



THE AGA KHAN UNIVERSITY
(International) in the United Kingdom

Institute for the Study of Muslim Civilisations

PRIVACY IMPACT ASSESSMENT

2022

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Document Approval

Name	Signature	Date
AKU UK Senior Management		October 2022
AKU Global Chief Information Officer (CIO)		September 2020
AKU Global Legal Representative		September 2022
AKU Global Data Protection Officer (DPO)		September 2022

Version Control

Version	Maintained by	Release date
1.0	Data Protection Team (DPT) as part of Global Data and Analytics Office (GDAO)	June 2020
2.0	Data Protection Officer (DPO)	September 2022

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Section 1: Assessment Questions	
Will the project involve the collection of new information about individuals?	
Will the project compel individuals to provide information about themselves?	
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	
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.	
Will the project result in you making decisions or acting against individuals in ways that can have a significant impact on them?	
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.	
Will the project require you to contact individuals in ways that they may find intrusive?	

Section 2: Project Details
Project Name:
Project Manager Details Name: Designation: Email: Tel Number:
Key Stakeholder Details Name: Designation: Email:

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Tel Number:

Project Implementation Date:

Section 3: PIA Checklist

<p>Project description: Provide a brief description of the project along with supporting system technology. If this is a change to an existing project and/or system technology, describe the current system or program and the proposed changes.</p>	
<p>What are the purpose and objectives of this project?</p>	
<p>What are the potential privacy impacts of this proposal?</p>	
<p>What type of data are you processing? Please also give examples of any sensitive personal data that you are processing.</p>	
<p>Have you formally identified the purposes for which you will be processing both personal data and sensitive personal data? If yes, please list them. If no, please indicate why not.</p>	
<p>Have you identified the categories of sensitive personal data that you will be processing? If yes, can you list them? If no, please indicate why not.</p>	
<p>For the processing of sensitive personal data, have you obtained the data subject's explicit consent? If no, please state why?</p>	
<p>Are data subjects being made aware that you will be processing their data? If yes, state how they are being made aware. If no, please indicate why not.</p>	
<p>How are individuals offered the opportunity to restrict processing for other purposes?</p>	
<p>Do you receive information about individuals from third parties for this project? If yes, please give examples.</p>	

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<p>Are procedures in place for maintaining a comprehensive and up-to-date record of use of personal data?</p>	
<p>What is the procedure for notifying (where necessary) the data subject of the purpose for processing their personal data?</p>	
<p>Does the project involve the use of existing personal data for new purposes? If yes, what checks are being made to ensure that further processing is not incompatible with its original purpose?</p>	
<p>What procedures are in place for periodically checking that data collection procedures are adequate, relevant and not excessive in relation to the purpose for which data are being processed?</p>	
<p>How is an assessment made as to the relevance (e.g. no more than the minimum required) of personal data for the purpose for which it is collected?</p>	
<p>How, and how often, are personal data being checked for accuracy?</p>	
<p>Are the sources of personal data used (i.e. data subject or third party) identified? If so, how? Please give examples:</p>	
<p>Is there any facility to record notifications received from the data subject if they believe their data to be inaccurate? If no, please indicate why not.</p>	
<p>Does the project include the formally stated data retention period?</p>	
<p>Is the project subject to any statutory / local requirements on retention? If yes, please state relevant requirements.</p>	
<p>When the data is no longer required for the project how will it be identified for deletion or destruction?</p>	

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<p>Are there any exceptional circumstances for retaining the data for longer than the required period?</p> <p>If yes, please give justification:</p>	
<p>Is there more security required to protect data from unauthorised or unlawful processing on this project?</p> <p>If yes, please describe the planned procedures. If no, please indicate why not.</p>	
<p>Are you transferring personal data to a country or territory outside of the EEA on this project?</p> <p>If yes, what type of data and to where? Are measures in place to ensure an adequate level of security when the data are transferred?</p>	
<p>Are you using a 3rd party to process, store or transmit any data on this project?</p> <p>If yes, how are you going to ensure that they comply with the DPA requirements and is there an on-going procedure for monitoring their data security measures?</p>	

Section 4: Privacy Issues Identified and Risk Analysis

Privacy issue	Risk to individuals	Compliance risk	Associated organisation/ corporate risk

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Section 5: Privacy Solutions Identified			
Risks	Solution(s)	Result (Is the risk eliminated, reduced, or accepted?)	Evaluation (Is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?)

Section 6: Sign Off and PIA Outcome Record		
Risk	Approved Solution(s)	DPO Approval

Section 7: PIA Outcome Integration to Project Plan		
Action to be taken	Date of completion of the actions	Responsibility for action