

Dear EDPB,

Thank you for the initiative and allowing to give public opinions.

While templates for privacy notices or the ROPA are commendable, many DPAs and the market produced a number of templates for these purposes. A standardisation is welcome on these points, but some more specific templates should be considered as well:

- A **legitimate interest assessment (LIA)** template should clarify compliance with EDPB Guidelines 1/2024. LIAs require even more effort than setting up a ROPA and practices are very diverging per Member State. For example, the ICO has an easy-to-use, sector-neutral [sample LIA template](#). An EDPB template could have more guiding questions on the practicalities, e.g. *"How can you delete the data subject's data when requesting the right to object?"*, *"Do you consider your legitimate interest compelling?"*, *"How will you inform the data subject about the legitimate interest?"*. Instead of *"Would you be happy to explain the processing?"*, it could ask *"What would you communicate to the data subjects if they ask about your legitimate interests?"*.
- A **cookie policy template and a cookie banner design**. The policy could follow the structure of a privacy notice template, but with standardised explanation from EDPB on 1) what is a cookie, 2) what are the risks, 3) how to disable them (potentially with links to more detailed guides by EDPB), 4) any recommended tools, privacy enhancing technologies, browsers, extensions, etc.
- **Transfer impact assessments (TIAs)** should be heavily standardized. Current issues: 1) the content of TIAs can only be inferred from the Schrems II decision, 2) most DPAs do not offer guidance on this, 3) requires high effort similar to DPIAs, if not higher, due to the obligation to assess each third country's laws, 4) some organisations may have to fill more TIAs than DPIAs. Examples: [CNIL](#), [IAPP](#).
- **Template forms for data subjects** to exercise their rights, e.g. [AEPD](#) offers standardised forms for DSARs. This helps consumers on one hand, but also helps creating more streamlined processes for companies and guides them to recognize such request in a more uniform manner.
- **Control management plan template** for DPOs to check the effectiveness of privacy safeguards.
- **Data retention table template**, due to the limited guidance on storage limitation. This could help implementing the anonymisation or pseudonymisation guidelines.

Thank you for your consideration and efforts for simplification.

Best regards,

Individual contributor with DPO experience