

# DPIA of ROIFORCIO GmbH

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## Step 1: Identify the need for a DPIA

Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

Roi4Presenter is a this is an online application for creating video conferences embedded in cms, inside which this functionality is placed. App empowers users with the information necessary to decide when they need call or when self-care is more appropriate.

The Roi4Presenter app does collect Usage Data and does request Personal Data.

In compliance with our Data Security and Protection processes, all of ROIFORCIO GmbH projects undergo a DPIA. Roi4Presenter is commissioned by public sector organizations and the financial sector, including NHS commissioning groups, so we identified the need to complete a data protection impact assessment

## Step 2: Describe the processing

**Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or another way of describing data flows. What types of processing identified as likely high risk are involved?

Location – A user is asked for their email,login,password so they can be assigned to the correct Local place / Teritorial group area. This information is sent securely via SSL to the cloud-based Roi4Presenter platform. A user can add multiple members to the app by defining their name, gender and date-of-birth. This children members Data is used to highlight relevant information articles to the user and is never transmitted from the app. Location and Data is held encrypted within the App's database. Usage Data is collected anonymously via Google Analytics and a bespoke system within the cloud-based Roi4Presenter platform hosted by Amazon Web Services .

Usage Data is made up of discrete Usage Events such as the user reading a company or products information article. Google Analytics and the bespoke system are only accessible by a limited number of Roi4Presenter employees. Data or reports may be shared with NHS organisation from ROIFORCIO GmbH company.

**Describe the scope of the processing:** what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

### Personal Data

All ROIFORCIO GmbH app users can add any number of members. Adding members is optional, however some functionality will be limited if it is not provided. All members data will remain indefinitely until removed by the user which they can do at any time. Adding credentials is optional but if not added then the user must manually input.

If the user does add their credentials they can later remove this information, in which case their User Events will not be assigned to any Data or members. Usage Data Usage Data covers: article opening and reading; app opening and closing; the act of adding/ search text;etc. No confidential, personally identifiable information, special category or criminal offence data is collected.

Usage Data is stored indefinitely.

**Describe the context of the processing:** what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

The Roi4Presenter app can store personal information regards a user's.

No point does this information leave the user's device, therefore it can not be accessed by any other party. The child's date-of-birth is used to highlight age related articles. Their name and gender is used to identify them to the user when highlighting the articles.

As personal information does not leave the user's device, no personal information about the users of Roi4Presenter is held in any external systems. Therefore, all Usage Data collected is anonymous and any requests for deletion or copies of data held about specific users cannot be fulfilled.

**Describe the purposes of the processing:** what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing for you, and more broadly?

Anonymous usage data is collected for the purposes of improving the product and recognising trends. Such as to understand exactly how the app is used, for what purposes, which sections are most often accessed, which articles are most often read and which issues are most commonly encountered.

## Step 3: Consultation process

**Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Extensive information, with in the privacy policy, help section and as part of the onboarding process, is provided to the user on what data is collected and how it is used.

The app encourages users to directly contact ROIFORCIO GmbH to share their views or provide any feedback. A form on the website allows users to anonymously send messages to ROIFORCIO GmbH.

Commissioning organisations are consulted about the use of data prior to launching in a region.

External organisations such as SOFTPROM are consulted regularly to evaluate the app which includes how data is used and collected.

## Step 4: Assess necessity and proportionality

**Describe compliance and proportionality measures, in particular:** what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Data is anonymised on the device before it is collected, preventing any possibility for misuse. The app provides extensive information to inform users on what anonymised data is collected and what it is used for.

## Step 5: Identify and assess risks

<b>Describe the source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
1. The data storage platforms are compromised.	Remote	Minimal	Low
2. Malicious code is inserted into the app and reuploaded to the distribution stores allowing for third parties to collect data.	Remote	Severe	Low
3. A personal device is lost or stolen containing personal data.	Remote	Minimal	Low

## Step 6: Identify measures to reduce risk

**Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5**

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
	<p>The app is distributed through the Google / Apple and any code changes are signed with a private key which are stored offline so third parties cannot update products with malicious code even if they had access to ROIFORCIO GmbH Google / AppleAccount.</p>	<p>Eliminated, reduced or accepted Reduced</p>	<p>Low, medium or high Low</p>	<p>Yes/no Yes</p>

## Step 7: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:	Anton Zvieriev, DevOps , 30th September 2022	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Anton Zvieriev, DevOps , 30th September 2022	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Pavlo Zhdanovych, DPO	DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice: The DPO has no other comments		
DPO advice accepted or overruled by:	Anton Zvieriev, DevOps , 30th September 2022	If overruled, you must explain your reasons
Comments: None		
Consultation responses reviewed by:	N/A	If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will be kept under review by:	Pavlo Zhdanovych, DPO	The DPO should also review ongoing compliance with DPIA