|  |  |
| --- | --- |
|  | Record—P1 |
|  | |
| Privacy Information Management System (PIMS) | |
| PII Processing Record – Record Form: Management of Employee Record, Working Time, subcontracting parties | |

General information

|  |  |
| --- | --- |
| Type | TBD |
| Reference | GDPR-EN |
| Version | TBD |
| State | Final |
| Owner | LISDataCenter |
| Date | 22/10/2021 |
| Classification | Internal |

Document history

History of the model

|  |  |  |  |
| --- | --- | --- | --- |
| Version | Date | Author | Changes |
| 21.1 | 01/04/2022 | Mr. Aubigny | Model included in ARIANA 21.1 |

History of the form

|  |  |  |  |
| --- | --- | --- | --- |
| Version | Date | Author | Changes |
| 0.1 | 30.03.2022 | M. Aubigny | Initial export of data on 24.06.2022 from the central processing records register  [TST\_Q999\_GDPRManagerTestFile.xlsx] |

Approval

|  |  |  |
| --- | --- | --- |
| Name | Responsibility | Signature |
|  | Approval of the data stored in the centralized processing register. |  |
|  | Person responsible for the treatment included in this form |  |

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# Introduction

## Context e

This document is an extract from the register of processing activities duly established by each controller in accordance with Regulation (EU) of the Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of PII and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter "GDPR").

The register of processing activities, which includes all the information related to the processing activities, exists in the form of a centralized Excel table from which the information of this specific processing activity is extracted for validation and daily management.

The processing activity manager oversees the modification of this document accordingly and forwards the new version to the registry manager responsible for re-importing the information into the centralized database.

## Objectives

The purpose of this file is to:

* document all information required by the GDPR with respect to the current processing activity;
* facilitate the update process after any change in the treatment activity;
* to ensure that staff do not perform actions other than those that meet the purposes and criteria indicated in this document (respectively in the centralized register).

At a minimum, according to the GDPR, the processing register must contain:

1. *"the name and contact details of the controller and, where applicable, the joint controller, the controller's representative and the data protection officer ;*
2. *the purposes of the processing ;*
3. *a description of the categories of data subjects and the categories of personal data;*
4. *the categories of recipients to whom the personal data have been or will be disclosed, including recipients in third countries or international organizations;*
5. *where applicable, transfers of personal data to a third country or to an international organization, including the identification of that third country or international organization and, in the case of transfers referred to in the second subparagraph of Article 49(1), the documents attesting to the existence of appropriate safeguards ;*
6. *to the extent possible, the deadlines for the deletion of the various categories of data;*
7. *to the extent possible, a general description of the technical and organizational security measures referred to in Article 32(1)."*

## Application and audience

This document applies to any aspect of the processing in question. In particular, it is intended to be used by personnel involved in a processing operation, including its manager(s) to obtain their approval.

## References

DELETE WHAT IS NOT NECESSARY AND ADD NEW REFERENCES in the list of documents.

1. itrust consulting, ISMS, Security Policy (ITR-General), POL\_00-0.
2. itrust consulting, PIMS Policy, POL\_01-0.
3. itrust consulting, processing activity log, STA\_01-02.
4. REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

## Acronyms

|  |  |
| --- | --- |
| Acronym | Explanation |
| DPIA | Data Protection Impact Assessment |
| CGIE | Education Information Management Center |
| PII | Personal data |
| DPO | Data Protection Officer |
| ISD | Information Security Officer |
| DSSI | Information Systems Security Officer |
| RGPD | General Data Protection Regulation (Regulation (EU) 2016/679) |
| SMPII | Personal Data Management System |
| (Security) Control | Protection measure |
| Person (legal sense) | Person concerned |
| PII processor | PII subcontractor |
| PII controller | Person in charge of the treatment |

# Information on treatment activity

|  |  |
| --- | --- |
| Specific Processing Record Form | Management of Employee Record, Working Time, subcontracting parties |

