

Brief Privacy Analysis

1. Project summary: Offer a new Online Service

1.1 Brief description of the project

- a) This is a new online offering, which will require new online systems to be implemented. Products will also need to be listed on an existing website. New online invoicing will be required to purchase from the website. The use of existing in-house purchasing systems can continue to be used for manual invoicing and payments.
- b) The purpose of the change is to develop an online offering, to customers who would like to buy goods by extending the functionality of our website. The benefits would be that we could expand our product sales and give customers the ability to purchase online.
- c) The main stakeholders include employees of Gifts Are Us Company (administration, marketing, management) and customers.

1.2 Personal information that the project will involve

Note: "Personal information" is any information about an identifiable living person. However, a person doesn't have to be named in the information to be identifiable.

Type of personal Information	Source of Information	Purpose of information for the project
Persons Name, contact details – including home address, telephone number, personal email address, bank account details.	Online Account setup and payment process.	To open a purchasing account and complete payment online.
Purchase information and history of purchases	Website, when a purchase is made.	Order fulfillment, track lost items, see customers buying patterns

2. Privacy Assessment

2.1 Areas that are risky for privacy

This checklist identifies and records whether your proposal raises privacy risks.

Does the project involve any of the following?	Yes (tick)	No (tick)	If yes, explain your response
Information management generally			
A substantial change to an existing policy, process or system that involves personal information	Yes		Contact Information held about individuals held online.
Any practice or activity that is listed on a risk register kept by your organisation		No	
Collection			
A new collection of personal information	Yes		Address information for delivery purposes
A new way of collecting personal information	Yes		Extension of website to allow for an online shopping basket system
Storage, security and retention			
A change in the way personal information is stored or secured	Yes		Online payment system
Transferring personal information offshore or using a third-party contractor	Yes		Online payment system
A decision to keep personal information for longer than you have previously		No	
Use or disclosure			
A new use or disclosure of personal information that is already held		No	
Sharing or matching personal information held by different organisations or currently held in different datasets.		No	
Individuals' access to their information			
A change in policy that results in people having less access to information that you hold about them.		No	
Identifying individuals			
Establishing a new way of identifying individuals.	Yes		Online collection of details and Bank payments
New intrusions on individuals' property, person or activities			
Introducing a new system for searching individuals' property, persons or premises		No	

Does the project involve any of the following?	Yes (tick)	No (tick)	If yes, explain your response
Surveillance, tracking or monitoring of movements, behaviour or communications		No	
Changes to your premises that will involve private spaces where clients or customers may disclose their personal information		No	
New regulatory requirements that could lead to compliance action against individuals on the basis of information about them.		No	
List anything else that may impact on privacy, such as bodily searches, or intrusions into physical space		Nil	

2.2 Initial risk assessment

If you answered “Yes” to any of the questions above, use the table below to give a rating – either **Low (L)**, **Medium (M)**, or **High (H)** – for each of the aspects of the project set out in the first column. For risks that you’ve identified as Medium or High, indicate (in the right-hand column) how the project plans to lessen the risk (if this is known).

Aspect of the Project	Rating (L, M or H)	Describe any medium and high risks and how to mitigate them
Level of information handling	Low	
Sensitivity of the information	High	Credit Card, email and Address details
Significance of the changes	Medium	New internal procedures and processes will be required to match payments and orders, as well as prepare and send orders.
Interaction with others	Medium	Instructions received from others in Company. New providers required to collect payment and booking information. Ensure security requirements are satisfied. New user access controls required and reports.
Public impact	Low	

3. Summary of Privacy Impact

The privacy impact for this project has been assessed as:	Tick
Low – There is little or no personal information involved; or the use of personal information is uncontroversial; or the risk of harm eventuating is negligible; or the change is minor and something that the individuals concerned would expect; or risks are fully mitigated	
Medium – Some personal information is involved, but any risks can be mitigated satisfactorily	Yes
High – Sensitive personal information is involved, and several medium to high risks have been identified	
Reduced risk – The project will lessen existing privacy risks	
Inadequate information – More information and analysis is needed to fully assess the privacy impact of the project.	

3.1 Reasons for the privacy impact rating

Medium - the main risk is in relation to information held online and secure payments systems. Therefore, systems the new systems must have adequate security and data protections to satisfy our current privacy requirements. Any personal information regarding the individuals, will be minimised to ensure adequate details for payment and delivery but reduce other personal data exposure. Any completed forms will not be printed, but held electronically on a secure server.

4. Recommendation

Impact assessment is required – because this service offering involves the collection of new information and the implementation of new procedures and systems.