



# **GDPR Data Protection Impact Assessment**

April 2024

The GDPR states several rights for individuals that must be maintained by organizations. The GDPR states that a Data Protection Impact Assessment (DPIA) must be carried out because this type of processing is considered high-risk. This assessment is used to show that EBSCO Stacks (Stacks) have identified and assessed what those risks are and how they will be addressed.

## Sources

As per the DPIA, Stacks has defined the current sources of personal data as the following:

1. Stacks Internal Users - Stacks has full control of data and is the owner of the data.
2. Integrated User Details - Stacks integrates data in real time via trusted services provided by other vendors. All security specified protocols are followed. Stacks does not retain this data beyond the session and is not the owner/controller of the data.
3. Automated individual decision-making including:
  1. Product newsletter;
  2. Microsoft Teams registration;
  3. Support Portal registration.

## Lawful Basis - Legitimate Interests

Stacks has determined that the Lawful Basis for the processing of personal data as outlined in the above sources, should be classified as 'Legitimate Interests'. This is defined by the GDPR as, "*...the use of people's data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing.*"

Stacks has taken the appropriate steps to ensure that Users are aware of these details in the Privacy Policy and can 'object' to the collection of personal information.

Stacks does not make decisions with data; we only provide qualified access.