Template for written risk assessment

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| **Form for information and assessment of risks in connection with research projects that include processing of personal data** |
| **1** | **Responsible parties**  |
|  | **Data controller:** AARHUS UNIVERSITY Nordre Ringgade 1 DK-8000 Aarhus CVR no.: 31119103  Has the project been reported to AU’s record? (*Please tick box*)     ☐ Yes    ☐ No  **Person responsible for registering the project:** Name: Click or press here to write text. Department/School/Centre: Click or press here to write text. AU ID: Click or press here to write text. Email: Click or press here to write text.  If the project manager is another person, please state the information here: Click or press here to write text.  |
| **2** | **Information about the research project:**  |
|  | Title of the research project: Click or press here to write text. The purpose of the research project: Click or press here to write text. The start date of the research project: Click or press to enter a date.  Has the project been approved by the head of department/school? (*Please tick box*)   ☐ Yes   ☐ No  |
| **3** | **Information on data**  |
|  | Describe what types of data will be processed in the project?  (*e.g. name, age, address, gender, pictures, video, sound sequences, fingerprints, etc.*) Describe: Click or press here to write text.  |
|  | Are you processing personal data about many people or a large quantity of personal data? (*Please tick relevant box*)   ☐ Yes   ☐ No  Describe: Click or press here to write text.  |
|  | Are you processing sensitive personal data in the project? (*Please tick relevant box(es)*):   ☐ Health-related information    ☐ Trade union membership   ☐ Matters relating to racial or ethnic origin   ☐ Political opinions, religious or philosophical beliefs   ☐ Sex life or sexual orientation   ☐ Genetic data   ☐ Biometric data for the purpose of uniquely identifying a natural person  Free text: Click or press here to write text.  |
|  | Are you processing some of the following data in the project? (*Please tick relevant box(es)*):    ☐Data relating to criminal convictions    ☐Data relating to criminal offences    ☐Data indirectly indicating criminal acts        Free text: Click or press here to write text.  |
|  | Does your project include confidential personal data? (*such as civil registration no. (CPR no.) and data considered confidential under other legislation*)    ☐ Yes   ☐ No  Free text: Click or press here to write text.  |
|  | Describe the identifiability of the data subject’s personal data. *E.g. directly identifiable data such as name and address, or more indirectly identifiable data such as CPR no., photos, biometrics, genetics* Describe: Click or press here to write text.  Has the personal data been pseudonymised or encrypted? (*Please tick relevant box*)     ☐ Yes     ☐ No  If yes, how? Click or press here to write text.  |
|  | Categories of people whose personal data is being processed in the project. *E.g. people with a diagnosis, relatives, control subjects, children of a certain age, vulnerable citizens, people with reduced functional capacity, etc.*  Describe: Click or press here to write text.  |
|  | Are you collecting personal data with or without consent to the processing of the data? (*Please tick relevant box*)   ☐  With consent   ☐  Without consent  From where do you collect personal data if not from the data subject himself or herself? *E.g. Statistics Denmark, registers, public authorities and universities abroad* Describe: Click or press here to write text.  |
|  | Has the information duty been fulfilled in relation to the data subjects? (*Please tick relevant box*)     ☐ Yes     ☐ No  If yes, how? Click or press here to write text.  Has the project been exempted from the information duty? If so, why? Describe: Click or press here to write text.   |
| **4** | **Data processor, shared data responsibility and sharing data with external parties**  |
