EASO

European Asylum Support Office

SUPPORT IS OUR MISSION

Data Protection Impact Assesment (DPIA) Methodology

General Guidelines: you will complete this impac assessment (DPIA) in 4 steps

- 1st step: fill in the **Knowledge Base** with information about your processing operation
- 2nd step: based on the information of the Knowledge Base, answer the questions of the **DPIA Template (Part I)**, which will ask you to assess and rate various Data Protection risks
- 3rd step: based on the answers you provided in the DPIA Template (Part I), you will describe the measures you envisage to **address/mitigate risks (Part II)**
- 4th step: you will then give a **general conclusion** about the Data Protection Impact of your operation **(Part III)**

Knowledge Base
Description of the envisaged processing operation

This part is meant to provide a general overview of the envisaged processing operation.
The different steps you will identify within the processing operation will serve as a base to fill in the risk assessment and the necessity and proportionality assessment.

Flowchart
What personal data do we collect?
Identification data (name or pseudo/alleged name, username, user identification and geographical area) (Occasionally) certain personal characteristics (age, gender, nationality) Views and/or comments on migration routes, smuggling of human beings/human trafficking and asylum processes Images and videos / any other information published on a website or social media page.
From where / whom do we get that information?
Posts made by users in social media (Facebook, Instagram, YouTube, Twitter) which are relevant to EU asylum and migration issues, within Arabic, Pashto, Dari, Urdu, Turkish, Russian, Tigrinya, Kurmanji Kurdish, Pidgin English, Hausa, Edo, as well as French communities.
What we do with this information?

The information consulted by SMM reaserchers is translated directly and mentally into English and transcribed without the use of any IT tools. They are simultaneously transcribed into the draft report. The social media posts are not collected, recorded, stored, retrieved, transmitted, disseminated or shared with third parties. The same applies to the original text of any posts in the source language, which are not copy-pasted or transferred. The reports are shared with stakeholders.

Where do we keep it?

No personal data is either stored or transmitted.
The processing of personal data is limited to the consultation of social media posts by SMM researchers on their web browsers.
On-screen visual texts are directly translated into English (not copy-pasted, saved, stored or transmitted) without IT tools, while any images which contain personal data are directly redacted to be unrecognizable before being saved, thus making the process non-reversible.
The cached memory of the web browsers (internet history of pages which have been visited) is deleted at the end of every week in order to ensure that no links to the visited social media pages are stored.
No links / hyperlinks are included in the SMM Reports.

Who do we give it to? / Do we share this with other stakholders?

No personal data is either stored or transmitted.

Detailed description of the purpose(s) and supporting assets			
Your process may include the following steps. Please fill in the blanks for the steps that are included in your process.	Description of the process	Description of the purpose. Please distinguish between purposes when necessary.	Supporting assets Please refer to the typology of supporting assets provided below and indicate for each step you identified which are the supporting assets.
Collection of the personal data			
Merging datasets			
Organising/structuring the data			
Retrieving/consulting/using the data	Relevant social media posts are viewed by SMM reasearchers and are translated directly and mentally into English and transcribed without the use of any IT tools. They are simultaneously transcribed into the draft report. The	The purpose of the SMM is to provide EASO management and relevant stakeholders (Member States, European Institutions and EU Agencies, UNHCR, IGC, Interpol and IOM) with reports on the latest shifts in asylum and migration	Social media posts are viewed by SMM reasearchers via the web browser on their computers. The information is then translated into the text of the draft SMM report using Word documents. The final version of the SMM Report is issued as a

	social media posts are not collected, recorded, stored, retrieved, transmitted, disseminated or shared with third parties. The same applies to the original text of any posts in the source language, which are not copy-pasted or transferred.	routes, smuggling offers and the discourse among social media community users on key issues – flight, human trafficking and EU+ asylum systems/processes.	PDF document.
Editing/altering the data	Any screenshots used to illustrate the final version of the SMM Reports are created by the SMM reaserchers using snipping tool, which enables for the blacking out/redacting of images and the blurring of any personal data such as names and phone numbers that may have been included in the original post. The process is irreversible.	No personal data is included in the SMM reports.	Windows snipping tool.
Discolsing/ransferring the data			
Restricting the access to the data			
Storing of the data			
Erasing/destroying the data	No personal data is included in the SMM reports. The information viewed in social media posts is translated mentally by SMM researchers into the draft text of the SMM reports. The cached memory of the web browsers (internet history of pages which have been visited) is deleted at the end of every week in order to ensure that no links to the visited social media	After the SMM researchers consult the social media posts, no further processing operation is deemed necessary (purpose of the SMM Reports). All possible measures are taken to keep any personal data out of the SMM Reports.	Web browser. Cache memory deleted every week.

