**Name of Person Completing Form:**

**Date:**

**College:**

**Department:**

| 1. **PROPOSED ACTIVITY**
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| What is the proposed processing activity? | [Provide a description of what activity is proposed, the purpose of the activity, the scope of personal information that will be processed (collected, used, processed, shared, deleted, or retained).] |
| What personal information (PI) is involved? | [List what specific PI data elements are involved] |
| Is sensitive personal information (SPI) is involved?  | [Y/N – if yes, indicate all that apply:biometrics, religious beliefs, specific identities, medical health, financial accounts, location information, personal information of minors under 14, other?] |
| Who are the affected individuals?  | [List whose PI/SPI is being processed? Indicate all that apply: Students, Employees, Alumni, Donors, Patients, Research Subjects, Student applicants, Employee applicants, others?]. |
| Are there minors under 14 involved? | [Y/N – if yes, indicate how legal guardian consent will be collected] |
| Do these individuals merit special protection? | [Is there reason to believe that the PI or SPI will have a significant impact on the individual’s rights or interest (e.g., job prospects, educational opportunities, home purchases, or other major life events?] |
| How many individuals will be involved in the proposed activity? | [Approximate the number of individuals whose PI/SPI will be processed] |
| How is the personal information collected?  | [Describe the specific processes used to acquire the PI/SPI (e.g., via website or online form, social media, in person, by third-party collector, etc.)] |
| Is any of the PI/SPI being obtained from a Chinese State Organ (e.g., certain government hospitals or state-owned enterprises) | [Y/N – If yes, specify the Chinese state organ. Note that transfer of any PI/SPI from a Chinese state organ requires that a Security Assessment be completed by the State Cyberspace Administration prior to transfer] |
| How often will the processing activity take place?  | [Will this be a one-time event or an on-going activity? If on-going, how frequently will activity be done]  |
| How much PI/SPI will be processed? | [Provide an estimate of the quantity of PI/SPI that will be processed per year (e.g., number of individuals, and/or aggregate quantity of data)] |
| To whom will the personal information be disclosed?  | [List all parties to whom the PI/SPI will be disclosed, their location, and relationship to MSU] |
| Does the activity require the transfer of PI/SPI outside China (e.g., back to MSU or to collaborator at another non-PRC location)? How is transfer done? | [Y/N – If yes, describe the process by which PI/SPI is transferred out of PRC, where PI/SPI is transferred to, and who receives the PI/SPI and their role in the activity.] |
| What is the MSU business purpose for the processing activity?  | [Specify the specific reason that the proposed processing activity will be done and its relevance to business of the MSU] |
| How are the data subjects benefitted or harmed from the proposed activity? Do the benefits outweigh the harm?  | [Specify what benefit individuals receive from the processing activity. Is there a risk of harm? If yes, describe possible harm and whether benefits outweigh possible harm] |
| Do any third-parties benefit from the proposed activity? Are any harmed from the proposed handling? Do the benefits outweigh the harm?   | [Specify what benefit any involved third parties may receive from the processing activity. Is there a risk of harm? If yes, describe possible harm and whether benefits outweigh possible harm] |
| Does the public benefit from the proposed activity? Do the benefits outweigh the harm?  | [Specify what benefit the public may receive from the processing activity. Is there a risk of harm? If yes, describe possible harm and whether benefits outweigh possible harm] |