|  | Are you planning to use an external data processor? (*Please tick relevant box*)     ☐ Yes     ☐ No   If yes, what processing will the data processor be performing?  Describe: Click or press here to write text.  Name of data processor: Click or press here to write text. Address: Click or press here to write text. Mobile phone number: Click or press here to write text. Email: Click or press here to write text. Central business registration no. (CVR no.), org. no. or VAT no. (if the data processor is a company):  Click or press here to write text.  If necessary, insert additional data processors: Click or press here to write text.  |
|  | Are you planning to enter into an agreement on shared data responsibility? (*Please tick relevant box*)     ☐ Yes     ☐ No  If yes, with whom? Name of the joint controller: Click or press here to write text. Address: Click or press here to write text. Mobile phone number: Click or press here to write text. Email: Click or press here to write text. Central business registration no. (CVR no.), org. no. or VAT no. (if the joint controller is a company): Click or press here to write text.   |
|  | Are you planning to share (disclose) data with others **within the** EU/EEA? (*Please tick relevant box*)    ☐ Yes    ☐ No  Name of recipient: Click or press here to write text. Address: Click or press here to write text. Mobile phone number: Click or press here to write text. Email: Click or press here to write text. Central business registration no. (CVR no.), org. no. or VAT no. (if the recipient is a company):  Click or press here to write text.  If necessary, insert additional recipients: Click or press here to write text.   |
|  | Are you planning to share (disclose) personal data collected **with consent from the person** with others **outside the** EU/EEA? (*Please tick relevant box*)   ☐ Yes   ☐ No   |
|  | Are you planning to share (disclose) personal data collected **without consent from the person** with others outside the EU/EEA? (*Please tick relevant box*)  ☐ Yes  ☐ No  If yes, note that you must obtain authorisation from the Danish Data Protection Agency, and that transfers out of the EU/EEA may result in an increased risk for the data subject.    |
|  | Are you planning to share (disclose) biological material with others **outside AU without consent from the data subject? (*Please tick relevant box*)**   ☐ Yes    ☐ No  If yes, note that you must obtain authorisation from the Danish Data Protection Agency.  |
|  | Are you planning to publish personal data in a recognised scientific journal **without consent from the data subject**? (*Please tick relevant box*)    ☐ Yes    ☐ No  If yes, note that you must obtain authorisation from the Danish Data Protection Agency.  |
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| **5** | **Storage of data**  |
|  | How are you planning to store personal data? (*Please tick relevant box*)  ☐   Personal network drive at AU (U drive)/OneDrive ☐   SurveyXact, Redcap, O drive, Sharepoint, etc. (see [data classification](https://medarbejdere.au.dk/informationssikkerhed/klassifikation-af-data/))           ☐   Statistics Denmark's servers in pseudonymised form ☐   Locked cabinet/drawer/freezer in locked room ☐   Ad hoc solutions approved by AU IT ☐   Other, please state: Click or press here to write text.    |
|  | Will there be structured pseudonymisation, erasure or full anonymisation of the data subject’s personal data? Describe: Click or press here to write text. When? Click or press to enter a date. If you cannot specify a date, describe the procedure for erasure: Click or press here to write text.  |
| **6** | **ASSESSMENT OF THE RISKS OF VIOLATING THE RIGHTS AND FREEDOMS OF THE DATA SUBJECT**  |
|  | **Confidentiality**  How likely is it that others will have unintentional access to personal data? *This also applies to personal data processed by a data processor*(*please tick relevant box*)  ☐   Unlikely (1) ☐   Not very likely (2) ☐   Likely (3) ☐   Expected (imminent) (4)  Free text: Click or press here to write text.  What will be the consequences of unintentional access to personal data for the people whose data is being processed in the project? (*Please tick relevant box*)  ☐   No or insignificant consequences (1) ☐   Inconvenient consequences (2) ☐   Critical consequences (3) ☐   Unacceptable consequences (4)  Free text: Click or press here to write text.  Likelihood times consequences (e.g. unlikely x inconvenient consequences = *1x2 =2) (tick the table)*

