

License Dashboard: Universal Data Portal Data Protection Impact Assessment Guidance

PHX201

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Introduction

Data Protection Impact Assessments (DPIAs) are a management tool designed to identify any risks to a person's privacy when implementing new systems, technologies, or process changes.

This document has been created by License Dashboard to aid customer organisations to complete DPIAs on the procurement of a License Dashboard Service and identify any risk to the rights and freedoms of data subjects.

The use of the term "individuals" in this document refers to the holding of personal data for any customer individual consuming the service.

Key Data Protection Impact Assessment Information

DPIA FAQ's

Data Protection Impact Assessment FAQ's	Yes/No
Will the service itself involve the profiling, tracking, monitoring, evaluating, screening, or making predictions about individuals in general, their performance, movement, behaviour, or location?	NO
Will the service be collecting or involving special category personal data e.g. medical, health disability, criminal convictions/offences, children, vulnerable individuals, sexual orientation, ethnicity, religion, trade union association, political opinion, sexual orientation, or financial information?	NO
Will the service be monitoring publicly accessible places for example CCTV?	NO
Will the service involve the use of technologies, digital solutions, or Internet of Things (IoT) to process or store information for example, cloud-based systems?	YES
Will the service be processing biometric information e.g. fingerprints?	NO
Will the service be collecting or using information that individuals have provided to someone else and may not be aware is being shared with us?	NO
Will the service be monitoring or collecting information online (website) or other digital means for example, cookies or other online technical mechanisms?	NO
Will the service be using automated decision processing, for example, a technical machine or algorithm is determining an outcome rather than a human intervention?	NO

Purpose

<p>What information does License Dashboard need to collect to provide the Universal Data Portal</p>	<p>To provide the service, the Portal collects information on computer assets including:</p> <p>Hardware and Configuration data, see below.</p> <p>Domain Name</p> <p>Computer Name</p> <p>Operating System</p> <p>Device Type</p> <p>Service Pack</p> <p>IP Address</p> <p>Physical or Virtual</p> <p>Make</p> <p>Model</p> <p>Serial Number</p> <p>CPU Name</p> <p>Number of Physical CPUs</p> <p>Number of Logical CPUs</p> <p>RAM in Bytes</p> <p>Last Logged On User</p> <p>Last Seen Date</p> <p>Environment</p> <p>Physical Host</p> <p>Business Unit</p> <p>Country Of Use</p> <p>OS Mobility</p> <p>Terminal Server</p> <p>Platform</p> <p>CPU Speed In MHz</p> <p>CPU Cores</p> <p>CPU Threads</p> <p>BIOS Date</p> <p>IBM PVU</p> <p>Virtualisation Type</p> <p>Multi-Threading Enabled</p> <p>Primary User</p> <p>Location</p> <p>Description</p> <p>Ship Date</p> <p>Warranty Start Date</p> <p>Warranty End</p> <p>Software Installs</p> <p>MSI/Package data</p> <ul style="list-style-type: none"> - EXE data <p>Software Metering</p> <ul style="list-style-type: none"> - EXE data <p>Software Subscriptions including the software information and associated user</p>
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	<p>User account information from Active Directory</p> <ul style="list-style-type: none"> - This can include Personal Data including <p> Name First Name Surname Display Name Company Name Distinguished Name Department Job Title Employee ID Manager Street Address City State Country Post Code Telephone Number Email Address SAM Account Name User Principle Name Distinguished Name Pre-Windows 2000 Name Last Logon Date Country Exchange Mail Enabled Exchange Recipient Type Exchange Home Mailbox Managed Service Account Is Domain Admin </p> <p>Software Licence Records</p> <p>End users requiring technical support may provide technical information about a customer's environment to support the investigation and diagnostic process.</p> <p>Any Personal Data communicated is business owned by the customer organisation and may include information offered through email signature, including name, email, contact information and organisation.</p>
What geographical areas does the data processing cover	Please see below for a breakdown of supporting toolsets and processing locations.
Who is the data subject	<p>The Data Subject is all users within the scope of the service and the individuals involved in the procurement stages; therefore it is likely the data subject are staff members of your organisation.</p> <p>This may differ per customer as the service may also process personal data relating to any Data Subjects of your organisation.</p>

