

# FCS LASER MAIL LTD

## DATA PRIVACY IMPACT ASSESSMENT (DPIA)



### INTRODUCTION

DPIAs are a legal requirement for data processing that is likely to be high risk. An effective DPIA can also bring broader compliance, financial and reputational benefits, helping demonstrate accountability.

A DPIA may cover a single processing operation or a group of similar processing operations.

FCS Laser Mail doesn't need to perform DPIA by law, as FCS Laser Mail doesn't perform such activities:

- use systematic and extensive profiling with significant effects;
- process special category or criminal offence data on a large scale;
- systematically monitor publicly accessible places on a large scale;
- use innovative technology (in combination with any of the criteria from the European guidelines);
- use profiling or special category data to decide on access to services;
- profile individuals on a large scale;
- process biometric data (in combination with any of the criteria from the European guidelines);
- process genetic data (in combination with any of the criteria from the European guidelines);
- match data or combine datasets from different sources;
- collect personal data from a source other than the individual without providing them with a privacy notice ('invisible processing') (in combination with any of the criteria from the European guidelines);

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- track individuals' location or behaviour (in combination with any of the criteria from the European guidelines);
- profile children or target marketing or online services at them;
- process data that might endanger the individual's physical health or safety in the event of a security breach.

As FCS Laser Mail is data processor, to show compliance with GDPR and Data protection Act regulations we do perform DPIA as best practise exercise.

Nature and context	FCS Laser Mail processes the data on behalf of our customers - data controllers. Data is kept on local servers. Data is used to process, print and mail personalised letters. Data access is restricted. FCS laser Mail doesn't share data. No third parties are used for data processing. Data subject contacts data controller and data controller passes information to FCS Laser Mail. FCS Laser Mail doesn't have direct contact with data subject. FCS laser Mail processes data for more than 30 years.
Scope	Data provided by customers. Name and address are most common personal data type. Data is processed one time and then deleted from systems. Number of data subjects in one job can vary dependant of customer supplied data. All processing is performed only in UK.
Type of personal data provided	Name, address

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Does provided data contain Sensitive personal data (data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation) or criminal conviction and offences data	No
Purposes of the processing	To inform the customer's (data controller) clients (data subjects) about their contract updates with the data controller
Compliance with data protection principles:	
Lawfulness, fairness and transparency	Data subject contacts data controller. No direct contact to FCS Laser Mail. Legitimate interests of a third party – data controllers.
Purpose limitation	Data received from data controller is specific to one job
Data minimisation	Data received is adequate, relevant and limited to what is necessary
Accuracy	Individuals request data controller to erase or rectify erroneous data that relates to them. Data controller informs FCS Laser Mail of an update or removal of data that is inaccurate or incomplete
Storage limitation	After the data has been processed, it is deleted after 30 days (or other specified term with customer)

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Integrity and confidentiality	Technical or organisational measures in place. FCS Laser Mail is ISO 27001 certified
Accountability	Data protection policies, documenting processing activities and security mechanisms, incident management
Data processed outside UK	No
Does FCS Laser Mail use third parties to process data	No
Risk assessment	Risk assessment in place
Is processing likely to result in a high risk to individuals	No

Version	Date	Description	Approved by
A	24.02.20	Initial version	Steve Beeching