**CHECKLIST 5 – Automated individual decision-making and profiling**

To comply with the GDPR...

☐ We have a lawful basis to carry out profiling and/or automated decision-making and document this in our data protection policy.

☐ We send individuals a link to our privacy statement when we have obtained their personal data indirectly.

☐ We explain how people can access details of the information we used to create their profile.

☐ We tell people who provide us with their personal data how they can object to profiling, including profiling for marketing purposes.

☐ We have procedures for customers to access the personal data input into the profiles so they can review and edit for any accuracy issues.

☐ We have additional checks in place for our profiling/automated decision-making systems to protect any vulnerable groups (including children).

☐ We only collect the minimum amount of data needed and have a clear retention policy for the profiles we create.

As a model of best practice...

☐ We carry out a DPIA to consider and address the risks before we start any new automated decision-making or profiling.

☐ We tell our clients/customers about the profiling and automated decision-making we carry out, what information we use to create the profiles and where we get this information from.

☐ We use anonymised data in our profiling activities.

To comply with the GDPR...

☐ We carry out a DPIA to identify the risks to individuals, show how we are going to deal with them and what measures we have in place to meet GDPR requirements.

☐ We carry out processing under Article 22(1) for contractual purposes and we can demonstrate why it’s necessary.

OR

☐ We carry out processing under Article 22(1) because we have the individual’s explicit consent recorded. We can show when and how we obtained consent. We tell individuals how they can withdraw consent and have a simple way for them to do this.

OR

☐ We carry out processing under Article 22(1) because we are authorised or required to do so. This is the most appropriate way to achieve our aims.

☐ We don’t use special category data in our automated decision-making systems unless we have a lawful basis to do so, and we can demonstrate what that basis is. We delete any special category data accidentally created.

☐ We explain that we use automated decision-making processes, including profiling. We explain what information we use, why we use it and what the effects might be.

☐ We have a simple way for people to ask us to reconsider an automated decision.

☐ We have identified staff in our organisation who are authorised to carry out reviews and change decisions.

☐ We regularly check our systems for accuracy and bias and feed any changes back into the design process.

As a model of best practice...

☐ We use visuals to explain what information we collect/use and why this is relevant to the process.

☐ We have signed up to [standard] a set of ethical principles to build trust with our customers. This is available on our website and on paper.