data processing ?	Absent	For this scope of service , we do not have any measures to ensure that processors comply with the scope of project.
	Basic	Data processors are informed about the boundaries of the scope and asked to esnure compliance while processing data.
	Intermediate	We have well defined controls in place to ensure that data processors are aware about the scope of service and they comply by them
	Advanced	We have well defined controls in place to ensure that data processors are aware about the scope of service and they comply by them. Processors are aslo asked to prvoide full disclosure about their prcoessing activites and ensure that they document all the data transfers.
To what extent are the measures defined to safeguard any international transfers?	Absent	There is no measures defined to safegaurd any international transfer of the data.
	Basic	We have a few controls to keep the data safe in the designated geography and prevent them from any international transfer..
	Intermediate	We keep a strict check on any international transfer of the data and have several safegaurds aiming to do same. We have efficient controls to keep the data safe in the designated geography.

	Advanced	We keep a strict check on any international transfer of the data and have several safegaurds aiming to do same. We also make sure that all the data controllers and processors who have access to our data also have efficient controls to keep the data safe in the designated geography.

Step 5: Identify and assess risks

Question	Selection	Content
Have you assigned a person/team who will be responsible for Identifying all the risks ?	Yes	A dedicated associate/person will be responsible for identifying all th risks.
	No	At present , we do not have any dedicated associate/person who will be responsible for identifying all th risks.
How matured is the process of documenting type and details of the risks from the proposed processing in your organization?	No Process	We do not have any process to documents the risks which were detected during DPIA process.
	Recommended	We recommend that the concerned team should document all the risks which were detected during DPIA process.
	Important	It is important for the concerned team to document all the risks which were detected during DPIA process.
	Essential	It is mandatory for the concerned team to document all the risks which were detected during DPIA process.
How matured is the process of calculating likehlihood and severity of the risk from the proposed processing in your organization?	No Process	Currently we do not have a process to calculate likelihood and severity of the risks detected during thr DPIA process.
	Recommended	Project lead is recommended to design a process to calculate likelihood and severity of the risks detected during thr DPIA process.
	Important	It is important for the project lead to design a process to calculate likelihood and severity of the risks detected during thr DPIA process.
	Essential	It is mandatory for the project lead to design a process to calculate likelihood and severity of the risks detected during thr DPIA process.
How matured is the process of finding residual risks <define what is residual risks> defined in your organization?	No Process	We do not define the residual risks which might arise from implementing risk mitigation measures.
	Recommended	It is recommended to look out for all possible residual risks and document their details.
	Important	It is important to look out for all possible residual risks and document their details.
	Essential	It is mandatory to look out for all possible residual risks and document their details.
To what extent is the plan to quantify the impact of the risks defined in your organization ?	No Process	We do not have any process to quantify the impacts of risks.
	Recommended	We recommend the project lead to define the plan which will be used to quantify the impact of risks.
	Important	It is important for the project lead to define the plan which will be used to quantify the impact of risks.
	Essential	It is mandatory for the project lead to define the plan which will be used to quantify the impact of risks.

Step 6: Identify measures to reduce risk

Question	Selection	Content
Have you assigned a person/team who will be responsible for describing the risk mitigation measures ?	Yes	For this scope of service , our organization has assigned a specific team to identify the risk mitigation/elimination measures .
	No	For this scope of service , our organization has not assigned any specific team to identify the risk mitigation/elimination measures .
Have you assigned a person/team who will be responsible for defining the impact of risk ?	Yes	Also , there will be a dedicated associate/team who will be responsible for defining the impact of risk.
	No	Currently, we do not have any dedicated associate/team who will be responsible for defining the impact of risk.
To what extent is the plan to reduce or eliminate risk defined in your organization ?	Absent	Currently we do not have any plan to reduce or eliminate risks.
	Basic	Plan to reduce or eliminate risks is done by the proejct team and focuses only on finding a single measure to handle risks.
	Intermediate	Plan to reduce or eliminate risks is reviewed by the project lead and comprises of measures which can be implemented to handle risks.
	Advanced	Plan to reduce or eliminate risks is reviewed by the project lead and comprises of timelines , impacts , alternate measures and risk residuals identification.
Have you assigned a person who will be responsible for planning and leading the risk mitigation action plan ?	Yes	A qualified associate will lead the risk mitigation action plan.
	No	We do not have any dedicated associate who will lead the risk mitigation action plan.
Have you assigned a person who will be responsible for auditing the plan ?	Yes	For this scope of service , our organization has assigned a specific lead to audit the risk mitigation/elimincation plan.
	No	For this scope of service , our organization has not assigned any lead to audit the risk mitigation/elimincation plan.

Step 8 : Post DPIA Process

Question	Selection	Content
Have you assigned a person who will be responsible for collecting and analysing the DPIA outcomes ?	Yes	After completion of DPIA , We assign an associate who will be responsible for collecting and analysing the DPIA outcomes.
	No	Post DPIA process , we do not assign any associate who will be responsible for post DPIA implementation activites..
Have you assigned a person who will be responsible for planning intergration of DPIA outcomes into the project plan ?	Yes	An Associate will be also be responsible for integrates DPIA outcomes in a project plan.
	No	Currently we do not have any associate who will integrate DPIA outcomes in a project plan.
	No Process	For this specific scope of service, our organization do not have a process to integrate DPIA Outocomes in our current Processing activities.

How matured is the process of integrating DPIA outsomes defined in your organization?	**Recommended**	For this specific scope of service , Our organization recommends the project lead to integrate DPIA outcomes to prevent any data leak or loss.
	Important	In our organization, It is important for the project lead to integrate DPIA outcomes to prevent any data leak or loss.
	Essential	In our organization, It is mandatory for every project lead to integrate DPIA outcomes before going live with the services.
How matured is the policy defined in your organization for assigning timelines to implement the DPIA outcomes?	**Absent**	We do not define any timelines to implement the DPIA outcomes.
	Basic	Our Post DPIA policy has a basic structure to estimate the timeline for implementing DPIA outcomes.
	Intermediate	Our Post DPIA policy takes good number of factors in consideration which will be used to estimate the timeline for implementing DPIA outcomes.
	Advanced	Our Post DPIA policy has a well defined process with multiple steps of approval before finalization of the timeline for implementing DPIA outcomes.
To what extent are the KPI's which will depict the success of Integration defined in your organization ?	**Absent**	At present , we do not have any KPI's to measure the success of Post DPIA Implementation process.
	Basic	We use a few generic KPI's to measure the success of Post DPIA Implementation process.
	Intermediate	We have a industry specfic KPI's list which we use to measure the success of Post DPIA Implementation process.
	Advanced	We define the KPI's while planning the post DPIA Implementation process and so that we have scope specific KPI's to measure the success of the project.