

## **Standardized Technical and Organizational Measures for Data Processors: A Practical Solution for SMEs**

Small and medium-sized enterprises across Europe regularly engage external service providers for tasks involving personal data processing, such as event management, customer relationship systems, cloud services, or IT support. Under Article 28 GDPR, these arrangements constitute data processing agreements requiring SMEs to carefully select processors, assess their technical and organizational measures, and continuously monitor compliance.

This regulatory obligation presents significant challenges for SMEs. Many lack the technical expertise required for comprehensive assessments, and the diversity of IT systems and services would theoretically necessitate individual, thorough evaluations for each processor. Given limited resources and competing priorities, this burden often proves overwhelming and creates legal uncertainty.

I propose developing standardized minimum criteria for technical and organizational measures that data processors must meet and demonstrate. These would comprise tiered catalogs reflecting different levels of data sensitivity—from basic contact information to special categories of data such as health records. Such standardization would provide SMEs with clear, actionable benchmarks while maintaining appropriate protection levels.

The practical benefits are substantial. SMEs could incorporate these criteria directly into service specifications and procurement processes, requiring vendors to demonstrate compliance from the outset. This approach would largely eliminate or significantly simplify the otherwise necessary case-by-case assessments, dramatically reducing administrative burden. For businesses operating across multiple EU member states, harmonized templates would prevent duplicative compliance efforts and reduce costs.

Moreover, standardized criteria create a level playing field: service providers gain clarity about expectations, enabling them to invest efficiently in appropriate measures. SMEs benefit from increased legal certainty, reduced liability risks, and simplified vendor management. The templates would be particularly valuable for businesses without dedicated data protection staff, effectively democratizing GDPR compliance.

By providing ready-to-use assessment frameworks aligned with proportionate risk levels, the EDPB would enable SMEs to fulfill their Article 28 obligations confidently and efficiently, transforming compliance from an overwhelming challenge into a manageable, structured process that protects both business interests and data subjects' rights.