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| **Consequences****X****Likelihood** | **No or insignificant consequences** | **Inconvenient consequences** | **Critical consequences** | **Unacceptable consequences** |
| **Unlikely** | 1☐  | 2☐  | 3☐  | 4☐  |
| **Not very likely** | 2☐  | 4☐  | 6☐  | 8☐  |
| **Likely** | 3☐  | 6☐  | 9☐  | 12☐  |
| **Expected imminent** | 4☐  | 8☐  | 12☐  | 16☐  |

 What has been done to limit the likelihood and the consequences? Describe: Click or press here to write text.   |
|  | **Integrity**  How likely is it that personal data will be inadvertently changed? *This also applies to data processed by a data processor (please tick relevant box)* ☐   Unlikely (1) ☐   Not very likely (2) ☐   Likely (3)  ☐   Expected (imminent) (4)  Free text: Click or press here to write text.  What will be the consequences of inadvertently changing data for the people whose data is being processed in the project? (*Please tick relevant box*) ☐   No or insignificant consequences (1) ☐   Inconvenient consequences (2) ☐   Critical consequences (3) ☐   Unacceptable consequences (4)   Free text: Click or press here to write text.  Likelihood times consequences (e.g. unlikely x inconvenient consequences = *1x2 =2) (tick the table)*

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| **Consequences****X****Likelihood** | **No or insignificant consequences** | **Inconvenient consequences** | **Critical consequences** | **Unacceptable consequences** |
| **Unlikely** | 1☐  | 2☐  | 3☐  | 4☐  |
| **Not very likely** | 2☐  | 4☐  | 6☐  | 8☐  |
| **Likely** | 3☐  | 6☐  | 9☐  | 12☐  |
| **Expected imminent** | 4☐  | 8☐  | 12☐  | 16☐  |

  What has been done to limit the likelihood and the consequences? Describe: Click or press here to write text.   |
|  | **Availability**  How likely is it that personal data will not be accessible, e.g. due to an IT failure or the bankruptcy of a data processor? *This also applies to personal data processed by a data processor*(*please tick relevant box*) ☐   Unlikely (1) ☐   Not very likely (2) ☐   Likely (3) ☐   Expected (imminent) (4)  Free text: Click or press here to write text.  What will be the consequences of lack of access to personal data for the people whose data is being processed in the project? (*Please tick relevant box*) ☐   No or insignificant consequences (1) ☐   Inconvenient consequences (2) ☐   Critical consequences (3) ☐   Unacceptable consequences (4)  Free text: Click or press here to write text.  Likelihood times consequences (e.g. unlikely x inconvenient consequences = *1x2 =2) (tick the table)*

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| **Consequences****X****Likelihood** | **No or insignificant consequences** | **Inconvenient consequences** | **Critical consequences** | **Unacceptable consequences** |
| **Unlikely** | 1☐  | 2☐  | 3☐  | 4☐  |
| **Not very likely** | 2☐  | 4☐  | 6☐  | 8☐  |
| **Likely** | 3☐  | 6☐  | 9☐  | 12☐  |
| **Expected imminent** | 4☐  | 8☐  | 12☐  | 16☐  |

  What has been done to limit the likelihood and the consequences? Describe: Click or press here to write text.  |
| **7** | **SPECIAL CIRCUMSTANCES THAT GIVE REASON TO CARRY OUT AN IMPACT ASSESSMENT**  |
|  | Will a new technology be tested in the planned processing or will there be systematic monitoring? *E.g. Iris scans, monitoring of employees, etc. (please tick relevant box)*  ☐ Yes  ☐ No  Will there be extensive systematic monitoring of a public area? *E.g. monitoring of the motorway network (please tick relevant box)*  ☐ Yes  ☐ No  Will the processing include comprehensive and systematic evaluation of natural persons?  *E.g. economic situation, personal preferences, health, etc. (please tick relevant box)*  ☐ Yes  ☐ No  Will the processing include automated decision-making processes (profiling) that can significantly affect the data subject? (*Please tick relevant box*)  ☐ Yes  ☐ No  Will the processing contain a large quantity of personal data and/or special categories of personal data (sensitive personal data), data about criminal convictions and offences and/or data with an increased risk of abuse? *E.g. where there is a high risk that the data can be used for identity theft (please tick relevant box)*  ☐ Yes  ☐ No  Will the processing include data on data subjects or groups of data subjects who are considered vulnerable? E.g. children, sick people, the elderly, etc. (*please tick relevant box*)  ☐ Yes  ☐ No  Will the processing, see point 4, entail that personal data is disclosed across borders outside the EU/EEA? (*Please tick relevant box*)  ☐ Yes  ☐ No  Will genetic data be processed together with one of the types of processing above? (*Please tick relevant box*)  ☐ Yes  ☐ No  |