## General

|  |  |  |
| --- | --- | --- |
| Name / Acronym | Management of Employee Record, Working Time, subcontracting parties | HR |
| Reference number | P1 | |
| Date of creation in the register | 16/06/2021 | |
| Date of modification in the register | 30/03/2022 | |
| Brief description | a) Management of personal files including security at work  Management of unsolicited applications (CVs) or solicited applications  Management of HR disputes  b) Management of the working time of employee  c) Management of information of third parties (subcontractors) and necessary for billing processing | |
| Data collected directly from data subjects | LISDataCenter | |
| Sensitive Data | Yes | |
| DPIA status (see §) 2.10) | Information non prevalent or missing | |
| Transfer to third countries | Information non prevalent or missing | |
| Persons Concerned | Staff of the organization: Yes  Clients: No  Prospects : Interns  Working prospects  Citizens : No  Suppliers: Yes (In case of subcontracting parties) | |
| Other useful information |  | |

## Information on the chain of responsibility

|  |  |
| --- | --- |
| Legal liability & Criminal liability | Description of the organization or function within the organization |
| Role of the organization | LISDataCenter Administration Dept |
| Processing controller | LISDataCenter |
| Joint Controller | No |
| Other Joint controller(s) | Information non prevalent or missing |
| IS Manager | CTO of LISDataCenter |
| IS Security Manager | CTO of LISDataCenter |
| DPO/Responsible for notifying the CNPD in the event of a data breach. | DPO of LISDataCenter |
| Responsible for communicating to the data subject in the event of a data breach. | Director of Operations |

## Purposes of the processing

|  |  |  |  |
| --- | --- | --- | --- |
| Goals | Description | The legal basis of the processing | Registration of the legal basis |
| Main #1 | a) Management of the employees' contract, security at work including legal issue and administrative declaration.  b) Processing of working time for establishment of salary  Global management of working time  c) Management of PII regarding subcontracting | Based on the employee contract  Based on legal obligation  Based on vital interest regarding employee | (a) Cf. Employment contract  (b) Labor legislation |
| Main # 2 | a) Management of human resource  Management of spontaneous candidature  b) Management of attendance and absence (leave time, sick leave) and declaration to administration | Balancing of interests  Based on the employee contract  Based on legal obligation | Privacy notes on the web site  Employment contract  Labor legislation |
| Secondary(s) | Computing of working indicators for general management of LISDataCenter organization | Balancing of interests | Privacy note on the web site |

## Information concerning the category of personal data [PII] (art. 30.1.c)

***PCD acronym for "personal data", i.e. art 4.1 "any information relating to an identified or identifiable natural person ("data subject")".***

|  |  |  |  |
| --- | --- | --- | --- |
| Data category | | Included | Description |
| N | Common PII (Article 30.1) | ☑ | Yes |
| 1 | Identification information directly related to the individual  Name, marital status, etc.  Image[[1]](#footnote-1) of a person recorded by a camera | ☑ | Name  Address  Age  Sex  Personal phone number  Personal email address  Image  Marital Status |
| 2 | Personal life (lifestyle, hobbies, family situation, etc.) | ☑ | a) Family Situation  b) Education level  c) Working time info  d)Leave (exceptional) |
| 3 | Information on the financial and economic situation  Income, financial situation, tax situation, etc.  Information on working conditions, etc. | ☑ | Tax situation  Salary  Billings and invoices information |
| 4 | Information on ICT  Dynamic IP address  Connection data (IP address, logs, etc.)  Cookies when they contain a unique user ID linked to a clear personal data.  Fingerprint, unique RFID or biometric information if it does not identify the physical person but is used to log into the computer system. | □ | Information non prevalent or missing |
| 5 | Direct location information  Travel information, GPS data, GSM, etc. of a natural person  WiFi location data (correlated with unique MAC address) | □ | Information non prevalent or missing |
| 6 | National identification number | ☑ | Yes |
| S | Sensitive PIIs | ☑ | Yes |
| 1 | Reveal racial or ethnic origin | □ | Information non prevalent or missing |
| 2 | Revealing your political opinions | □ | Information non prevalent or missing |
| 3 | Revealing your religious or philosophical beliefs | □ | Information non prevalent or missing |
| 4 | Revealing union membership | □ | Information non prevalent or missing |
| 5 | Genetic data | □ | Information non prevalent or missing |
| 6 | Biometric data that uniquely identifies a natural person. | □ | Information non prevalent or missing |
| 7 | Health information | ☑ | Workplace health information |
| 8 | Information concerning the sex life or sexual orientation of a natural person | □ | Information non prevalent or missing |
| C | PIIs for criminal convictions and offenses | □ | No |
| 1 | Conviction records | □ | Information non prevalent or missing |
| 2 | Violation files | □ | Information non prevalent or missing |

