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)*     |  |  |  |  |  | | --- | --- | --- | --- | --- | | **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)*   |  |  |  |  |  | | --- | --- | --- | --- | --- | | **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)*     |  |  |  |  |  | | --- | --- | --- | --- | --- | | **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 |