**Data Impact Analysis**

Submitted by:

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**ASSIGNMENT SUMMARY**

**Purpose:**

Impact Analysis quantifies the risks inherent in collecting and owning the data. In this assignment, you will document the data impact so that other parts of the organization can assess the legal and regulatory risk in collecting and using the data.

**Assignment Objective:**

Analyze the legal and privacy impact of the selected data sources you described in Assignment 2: Data Collection Plan. Identify the Data Subject, the Data Controller, and the Data Processor. Also, consider how your data sources impact Physical Privacy, Informational Privacy, and Organizational Privacy.

**Instructions:**

In this assignment, you are assessing the legal and privacy impact of the data sources from Assignment 2: Data Collection plan. Please answer in paragraph format.

For each data source you use, identify the following:

1. The description of the data source

2. Who the Data Subject is?

3. Who the Data Controller is?

4. Who the Data processor is?

5. Assess the data source for:

5.1 Physical Privacy

5.2 Informational Privacy

5.3 Organizational Privacy

# **CONTENTS**

[CONTENTS 3](#_Toc90043009)

[1. Review of the problem 1](#_Toc90043010)

[2. Data Sources 1](#_Toc90043011)

[3. Document Purpose 1](#_Toc90043012)

[4. Identified Data Sources 1](#_Toc90043013)

[5. Data Source - Description & Purpose 2](#_Toc90043014)

[6. Data Ownership 4](#_Toc90043019)

[6.1. Data Subject 4](#_Toc90043020)

[6.2 Data Controller 5](#_Toc90043024)

[6.3 Data Processor 6](#_Toc90043028)

[7. Data Privacy 7](#_Toc90043030)

[8. Reference 12](#_Toc90043035)

# **1. Review of the problem**

NPhone is planning to **expand their global presence** and looking for **new markets**. They are planning **to enter Indian market** with their new smartphone model. NPhone wants to understand **customer demand and current market trend of Indian market**. NPhone also wants to make decision on **features and factors affecting the buying decision** of Indian customers. Also needs to understand **socio-economic characte**ristics which affects the **buying behavior** of the potential **customers in India**.

# **2. Data Sources**

In data collection plan we included, **2 public data sources** (Instagram and Facebook) and **2 private data sources** (gsmarena.com and NIC -National Informatic Centre, India) and with the primary focus on business data, scientific data, and social media. Data from Instagram and Facebook will allow **capturing spontaneous messages from interested customers from the region**, while the data which is publicly shared by consultants/government agencies like gsmarena.com and NIC will provide **information for market research**. Social media marketing team should be pro-active in posting **new content and improving the reach to attract potential customers** in the region and also collect maximum data from the customers who interact though **messages and comments**. Purpose of getting data from public data from consultants is to **derive clean and correct data** without wasting time un-necessarily looking for other data sources.

# **3. Document Purpose**

NPhone collects, stores, or uses personal data, there is a **risk while processing the data**. These risks range from **personal data being stolen or inadvertently released and used by criminals** to impersonate the individual, to worry being caused to individuals that their data will be used by organization for unknown purposes. Impact Analysis is a process designed to document the data impact so that other parts of the organization can assess the **legal and regulatory risk in collecting and using the data**, also **give awareness of risks** arising out of the processing of personal data and hence to minimize these risks as far and as early as possible.

# **4. Identified Data Sources**

|  |  |  |
| --- | --- | --- |
| **Sl. No.** | **Data Source** | **Private/Public** |
| 1 | gsmarena.com | Private |
| 2 | NIC -National Informatic Centre, India | Private |
| 3 | Instagram | Public platform, Private account |
| 4 | Facebook | Public platform, Private account |

# **5. Data Source - Description & Purpose**

# **5.1 gsmarena.com**

**Description**

gsmarena.com is based out of India that offers **comprehensive and up-to-date mobile phone information**, **model comparisons, customer ratings** etc. gsmarena.com quarterly publishes information regarding the smartphones which includes reason to **change the smartphone, top features in smartphones, average money spent on smartphones, favorite online shopping site, reason to change the smartphone etc**. These data are **managed and controlled by Informatics Centre Manger** of the company Which allows for commercial use of data.

**Purpose**

* The data source provides information on age, sex, reason to change the smartphone, top features in smartphones, average money spent on smartphones, favorite online shopping site, reason to change the smartphone etc.
* This data will be used to analyze **key features and factors deciding the buying decision**
* To understand the customer demand of the product

# **5.2 NIC -National Informatic Centre, India**

**Description**

NIC -National Informatic Centre, India conducts **demographic research** in the area of population and development, and assists India in developing their capacity to produce and **analyze population data**. Collected information is processes at **NIC facility in Delhi**. NIC publishes datasets on **India’s population and analyzes demographic trends**. The data collected by NIC department are made available publicly and **managed by National Informatics Centre Web Information Manager** Which allows for **commercial use of data**.

**Purpose**

* The data source provides information on Total Population, Population, Socioeconomic class, Shopping Preference, Education, Density and Population by Age Groups - Both Sexes.
* This data will be used to **analyze the population distribution across the area and region** where NPhone plans to launch the new smartphone.