## Information concerning the Persons concerned.

|  |  |  |
| --- | --- | --- |
| Categories Concerned Persons | Concerned | Description |
| Organizational staff | ☑ | Yes |
| Customer | □ | Information non prevalent or missing |
| Prospects | ☑ | Interns  Working prospects |
| Citizen | □ | Information non prevalent or missing |
| Suppliers | ☑ | Yes (In case of subcontracting parties) |

## Information about the recipient of the data

***Art. 4.9: "The term 'recipient' means a natural or legal person, public authority, department or other body to whom personal data are communicated, whether or not it is a third party.***

### Recipient 1

|  |  |
| --- | --- |
| Description of the recipient of the data | Information non prevalent or missing |
| Recipient's country | LUX |
| Set of data included in the processing data | a) Social Identification Number  Tax situation etc.  b) Working Time  Tax situation  Leaves  c) All information |

### Recipient 2

|  |  |
| --- | --- |
| Description of the recipient of the data | a) Law working court  b) Internal Service  c) Accounting Service |
| Recipient's country | LUX |
| Set of data included in the processing data | a) Complaint  b) Leaves  c) Status of subcontracting info |

### Recipient 3

|  |  |
| --- | --- |
| Description of the recipient of the data | Internal Service |
| Recipient's country | LUX |
| Set of data included in the processing data | All information for payroll calculation  Working organization |

## Transfer of data outside the European Union

***Art. 44:*** *"Any transfer of personal data undergoing processing or intended for processing after transfer to a third country or international organization may only take place if, subject to the other provisions of this Regulation, the conditions laid down in this chapter [Art. 45-49] are complied with by the controller and the processor... "*

|  |  |
| --- | --- |
| The processing includes transfers of data outside the EU | Information non prevalent or missing |

|  |  |
| --- | --- |
| Information/Transfer No. | Transfer 1 |
| Name of the transfer | ESSAI 1 |
| Description of the transfer | Ceci est un essai |
| Lawfulness of the transfer | Information non prevalent or missing |

|  |  |
| --- | --- |
| Information/Transfer No. | Transfer 2 |
| Name of the transfer | Information non prevalent or missing |
| Description of the transfer | Information non prevalent or missing |
| Lawfulness of the transfer | Information non prevalent or missing |

|  |  |
| --- | --- |
| Information/Transfer No. | Transfer 3 |
| Name of the transfer | Information non prevalent or missing |
| Description of the transfer | Information non prevalent or missing |
| Lawfulness of the transfer | Information non prevalent or missing |

## Data retention and deletion

|  |  |  |  |
| --- | --- | --- | --- |
| Data qualification | Name of the data | Maximum retention time | Periods of deletion after a legitimate request or after the expiration of the retention period |
| Category PII maximum retention | a) Health information including in the personal data file of employee  b) Exceptional Leave  c) Contract Amount | a) 10 Years after end of contract  b) 5 years after the payment  c) 10 years after end of contract | Non applicable |
| Critical PII category | a) Disciplinary Sanction  b) Other leave  c) Personal contact | a) 10 Years after end of contract  b) 5 years after the payment | a) & b) Non applicable  c) 2 months |
| Other categories of PIIs | a) Other data including in HR file (Descriptive data, National ID), CV of candidature  b) Timesheet  c) Other data used in subcontracting mgt | a) 10 years after end of contract  b) 5 months  c) working time management data retained until end of contract | a) Non applicable  b) 1 month  c) 2 months |

