

## Contribution to the EDPB Public Consultation

*Submitted on behalf of the Compliance Team supporting Greenvolt Energias Renováveis S.A. and Greenvolt Power Group Sp. z o.o.*

In response to the EDPB's consultation, the Compliance Team of the above entities proposes a focused set of eight templates and frameworks that, in our assessment, would provide the highest operational value for organisations across the EU. These proposals reflect practical compliance challenges observed in cross-border energy operations and were selected based on feasibility, market relevance and alignment with GDPR's accountability and risk-based approach.

*T (Template): a fully standardised, ready-to-use document with predefined fields and structure.*

*F (Framework): high-level guidance or decision model that ensures consistency but must be adapted to each organisation's context.*

**Multi-layer Privacy Notice Templates (T)** A harmonised, multi-layer format for customers, employees and vendors would improve transparency and reduce inconsistencies between Member States, supporting organisations of all sizes.

**Enhanced ROPA for Controllers and Processors (T)** Article 30 records remain highly fragmented. A standardised EU-level template with predefined fields would strengthen accountability, comparability and audit readiness.

**Legitimate Interest Assessment Template (T)** Organisations apply the balancing test inconsistently. A structured EDPB-approved template would enhance clarity and ensure uniform application of Article 6(1)(f).

**Transfer Impact Assessment Methodology (F)** Post-Schrems II, assessing third-country risks is one of the most challenging areas of compliance. A harmonised methodology would bring clarity and proportionality while allowing necessary flexibility.

**EU International Transfer Decision Tree (F)** A unified decision flow covering adequacy, SCCs and derogations would reduce misinterpretations and support a more consistent application of Chapter V GDPR.

**DPIA Pre-Assessment / Privacy by Design Checklist (T)** A practical early-stage tool would support teams in identifying when a DPIA is required and in integrating privacy-by-design principles from the outset.

**DSAR / Data Subject Rights Handling Playbook (F)** With increasing DSAR volumes, organisations need high-level operational guidance to ensure timely and consistent handling of access, erasure and portability requests.

**Data Breach Response Essentials Kit (F)** A harmonised severity matrix and response checklist would help organisations manage incidents effectively and ensure timely, compliant notifications.