

Maintaining Stakeholder Focus on Privacy in the Data Life Cycle

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Whitehead Nursing Home fined £15,000 over stolen computer data breach

🕒 25 August 2016 | Northern Ireland



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Personal data compromised after laptop is stolen.

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Politics

Lost in the post - 25 million at risk after data discs go missing

- Mass fraud fear as personal details of 7m families mislaid
- Inland Revenue chief resigns following 'substantial failure'
- Tories claim blunder is 'nail in coffin' of ID cards scheme



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Patrick Wintour,
political editor

Wednesday 21 November
2007 09.23 GMT

The government was forced to admit the most fundamental breach of faith between the state and citizen yesterday when it disclosed that the personal records of 25 million individuals, including their dates of birth, addresses, bank accounts and national insurance numbers had been lost in the post, opening up the threat of mass identity fraud and theft from personal bank accounts. MPs gasped when the chancellor, Alistair Darling, told the Commons that discs containing personal details from 7.25 million families claiming child benefit had been lost. They went missing in the internal post after a junior official at HM

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Data discs lost in the mail.

FRENCH NEWS

Connexion journalist
30 July 2017
200 words

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Hertz France must pay €40 000 fine in new digital law



Names, addresses, and driving license numbers of 35 357 people were found easily accessible

The car rental company Hertz has been hit with a €40 000 fine after personal details of 36 000 customers were found to be easily available online.

This fine is the first of its kind in France. It is the type of data breach that occurred after a major digital privacy law came into force in November 2016.

Names, addresses, and driving license numbers of 35 357 people were found easily accessible on www.carter-les-sarts.com, a website owned by Hertz France, after investigations by the CNIL (The Commission on computing and freedom; La Commission de l'informatique et des libertés).

Personal data of customers were left accessible online.

What is common among
these data breaches?

failure to maintain
stakeholder **focus**

The solution?

Privacy Impact
Assessment

Privacy Impact Assessment, *definition:*

- is a **tool / process** to help an organization **identify** and **reduce** the privacy risks of a project.
- for planning and review

Privacy Impact Assessment, *legal bases:*

- NPC Circular 16-01

*(Security of Personal Data in
Government Agencies)*

- NPC Circular 16-03

(Personal Data Breach Management)



The Data Life Cycle

Who are the stakeholders?

1. Internal stakeholders
2. External stakeholders

The PIA can be a tool
to help maintain
stakeholder focus on
the Data Life Cycle.

Why the PIA?

- ✓ Thorough
- ✓ Adaptable
- ✓ Flexible

The PIA process, *in general*:

#1 Identify **need** for PIA.

#2 Describe the information **flow**

#3 Identify the privacy and
related **risks**

#4 Identify privacy **solutions**

#5 Sign off and record PIA **results**

#6 **Integrate** the insights into the
project plan

You can do a full-
scale or a small-
scale PIA.

Ideally, the PIA is
deployed at the
beginning of the project
management process.

You can also do a PIA at
any point after if:

- ✓ Laws change
- ✓ Technology changes
- ✓ Practices change

The PIA is, at its core, a checklist.

“Just ticking boxes is not the ultimate goal here... Embracing a culture of **teamwork** and **discipline** is.”

- Atul Gawande,
The Checklist Manifesto

Privacy
is a fundamental
human right.

Atty. Maria Cecilia Soria

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