	pages are stored.		
Other			

Interaction with other processes	
Does this process rely on personal data being fed in from other systems? (Y/N)	No
Are the data from this process re-used in other processes? (Y/N)	No

Knowledge base for the description of supporting assets Typology of supporting assets		
Information systems	Hardware and electronic data media	Example: Computers, communication relays, USB drives, hard drives
	Software	Example: Operating systems, messaging, databases, business application
	Computer channels	Example: Computer channels: Cables, WiFi, fiber optic
Organisations	People	Example: Users, IT administrators, policymakers
	Paper documents	Example: Print, photocopies, handwritten documents
	Paper transmission channels	Example: Mail, workflow

Knowledge base to fill in the DPIA Template (see Part I below)

Rating likelihood			
1. Negligible	2. Limited	3. Significant	4. Maximum
It does not seem possible that the data protection principle (fairness, transparency, etc.) could be affected.	It seems difficult that the data protection principle (fairness, transparency, etc.) could be affected.	It seems possible for the data protection principle (fairness, transparency, etc.) to be affected.	It seems extremely likely that the data protection principle (fairness, transparency, etc.) would be affected.

| of losing control over one's data- Feeling of invasion of privacy without real or objective harm (e.g. commercial intrusion)- Lack of respect for the freedom of online movement due to the denial of access to a commercial site | objective psychological ailments (defamation, reputation)- Relationship problems with personal or professional acquaintances (e.g. image, tarnished reputation)- Feeling of invasion of privacy without irreversible damage- Intimidation on social networks | of invasion of privacy with irreversible damage- Feeling of vulnerability after a summons to court- Feeling of violation of fundamental rights- Victim of blackmailing- Cyberbullying | Criminal penalty- Abduction- Loss of family ties- Inability to sue- Change of administrative status and/or loss of legal autonomy (guardianship) |

DPIA Template - Part I
Impact Assesment

Part I. A. – Necessity and Proportionality Assessment

Necessity — Need for the processing in order to achieve aims assigned to the organisation		Proportionality — Ensure that advantages resulting from processing are not outwieghted by the disadvantages that processing causes			
How and why are the proposed processing operations an effective means for your organisation to fulfil the mandate assigned to it?	Have you considered alternatives for fulfilling this task? Why is the chosen approach the least intrusive one?	Benefits of the processing	Risks to the fundamental rights arising from the processing		
			Risk	Likelyhood (rate from 1 to 4, see knowledge base)	Impact (rate from 1 to 4, see knowledge base)
EASO's SMM activities aim to support the implementation of the Common European Asylum System (CEAS) by alerting Stakeholders, notably migration and asylum authorities of EU+ Member States, as well as relevant EU Institutions / EU Agencies, and relevant International Organisations (UNHCR, IOM, IGC and Interpol) of developments which are relevant to such implementation. It does this by:	N The information included in the SMM reports can only be retrieved from social media platfroms. No personal data is included in the SMM Reports.	See explanation provided under "Necessity" (of the processing)	Data subjects are not immediately aware of the processing operation	3	2

Please rate the overall necessity of the process from 1 (low) to 4 (imperative)	Please rate the overall proportionality of the process from 1 (low) to 4 (imperative)
3	3

PART I. B. - Risk Assessment: Assessing likelihood & impact
For each step of the processing operation (collection of data, merging data sets, etc.), answer Yes/No to the questions about the principles of data potection that they may affect. Your processing operation may not involve all the steps that are linked to a question, or may include additionnal steps, which you can indicate in "other" : please refer to the information you provided in Part I of the Knowledge Base to see which are the steps of your specific processing operation. To rate the possible impact of the process on each of the 7 data protection principles, please refer to Part II of the Knowledge base.

