

Submission on EDPB DPIA Template

Public consultation reference: DPIA Template

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Organisation /Respondent: Ambit Consultancy Services t/a Ambit Compliance

Type of respondent: Data Protection Consultancy providing outsourced support to private and public sector organisations in Ireland, UK, US and Europe.

We welcome the opportunity to provide feedback on the European Data Protection Board's proposed template for Data Protection Impact Assessments (DPIAs). We appreciate the EDPB's efforts to promote greater consistency and accountability in DPIA practices. Please find our observations and suggestions below.

1. Structure and Numbering

From a practical implementation perspective, we appreciate that each question within the template be clearly numbered. This would significantly facilitate its use in advisory contexts, particularly when supporting clients in completing DPIAs, as it allows for easier identification of incomplete sections and tracking of outstanding actions.

2. Use of Internal Documentation

We positively note the explicit recognition, in Sections 0.5 and 4.1(b), that organisations may refer to their own internal documentation, policies, or guidance when completing elements of the DPIA. This reflects operational reality and supports a more efficient and integrated compliance approach.

3. Need for Sector-Specific Templates (e.g. CCTV)

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If the intention is to broaden the applicability of the DPIA template to multiple types of processing operations, we recommend the development of sector or use-case-specific variants. In particular, a dedicated CCTV-focused DPIA template would be highly beneficial. This would reduce ambiguity and improve usability for both controllers and advisors frequently dealing with such processing activities.

4. Clarification of “Matching or Combining Datasets” (Section 0.5, Question 3)

We suggest including a concrete example to illustrate what is meant by “matching or combining datasets.” As currently drafted, this concept may be interpreted inconsistently. Providing examples would enhance clarity and ensure a more uniform understanding among users.

5. Secondary or Compatible Use (Section 1.1(c))

The reference to “secondary or compatible use” would benefit from further clarification. It is currently unclear whether this refers to:

- Legitimate compatible further processing within the meaning of Article 6(4) GDPR; or
- Broader concerns such as scope creep or repurposing of data beyond the original intent.

An illustrative example would be helpful. For instance, in a CCTV context:

- Primary purpose: ensuring safety and security
- Secondary use: monitoring employee attendance

Clarifying this distinction would improve the accuracy of responses.

6. Sections 1.2 and 1.3 – Need for Additional Guidance

Sections 1.2 and 1.3 would benefit from more detailed instructions. At present, it is not sufficiently clear what level of detail or type of information is expected. The accompanying explainer document does not fully resolve this ambiguity. Additional guidance or examples would improve usability.

7. Inclusion of Data Protection Principles (Section 2.3)

We welcome the inclusion of data protection principles within the template. Explicitly anchoring the DPIA in these principles is valuable and encourages organisations to systematically assess compliance with core GDPR requirements.

8. Risk Assessment Structure (Sections 3.1 onwards)

The template separates:

- Impacts of processing
- Impacts of breaches
- Risks
- Mitigating measures

While this structure is clear, we suggest considering an alternative approach where each identified risk is assessed holistically, including its associated impact and corresponding mitigation measures within a single, integrated section. This approach may better support comprehensive risk analysis and more practical decision-making.

9. Editorial Clarification (Section 5.2)

Section 5.2 appears to contain a minor typo: “including explanations o why”. We assume this should read “including explanations of why”.

10. Cross-Referencing Issue (Section 6)

Section 6 states: “The processing will be consulted with the SA (see 6.2)”. However, there is no Section 6.2 in either the template or the explainer document. It is unclear whether this reference is intended to point to Annex 1 of the explainer document or another section. We recommend correcting or clarifying this cross-reference.

11. Overall Usability and Accessibility

Overall, the template appears more detailed and technically oriented than many existing DPIA formats. This has clear advantages in ensuring alignment with legal obligations and promoting



thorough assessments. However, it may also reduce accessibility for non-expert users, including many organisations required to conduct DPIAs.

In practice, this may necessitate increased support from advisors and could present challenges for smaller organisations. Consideration could be given to providing a simplified version or additional user guidance to enhance accessibility without compromising rigour.

We hope these comments are helpful and remain available to provide further input if required.

Yours faithfully,

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