

Section		Industry comment	
1	Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.	The CMA order and the modification are clear that access is to be provided to internet based PCWs/TPIs, so I think the PIA should be specific on this point. In the definition of PCW it stipulates that the definition PCW “means an internet based price comparison service or other internet based TPI that provides...”	Eon
1.2	4.1. Xoserve must give PCWs access to DES upon written request, and subject to the satisfaction of reasonable access conditions.	What mechanism will the PCW’s use and how will we be sure (evidence) they have the customer’s consent to access what is likely to be personal data (address and consumption data) – have the PCW’s completed a similar PIA to share with the energy sector over how they intend to comply with Privacy laws, including date stamping requests / lawful disclosure rules? e.g. such data could be useful to PCW if they were to keep it had the relevant permission from the customer, could contact the customer again with switch messages – can we preclude PCW’s from keeping any Xoserve data and make the responses yes and no to preserve our data but provide the responses needed?	BG
		As above. Perhaps the document would benefit from a definition section or glossary.	Eon
1.3	3. Also summarise why the need for a PIA was identified (this can draw on your answers to the screening questions).	It should make it clear that the data being provided is considered Personal Data under the DPA as the primary reason for the PIA.	Eon
2.1	Data available will be as listed below – Modification 0593 / iGT UNC Modification 095 creates the permission to release data to PCWs within Uniform Network Code (UNC) and iGT UNC, please note permission will be granted under a set of conditions being met by PCWs	They need to justify how the disclosure of data complies with GDPR e.g. consent / legitimate interests and how they will ensure the security of our data, inc retention deletion – as above if we can provide yes / no responses rather than disclosures of actual data, where that data is personal	BG
	Metering Point Address	Personal data with post code, post code is personal data in its own right	BG
	Annual Quantity	Consumption data is personal data	BG
	GT Id	you indicate in the description that this is a geographical relationship; however that is not the case for iGT Supply Points, whose identity doesn’t confer a location	Eon
	Contractual arrangements	Suggest that the Service Contract box is put between Xoserve and the PCW to remove any confusion. Confidentiality agreement – is that between each iGT and DNO and the PCW or is it between Xoserve and the PCW, in their role as CDSP?	Eon

	Use and deletion of personal data	I can't comment here on appropriateness. Appropriateness will be dependent on what actual data is disclosed, what we allow PCW's to do with that data, other than validate customer responses. If we allow PCW's to keep data, given it could be useful to them for other services, retention will need to be considered	BG
		Extra full stop at the end of para 1.	Eon
2.2	2. Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted, internally and externally? How will you carry out the consultation? You should link this to the relevant stages of your project management process	The PIA is not the sole responsibility of the workgroup, since the workgroup are only giving permission for the data to be accessed, Xoserve as providers of the service must also ensure that the service is provided in compliance with the DPA. Therefore they should consider their role in the PIA	Eon
3	Reporting around access and use of the data for its intended purposes is required i.e. auditing measures to ensure customer data is not misused	Is reporting a risk or is it there to mitigate inappropriate access risk?	BG
		Is auditing a risk or a mechanism to mitigate inappropriate use of data risk	BG
	Data related to those customer types mentioned within the CMA report should only be accessed, the solution should not provide unfettered access to all industry data including non-domestic data	Should there be a risk to data where the customer has not consented? How will this data be protected?	BG
		Non-domestic access – how will domestic and non-domestic be segregated...there is no explanation of how this risk is mitigated.	Eon
	Consumer consent and data accessed by PCWs should only be held by PCWs for no longer than reasonably required to comply with relevant legislation	Should this risk be monitored by GTs through audits?	BG
	Where any suspected misuse comes to the attention of the Transporters, then the Transporter has the right to cancel provisions	How will this be reported and to who? ICO, Shippers and GTs?	BG
4		Part four appears to be missing, or sections are misnumbered.	Eon
5	Risks	Should this be the DSC Change Management Committee or the DSC Contract Committee?	Eon

6.1	1. Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns which may arise in the future	Incomplete...but this should be CDSP	Eon
6.2	2. Contact point for future privacy concerns	Should this be CDSP Information Security Officer	Eon
General	Risks	<p>There were a number of risks identified by the mod responses, however the PIA hasn't fleshed out what they are and how they will be mitigated.</p> <p>For example: Risk 1 regarding audit issues – the scope of what will be audited should be more specific, so that it's clearer what the mitigation actions will be, to just state there will be monitoring is insufficient.</p>	Eon
	GDPR	Are there any additional risks presented by the new GDPR requirements?	Eon

	<p>It is difficult to identify the risks associated until sufficient detail has been given into the API solution, this includes understanding what auditable controls are in place and which system will be used. Modifications 0593 and iGT095 are only seeking to grant permissions to release gas domestic data to PCWs, therefore the modifications are not reliant on the solution. There is a timing issue as the PIA is dependent on the solution being developed in order to give parties reasonable confidence the intent of the Order will be met.</p> <p>We believe the service provider must be transparent with the developments of the solution in order to mitigate industry concerns. We recognise some parties wish to have visibility of the enduring solution prior to supporting the permission modifications but due to modification timescales we cannot see how this is achievable. We acknowledge the solution is yet to be developed and will be further discussed within the DSC Change Management Committee. It is suggested the PIA be sent to this forum for further development rather than via the modification workgroups, we note, the purpose of the modification work stream meetings is to develop and progress modifications related to code. The FMRs are due to be sent to the July Panels prior to being sent out for consultation, we acknowledge the ChMC meeting is on the 12th/13th July with the UNC Panel on the 20th July. It is therefore possible for the ChMC to conclude the PIA (on the provision the CDSP provide enough information on the enduring solution) and send to Panel for approval, alongside the FMRs.</p> <p>We do not feel we can give a view on section three of the PIA until we have visibility of what the API solution involves. It would be helpful if the ChMC had visibility of the contractual arrangements between the CDSP and the PCWs as this could give industry parties some confidence in ensuring the risks to privacy are alleviated</p>	Bu-uk
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