



**Digital
Business
Ireland**

Submission to EDPB on DPIA Template

8 June 2026

Introduction

Digital Business Ireland is the leading and most active voice for Ireland's digital and ecommerce sectors. Digital Business Ireland represents over 8,000 members from multinationals to Irish SMEs, and experts in law and academia.

Digital Business Ireland's mission is to accelerate the digital transformation of businesses in Ireland and drive the growth of Ireland's digital economy.

Over the past year, DBI has engaged with the Irish Data Protection Commission (DPC) on the need to provide enhanced, accessible guidance to Irish SMEs on achieving compliance with data protection law, including hosting a webinar for SMEs at which DPC presented.

Feedback on DPIA Template

DBI welcome the publication of the DPIA Template Explainer and support the EDPB's objective of promoting greater consistency and quality in DPIAs across the EEA.

The explainer is well-structured, closely aligned with the DPIA template, and provides valuable guidance on the information expected within each section. It is likely to be highly useful for organisations with dedicated privacy expertise and should contribute to more consistent and higher-quality DPIAs.

From an SME perspective, however, there is an opportunity to further improve accessibility and practical usability. Many SMEs do not have a Data Protection Officer, privacy specialist, or in-house legal support. While the explainer explains what information is required, it does not always provide sufficient support for users who are unfamiliar with data protection terminology or the practical application of DPIA methodology.

The following recommendations are intended to strengthen accessibility for SMEs while preserving the rigour and consistency of the DPIA process.

1. Increase Use of Plain Language

The explainer necessarily relies on concepts such as "necessity and proportionality", "risks to rights and freedoms", "residual risk", and "safeguards". While familiar to privacy professionals, these terms may be challenging for SME users undertaking a DPIA for the first time.



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To improve accessibility, the EDPB could supplement technical explanations with plain-language descriptions and practical interpretations. For example:

- "Residual risk" could be described as the level of risk that remains after safeguards have been implemented.
- "Risks to rights and freedoms" could be illustrated through practical outcomes such as identity theft, discrimination, financial loss, exclusion from services, or reputational harm.

Short "What does this mean in practice?" text boxes and a consolidated glossary of key terms would help SMEs understand concepts without needing to consult additional guidance.

2. Include More Practical Examples

The explainer clearly describes the information required in each section of the template. However, many SME users are likely to understand the question being asked but remain uncertain about the level of detail expected in their response.

The inclusion of worked examples would significantly improve usability. Examples based on common SME processing activities could include:

- AI-assisted recruitment;
- employee monitoring technologies;
- CCTV systems;
- customer analytics and profiling;
- cloud-based HR or CRM systems.

Illustrative sample responses showing how to describe processing, identify risks, document mitigations, and justify conclusions would provide practical guidance and improve consistency in completed DPIAs.

3. Reduce the Cognitive Burden on First-Time Users

Completing a DPIA remains a complex exercise involving several interconnected assessments. SMEs may find it difficult to understand where to begin, how the various sections relate to one another, and how information developed in one section should inform later assessments.

The explainer could be strengthened through additional process-oriented guidance, including:

- a visual workflow showing the DPIA process from initiation to conclusion;
- signposting between related sections of the template;
- chapter summaries explaining the purpose of each stage;
- simple checklists identifying the minimum information required before progressing.

These additions would help users understand the DPIA as a structured process rather than a series of independent questions.



4. Additional Recommendations

To further improve SME accessibility, we recommend the EDPB consider the following supplementary resources:

(i) "Do I Need a DPIA?" Decision Tree

A simple decision tool would assist organisations in determining whether a DPIA is required before commencing the process. Practical examples of processing activities that generally do and do not require a DPIA would promote greater consistency and reduce uncertainty.

(ii) A Fully Completed Example DPIA

A model DPIA completed from start to finish would be one of the most valuable resources for SMEs. It would demonstrate the expected level of detail, show how risks and mitigations are linked, and provide a practical benchmark for organisations conducting their first DPIA.

(iii) Example Responses Throughout the Explainer

Short sample entries embedded within relevant sections of the explainer would help users understand how the guidance translates into completed DPIA content without significantly increasing the document's length.

Conclusion

The DPIA Template Explainer is a valuable and welcome resource that supports the EDPB's objective of improving consistency in DPIA practice across Europe. Its structure and content provide a strong foundation for organisations with privacy expertise.

To maximise its effectiveness for SMEs, the EDPB should consider supplementing the explainer with clearer plain-language guidance, practical examples, a DPIA decision tool, and worked case studies. These enhancements would not alter the underlying legal requirements but would make the resource significantly more accessible to organisations with limited privacy expertise, improving both the quality and consistency of DPIAs across the European economy.

Overall, the explainer is a strong foundation and, with relatively modest additions focused on usability and practical application, could become an exemplary resource for both privacy professionals and SMEs undertaking DPIAs for the first time.