

Subject: Re: Query Regarding External Cloud Provider
Date: Wednesday 22 May 2024 at 17:23:01 British Summer Time
From: Diego Pajarito Grajales
To: Grace Gielink, Andrew Clarke

Thanks Grace for coming back with this.

In a nutshell... As expected, we can start by updating our ethics (DPIA and others) for the scenario of a new cloud provider. Then, we submit the amendment and see if any other concern comes out from DP. In parallel, we continue with the contracts team. This must be taken to the Backlog and would demand a couple of days from me (again), so it can impact my roadmap. It's not that critical, though.

Now further details.

For reference, we undertook a DPIA as part of the ethics application approved. I see they're suggesting we update ours considering the new provider... that sounds like we have the freedom to evaluate and propose a reasonable strategy to protect our data. We can work together on identifying the potential privacy risks (section listed below) and the mitigations to lower them down.

- **How will you store the data?**
- **How will you delete the data?**
- **Does the project involve the use or development of new technology? *If yes, have you contacted [IT Services](#) for advice?***
- **How will the data be kept securely, both during the project and after completion?**
- **Will you be sharing data internationally, e.g. sending it to or receiving it from an organisation abroad, or using an international service/platform to process your data?**

Some risks to review:

- **Data breaches...**

Please note what we have stated in our previous DPIA

- **What types of processing identified as likely high risk are involved?**

There are no high-risk processing types identified as high risk. The data collected and processed during the project is considered low risk: data intended for public disclosure and staff work contact information.

From: Grace Gielink <Grace.Gielink@glasgow.ac.uk>
Date: Wednesday, 22 May 2024 at 15:20
To: Andrew Clarke <Andrew.C.Clarke@glasgow.ac.uk>, Diego Pajarito Grajales <Diego.PajaritoGrajales@glasgow.ac.uk>
Subject: Re: Query Regarding External Cloud Provider

Hey both,

What do you think of this? The auto email that I got from Data Protection on Monday said that DPIA's are expected to have a turnaround of 8 weeks. Diego have you done one of these before?

I am going to get back to Claire from the contracts team who snuffed me off to Procurement... and let her know that Data Protection told me I need her input.

Grace Gielink
Project Officer - Urban Big Data Centre
University of Glasgow

From: Data Protection <dp@glasgow.ac.uk>
Date: Wednesday, 22 May 2024 at 14:06
To: Grace Gielink <Grace.Gielink@glasgow.ac.uk>
Cc: Andrew Clarke <Andrew.C.Clarke@glasgow.ac.uk>, Diego Pajarito Grajales <Diego.PajaritoGrajales@glasgow.ac.uk>
Subject: RE: Query Regarding External Cloud Provider

Hi Grace,

Thanks for getting in touch. The [Contracts](#) team should be advising you on the contractual/T&Cs side of things. That's not something we can really assist with.

Will the web platform be used to process personal data? If so, have you undertaken any data protection compliance work with regards to the new provider? We would recommend completing a [DPIA](#) in the first instance, which will help to identify the potential privacy risks associated with the use of the provider/platform and mitigations to lower or ideally eradicate those risks.

Best Wishes,
Angharad

Angharad Stockwell
Information Compliance & Records Management Specialist

Data Protection & Freedom of Information Office
University of Glasgow
email: dp@glasgow.ac.uk

From: Grace Gielink <Grace.Gielink@glasgow.ac.uk>
Sent: Tuesday, May 21, 2024 10:08 AM

To: dp@gla.ac.uk

Cc: Andrew Clarke <Andrew.C.Clarke@glasgow.ac.uk>; Diego Pajarito Grajales <Diego.PajaritoGrajales@glasgow.ac.uk>

Subject: Query Regarding External Cloud Provider

Good morning,

I am writing regarding a research project that I work on at the Urban Big Data Centre. I initially posed these questions to the Research Data Management office and the Contracts office, but we need further guidance.

One of the main outputs of our project is the production of a web platform. Currently, the platform is being built on Microsoft Azure services. Due to unforeseen circumstances, we want to transfer the platform services and the research data to another external provider—Nhost. This provider stores their data in the UK with Amazon Web Services, which is already used by our Centre on other projects.

Could you help us understand further details about this option – for example, would a contract be required in this situation to comply with the University's Cloud Policy? And if so, how would we begin that process? Could we rely on the terms and conditions offered by the provider once we set up an account and payment with them?

Thank you,
-Grace

Grace Gielink
Project Officer - Urban Big Data Centre
University of Glasgow