# **5.3 Instagram**

**Description**

NPhone make use of Instagram account for its business by **creating posts and videos related to its product** and **capturing customer responses** on the posted content. **Instagram Insights** is a tool or functionality available in Instagram for the Business Account users, that provides information about the **Page's performance, like demographic data about the audience and how people are responding to the posts**. Also respond to fans messages to make it **more interactive and obtain feedbacks from customers**. These data are further processed to drive meaningful insights for the business.

**Purpose**

* To drive marketing campaigns and promote products
* To analysis customer reaction on products and new launches
* To understand how people are engaging with NPhone Page.
* To obtain information on Followers, Impressions, Reach, Likes and Engagement for post video related to product published in Instagram page.

# **5.4 Facebook**

**Description**

NPhone has **a large fan follower around the world** and uses Facebook as a medium **for marketing and to reach its potential customers**. **Product launches announcements** are also carried out using Facebook. Facebook page is also used for its **marketing activities by creating posts and videos** related to its product and capturing customer responses on the posted content. To use the available data, NPhone make use of Facebook API application available in Facebook for the Business Account users, that provides information about the Page's **performance, demographic data** and also about the **audience reaction to the posts**.

**Purpose**

* To understand the **customer demands and interest** in the brand and products
* To obtain information on **Likes, Reaction, Reach, View, Action and Engagement** on the Facebook page for thepublished posts.
* Understand how **people are engaging** with NPhone page.
* Provides segmentation data in **understanding customer preference**.

# **6. Data Ownership**

# **6.1 Data Subject**

# **6.1.1 gsmarena.com customer and viewers**

* **Customers performing online research** using gsmarena.com mobile or web application provide name, email address, mail address, phone number and other information for searching and filtering their smartphone choice. This information can be used to identify a person.
* **Customers who create or already have an account** in the gsmarena.com website provide personal information like name, address, dob, email address and preferences at the time for creating account. Those details identify a specific person.
* **Customers who participate in gsmarena.com online events or surveys** provide personal information like name, address, dob, email address and other choices using which he/ she can be identified.
* **Customers who participate in online context** also provides required data like name, address, dob, email address and preferences at the time of filling application.

# **6.1.2 NIC -National Informatic Centre, India – People Population**

* The **people population** living in different areas of India.
* The data collected by NIC may contain **personal and sensitive information**. But only the processed data with **no personal information of the individual is made available by National Informatics Centre Web Information Manager** which allows for commercial use of data.

# **6.1.3 Instagram - Fans, Viewers and Customers**

* **Fans and potential customers having Instagram account** and accessing NPhone Instagram page, posts, videos, and ads. Information on Followers, Impressions, Reach, Likes and Engagement for posted content and videos related to product are stored in the backend using the **Instagram Insight for analysis**.
* Fans and potential customers can be **identified based on the personal information** like name, age, dob, location, pictures, and interests that he/ she publishes in the social media account or page.

# **6.1.4 Facebook – Fans, Viewers and Customers**

* **Fans and potential customers having Facebook account** and accessing NPhone Facebook page, announcements, posts, videos, and ads. Their Likes, Reactions, Reach, View, Action and Engagement for product page or post published in NPhone Facebook page get stored in the backend using **Facebook API application for analysis.**
* Fans and potential customers can be **identified based on the personal information** like name, age, dob, location, pictures, and interests that he/ she publishes in the social media account or page.

# **6.2 Data Controller**

# **6.2.1 gsmarena.com - Company Executives and Chief Data Engineer**

gsmarena.com **collects data from user** accessing its application (both mobile and web) and makes it available for the respective internal team for processing. **Chief** **Data engineer makes decision** on collecting and using personal information of the customers with approval from **company executives** before publishing the data.

# **6.2.2 NIC -National Informatic Centre, India - National Informatics Centre Web Information Manager**

Population Division of the of NIC collects the data, **process, store, and conducts** demographic research, and publishes anonymized datasets on their website which is **controlled and made available by National Informatics Centre Web Information Manager**.

# **6.2.3 Instagram - Social media company Instagram**

Instagram **collects the personal data furnished by the user** at the time of account set up and login to Instagram API application. They are the first point Data Controllers as they have the complete ownership of the user data. Instagram keeps track of the user page, posts, shares, likes, comments, reactions, engagements, and preferences **shared by user**. All the users **agree to the** **terms and conditions** of Instagram before using signing up so data shared by Instagram is managed by the Instagram itself.

**6.2.4 Facebook - Social media company Facebook**

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# **6.3 Data Processor**

**6.3.1 gsmarena.com**

**gsmarena.com IT Team**

Software developers who build code that **collects user data through applications and web services**.

**Data Analytics Team**

Includes Data Engineers and Analysts who process the data to **perform analytics, apply modeling, create visualization, and derive insights.**

**Chief Data Officer/ Information Manager**

Chief Data Officer/ Information Manager is responsible for the data **collection and availability** of data on the database, which is maintained Informatics Centre Manger.

