

DATA INNOVATION RISK ASSESSMENT TOOL

Part 3: Data Use

3.1 Purpose specification

The purpose of data use should be legitimate and as narrowly defined as practically possible. Furthermore, requests or proposals for data access (or collection where applicable) should also be narrowly tailored to a specific purpose. The purpose of data access (or collection where applicable) should be articulated no later than the time of data access (or collection where applicable). In answering this question, concentrate on the reason why you need the data. Also, think about articulating your answer prior to or at the time of request for data.

Have you defined the purpose for which you will be using the data as narrowly, reasonably and practically as possible?

- ☐ Yes
- ☐ No
- ☐ Don't Know
- ☐ Not Applicable

Comments:

3.2 Purpose compatibility

Any data use must be compatible to the purposes for which it was obtained. Mere difference in purpose does not make your purpose incompatible. In determining compatibility consider, for example, how deviation from your original purpose may affect an individual(s) or group(s) of individuals; the type of data you are working with (e.g. public, sensitive or non-sensitive); measures taken to safeguard the identity of individuals whose data is used (e.g. anonymization, encryption). There must be a legitimate and fair basis for an incompatible deviation from the purpose for which the data was obtained. (See notes on "Lawfulness, legitimacy, and fairness" above)

Is the purpose for which you will be using the data compatible with the purpose for which you obtained the data?

- ☐ Yes
- ☐ No
- ☐ Don't Know
- ☐ Not Applicable

Comments:

3.3 Data minimization

Data access, analysis, or other use should be kept to the minimum amount necessary (to fulfill its legitimate purpose of use as noted in points 3.1 and 3.2). Data access, collection, analysis or other use should be necessary, adequate, and relevant in relation to the purposes for which the data has been obtained. Data should only be stored for as long as necessary, and any retention of data should be lawful, legitimate, and fair. The data should be deleted and destroyed at the conclusion of the necessary period. In answering this question, consider if at any point in time in your project cycle you have the minimum data necessary to fulfill the purpose of intended use.

Are all the data that you will be using (including its storage) necessary and not excessive?

- ☐ Yes
- ☐ No
- ☐ Don't Know
- ☐ Not Applicable

Comments:

3.4 Regulation and legal compliance

Make sure that you have obtained all regulatory and other required authorizations to proceed with the Project. (For example, the use of telecom data may be restricted under telecommunication laws, and additional authorizations may be needed from a telecommunication regulator; or the transfer of data from one country to another may need to comply with rules concerning trans-border data flows). Furthermore, to ensure that you have complied with the terms under which you have obtained the data, you should check existing agreements, licenses, terms of use on social media platforms or terms of consent. If you are uncertain about this question, you should consult with your privacy and legal expert.