TOLL COLLECT
service on the road

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European Data Protection Board

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Template [2026] for Data Protection Impact Assessment ('DPIA'), Version 1.0, Adopted on 10 March 2026 – public consultation

Dear Sir or Madam,

Toll Collect is a technology service provider and stands for the intelligent management of mobility. On behalf of the Federal Government, Toll Collect performs a wide range of tasks in this area. Toll Collect operates one of the largest satellite-based toll collection systems worldwide on a network of 51,000 kilometres. In doing so, Toll Collect ensures the efficient collection of truck tolls in Germany and reliable toll revenues for the Federal Government. At the same time, Toll Collect is committed to making mobility in Germany more efficient and sustainable. Therefore, Toll Collect leverages its core competencies to undertake new tasks in the interest of the Federal Government. Reliability, sustainability, and diversity form the basis for Toll Collect's actions.

I would like to provide a contribution within the framework of the public consultation regarding the above-mentioned template.

It should be noted that the approach of an EU-wide uniform solution for conducting a Data Protection Impact Assessment is highly commendable. In view of increasing regulatory requirements and the growing complexity of data processing in organisations, comprehensible and practicable solutions in data protection process organisation play a central role and contribute significantly to the acceptance of data protection.

1.1.b Purposes of the processing

In this section, a "justification" is to be provided for the data involved per processing purpose. It is unclear whether this refers to necessity, which is also to be assessed later in the template under sections 2.2.a and 3.2, or whether a different type of justification is intended here. To avoid

misunderstandings, the explainer published with the template should contain clarifications on this matter, or the "justification" should be removed here.

2.2.b Data quality

In this section, it is unclear to what extent content other than that in section 2.3.a "Accuracy principle" is to be assessed. To avoid misunderstandings, the explainer published with the template should contain clarifications on the distinction, or this section should be deleted due to redundancy.

2.3.d Measures supporting data protection by design and by default

In this section, it is unclear to what extent content other than that in section 2.3.a "Data minimisation principle" is to be assessed. The implementation of Article 25 GDPR essentially relates to aspects of data minimisation. To avoid misunderstandings, the explainer published with the template should contain clarifications on the distinction, or this section should be deleted due to redundancy.

2.3.e Measures supporting security of processing

In this section, it is unclear to what extent content other than that in section 2.3.a "Storage limitation principle" and "Integrity and confidentiality principle" is to be assessed. To avoid misunderstandings, the explainer published with the template should contain clarifications on the distinction, or this section should be deleted due to redundancy.

3.2 Assess the necessity of the processing

In this section as well, it is unclear what differences are expected compared to the necessity assessment in section 2.2.a (see also the above comment on section 1.1.b). To avoid misunderstandings, the explainer published with the template should contain clarifications on the distinction. If the same is intended, necessity aspects should be assessed at only one point in the template to avoid unnecessary effort.

4.2.a Additional mitigating measures and 4.2.b Residual risk assessment

In this section, additional measures (4.2.a) and a subsequent renewed risk assessment (4.2.b) are undertaken. The explainer for section 4.1.c explains that risk-reducing measures are also to be considered among the "modulating factors" (*"Mitigating (downward-modulating) factors are design choices and measures (section 2.3.)"*). In doing so, explicit reference is made to existing measures pursuant to section 2.3. If all measures that can reduce a risk are already to be considered in section 4.1.c, it is not apparent what additional risk-reducing measures should exist beyond that. Consequently, the need for a further risk assessment in section 4.2.b is also not apparent and therefore appears redundant. With a view to avoiding unnecessary effort, the deletion of sections 4.2.a and 4.2.b should be considered.

Yours sincerely

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