**6.3.2 NIC -National Informatic Centre, India**

**Data Analytics Team**

Includes Data Engineers and Analysts who process the data to **perform analytics, apply modeling, create visualization, and derive insights.**

**Chief Data Officer/ Information Manager**

Chief Data Officer/ Information Manager is responsible for the **data collection and availability of data on the database**, which is **maintained by Government of India**. Collected and updated half yearly by Chief Data Officer Team via Online surveys, By survey forms etc.

**6.2.3 Instagram**

Instagram itself is a data processor that processes its customer/ user data and generate insights about its user actions using Instagram API application.

**Media Analyst**

* **Extract the metrics data** from the NPhone Instagram page using Instagram API application feature, clean the data and upload it to the data storage.

**Data Analytics Team**

* Includes **Data Engineers and Analysts** who process the data to perform analytics, apply modeling, create visualization, and derive insights.
* They provide **storage infrastructure, tools, support, and software for storing and accessing data securely**.

# **6.2.4 Facebook**

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**Media Analyst**

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**Data Analytics Team**

* **Includes Data Engineers and Analysts** who process the data to **perform analytics, apply modeling, create visualization, and derive insights**.
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# **7. Data Privacy**

# **7.1 gsmarena.com**

**Physical Privacy**

* The data subjects are the gsmarena.com customers, website **viewer and content participants**.
* gsmarena.com **collects data from user accessing its application** (both mobile and web) and makes it available for the respective internal team for processing.
* gsmarena.com is **secondary data which doesn’t have any personal data** which is verified and approved by chief of officers before making it public

**Informational Privacy**

gsmarena.com is **secondary data which doesn’t have any personal data** which is verified and approved by chief of officers before making it public

**Organizational Privacy**

* The number of people potential privacy breaches include **data leakage, malware attack on device or theft** of data in transit as the data is refreshed to the server every 10 minutes.
* **Any breach** in privacy could cause the organization software prone to malware and **lose other sensitive information.**
* These risks are reduced using **multiple and high-level firewalls systems** which **alert or blocks suspicious activities or users.**

# **7.2 NIC -National Informatic Centre, India**

**Physical Privacy**

* Data is collected from people around India by NIC with the **help of surveys**. NIC only uses the **secondary data made available public** by NIC with several government approvals. **Secondary data** published by NIC **doesn’t have any personal information**.

**Informational Privacy**

* **No personal information is collected** from this open data sources.
* Population data collected by the Population Division of NIC are **deanonymized before making it available for public.**
* But **potential threat from this source could be a virus** or malware getting downloaded at the time of accessing the public website or file download.
* The downloaded virus residing in the device can allow **hackers to read sensitive information about the project, people, and the organization residing** in the electronic device.
* **Antivirus has to be installed and appropriate scanning** after file download and scanning the system for security threats and vulnerabilities, will help reduce the risk of data loss.

**Organizational Privacy**

* **No organization specific information is collected** from this open data source.
* NIC have their **own privacy policy statement** for data protection and security.
* **Possible threat could be a virus or malware getting automatically** downloaded from the website at the time of accessing or during file download.
* The downloaded virus residing in the device can **allow hackers to read sensitive information** about the project, people, and the organization residing in the electronic device.
* **Antivirus has to be installed and appropriate scanning** after file download and scanning the system for security threats and vulnerabilities, will help reduce the risk of data loss.

# **7.3 Instagram**

**Physical Privacy**

* The data subjects are the **fans or potential customers accessing NPhone Official Instagram page**, posts, videos, and ads.
* NPhone never **contacts in person for any information** so there is no for physical privacy or its breach.

**Informational Privacy**

* Information regarding fans, the potential customers and visitors are **collected and maintained by Instagram itself.**
* Instagram have their **own privacy policy for data security, privacy, and protection**.
* Instagram account of NPhone is used **to create contents and posts in the social media page** and insights on people response and reactions from the insights tool.
* Instagram insights provide **deidentified data on the content likes and people responses**. So, **personal sensitive information is not obtained or stored** as part of this source.
* Potential threat from this source could be a **virus attacks or malware getting downloaded** at the time of accessing the public website or file download.
* The downloaded virus residing in the device can **allow hackers to read sensitive information** about the project, people, and the organization residing in the electronic device.
* **Antivirus has to be installed and appropriate scanning** after file download and scanning the system for security threats and vulnerabilities, will help reduce the risk of data loss.

**Organizational Privacy**

* **Organization specific information or trade secrets are not collected** by Instagram.
* Instagram has their **own privacy policy for data security, privacy, and protection**.
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* Antivirus has to be installed and appropriate **scanning after file download and scanning the system** for security threats and vulnerabilities, **will help reduce the risk of data loss**.

NPhone have to also look into various lawsuits and regulations associated with India i.e., **Personal Data Protection Bill 2019 (India)** which says about the personal data protection policies in India as it might differ from another region where NPhone is already operating. Also company should focus on getting a certification in information security management system (ISMS) by which company will be able to develop policies and procedures for systematically managing of organization's sensitive data.

# **8. Reference**

* Data 1201 - Data Collection Assignment #1
* Data 1201 - Data Collection Assignment #2
* DC >> Content >> Week 12