



EDPB DPIA Template feedback

Provided by Fundación CARTIF on their behalf and related with their participation in LIFE LiveBetter project as responsible of its legal challenges (task 4.2.1).

Contribution from the perspective of an EU-funded project developing a digital building data space and AI-enabled services.

According to our experience it can significantly improve consistency across the EU.

From the perspective of EU-funded collaborative projects such as LiveBetter, we would encourage further consideration of four aspects that are becoming increasingly relevant in modern digital ecosystems.

First, the template could explicitly recognise the concept of a preliminary DPIA screening phase. In many research and innovation projects, multiple partners process different categories of data under different responsibilities. A screening exercise is often necessary to determine whether a full DPIA is required for a specific partner or processing activity. This would help organisations apply a risk-based approach and avoid unnecessary assessments.

Second, additional guidance would be useful for multi-controller and multi-partner environments. Many EU projects involve several organisations across different member states (8 in LIFE LiveBetter), with shared platforms, common data governance arrangements and interconnected processing operations. The template could provide practical examples on how responsibilities should be assessed and documented in such situations.

Third, the template could include specific references to AI-enabled services. Organisations increasingly use AI for prediction, optimisation, recommendation and decision-support purposes. Even where AI systems do not fall within high-risk categories under the newly enacted AI Act, DPIAs



often need to consider issues such as transparency, automated processing, human oversight, fairness and potential impacts on fundamental rights.

Finally, additional guidance would be beneficial for data spaces, data-sharing platforms and smart-contract-based environments. These architectures frequently involve data exchanges between multiple actors, decentralised governance models and innovative technologies that raise questions regarding accountability, data subject rights, data retention and the management of automated actions.

Addressing these topics would make the template particularly valuable for emerging European digital ecosystems and collaborative innovation projects.