1 Fairness

Questions	Step of the operation Only answer (Yes/No) to the steps included in your processing operation					
	Collection	Merging datasets	Retrieval/consultation/use	Disclosure/Transfer	Storage	Other
1. Is the processing of this data something that people can expect, even whithout reading the information that you give them ?			Y In light of high level EU political statements and the EU's narrative on cmbatting abuses to the CEAS, it can reasonably be exoected by the data subjects that such public information and posts are used by EASO and other EU institutions.			
2. Consent						

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a. If you rely on consent, is it really freely given?						
b. If you rely on consent, can people revoke it?						
Please indicate how.						
c. If your processing operation relies on consent, please indicate how you document that people gave it. If it relies on a legal obligation, internal rules or other, please indicate which.						
3. Could this operation decrease the likelihood that people exercise their fundamental rights (e.g. freedom of expression, belief...) ?E. g. When investigating e-mails, if one checked the content instead of only checking the traffic data, this would decrease the likelihood that people exercise their freedom of expression.			N			
4. Could this processing operation lead to discrimination ?			N			
5. Is it easy for people to exercise their rights to access, rectification, erasure, etc. ?			Y Privacy statement is made available on EASO's web site.			

Based on your answers, assess the likelihood that a Data Subject would be affected by an unfair processing of his/her data (rate from 1 to 4)	Based on your answers, assess the impact if a Data Subject were affected (rate from 1 to 4)
2	2

2 Transparency	

Questions	Step of the operation Only answer (Yes/No) to the steps included in your processing operation

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	Collection	Merging datasets	Retrieval/consultation/use	Editing/Alteration	Disclosure/Transfer	Storage	Other
1. Is the information you provide complete and easy to understand?			Y	Y			
2. Do you make sure the information you provide actually reaches the individuals concerned? Answer Y/N and indicate how.			Y Since the information needed for SMM Reports is gathered from publicly available sources (social media posts) the most effective way of informing data subjects is by publishing the privacy notice for the SMM project on EASO's website.	Y (see explanation in column to the left)			
3. Is it targeted to the audience? E.g. job applicants may require tailored information. Answer Y/N and indicate how.			Y Efforts were made to keep the language used in the privacy notice as easily understandable by data subjects (social media users).	Y			
4. In case you defer informing people, please indicate how you justify this.							

Based on your answers, assess the likelihood that a Data Subject would be affected by an untransparent processing of his/her data (rate from 1 to 4)	Based on your answers, assess the impact if a Data Subject were affected (rate from 1 to 4)

	3				2			
				3 Purpose limitation				

Questions	Step of the operation Only answer (Yes/No) to the steps included in your processing operation							
	Collection	Merging datasets	Organisation/ Structuring	Retrieval/ consultation/ use	Editing/Alteration	Disclosure/Transfer	Storage	Other
1. Have you identified all purposes of your process?				Y	Y			
2. Are all purposes compatible with the initial purpose?				Y	Y			
3. Is there a risk that the data could be reused for other purposes?				N	N			
Please indicate how you ensure that data are only used for their defined purposes.				No original data (social media posts) as viewed by the SAM team is saved, stored or transmitted.	The draft version of the SAM Reports is also checked by the DPO (before approval is given for the final version) in order to ensure that no screenshots included in the reports contain any personal data.			
4. In case you want to re-use data for scientific research, statistical or								

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historical purposes, do you apply appropriate safeguards?								
Please indicate which safeguards you apply.								

Based on your answers, assess the likelihood that a Data Subject would be affected by a default of purpose limitation (rate from 1 to 4)	Based on your answers, assess the impact if a Data Subject were affected (rate from 1 to 4)
2	2

4 Data minimisation

Questions	Step of the operation Only answer (Yes/No) to the steps included in your processing operation							
	Collection	Merging datasets	Organisation/ Structuring	Retrieval/ consultation/ use	Editing/Alteration	Disclosure/Transfer	Storage	Other
1. Do data you collect measure exactly what you need to achieve your goal?				Y	Y			
2. Are there data items you could remove/mask without compromising the purpose of the process?				N All possible data which can be removed/masked is alrady removed from the Reports.	N			
3. When you collect data, for instance								

			use					
1. Do you have a procedure to perform an identification, analysis and evaluation of the information security risks that could affect personal data and the IT systems supporting their processing?			Y Not formalised. Following EDPS's recommendations this process can be formalised.	Y Not formalised. Following EDPS's recommendations this process can be formalised.	Y Not formalised. Following EDPS's recommendations this process can be formalised			
2. Do you target the impact on people's fundamental rights, freedoms and interests, and not only the risks to the organisation?			Y	Y	Y			
3. Do you take into account the nature, scope, context and purpose of processing when assessing the risks?			Y	Y	Y			
4. Do you manage your system vulnerabilities and threats for your data and systems?								
5. Do you have resources and staff with assigned roles to perform the risk assessment?			Y	Y	Y			
6. Do you systematically review and update the security measures in relation to the								

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