

GOVERNED TEMPLATE RENDERING REFERENCE: PRIVACY IMPACT ASSESSMENT DEFAULT V2 (DRAFT)

definition 32e49429...f41f

PRIVACY IMPACT ASSESSMENT · PROJECT ARTIFACT

SPECIRA

Privacy Impact Assessment: Dispatch Modernization

Meridian Field Services: instructional example, not project evidence

DRAFT · WATERMARK POLICY: DRAFT_ONLY

template privacy_impact v2 · pack: specira_default_delivery

the attachment the classification's DPIA summary cites · harm to the person is the lens

§1 Impact Assessment

mandatory

1 decision

1 evidence rule

validators: screening_result_cited_from_classification_register ·
every_risk_framed_as_harm_to_data_subject_not_company ·
residual_risk_has_named_signoff_owner ·
worker_representative_consultation_recorded_where_monitoring

The classification register ran the trigger test and cites this document as its attachment. Every risk row names harm to a PERSON; the lens inverts here.

Screening handshake: the trigger test FIRED on systematic monitoring of workers ([impact assessment](#)^[1]); this document is the attachment that summary cites.

Processing description, by citation: continuous technician location during shifts ([RESTRICTED](#) , 30-day purge; basis: contract performance and legitimate interest, per [labels · retention · consent](#)^[1]); override telemetry ([CONFIDENTIAL](#) worker-conduct records with the employment-notice discipline).

Necessity: dispatch cannot assign on proximity without positions; nothing less intrusive suffices. Zone-only precision was evaluated and fails the assignment use case (the walked alternative recorded in [ADR-6 context](#)^[2]). **Proportionality, designed in:** the 30-day purge, band-level display off dispatch surfaces, no off-shift tracking, the anonymized-code boundary at the model gateway ([SR-014](#)^[3]).

Id	Harm: to whom, what	Severity	Mitigations (cited)	Residual
R-S1	A technician's movement patterns re-identified → loss of control over personal data	possible · high (the project scale ^[4])	SR-033 , SR-034 ^[3] + the purge; threat row TM-07 ^[4] , cross-cited both ways	rare · m
R-S2	Telemetry-driven discipline beyond the agreed monitoring purpose → unfair treatment	possible · moderate	The override-review purpose limit (BR-03 ^[5]) + the audit trail (SR-009 ^[3])	rare · m
R-S3	Chilling effect on work practices from felt surveillance → behavioral harm	possible · moderate	Meaningful notice, band display, the transparency question (open questions ^[6])	possible

Residual sign-off: N. Duval, July 15, 2026. **Prior consultation NOT triggered:** residuals sit below the high band after mitigation, stated with the scale citation. **Consultation record:** privacy officer consultation documented July 12; worker-representative consultation, the union co-signature review, in flight, due August 8 ([shared thread](#)^[3]); the assessment is *conditional-complete until it lands, and says so*. **Reopening triggers:** off-shift tracking ever proposed; a new recipient; precision below band level; the model boundary changing.

§2 Cross-Border Transfer Assessment

conditional · OMITTED, with rationale

1 decision

1 evidence rule

validator: every_cross_border_transfer_has_mechanism_and_destination_law_assessment

Omission note: "cross_border omitted: processing is single-region; the classification register's cross-border record carries the claim and its re-run trigger (cross-border^[1]). No transfer exists to assess; the trigger re-runs if a processor outside the region joins the integration register (register^[7])."

§3 Data Subject Rights

mandatory 1 decision 1 evidence rule

validators: every_right_has_intake_sla_and_verification · no_right_declared_without_mechanics · deletion_vs_retention_precedence_cited

Rights carry mechanics before they are declared supported: the answer the intake team gives is written before the first request arrives. Staff are the subjects; the worker context is the default here.

Right	Intake	Verification	SLA
Access	The HR service portal's named request form	Employee SSO session, proportionate: the requester is authenticated staff	30 days; one 60-day extension with notice
Rectification	Roster errors route to the HR directory, the system of record (<u>INT-5^[7]</u>); this system corrects by sync, stated so the intake team routes right		
Erasure	The precedence law applied (<u>retention rules^[1]</u>): positions purge at 30 days regard (often the request is already satisfied); assignment records resist erasure under cc clause 14 and active holds; the written answer lives in the fulfillment pack (<u>rights runbook^[8]</u>)		
Portability	Not applicable to employment-context monitoring data under the governing regime as a claim with counsel's citation		
Objection	Routes to the representative channel (the union process) plus the individual grievance path; monitoring-purpose objections land with N. Duval		

Worker-context note: every right above names its worker-facing channel; the representative channel exists and is cited, not implied.

§4 Open Questions

mandatory

1 decision

Question	Owner	Answer by	Blocks
Does the union co-signature review change the notice text only, or also the objection path's routing? (Two rows depend on one answer.)	N. Duval	Aug 8, 2026	The consultation record's completeness and R-S3's revisit wording

Refs References & Package Contents

In this export package

package [8] Rights runbook: the fulfillment pack with written answers ./compliance/rights-runbook.pdf

In the Specira workspace

specira [1] Data classification: the trigger test + DPIA summary this document attaches to; labels, retention, consent, cross-border app.specira.ai/projects/dispatch-modernization/artifacts/data-classification

specira [2] Decision log: ADR-6 context (the walked zone-precision alternative) app.specira.ai/projects/dispatch-modernization/artifacts/decision-log#adr-6

specira [3] Security requirements: SR-009, SR-014, SR-033, SR-034; the shared union thread app.specira.ai/projects/dispatch-modernization/artifacts/security-requirements

specira [4] Threat model: TM-07 (the threat side), the anchored scales app.specira.ai/projects/dispatch-modernization/artifacts/threat-model

specira [5] Business rules: BR-03 override reason (the purpose limit) app.specira.ai/projects/dispatch-modernization/artifacts/business-rules#br-03

specira [6] Observability: the dashboard transparency question app.specira.ai/projects/dispatch-modernization/artifacts/observability-monitoring#questions

specira [7] Integration inventory: INT-5 system of record; the register the trigger watches app.specira.ai/projects/dispatch-modernization/artifacts/integration-inventory