

We welcome the public consultation organised by the EDPB regarding the series of the ready-to-use templates for organisations that the Board is going to develop. We are grateful for the opportunity to provide the feedback.

We would like to express interest in the elaboration of the following templates: Legitimate Interest Assessment (LIA), Transfer Impact Assessment (TIA), joint controllership arrangement, privacy and/or cookie policies, as well as checklists or interpretative grids that can be used for assessing pseudonymisation and anonymisation techniques.

First in connection with the development of a LIA template, relying on legitimate interest requires a careful and well-substantiated balancing exercise, demanding robust justification. This legal basis becomes even more important as organisations engage more and more often in new technologies such as artificial intelligence. Providing a template that supports this assessment would help ensure that individuals' rights remain properly protected.

Second, as many companies routinely transfer personal data outside the EU, a structured, voluntary TIA template would be extremely helpful given the challenging nature of these transfers and the extensive assessments required before they can take place.

Third, a practical guidance or decision tree for elaborating joint controllership arrangement would be highly beneficial - as organisations often struggle to clearly allocate respective roles and responsibility.

Fourth, we also see significant value in developing templates for privacy policies and cookie policies, as these widely used user-facing notices are used by organisations of all sizes, including SMEs. Clear, user-friendly templates could help many companies provide more accessible and transparent information to data subjects, ultimately supporting better understanding of how personal data is processed. It might also be interesting if the EDPB considered proposing a set of standardized icons, a similar initiative had already been promoted by the Italian Data Protection Authority.

Finally, due to the complexity surrounding the interpretation of pseudonymised and anonymised data, practical tools such as checklists or interpretative grids that can provide legal certainty when assessing the effectiveness of pseudonymisation and anonymisation techniques would be of a great importance for organisations of all sizes.

For all templates suggested above, we strongly encourage the EDPB to organise dedicated stakeholder consultations. Early dialogue with organisations and practitioners would help ensure that the templates are practical, proportionate, and aligned with operational realities. Experiences shared at national level also show that consultation can greatly improve the usability of such tools.

Additionally, due to the case-by-case approach required by the GDPR, the templates elaborated by the EDPB should remain non-binding soft-law instruments that organisations may use or adapt as appropriate, rather than prescriptive formats.

Thank you for your consideration.