



Presidenza del Consiglio dei Ministri

UFFICIO DEL SEGRETARIO GENERALE

Il Responsabile della protezione dei dati personali della Presidenza del Consiglio dei Ministri

EDPB public consultation on privacy templates

The Data Protection of the Italian Government is pleased to provide comments on the consultation.

It would be advantageous for our organization to have the following ready-to-use templates at its disposal:

- a. Template privacy notice: The privacy notice should contain only the information that is strictly necessary, presented in a concise and structured manner through clearly defined paragraphs. The inclusion of graphic elements or icons may facilitate readability. Where the data processing requires the data controller's consent, the consent request should be set out separately from the privacy notice (for example, at the end of the document).
- b. Template record of processing activities: The contact details of the controller, the joint controller, and any other relevant parties included in the document should be limited to a telephone number and an e-mail. Technical and organizational measures should be described in a concise form (preferably organized into macro-categories that may be selected through drop-down menus).
- c. Template for data protection impact assessment (DPIA): The impact assessment constitutes a central and particularly significant activity, often requiring specialized expertise on the part of the controller. Even if it is possible to find lots of software, the availability and the use of a standardized open-source software capable of generating assessments on the basis of the information entered may prove beneficial, particularly for SMEs. In any event, the DPIA should be drafted in a succinct and easily manageable format, for example, by using drop-down menus to facilitate compilation.

It is further recommended that practical examples be incorporated into each template to enhance clarity and usability. In addition, all templates should comply with the principle of data minimization.

These considerations may appear self-evident; however, in our experience, templates frequently fail to incorporate such measures.

Best regards,

Stefania Tilia