

EDPB DPIA Template: L'Oréal's Answers to Consultation Feedback



INTRODUCTION

On 14 April 2026, the European Data Protection Board (EDPB) adopted a [DPIA template](#) (the “**Template**”) and an accompanying explainer document, open for consultation until 9 June 2026 via [this form](#).

The present document provides L'Oreal's suggested improvements on this EDPB template.

CONSULTATION FEEDBACK

Points for Submission to the EDPB

- **Mandatory EU Standard.** Make this EDPB template the mandatory standard across the EU. Otherwise, companies will continue to use their local authorities' templates, which prevents harmonization.
- **DPIA Scope (Purpose vs Project)** Clarify whether DPIAs should be conducted per purpose or per project. Assessing by purpose leads to unclear evaluations and difficult action plans follow-up. In practice, companies increasingly need to perform DPIAs on a project-by-project basis.
- **Simplify and Avoid Redundancy.** Keep the template as short and simple as possible. Merge overly detailed sections to avoid redundancies (for example, Sections 1.2 and 1.3).
- **AI-Readiness and Usability.** Ensure the template is AI-readable and easy to complete based on direct discussions with business teams.
- **Data Quality section.** Clarify the meaning of "Data quality metrics" (Section 2.2.b). Please specify if this refers to regular data updates or other criteria.
- **Standardized Risk Library.** Provide a standardized risk library and evaluation methodology to help companies align and simplify their risk assessments.
- **DPIA / LIA / FRIA Interaction.** How to manage potential overlaps? Is the consolidation of both in one single document planned? Is a cross reference expected to avoid redundancies?

Thank you!

