

Personally, I had expected the document to be more helpful when it comes to carrying out a DPIA. In the end, it comes across as a simple checklist to be filled in, but it does not actually assist in doing so.

A list of minimum risks and mitigating measures to be considered would have been extremely helpful. Nor does the document provide any methodology for assessing the level of risk, instead merely referring to guidelines already issued by supervisory authorities, which are precisely the problem because they are not practical.