

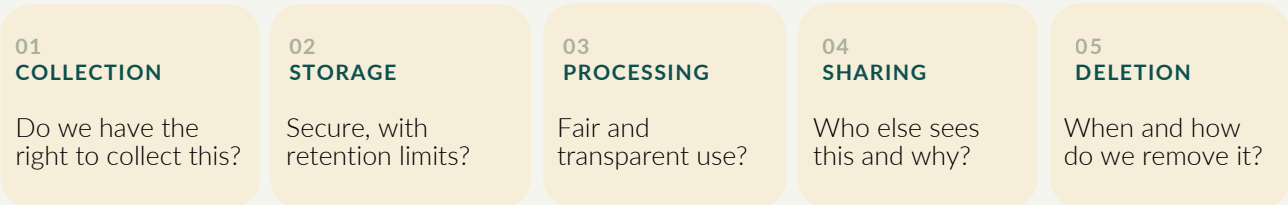


ACUITY DATA

Data Ethics

Implementation Guide

The Data Ethics Lifecycle



Golden rule: At each stage, ask, just because we *can* do this, should we?

Phase 1 – Data collection

CONSENT Freely given, specific, and informed	CONTRACT Necessary to fulfil an agreement	LEGAL OBLIGATION Required by law
VITAL INTERESTS Protecting someone's life	PUBLIC TASK Performing official functions	LEGITIMATE INTERESTS Must pass balancing test, most abused basis

DATA MINIMISATION <ul style="list-style-type: none"> <input type="checkbox"/> List every data point collected, justify each one <input type="checkbox"/> Remove anything you can't map to a specific process <input type="checkbox"/> Prefer derived attributes (age verified) over raw data (DOB) 	MEANINGFUL CONSENT <ul style="list-style-type: none"> <input type="checkbox"/> Separate consent from T&Cs, no pre-ticked boxes <input type="checkbox"/> Plain language. Could a 14-year-old understand it? <input type="checkbox"/> Record when and how consent was given
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Phase 2 – Storage

SECURITY <ul style="list-style-type: none"> <input type="checkbox"/> Encryption at rest and in transit (TLS 1.2+, AES-256) <input type="checkbox"/> Role-based access controls, least privilege principle <input type="checkbox"/> Audit logs: who accessed what and when 	RETENTION LIMITS <ul style="list-style-type: none"> <input type="checkbox"/> Marketing data: 2 years from last interaction <input type="checkbox"/> Financial records: 6 years (HMRC requirement) <input type="checkbox"/> CCTV: 30 days unless incident occurs
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Phase 3 – Processing

PURPOSE LIMITATION <ul style="list-style-type: none"> <input type="checkbox"/> Document primary purpose at collection time <input type="checkbox"/> New use case? Check compatibility. If incompatible, get new consent <input type="checkbox"/> Test: would this use surprise the person? If yes, new consent required 	AUTOMATED DECISIONS <ul style="list-style-type: none"> <input type="checkbox"/> Inform individuals when solely automated decisions occur <input type="checkbox"/> Explain the logic; provide right to human review <input type="checkbox"/> Applies to: credit, recruitment, insurance, benefit eligibility
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Phase 4 – Individual rights

Subject Access 1 MONTH TO RESPOND Provide copy of data held, purposes, recipients, retention period, and their rights	Rectification 1 MONTH TO RESPOND Verify claim, correct if inaccurate, notify anyone you've shared data with	Erase 1 MONTH TO RESPOND Delete unless exception applies: legal obligation, contract, legitimate interests	Object 1 MONTH TO RESPOND Direct marketing: must stop immediately. Legitimate interests: stop unless compelling grounds
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Incidents – Data breach response WITHIN 72 HOURS

Step 1 CONTAIN Stop the breach from spreading	Step 2 ASSESS Evaluate risk to individuals	Step 3 REPORT Notify ICO if high risk to people	Step 4 NOTIFY Notify ICO if high risk to people
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Special category data – extra protections

Racial/ethnic origin	Political opinions	Religious beliefs	Trade union membership
Genetic data	Biometric data	Health data	Sex life/orientation

Requires one of the Article 9 conditions plus extra security measures, stricter retention limits, and a higher DPIA threshold. Avoid collecting unless absolutely necessary.

Ethics decision framework

01 Identify stakeholders	02 Name values in tension	03 Apply principles	04 Imagine the headline	05 Seek diverse perspectives	06 Document the decision
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Acuity Data conducts independent data ethics audits for UK organisations. Get your systems assessed before a regulatory inquiry does it for you.

<https://www.acuitydata.io/risk-governance>

As at April 2026

