MSS-DP-DOC-11.6   
DATA PROTECTION Impact Assessment

Retirement Capital

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# Revision History

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# Management Summary

The purpose of this procedure is to ensure that the relevant data is collected during spot checks and regular audit such that a full impact assessment of any vulnerabilities is undertaken, mitigating actions determined and full Board approval obtained.

## 1.1 Data Protection Act 2018

The Data Protection Act 2018 is the UK’s implementation of the General Data Protection Regulation (GDPR). This Data Protection Policy forms the basis for complying with legal data protection requirements as well as the protection of the processed personal data of Retirement Capital

Data protection is essential for Retirement Capital in order to meet the legal requirements for handling person-al data. This data protection Policy is therefore made binding on all the organisation’s internal pro-cesses. This is data protection by design and is fundamental to the company’s policy and attitude to data protection.

Retirement Capital is both a data controller and a data processor as defined under the Act. The former because we hold necessary data on our staff, subcontractors, suppliers and customers. The latter because we provide cloud processing services for government and private sector customers.

Under the Act, everyone responsible for using personal data has to follow strict rules called data protection principles. They must make sure the information is:

• used fairly, lawfully and transparently

• used for specified, explicit purposes

• used in a way that is adequate, relevant and limited to only what is necessary

• accurate and, where necessary, kept up to date

• kept for no longer than is necessary

• handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

This Data Protection Policy regulates the handling of personal data. In particular, it is intended to:

• Assign responsibilities and obligations for all relevant privacy issues,

• Raise awareness of the need for strategic, technical and organisational measures to ensure data protection requirements, and

• Define the procedure for dealing with data Breach incidents.

# Scope

## Scope

The scope of this procedure is any data protection or security vulnerability that may exist or that has been detected.

## Procedure

Regular and ad hoc security audits to check the risks associated with:

* + - 1. Operating system, installed applications, cloud applications.
      2. Partner developed software being sold as a service by Retirement Capital
      3. Physical security.
      4. Staff records.
      5. Staff awareness, including training, induction and performance reviews.
      6. Portable data encryption.
      7. Laptop and desktop usage.
      8. Backups
      9. Business continuity
      10. Other

## Frequency

Ad hoc audits to be conducted at least 4 times per year, formal review o be conducted annually. The responsible person is the Data Protection Officer.

## Reporting

The form to be used for the Impact Assessment is S010 Impact Assessment Report. Completed reports are to be held for seven years in the secure data repository.