## Privacy risk assessment *(rapid approach based on data categories)*

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Datasets (see 2.8) | Type of media | Probability of occurrence | Impact | Risk level |
| a) Health information including in the personal data file of employee  b) Exceptional Leave  c) Contract Amount | Information non prevalent or missing | Information non prevalent or missing | Information non prevalent or missing | N/A |
| a) Disciplinary Sanction  b) Other leave  c) Personal contact | Information non prevalent or missing | Information non prevalent or missing | Information non prevalent or missing | N/A |
| a) Other data including in HR file (Descriptive data, National ID), CV of candidature  b) Timesheet  c) Other data used in subcontracting mgt | Information non prevalent or missing | Information non prevalent or missing | Information non prevalent or missing | N/A |

## Data Privacy Impact Assessment [DPIA] (art. 35)

Art 35.1: High Risk Assessment

|  |  |
| --- | --- |
| Does the treatment pose a high risk to the individuals involved? | Non |
| Type of data category affected by the highest risk | a) Health information including in the personal data file of employee  b) Exceptional Leave  c) Contract Amount |
| Highest level of risk for an individual | Information non prevalent or missing |
| Maximum number of people involved | 15 persons |
| Level of impact on privacy (Consequence for individuals) | Information non prevalent or missing |

Art 35.3-4 Treatment requiring an DPIA.

|  |  |  |
| --- | --- | --- |
| Justification for the completion of the DPIA | | Full filled |
| *The nature of the treatment met at least 2 or 3 items from the list below (see WP-248 rev.01 EDPB).* | | |
| Criteria based on the nature of the treatment | | Evaluation of criteria for treatment |
| 1 | Evaluation or scoring (including profiling and prediction) | Information non prevalent or missing |
| 2 | Automated decision making with legal or similar significant effect | Information non prevalent or missing |
| 3 | Systematic monitoring | Information non prevalent or missing |
| 4 | Sensitive or highly personal data | Information non prevalent or missing |
| 5 | Data processed on a large scale (taking into account the number of persons concerned, the volume of data, the duration/permanence, the geographical scope). | Information non prevalent or missing |
| 6 | Matching or combining data sets | Information non prevalent or missing |
| 7 | Data concerning a vulnerable person (unbalanced relationship between the data subject and the controller) | Information non prevalent or missing |
| 8 | Innovative use or application of new technological or organizational solutions | Information non prevalent or missing |
| 9 | The processing prevents data subjects from exercising a right or using a service or contract | Information non prevalent or missing |
| The processing operation is identified by the supervisory authority (CNPD) in the list of processing operations qualified for DPIA (see art. 35.5) | | Information non prevalent or missing |

Art 35.5-6 Treatment outside of DPIA.

|  |  |
| --- | --- |
| Rationale for not completing the DPIA | **Information non prevalent or missing** |
| Reason given for non-obligation | Information non prevalent or missing |
| Justification for invoking the above ground | Non applicable |

Additional information about the DPIA

|  |  |
| --- | --- |
| DPIA Report | Non applicable |
| Summary of the DPIA report (if published) | Non applicable |
| Result of the CNPD consultation (before any new data processing) | Non applicable |

## Specific security measures for the protection of PIIs

### Organizational and technical measures (art. 32 and 40)

|  |  |
| --- | --- |
| Domain | Description or justification for not implementing |
| Encryption | No |
| Pseudonymization or anonymization | No |
| CIA controls and IS resilience (to protect confidentiality, integrity and availability) | Information non prevalent or missing |
| Process for restoring availability after a physical or logical incident | BackUp of data |
| Test procedure to test controls and evaluate their effectiveness. | Regular restoration test based on annual cycle |
| Risk analysis according to CIA criteria | Information non prevalent or missing |
| Approved [sector] Code of Conduct (s. 40) | a/b) No  c) Commercial regulation |
| Certification (s. 42) | No |
| Contracts for all access to PIII and controls to ensure that all access to PIII is based on a contractual agreement that complies with the rules of the PIII Controller (consistent with the purposes of the processing). | Information non prevalent or missing |

### Other security measures not described in s. 32

|  |  |
| --- | --- |
| Domain | Description or justification for not implementing |
| ePD Directive - specific controls | Non applicable |
| Controls to ensure transparency of automatic decisions | Non applicable |
| Implementation of PCD protection via the principle of protection by default and by design (art. 25) | Non applicable |

