Data Access Decision Simulator – Final Deliverable

Role: DevOps Engineer
Organization: EduConnect Ghana
Regulatory Framework: Ghana Data Protection Act

Data Access Decision Form – Request 1

Request 1: Marketing Campaign

Requester: Sarah Owusu, Marketing Manager

Decision

DENY **(with alternative recommendation)**

Lifecycle Stage

Use / Share

Justification

- The request includes **CONFIDENTIAL data** (student email addresses).
- Sarah has **INTERNAL access only**, which does not permit handling CONFIDENTIAL data.
- Request violates the **principle of least privilege**: marketing does not require full student PII to run campaigns.
- Bulk access to PII increases risk of data leakage and non-compliance.

Action Steps

1. Deny access to the full student database.
2. Propose an **alternative solution**:
    - Use an **opt-in mailing list** or
    - Provide **anonymized or consent-based contact data** extracted by Engineering.
3. Require confirmation that students have explicitly consented to marketing communications.
4. Log the decision for audit purposes.

Data Access Decision Form – Request 2

Request 2: Analytics Partnership

Requester: David Mensah, Head of Product
Third Party: DataInsights Inc.

Decision

CONDITIONALLY APPROVE

Lifecycle Stage

Share

Justification

- Request involves **cross-border data transfer** and **CONFIDENTIAL data** (student profiles).
- Sharing raw database access and credentials is a **major security and compliance violation**.
- Ghana DPA requires safeguards for international data transfers and third-party processing.
- Least privilege is violated by granting full AWS database access.

Action Steps

1. **Do NOT share database credentials.**
2. Limit shared data to **anonymized or pseudonymized datasets** only.
3. Ensure the following are in place before approval:

   - Data Processing Agreement (DPA)
   - Cross-border data transfer safeguards
   - Purpose limitation and retention terms
4. Grant access via:

   - Read-only API or
   - Secure data export bucket with logging enabled
5. Obtain sign-off from:

   - Legal
   - Security
   - Data Protection Officer (if designated)

Data Access Decision Form – Request 3

Request 3: Archive & Deletion

Requester: Comfort Asante, Customer Support Lead
Student: James Boateng

Decision

APPROVE

Lifecycle Stage

Destroy (with limited Archive)

Justification

- Student has exercised the **"right to be forgotten"** under Ghana DPA.
- Account is inactive, and there are **no legal or financial obligations** preventing deletion.
- Organization is required to delete personal data when it is no longer necessary for its original purpose.

Action Steps

1. Verify the requester's identity and confirm deletion request.
2. Trigger account deletion workflow:
   - Remove PII (name, email, phone, profiles)
   - Delete learning activity linked to identity
3. Retain **minimal non-identifiable records** only if required:
   - Financial transaction summaries (for statutory audit)
   - Fully anonymized analytics data
4. Document the deletion request and completion.
5. Notify the student once deletion is finalized.

Final Summary

All three data access requests were evaluated using **data classification policy**, **data lifecycle principles**, **least privilege**, and **regulatory compliance**. The decisions protect student data, reduce organizational risk, and align EduConnect Ghana with best practices in DevOps and data governance.