

PIA information

PIA

Map Helper

Author's name

Entidade 1

Assessor's name

Entidade 2

Validator's name

Entidade 3

Creation date

16/04/2019

DPO's name

entity 4

DPO's opinion

It is possible to use the treatment

Search of concerned people opinion

Concerned people opinion was requested.

Concerned people opinions

entity5

Concerned people statuses

The treatment could be implemented.

Concerned people opinions

The treatment can be used

Context

Overview

Which is the processing under consideration?

Gathering location user data

What are the responsibilities linked to the processing?

Get consent from the users to use their location data and keep this data private from other entities.

Are there standards applicable to the processing?

GDPR

Evaluation : Acceptable

Data, processes and supporting assets

What are the data processed?

Location data (coordinates), locations of interest.

How does the life cycle of data and processes work?

Location data is saved when the user turns on the app, accessed for suggestions of routes, and removed if the user asks for removal.

What are the data supporting assets?

Servers that can support location data of several users.

Evaluation : Acceptable

Fundamental principles

Proportionality and necessity

Are the processing purposes specified, explicit and legitimate?

Yes, the consent of the user is asked before any location data is gathered.

Evaluation : Acceptable

What are the legal basis making the processing lawful?

User consent

Evaluation : Acceptable

Are the data collected adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')?

Yes, the data is relevant due to being needed for suggesting different routes and similar locations to the user

Evaluation : Acceptable

Are the data accurate and kept up to date?

Yes the data is kept up to date and accurate.

Evaluation : Acceptable

What are the storage duration of the data?

When the user asks for data removal or when the app is uninstalled.

Evaluation : Acceptable

Controls to protect the personal rights of data subjects

How are the data subjects informed on the processing?

When they install the app.

Evaluation : Acceptable

If applicable, how is the consent of data subjects obtained?

When they install the app.

Evaluation : Acceptable

How can data subjects exercise their rights of access and to data portability?

If the user asks for the data stored in the database, he/she will be able to download all of the data gathered until the moment of the request.

Evaluation : Acceptable

How can data subjects exercise their rights to rectification and erasure?

If the user requests for data removal, all data gathered until now will be erased.

Evaluation : Acceptable

How can data subjects exercise their rights to restriction and to object?

If the user wants to use the app he needs to consent to the use of location data.

Evaluation : Acceptable

Are the obligations of the processors clearly identified and governed by a contract?

Yes.

Evaluation : Acceptable

In the case of data transfer outside the European Union, are the data adequately protected?

Yes.

Evaluation : Acceptable

Risks

Planned or existing measures

Access to account from another device

The user is asked to confirm that the device is theirs. If the device isn't confirmed in 2 days, the access to the application is blocked.

Evaluation : Acceptable

Illegitimate access to data

What could be the main impacts on the data subjects if the risk were to occur?

Visited locations can be discovered

What are the main threats that could lead to the risk?

User location can be found

What are the risk sources?

Attacker can use client location to do harm

Which of the identified controls contribute to addressing the risk?

Access to account from another device

How do you estimate the risk severity, especially according to potential impacts and planned controls?

Important, Knowing user location data can put him/her in danger

How do you estimate the likelihood of the risk, especially in respect of threats, sources of risk and planned controls?

Limited, The administrators will fix any security flaws so nothing happens to the users

Evaluation : Acceptable

Unwanted modification of data

What could be the main impacts on the data subjects if the risk were to occur?

Robbery or selling location data

What are the main threats that could lead to the risk?

Attackers that know the users location

What are the risk sources?

Attackers with hacking skills

Which of the identified controls contribute to addressing the risk?

Access to account from another device

How do you estimate the risk severity, especially according to potential impacts and planned controls?

Important, We will notify the user if anything happens to his/her location data and steps will be taken to protect the users data.

How do you estimate the likelihood of the risk, especially in respect of threats, sources of risk and planned controls?

Limited, It's not very common for this to happen.

Evaluation : Acceptable

Data disappearance

What could be the main impacts on the data subjects if the risk were to occur?

Losing location data

What are the main threats that could lead to the risk?

Attackers with hacking skills

What are the risk sources?

Attackers with experience in hacking

Which of the identified controls contribute to addressing the risk?

Access to account from another device

How do you estimate the risk severity, especially according to potential impacts and planned controls?

Negligible, The user will not be able to use the app for some time

How do you estimate the likelihood of the risk, especially in respect of threats, sources of risk and planned controls?

Important, The app can lose users if the time to fix this is too long

Evaluation : Acceptable

Action plan

Overview

Fundamental principles

- Purposes
- Legal basis
- Adequate data
- Data accuracy
- Storage duration
- Information for the data subjects
- Obtaining consent
- Information for the data subjects
- Right to rectification and erasure
- Right to restriction and to object
- Subcontracting
- Transfers

Planned or existing measures

- Acess to account from another device

Risks

- Illegitimate access to data
- Unwanted modification of data
- Data disappearance

Improvable Measures
Acceptable Measures

Fundamental principles

No action plan recorded.

Existing or planned measures

No action plan recorded.

Risks

No action plan recorded.

Risks overview



Risk mapping