Nature

Who in License Dashboard will have access to the data?	<p>License Dashboard operates the Principle of Least Privilege and Role Based Access Control. Access to the customer environment is limited to the service provisioning technical staff only – our IT personnel.</p> <p>The allocated Customer Account Managers have access to the customer organisation support, requests, and task tickets to provide additional support and context in the event of ticket escalation.</p>
What hardware, software, networks, and/or paper systems will be used to collect or store the data?	Data including customer contact information; contract data; scheduled tasks and review schedule is held with the License Dashboard internal contract management system. Please see below for toolset breakdown.
How often will the data be used?	Data will be used as required by the service. The data will be updated into the performance dashboard daily. This will include the ticket requester name.

Data Minimisation

What measures are in place, or proposed, to ensure that only a minimum of data is collected, created, or obtained to enable License Dashboard to proceed with License Dashboard project?	<p>Data held is restricted to that required to deliver the contract and that provided by individuals to raise support tickets.</p> <p>Due to the nature of the managed services provided by License Dashboard, our service delivering staff members may have remote access to the customer environments. It is the responsibility of the customer to ensure that the access rights of License Dashboard staff within the customer environments is proportionate and appropriate for service delivery.</p>
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Data Accuracy

What measures are in place, or proposed, to ensure that the data remains accurate and up-to-date?	Data held includes environment information which is updated through the course of the contract. Customer contact information is updated as advised by the customer
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Data Retention And Disposal

What measures are in place, or proposed, to ensure that personal data collected, created, or obtained, will be kept for as short a period as possible?	<p>In order to run the service, we only collect information relevant to the service and nothing more.</p> <p>Any data processed on your Data Subject's is supported in accordance with your requirements.</p>
What retention periods are applied to the personal data?	<p>Customer contact information is held for the contract duration + 7 years.</p> <p>Any data belonging to your data subject's is deleted in accordance with your retention schedules and deleted upon service termination in accordance with our contract with you.</p>

How will the data be treated at the end of the retention period?	Sensitive data destruction takes place as appropriate across systems.
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Involvement of External Organisations

Service	Supplier	Function	Data type	Data location
Clarity/SAM Essentials	Microsoft Azure	Cloud Hosting	Customer SAM data	UK
	ZenDesk	Support Ticketing Tool only	Support ticket content	Ireland

The service itself will only collect the below data in order to operate:

Name, Address, Phone, Email	✓	Location	✓
Financial	✗	Disabilities	✗
Medical/Health	✗	Biometric or genetic	✗
Behavioural	✗	Profiling	✗
Criminal offences/convictions	✗	Photographic	✗
CCTV images	✗	Religious Beliefs, Trades Union Membership or Political Opinions	✗

Lawful Basis

For personal data being processed on your staff we process this data under a legitimate interest in order to manage the relationship with you, or through contractual obligation. Any personal data on your data subject's being processed is based on your grounds for processing where we are acting as your processor.

Managing Risk

License Dashboard is ISO27001 certified with no clause exclusions. This information security management standard ensures company focus on the confidentiality, integrity, and availability of information through technical controls, audit focus and risk management. Our ISO27001 Management system is audited by third party assessors.

Version Control

<u>Author</u>	<u>Version</u>	<u>Date</u>	<u>Description</u>
Ben Rayner	1.0	25/04/2022	Original Document
License Dashboard	2.0	15/03/2023	Amendments following annual review

Document Approval

<u>Name</u>	<u>Version</u>	<u>Date</u>	<u>Position</u>
Sam Mudd	1.0	25/04/2022	Managing Director
Clare Metcalfe	2.0	20/03/2023	Operations Director

Signed: *Clare Metcalfe* Clare Metcalfe, Operations Director

Dated: 20/03/2023