### Additional security measures to mitigate specific risks.

|  |  |
| --- | --- |
| Description | Information non prevalent or missing |

## PII Processing Agreements

### Processor 1

|  |  |
| --- | --- |
| Name or reference | - TM: UniLU |
| Contract reference | TBD |
| Summary of controls included in the contract | Restriction of access  Backup  Deletion after 2 months |

### Processor 2

|  |  |
| --- | --- |
| Name or reference | Information non prevalent or missing |
| Contract reference | Information non prevalent or missing |
| Summary of controls included in the contract | Information non prevalent or missing |

## Rights of the persons concerned

|  |  |
| --- | --- |
| Domain | Description |
| Indication of special rights | No |
| Reference to the information provided | Privacy Policy and Security Charta |
| Mechanism for changing or withdrawing consent | Non applicable |
| Opposition to processing if legitimate | Non applicable |
| Access, correction and overwriting mechanisms | Via request to HR responsible by email |
| PII Carrying Mechanism | Information non prevalent or missing |
| Mechanism for justifying an automated decision | Non applicable |
| Other Information on the rights of the person concerned | Information non prevalent or missing |

## Specific treatment information

|  |  |
| --- | --- |
| S1 | Information non prevalent or missing |
| S1.1 | Information non prevalent or missing |
| S1.1.1 | Information non prevalent or missing |
| S1.1.2 | Information non prevalent or missing |
| S1.1.3 | Information non prevalent or missing |
| S1.2 | Information non prevalent or missing |
| S1.2.1 | Information non prevalent or missing |
| S1.2.2 | Information non prevalent or missing |
| S1.2.3 | Information non prevalent or missing |

|  |  |
| --- | --- |
| S2 | Information non prevalent or missing |
| S2.1 | Information non prevalent or missing |
| S2.1.1 | Information non prevalent or missing |
| S2.1.2 | Information non prevalent or missing |
| S2.1.3 | Information non prevalent or missing |
| S2.2 | Information non prevalent or missing |
| S2.2.1 | Information non prevalent or missing |
| S2.2.2 | Information non prevalent or missing |
| S2.2.3 | Information non prevalent or missing |

# Appendix: Encoding parameters

## Legal basis for the main purposes

|  |  |  |  |
| --- | --- | --- | --- |
| ID | Name | Legal basis (foundation or condition) | |
| N. | **For conventional PII treatments (art 9)** | | |
| N.1 | Consent | | Based on consent |
| N.2 | Contract | | Based on a contract |
| N.3 | Legal obligation | | Based on legal obligation(s) |
| N.4 | Vital interest | | Based on a vital interest for the person |
| N.5 | Public interest | | Based on a public interest mission |
| N.6 | legitimate interests | | Based on one of the legitimate interests (balancing of interests) |
| S. | **For processing of sensitive PIIs (art 10-11)** | | |
| S.1 | Explicit consent | | Based on explicit consent |
| S.2 | Labour law | | Within the framework of labour law, social security or social protection |
| S.3 | Vital interest | | To safeguard the vital interests of the person |
| S.4 | ASBL | | For a non-profit organization |
| S.5 | Public | | Obviously made public |
| S.6 | Legal defense | | In the context of defending a right in court |
| S.7 | Public interest | | Important public interest grounds, based on Union law or the law of a Member State |
| S.8 | Medical reasons | | Based on medical or related reasons |
| S.9 | Public Health | | For public health reasons |
| S.10 | Archiving, research or statistics | | For archiving, research or statistics |
| S.11 | National legislation | | Within the framework of "national" legislation, particularly in the area of genetic and biometric data, etc. |
| C. | **For treatments with special conditions** | | |
| C.1 | Journalism, art... | | For journalistic, academic, artistic or literary purposes (art. 85) |
| C.2 | Official documents | | For data included in official documents (art 86) |
| C.3 | National identification | | For national identification data (art 87) |
| C.4 | Specific requirement for archiving, research or statistics | | For archival purposes of public interest or scientific, historical or statistical research (s. 88) |
| C.5 | ePrivacy | | Based on ePD (ePrivacy Directive): DIR 2002/58/EC amended by DIR 2009/136/EC   1. Cookies 2. Traffic Data 3. Location 4. Direct marketing |
| C.10 | Specific condition for minors | | For data on children (<16 years) |