| 1. **JUSTIFICATION/RATIONALE FOR PROPOSED ACTIVITY**
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| Why do you need to handle each category of personal information? | [For each type of PI/SPI data element (e.g., name, date of birth, IP address, etc.), specify why that data element is required to achieve the proposed activity purpose] |
| How long will the personal information be retained? And why do you need to keep the personal information that long? | [State for how long PI/SPI will be retained and provide rationale for the retention time needed] |
| What is the legal basis (justification) for the processing activity? | [Specify the legal basis for processing activity: 1) consent, 2)performance of a contract, 3)performance of statutory duties or obligations, 4)necessary for public health emergency or protection of life, health, and property safety of individual, 5) to carry out activities such as news reporting and supervision by public opinions for the public interest, 6) PI was disclosed by individuals themselves or other legally disclosed PI is processed within a reasonable range in accordance with laws and administrative regulations, or 7) circumstances provided by laws and administrative regulations |
| How do you ensure the personal information remains accurate?  | [Specify what security measures are in place to ensure the integrity and accuracy of the PI/SPI] |
| How do you disclose to people that you are collecting their PI/SPI and how you will use their personal information? | [Describe how notice is given to individuals whose PI/SPI will be processed and what information is provided to them regarding how their PI/SPI will be used] |
| How do you collect consent? | [Describe process of obtaining consent from individuals, who will be obtaining consent from individuals, and how consent will be documented. Describe how individuals can withdraw consent and how you notify and re-consent individuals if there are any processing changes] |
| How do you collect and process data rights requests?  | [Describe process for responding to requests from individuals to copy, consult, edit, supplement, transfer, restrict access or delete their PI/SPI] |
| What training is provided to MSU personnel who will be involved in the activity regarding data protection requirements? | [Describe training provided to all MSU personnel who will be involved in the activity regarding data protection requirements.] |
| Will your activity involve any Entrusted Parties (i.e., vendors, agents, partners) that are processing PI/SPI on behalf of MSU? | [Provide a list of any third-party vendors, collaborators or partners that will be involved in the activity and detail their specific role in the activity. Note if any of them have been used by MSU as an Entrusted Party in the past.] |
| Does your activity involve you (MSU) acting as an Entrusted Party on the behalf of a Third Party? | [Provide a list of the third party on whose behalf you (MSU) will be acting as an Entrusted Party for this activity and detail what your specific role is. Note if you have worked as an Entrusted Party for this third party in the past and if a contract is already in place. |
| Do you have contract addenda in place with the Entrusted Parties (i.e., vendors, agents, partners) regarding additional data security requirements? | [State whether or not there are contract addenda drafted or executed with Entrusted Parties who are working for MSU or Third Party] |
| How do you ensure the Entrusted Parties (i.e., vendors, agents, partners) follow the law? | [Describe process for ensuring that Entrusted Parties (i.e., vendors, agents, partners] involved in the activity are ensuring compliance with the contract, and the laws and regulations relating to data protection.] |
| Will your activity involve any Joint Handlers (i.e., vendors, agents, partners) that are jointly processing the same PI/SPI for their own purpose / own behalf? | [Provide a list of any third-party vendors, collaborators or partners that will be involved in the activity and detail their specific role in the activity. Note if any of them have worked with MSU as a Joint Handler in the past.] |
| Does your activity involve you (MSU) acting as a Joint Handler in conjunction with a Third Party who is leading the activity? | [Provide a list of the third party with whom MSU will be acting as a Joint Handler for this activity and detail what your specific activity will be. Note if any of them have worked with MSU as a Joint Handler in the past and if a contract is already in place.] |
| Do you have contract addenda in place with the Joint Handler (s) (i.e., vendors, agents, partners) regarding additional data security requirements? | [State whether or not there are contract addenda drafted or executed with Joint Handler(s) who are working with the MSU or Third Party] |
| How do you ensure the Joint Handler(s) (i.e., vendors, agents, partners) follow the law? | [Describe process for ensuring that Joint Handler(s) (i.e., vendors, agents, partners] who are jointly processing the same PI/SPI are ensuring compliance with the contract, and the laws and regulations relating to data protection.] |

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| 1. **SECURITY AND PRIVACY CONTROLS FOR PROPOSED ACTIVITY**
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| What specific security controls do you have to protect the personal information being handled? | [Describe specific security measures, both electronic (encryption, password protection) and physical (locks, key card access), are in place to ensure restricted access, confidentiality, integrity and accuracy of PI/SPI being processed]  |
| What security controls do you have to protect personal information generally? | [Describe all program level security controls, plans, etc used to ensure data protection including incident reporting, event logging, system configurations, restricted transmissions, and system backups, etc.]  |
| What organizational controls do you have to protect the personal information being handled? | [Describe all organization level controls in place used to ensure data protection including policies, processes, procedures, training, etc.]  |
| How would you rate the risks to the personal information? And how are you mitigating those risks? | [Are the security protection measures being proposed effective and appropriate to the degree of risk?] |

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| 1. **SUMMARY OF IMPACT ASSESSMENT – To Be Completed by Reviewer**
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| PROPOSED ACTIVITY | [Summary of processing activity proposed, the purpose of the activity, the scope of personal information that will be processed (collected, used, processed, shared, deleted, or retained).] |
| Are the privacy controls proposed on the personal information processing adequate? | [Y/N – If No, describe deficiencies found, needed remediation steps to allow processing activity to move forward] |
| Are the security controls proposed on the personal information processing adequate? | [Y/N – If No, describe deficiencies found, needed remediation steps to allow processing activity to move forward] |
| Overall, are there sufficient legal basis for the processing activity? | [Y/N – If No, describe deficiencies found, needed remediation steps to allow processing activity to move forward] |
| FINAL ASSESSMENT | * Proposed Activity Can Proceed
* Proposed Activity Can Proceed with additional measures implemented
* Proposed Activity Cannot Proceed
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