

The comments provided on the DPIA template primarily concern its structure, internal consistency and practical applicability. While the template is recognised as comprehensive, several elements could be improved to enhance usability and alignment with established DPIA practices.

First, the overall structure of the template is not always considered logically sequenced. The current layout requires detailed information, such as personal data categories and involved parties, at an early stage, whereas in practice such information often becomes available only after the processing activities have been fully mapped. A more process-oriented approach is therefore recommended, starting with a clear description of processing steps and subsequently addressing detailed elements such as data categories, purposes and roles.

Second, the template contains a degree of duplication and fragmentation. Similar information, including personal data, purposes, retention periods and compliance measures, is requested across multiple sections. This may lead to inefficiencies and inconsistencies. Consolidating related elements, for instance by integrating data categories, purposes and retention periods within a single process-based overview, would improve clarity and coherence.

Third, concerns are raised regarding the alignment of the template with practical DPIA processes. In particular, the template appears to assume a linear and fully predefined assessment, whereas DPIAs are typically iterative and evolve as more information becomes available. Certain fields, such as those relating to the identification of controllers or versioning of the processing, may therefore be difficult to complete at the outset.

Fourth, the template is currently more suited to new processing activities than to existing ones. It provides limited guidance for situations where existing processing operations evolve and may increase in risk, or where previously unassessed processing may require a DPIA. A clearer distinction between different scenarios (new processing, modified processing, and existing processing) would improve its applicability.

Finally, several terminological and conceptual clarifications are suggested. Certain formulations, such as those relating to Article 9 GDPR, could be reconsidered to better reflect the legal framework. In addition, some sections, particularly those addressing compliance measures and necessity and proportionality, appear to overlap or lack clear differentiation.

In conclusion, it is recommended to revise the template to ensure a more logical, process-driven structure, reduce duplication, better reflect the iterative nature of DPIAs, and clarify specific legal and methodological concepts.