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| **Application to the Sandbox beta phase** |
| **Getting Started** |
| Please submit all completed applications to applysandbox@ico.org.uk, no later than midday **24 May 2019.**Please include all the information we need to assess your application within this Word document and mark up any sections that are confidential or commercially sensitive. Please do not use web-links or signpost to further information. By submitting this form you are certifying that the information you have provided is true and accurate and that you have the relevant authority to make this application.  |
| **Your organisation’s details** |
| **What is the name of your organisation?** | Please provide the full name of your organisation (and any relevant trading or legal entity names relevant to this application) and any unique identifier such as your Companies House number or Charity Registration number, where relevant. |
| **What is your registered address?** |  |
| **Where is the team developing your product or service based (if different from above)?** | Please provide the address. |
| **Who is your authorising senior manager?**  | This is the person who has authorised your organisation to make this application. They must have appropriate decision making powers within your organisation. This may be your DPO, SIRO, CEO or relevant Director with responsibility for the product/service. Please provide their full name(s), job title and contact details. |
| **Who is your Sandbox Single Point Of Contact (SPOC)?** | This is the person you want all correspondence regarding your application to be directed to.Please provide their full name(s), job title and contact details including email address. |
| **What is your organisation’s website URL?** |  |
| **What is your ICO registration number?** |  |
| **Have you reported any incidents, or had any enforcement action taken against you initiated by the ICO in the last two years?** **If yes, please provide brief details, and if possible include the date the matter was reported and the ICO reference number.** | Having enforcement action or reported incidents taken against your organisation is not a bar to entry to the Sandbox. However we will need to consider the severity of the action or incidents, and the relevance of the issue to this application. |
| **Are you a micro, small or medium-sized enterprise/organisation?** | Please use the following guide: micro = 1-9 employees; small = 10-49 employees; medium = 50-249 employees. |
| **Do you employ or are you in anyway associated with former ICO staff?****If yes, please explain the role of the former ICO staff member and whether they are expected to have any contact or dealings with the ICO during the Sandbox.**  | For example spouses, partners, children and parents, business partners, employers, managers, directors as per the terms and conditions. |
| **Do you employ any staff who are related to or are in anyway associated with an ICO staff member?****If yes, please explain the role of the staff member and whether they are expected to have any contact or dealings with the ICO during the Sandbox.**  | For example spouses, partners, children and parents, business partners, employers, managers, directors as per the terms and conditions. |
| **Your product or service** |
| **What product or service do you wish to participate in the ICO Regulatory Sandbox?** | Please include a full description of the personal data your product or service uses.As far as possible, please explain your product or service in plain English, without the use of unexplained jargon or industry-specific acronyms.  |
| **What do you consider to be the lawful basis for the processing in your proposed innovation?** | Please reference Article 6 and Article 9 (if required) of the GDPR in your response. And refer to our [guidance](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/) as necessary.  |
| **What are the specific data protection issues you are dealing with that mean your product needs to enter the Sandbox?** | If possible please refer to the specific provisions of GDPR/Data Protection Act 2018 that are relevant and indicate if any of the following DP challenges are relevant: * Use of personal data in emergent or developing technology such as biometrics, internet of things, facial recognition, wearable tech, big data, cloud-based products.
* Complex data sharing at any and all levels.
* Building good user experience and public trust by ensuring transparency, clarity and explainability of data use.
* Perceived limitations, or lack of understanding of GDPR/DPA18 provisions on automated decision making, big data, machine learning or AI.
* Utilising existing data (often at scale and in linking data) for new purposes or for longer retention periods.
* Building privacy by design into product development taking account of cost issues and difficulties of doing this until testing has been undertaken.
* Ensuring the security of data and identifying data breaches in complex and innovative environments.
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| **Will your product or service process personal data within the UK?** | **Y/N** |
| **Will your product or service process special category data? If yes, please specify.** | **Y/N** |
| **Does your product or service involve any form of international data transfer? If yes, please specify.** | **Y/N** |
| **Is your product or service likely to result in a high risk to the rights and freedoms of individuals? If yes, please specify.**  | **Y/N**Please ensure you refer to [ICO guidance about Data Protection Impact Assessments](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/), when answering this question. We will expect you to be undertaking a DPIA if you are developing a product or service of this nature.  |
| **How is your product or service innovative?**  | We will interpret innovation broadly as any new idea, device or method, including new approaches to achieving existing objectives.Use any qualitative or quantitative measures as appropriatePay particular attention to explaining in what way the idea, device or method is sufficiently different to previous approaches to be considered innovative. |
| **How and to what extent will your product or service benefit the public?** | We will interpret public benefit broadly to encompass any demonstrable positive benefit to the public with no form of benefit being more valued than any other (e.g. health and wellbeing or financial). We also consider public benefit to cover business benefit in terms of ‘back-office’ solutions; however care needs to be taken to ensure that the ultimate benefit to the public is articulated (e.g. in efficiency savings). In assessing public benefit we will consider the potential depth (the amount of benefit experienced) and breadth (the volume of people benefiting) of your product or service using the criteria indicators provided alongside the other criteria and factors listed. Please use any qualitative or quantitative measures as appropriate.Particular attention should be given to explaining the extent of benefit realised 1) as a direct result of sandbox participation or 2) should the product/service be successful post-sandbox.Products/services need not be both broad and deep in their benefit to be considered. |
| **Does your product or service require any other form of regulatory authorisation to proceed? Or are there any other regulatory implications that we need to be aware of?** **If yes, provide information on its current status and/or what these implications are.** | You remain responsible for complying with any other legal and regulatory obligations |
| **Your proposed Sandbox plan** |
| **What activity do you want to undertake in the ICO Sandbox?** | Please describe what specific activity you want to undertake in the Sandbox, referring to both advisory assistance and adaptive mechanisms (e.g. statement of regulatory comfort upon exit). We will design and agree further Sandbox mechanisms with you, if you are successful, in your bespoke Sandbox plan. |
| **Do you want to undertake any form of testing involving ‘live’ personal data as part of your sandbox participation?** **If yes, provide details and how you will control any risks to data subjects.** | If you wish to include live testing in your Sandbox participation we will require you to provide assurance to us that you have mitigated risks before processing can start. Please read the ICO’s guidance regarding [Data Protection Impact Assessments](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/) for further information. Live testing will only be considered in relation to data subjects based in the UK.  |
| **What is your proposed timeline and the key milestones of your proposed participation in the Sandbox?** | Although the Sandbox beta phase ends in September 2020, there is no requirement for your participation to last up until this date. We are equally interested in short engagements.  |
| **What are the key risks to data subjects of your involvement in the sandbox?**  |  |
| **What control mechanisms will you use to prevent harm to data subjects?**  |  |
| **What actions will you take in the event of a control mechanism failure and in particular in case of any breach?**  |  |
| **What is your proposed exit plan if it is unsuccessful (i.e. there is a technological failure)?**  | Please describe how you will end your participation, if needed. |