

PIA vs DPIA

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<http://www.rogerclarke.com/DV/PIAvsDPIA.html>.pdf

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1

Reasons why a DPIA isn't a PIA

- A DPIA is not driven by social values
- A DPIA will be interpreted as a mere Data Protection Law Compliance Assessment
- A DPIA does not encompass all 5 Dimensions of privacy, or all of Koops et al.'s 8+1 Privacy Types

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3

Assessment Categories

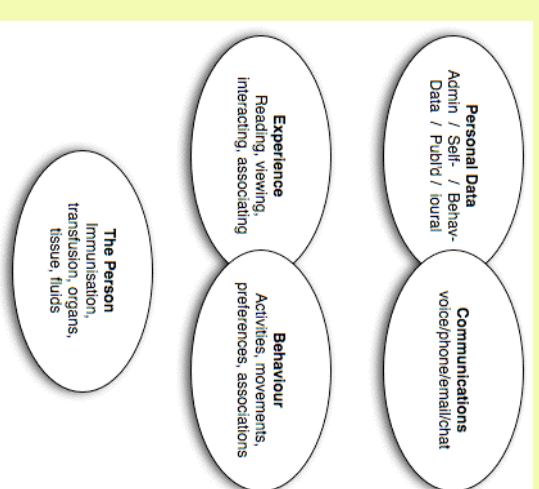
- **Technology Focus**
- "Technology Assessment"
- Surveillance IA
- **Project or Proposal Focus**
- Business Case Formation
- Security IA, aka "Threat Risk Assessment"
- **Social Impact Focus**
- Human Rights IA
- Ethical IA
- **Privacy IA**
- Data Privacy IA
- **Compliance Focus**
- "Regulatory Compliance"
- Org'l Self-Regulation
- Industry Self-Regulation
- Co-Regulation
- Formal Regulation
- Privacy Law Compliance
- All Statutes, Delegated Legislation, Common Law
- **Data Protection Law Compliance**
- **EU GDPR or a Statute**

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2

Privacy Dimensions

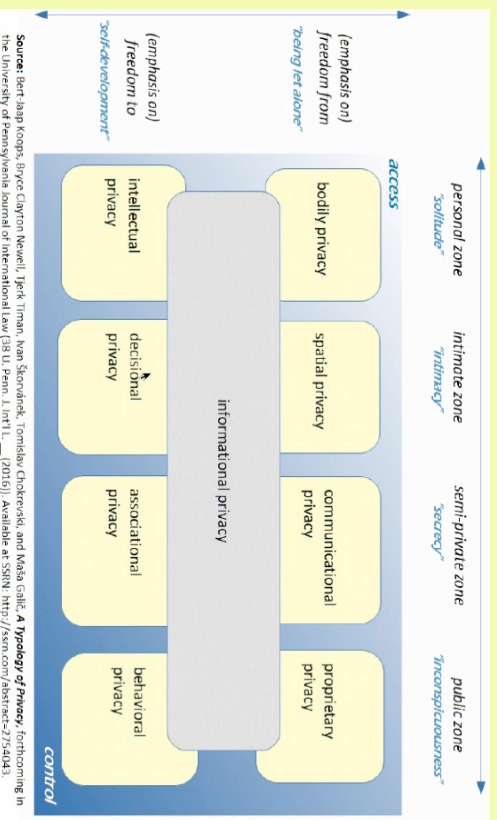


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<http://www.rogerclarke.com/DV/Intro.html#Priv>

4



8 Privacy Types and 1 Aspect

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Koops et al. (2016), in the Cave at 14:30

5

Reasons why a DPIA isn't a PIA

- A DPIA is not driven by social values
- A DPIA will be interpreted as a mere Data Protection Law Compliance Assessment
- A DPIA does not encompass all 5 Dimensions of privacy, or all of Koops et al.'s 8+1 Privacy Types
- A DPIA doesn't even cover all of data privacy
- A DPIA merely applies to the sub-set of the data privacy interest that is subject to data protection law

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6

Questions re Collection of Body Tissue and Body Fluids

Can a DPIA consider the physical aspects of acquiring bio-samples?

Does it make any difference if the material is collected as a result of a 'request' rather than as a 'demand' backed by legal authority?

Can a DPIA consider the impact of the data collection process on:

- (i) the privacy of the physical person?
- (ii) the privacy of personal behaviour?

Questions re Visual Surveillance

CCTV, ANPR, body-worn cameras, drone-borne cameras

Data can be streamed elsewhere without recording it
The mere presence of cameras can concern people

If no data is recorded, can a DPIA consider the impact on the privacy of personal behaviour of:

- (i) the operation of cameras?
- (ii) the existence of cameras, even in non-operational?

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7

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8