## Legal basis for secondary purposes

|  |  |  |  |
| --- | --- | --- | --- |
| ID | Name | Conditions | Legal basis (foundation or condition) |
| C.1 | Specific purposes | Eligible treatment Art 89 | For archiving purposes in the public interest, for scientific or historical research or for statistical purposes (Art 89) |
| C.2 | Consent | Description of the purpose in the consent application includes secondary processing including the description of the individual's rights | Based on initial consent |
| C.3 | National Security | Treatment to ensure:   * national security, defense, public safety * prevention and detection of criminal offenses * public policy objectives * protection of judicial independence * -prevention and detection of ethical breaches * -protection of the person * - enforcement requests civil law | Based on Article 23.1 regarding special treatment |
| P.1 | Consequential or subsequent purpose | if the following conditions are met:   * there is a link with main purpose(s) * the data controller does not oblige * the nature of the data is compatible with the processing * the consequences of the processing do not subsequently affect the data subject * - security measures are in place to protect data during processing | Processing that can be considered as a logical and/or temporal process to the initial processing with regard to the purpose |

## Impact criterion

### For the person concerned

|  |  |
| --- | --- |
| Acr. | Description of the negative consequences on the person concerned |
| Maximum | Serious or even irreversible consequences, which they will not be able to overcome (financial distress, insolvency, inability to work, long-term deterioration of physical or psychological health, death, etc.) |
| Significant | Significant consequences, which they could overcome at the cost of serious difficulties (e.g. inappropriate reallocation of funds, blocking of services by banks, damage to own property, loss of employment, legal action, deterioration of health, etc.). |
| Limited | Limited disadvantages that they will overcome despite some difficulties (additional costs, denial of access to certain services, fear, misunderstanding, stress, minor physical disruptions, etc.). |
| Negligible | Few inconveniences that they will overcome without difficulty (time wasted in re-filling information, annoyance, irritation, etc.). |

### At the treatment level

| Id. | Target | Consequence |
| --- | --- | --- |
| IP01-little-neg | 100 or 1% of the people concerned | Some easy to overcome disadvantages (time spent re-entering information, annoyances, irritations, etc.) |
| IP02-bcp-neg | > 100 and 1% of the people concerned | Few disadvantages easy to overcome (time spent re-entering information, inconvenience, irritation, etc.) |
| IP03-lim | 100 or 1% of the people concerned | Limited and easily overcome disadvantages (additional costs, denial of access to commercial services, fear, misunderstanding, stress, minor physical problems, etc.) |
| IP04-bcp-lim | > 100 and 1% of the people concerned | Limited and easily overcome disadvantages (additional costs, denial of access to commercial services, fear, misunderstanding, stress, minor physical problems, etc.) |
| IP05-less-sign | 100 or 1% of the people concerned | Significant consequences that are difficult to overcome (embezzlement, blacklisting by banks, property damage, loss of job, subpoena, worsening health condition, etc.) |
| IP06-bcp-sign | 100 or 1% < people affected <10,000 or 10%. | Important and difficult to overcome consequences (embezzlement, blacklisting by banks, property damage, loss of job, subpoena, aggravation of health condition...). |
| IP07-eno-sign | More than 10,000 or 10% of the people involved | Significant consequences that are difficult to overcome (embezzlement, blacklisting by banks, property damage, loss of job, subpoena, worsening health condition, etc.) |
| IP08-less-max | 100 or 1% of the people concerned | Serious or even irreversible consequences (financial distress such as an unbearable debt or an inability to work, long-term psychological or physical illness, death, etc.). |
| IP09-bcp-max | 100 or 1% < people affected <10,000 or 10%. | Serious or even irreversible consequences (financial distress such as unbearable debt or inability to work, long-term psychological or physical disorders, death, etc.) |
| IP10-eno-max | More than 10,000 or 10% of the people involved | Serious or even irreversible consequences (financial distress such as unbearable debt or inability to work, long-term psychological or physical disorders, death, etc.) |

1. Some images may be classified as sensitive data if they identify certain sensitive information such as religious or philosophical beliefs, sexual orientation, etc. [↑](#footnote-ref-1)