Privacy Impact Assessment and Report
(Gust.com)

A Privacy Impact Assessment (PIA) process involves the following steps:
1. Conduct a threshold assessment
2. Plan the PIA
3. Describe the project
4. Identify and consult with stakeholders
5. Map the personal information flow
6. Identify the privacy risks
7. Identify options to address the privacy risks
8. Respond and review

1. Conduct a Threshold Assessment

*Attach privacy threshold assessment results:*

- Privacy Threshold Assessment completed on 5/6/2019
- 2/17 Questions resulted in 'Yes' indicating a PIA is required
  - 1. Will the project involve collecting personal information or a new way of collecting personal information?
    - Yes
  - 5. Will the project involve disclosing personal information to another agency, a contractor, the private sector or to the public?
    - Yes (only to the judges through the same platform)

2. Plan the PIA

*What aspects of the project will be assessed*

- **Collection** – How the data is collected? Is this being entered by the customer, or is entered by AgriFutures on behalf of the customer?
  - Data will be entered by the customer on the Gust platform on their own, at the direction of AgriFutures Staff.
- **Storage** – Where is the data being stored? Is this location secure?
  - The data will be stored on the Gust.com system, which is a cloud based system located in the EU
- **Access** – Who has access to the information? Are there suitable controls restricting access to additional users?
  - There are only 4 parties with access to the data being published and they are AgriFutures staff, the customer, the judges and Gust.com system administrators
- **Disclosure** – In what form is the data being published? Is this method of disclosure suitable for personal information?
  - The data is only disclosed to the judges in a view specific to what they require for the judging component of the event.

*Where the PIA will fit in the overall project plan and timeframes*

- The PIA will run simultaneously to the running of the project.

*Who will conduct the PIA and what resourcing is available.*

- Gerard McTaggart will complete the PIA with the review being performed by Privacy Officer Louise Heaslip. The scope of the project and the PIA means these resources are suitable.
• The extent and timing of stakeholder consultations
  ▪ There is only a small amount of consultation with stakeholders (Dallas / Rest of Evoke team) which will be able to be performed via Email.
• The steps that will need to be taken after the PIA, such as implementation of recommendations and arrangements for ongoing monitoring
  ▪ Any changes to this process to be advised by the project manager (Dallas Pearce)

3. Describe the project

The project at hand is a key component of the Agrifutures EvokeAg event. A fundamental component of this event is the Startup Alley initiative which sees new and emerging businesses showcasing their business models in the hope of gaining exposure and investment. There is also a judging component to decide on the most exciting startup at the event.

The EvokeAg team has sought out a platform which will enable a central location for both the startups and the judges to interact. Dallas Pearce has decided on the web application called www.Gust.com, Gust will allow the the startups to store their information in a standardised format through a questionnaire. Judges will then be able to login and assign a score to each of the startups.

The main privacy risk deemed to arise from this project is that there is a small element of personal information being provided by the startups to the platform, of which Agrifutures does not have any control over.

4. Identify and consult with stakeholders

There has already been a degree of consultation with the team behind the EvokeAg event and Startup Alley, however more may be required to gain more specific information on the collection process of the project and any other potential phases where there is uncertainty around the use of the data.

Email consultation was performed by Dallas Pearce who is the project manager for this event. The consultation was to clarify details on the exact data being collected and the process as to how it was collected.

5. Map the personal information flow

![Diagram of personal information flow]

- Customers add their own data to Gust.com
- Judges view the customers data through Gust.com
Customer Information Collected

- Full Name
- Mobile Phone Number
- Email Address
- Gender
- City

How it will be stored
- Gust.com storage?

What the personal information will be used for
- Used as a way to identify the ownership of a business to the judges

Whether the personal information will be routinely disclosed
- The personal information will only be disclosed to the judges when they are judging the businesses

How individuals will be able to access and amend their personal info
- Through the Gust website

6. Identify the privacy impacts

Risk 1: The main risk involved is the data is dealt with by an external party of which Agrifutures does not have visibility over. More specifically Gust hosts its data overseas which may create additional risks.

Risk 2: Originally there was an IP component of the questionnaire which required the startups to disclose if they had IP and what it roughly entailed. This has since been removed.

7. Identify options to address the privacy risks

Risk 1: (Action 1) – Agrifutures can provide a disclaimer that states that the data being held will be subject to the guidelines provided by Gust.com, which is a fully GDPR compliant entity

Risk 2: (Action 2) – The IP component of the data has since been removed from the data being captured.

Dealing with Risk

Risk Matrix
8. Respond and review

This PIA will be revisited in the future to reassess the Privacy Impact and Recommendations, particularly if there is major changes to the project, requiring additional privacy recommendations.

Document Information

Date PIA completed: 17/6/2019
Status: Waiting for Review
Prepared by: Gerard McTaggart
Position: Systems Coordinator
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Endorsement and approval PROJECT MANAGER

I recommend the project proceeds as proposed in this document.

Name: Dallas Pearce
Position: Special Projects Manager
Signature: [Signature]
Date: 19/06/2019

Endorsement and approval PRIVACY OFFICER

I agree to the project proceeding as proposed in this document.

Name: Louise Heaslip
Position: General Manager Corporate
Signature: [Signature]
Date: 17-6-19