**3.12 Data Protection Impact Assessment (DPIA)**

As per GDPR, DPIA should be done out before carrying out processing likely to result in high risk to individuals' interests. This is a key element of the focus on accountability and data protection by design, and a more risk-based approach to compliance. ICICI Bank has defined to carry out DPIA in case there is a change in the processes, new technology adopted, new product launched, analysis of individual behaviour or account activities is carried out, profile individuals or children, etc. Bank has prepared a separate note on DPIA which speaks of these scenarios in detail. The DPIA note specifies that it is the responsibility of the Process Owner to assess if the process change requires DPIA to be undertaken and in this process the Process Owner can seek guidance from the DPO. Further, the Bank has included the requirement of DPIA assessment in the PAC review process. The DPIA note is attached to this policy as Appendix 3.