

afiniti

MAKING CHANGE STICK

Title
Privacy Impact Assessment

Date
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Review date
June 2020

INSPIRE > INVOLVE > INTERACT

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1 Privacy impact assessment screening questions

	Nurturing leads and contacts	Generating new leads
Using existing information about individuals?	Yes	No
Will the project involve the collection of new information about individuals?	No	Yes
Will the project compel individuals to provide information about themselves?	No	Yes
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	No	No
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	No	No
Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	No	No
Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?	No	No
Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.	No	No
Will the project require you to contact individuals in ways that they may find intrusive?	No	No

2 Privacy impact assessment

2.1 Project objectives and aims

2.1.1 Generating new leads

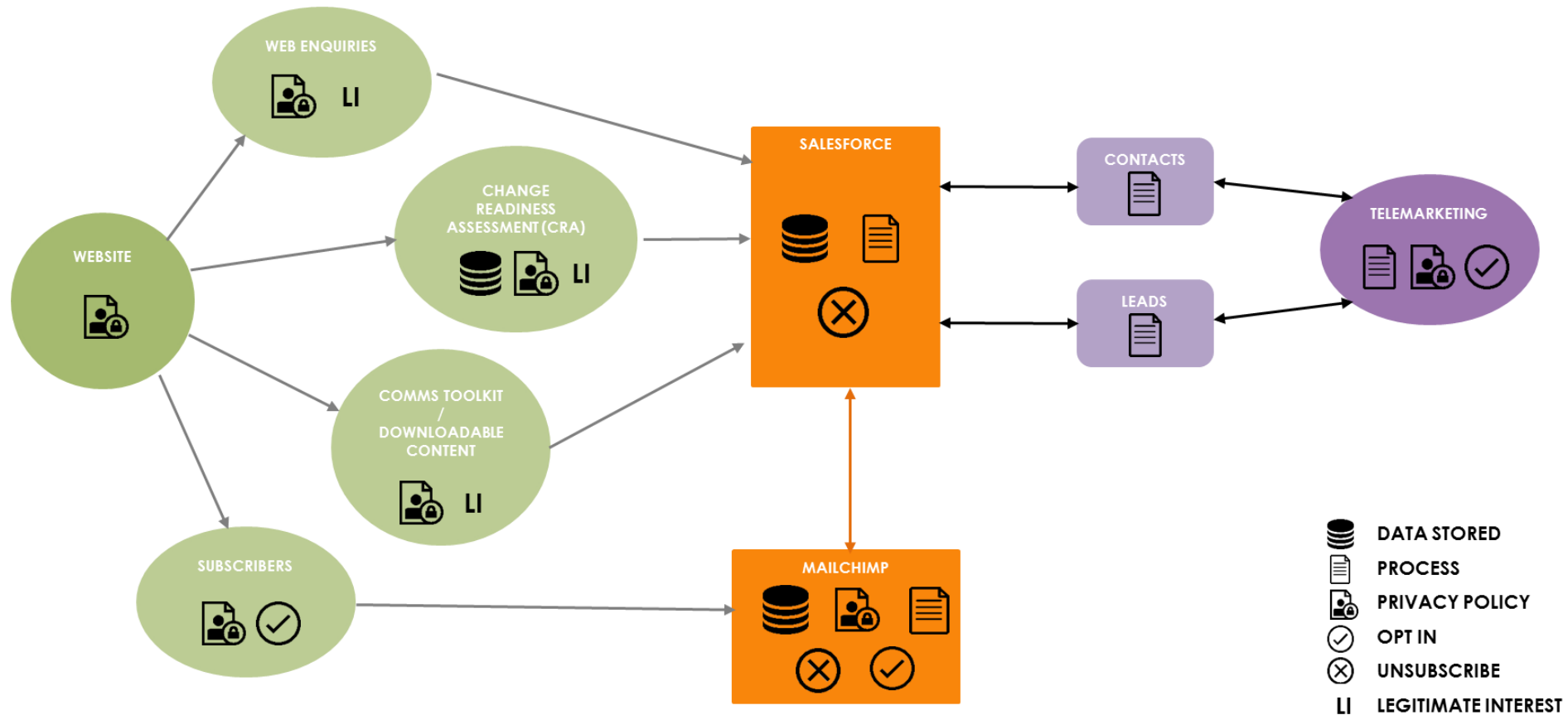
- Research and contact highly qualified (targeted/selected) organisations and roles to scope their current or future business change needs and how Afiniti can add value to their change projects.
- Post relevant and targeted content onto our website in order to attract potential new leads to contact us and position Afiniti as thought leaders in our industry.
- Become a service provider of business change to these organisations and roles.

2.1.2 Nurturing leads and contacts

- Create, develop and maintain business relationships with existing or potential clients
- Send relevant and targeted content to our leads and contacts to showcase Afiniti's expertise and provide value to the recipients for their job roles and organisational business change objectives
- Position Afiniti as thought leaders in our industry

3 Data mapping

Any suggested collection, purpose, volume and deletion of PII should be recorded here. If a data mapping exercise has been completed this should be linked here and the information below should provide a summary of those maps:



Origination	Collecting new data	Purpose	Volume	Storage	Deletion
Website	Web enquiries	Marketing our services and products to clients or potential clients to create and nurture potential mutually beneficial business relationships	User-led – inbound. Typically < 2 per month	Salesforce cloud CRM	<ul style="list-style-type: none"> If subject objects to processing (goes into suppression list) If Afiniti qualify them out (they no longer are of legitimate interest) Data cleansed annually – each record reviewed once per year and if cold/qualified-out it is deleted
	Downloadable content		User-led – inbound. Typically < 2 per month		
	CRA		User-led – inbound. Typically < 2 per month		
	Subscribers (Insights Blog monthly email)		User-led – inbound. Typically < 10 per month	Mailchimp (MC) & Salesforce (if a subject is also a client or potential client/lead)	
Publicly available sources	LinkedIn/social media		Typically ~ 40 per month	Salesforce cloud CRM	As above for Web enquiries
	Google			Salesforce cloud CRM	
	Industry related forums			Salesforce cloud CRM	

4 Privacy risks and the solutions

Summary of key privacy risk	Risk to individual	Risk to Afiniti	Solution	Result – is the risk: eliminated, reduced or accepted
Security breach For example, a third-party breach – by web host.	Contact information (name, email address, organisation, role, office address) obtained by unauthorised party	<ul style="list-style-type: none"> PR/reputational risk Economic (in the case of a fine) Loss of other data as subscribers hear about it and unsubscribe 	<ul style="list-style-type: none"> Third party service providers go through a regular quality check process and sign contractual agreements and NDAs 	Accepted
Security breach For example, a laptop gets lost or stolen and lands in the wrong hands	Contact information (name, email address, organisation, role, office address) obtained by unauthorised party	<ul style="list-style-type: none"> PR/reputational risk Economic (in the case of a fine) Loss of other data as subscribers hear about it and unsubscribe 	<ul style="list-style-type: none"> Laptops are password protected Most devices are encrypted at rest Afiniti team members receive training on cyber security 	Accepted
Security breach For example, a cyber attack on Mailchimp or Salesforce,	Contact information (name, email address, organisation, role, office address) obtained by unauthorised party	<ul style="list-style-type: none"> PR/reputational risk Economic (in the case of a fine) Loss of other data as subscribers hear about it and unsubscribe 	<ul style="list-style-type: none"> Third party processing systems (Mailchimp and Salesforce) are password protected Afiniti Salesforce users receive training on the correct use of Salesforce, data minimisation, processing and deletion Afiniti team members receive training on cyber security 	Accepted

Summary of key privacy risk	Risk to individual	Risk to Afiniti	Solution	Result – is the risk: eliminated, reduced or accepted
<p>Manual processing of data flow between Mailchimp and Salesforce If an individual unsubscribes from Mailchimp list the team manually ensure that their preferences are reflected in Salesforce (if the data is in Salesforce)</p>	<p>The request is overlooked by the Sales and Marketing team and the subject continues to receive information which they've objected to or the subject fails to get a response in relation to an enquiry about their data</p>	<ul style="list-style-type: none"> Investigation by the ICO if the subject lodges a complaint Economic (in the case of a fine) Damage to client/potential client relationship PR and Reputational 	<ul style="list-style-type: none"> Low number of subjects with records shared in both Mailchimp and Salesforce Stringent process put in place to make sure requests are captured and actioned within prescribed timeframes Dedicated Sales and Marketing team staff are trained in the process for dealing with objections and queries about data Small, well established and close knit team dealing with objections and queries, There are always multiple people available to deal with objections and queries which ensures consistency and speed of response via shared mailbox. A log of all requests is kept, including dates, who dealt with them, when actioned etc. The log assigns tasks to team members and reminds them when they are due/overdue 	<p>Accepted</p>

Summary of key privacy risk	Risk to individual	Risk to Afiniti	Solution	Result – is the risk: eliminated, reduced or accepted
<p>Manual process for dealing with objections/enquiries about data If an individual objects to their data being processed the Afiniti Sales and Marketing team have a manual process for ensuring the subject's request is dealt with in accordance with GDPR and PECR</p>	<p>The request is overlooked by the Sales and Marketing team and the subject continues to receive information which they've objected to or the subject fails to get a response in relation to an enquiry about their data</p>	<ul style="list-style-type: none"> • Investigation by the ICO if the subject lodges a complaint • Economic (in the case of a fine) • Damage to client/potential client relationship • PR and Reputational 	<ul style="list-style-type: none"> • Stringent process put in place to make sure requests are captured and actioned within prescribed timeframes • Dedicated Sales and Marketing team staff are trained in the process for dealing with objections and queries about data • Small, well established and close knit team dealing with objections and queries, • always multiple people available to deal with objections and queries to ensure consistency and speed of response • dedicated, shared compliance mailbox Which is regularly checked by multiple team members • A log of all requests is kept, including dates, who dealt with them, when actioned etc. The log assigns tasks to team members and reminds them when they are due/overdue 	<p>Accepted</p>

5 Sign off and approval

Risk	Approved solution	Approved by, date
Security breach	<ul style="list-style-type: none"> • Approved password protection process in place • Training schedule for Afiniti staff on cyber security developed and in place • NDAs obtained and filed • Encryption at rest activated on Afiniti laptops where possible 	Anthony Edwards, July 2019 <i>Anthony Edwards</i>
Manual process for dealing with data flow between Mailchimp and Salesforce & objections/enquiries about data	<ul style="list-style-type: none"> • Data objections/queries process in place • Sales and marketing team trained to follow process, more than one person available to deal with objections and queries • Low volumes of data being processed • Dedicated mailbox for objections and queries • Log of subject requests kept, showing dates, person responsible and has inbuilt reminders 	Anthony Edwards, July 2019 <i>Anthony Edwards</i>