2.11.3 Data Protection Risk Assessment ('DPRA')

You are required to complete this section because it has been determined that personal data you are collecting requires a Data Protection Risk Assessment ('DPRA').

The questions in this section will assess the risk to the personal data processed for your research project and determine whether a further, more detailed assessment - a Data Protection Impact Assessment ('DPIA') - will be required.

'Data protection by design' means embedding data privacy features and data privacy-enhancing technologies directly into the design of a project at an early stage. This will help to ensure increased protection for individual data privacy throughout the lifecycle of a research project. A key component of data protection by design is the DPIA.

What is a DPIA and why may it be required / beneficial for a Research Project?

A DPIA is a process designed to identify risks arising from the processing of personal data and to manage these risks from as early as possible during the lifecycle of the project. It also demonstrates compliance with the GDPR.

It is a mechanism for assessing the impact of new initiatives or new technologies and implementing measures to minimise or reduce associated risks.

DPIA completion is frequently required as a key component of research project design.

A DPIA is particularly important in instances where the research utilises new technologies or, taking into account the nature, scope, context and type of processing, is likely to result in a high risk to the rights and freedoms of individuals.

The DPIA process and outcomes will help to improve the design of a research project and enhance communication about data protection risks with relevant stakeholders such as research partners, third parties and participants.

Please review the Questions and associated Guidance in the section below. If you answer 'Yes' to two or more of the Questions then your research project will require a DPIA.

<table>
<thead>
<tr>
<th>Question</th>
<th>Help Text</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2.11.3.10</strong> Does the project involve the evaluation or scoring, including profiling and predicting, of participants to make generalisations about an individual that could lead to significant decisions being made that could directly affect the individual?</td>
<td>See Guidance - please review carefully before answering.</td>
<td>You should consider whether the research study involves any evaluation or scoring, including profiling and predicting, especially “from aspects concerning the data subject’s performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements” (see Recital 71 GDPR) - <a href="http://www.gdpr-info.eu/recitals/no-71/">www.gdpr-info.eu/recitals/no-71/</a>.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>It is important to note that automated decision making can be made with or without profiling, and profiling can take place without automated decision making.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Profiling can be used for a wide range of purposes. It can be used extensively in an online context to suggest or serve content to users, to determine where, when and how frequently that content should be served, to encourage users towards particular behaviours, or to identify users as belonging to particular groups. It can also be used to help establish or estimate the age of a user (as detailed in the standard on age appropriate application), or for child protection, countering terrorism, or the prevention of crime.</td>
</tr>
</tbody>
</table>
Profiles are usually based on a user’s past online activity or browsing history. They can be created using directly collected personal data or by drawing inferences (e.g. preferences or characteristics inferred from associations with other users or past online choices).

The use of the word ‘evaluating’ suggests that profiling involves some form of assessment or judgement about a person.

E.g. Cancer research that classifies individuals into different groups (High risk of getting cancer; Low risk of getting cancer) on the basis of their personality, behaviour, interests and habits.

E.g. A biotechnology company offering genetic tests directly to consumers in order to assess and predict the disease/health risks.