

Welcome to the RGDP September '22 Data Protection Newsletter

This month we are focusing on receiving data from other controllers.

In a Nutshell

- Do you know how to handle information from other controllers?
- SDM Housing system update
- Other key topic updates:
 - Changes to Data Protection law
 - Data breach costs

Do you know how to handle information from other controllers?

- Data sharing and processing activity is normally focussed on you sharing information with other controllers, or having in place a processor agreement with third parties who are doing work for you.
- Just as important is how you manage the data you receive from other data controllers.
 - Examples of this could be from the police, public authorities and personal data purchased for marketing purposes.
 - It may be that you are sharing information as part of a multi agency group, or it could be that you are processing data for another controller, such as bookings, maintenance contracts and so on.
- In either case, you need to make sure that you handle any personal data lawfully, and consider, for instance, what is the other controller's lawful basis to share with you, do you have a sharing agreement or processing agreement in place, what is your lawful bases for processing the data, and are you holding it following the data protection principles.
- The flowchart on the second page outlines the steps you must take.
- Just ask your DPO for more information if you need support on this topic.

SDM Housing management system update

- Many Housing Associations are using SDM as their Housing System and there are a couple of items to highlight for users.
- Retention - the recommended way of doing this in the past has been the use of archive, but a new release is more GDPR compliant and allows for deletion.
- Equalities - it is believed that there is no way to store equalities data safely, and extraction methods are unsecured. Work is ongoing to find a way to store what is collected more safely on a 3rd party system that links to SDM.
- Sale of SDM - RGDP has created a generic DPIA on this change of location. If you require a copy, please contact your DPO.
- Contact your DPO for more information on these topics.

Other key topic updates

- Changes to Data Privacy Law
 - The draft Data Protection and Digital Information Bill is still to be reviewed through Parliament and no timescale has been released for when it will take effect and in what form.
 - Until then we would remind our clients that UK GDPR and DPA 2018 are still in force and that the current measures enacted in those still have to be followed.
- Data breaches
 - Data breaches are never what an organisation wants - they cause business disruption and reputational damage if not handled well.
 - The costs of handling breaches is on the rise. Average Data Breach Costs Hit a Record \$4.4 Million, Report Says - CNET.

Reminder: our next free training session will be held at at 10.00 – 10.30am on 27th October and will be on receiving personal data from third parties. We will also be re-running the International Data Transfers presentation at 0900-0930 on the same day. RGDP will be sending you an invitation for these events soon.

