

# Recommendations to the EDPB on the use of templates to facilitate GDPR compliance

[Workday](#), the AI platform for managing people, money and agents, submits these recommendations to the EDPB on the use of templates to facilitate compliance with the GDPR. Please contact Marco Moragón at [marco.moragon@workday.com](mailto:marco.moragon@workday.com) if you would like further information.

## Introduction

As the EU digital rulebook expands, regulatory consistency is essential. Standardised tools, when applied appropriately and consistently, can significantly reduce administrative friction and costs for businesses, while strengthening the application of foundational principles like Accountability and Transparency. Reflecting this shared goal of harmonisation, Workday welcomes the EDPB's [Helsinki Statement](#) and its actions to develop templates (e.g. for DPIAs and data breach notifications) to simplify GDPR application.

## Record of Processing Activities (RoPA)

Specifically, Workday supports a standardised template for the Record of Processing Activities (RoPA) under Article 30 GDPR, as its mandatory content is legally precise. This support is informed by valuable [guidance](#) from the Irish Data Protection Commission (DPC), which has noted difficulties many organisations face in producing a complete RoPA on request. A template could ensure regulatory minimums are met consistently by establishing a harmonised structure for administrative simplification.

We understand the DPC's concerns about using hyperlinks to internal documentation. However, linking to existing documentation can significantly save an organisation time without impacting privacy. We recommend that an EDPB template for RoPA **explicitly permit hyperlinks to internal documentation** (e.g., internal data retention schedules, risk mitigation plans, or security policies), so long as the organisation can easily present the information holistically to a regulator upon request. This avoids repetition and significantly eases administrative burden, while preserving the RoPA's central function as an index and accountability tool.

## Considerations for Large Enterprises

While we support the EDPB's development of standardised templates to facilitate compliance with the GDPR, the EDPB must also consider their limits, particularly for large enterprises. For example, any attempt to establish a standardised, generic template for privacy notices would hinder clarity. Privacy notices should be flexible and encourage the use of just-in-time notices and dynamic updates, such as:

- **Product-Specific Fact Sheets or Datasheets:** Openly publishing informative materials for enterprise customers provides clear, concise documentation of how AI models are developed, trained, and tested for specific product features.
- **Customer Dashboards and Configured Workflows:** These tools allow customers to monitor terms for specific features, subscribe to dashboards, and configure workflows to receive updates on data uses in a consistent, up-to-date fashion.

For this reason, we would not support a mandated template for granular use cases to be spelled out in a static privacy policy or public notice when more effective mechanisms are commonly used in enterprise customer relationships. Ultimately, a successful compliance framework for the GDPR must balance the efficiency of standardisation in specific areas with the flexibility required for transparent communication in others.