EDPB DPIA Template Feedback – Booking.com
Point of contact: [removed for public consultation]
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At Booking.com, we have long believed in using information produced by data protection Supervisory Authorities to inform our approach to DPIAs. While we use our own custom DPIA template, it is informed by guidelines and templates published particularly by the Dutch AP, French CNIL, and UK ICO (pre-Brexit template). As a very large organisation based in the EU, we take our commitments and responsibilities under the GDPR seriously, and dedicate significant time across various legal, policy, and compliance teams to ensure DPIAs are completed to a high degree of detail as part of the larger privacy review process.

At a high level, we are concerned about the amount of technical detail requested in the EDPB's DPIA template. Even at a company with resources like Booking.com, it would require a meaningful impact on the ways of working, with much time needed from engineering to work on this documentation rather than their usual research and innovation tasks. Whilst we do, of course, bring in engineering and other technical staff as needed on DPIAs and other privacy assurance documentation currently, the template from the EDPB seems to go above and beyond any previous SA recommendations on the technical side of the DPIA, and does not clearly define what the benefit of including this information in the DPIA would be.

If we were able to include the detailed technical points outlined in the EDPB template, this also introduces new risks. The details are sufficiently granular to potentially contain business secrets, and could increase the risk of data loss, or leaks, externally. In practice, this information could be redacted should a Supervisory Authority request review of a DPIA, but this returns to the question of what benefit there then is to including such technical details in the DPIA in the first place.

Some questions are also excessive in nature. These are enumerated below:

- 1.1.d Nature, scope, and context of the processing: Risk mapping is part of the DPIA process and is certainly of high importance. However, this question's granularity and open ended phrasing in the guidelines introduces a very high bar of detail to meet.
    - Suggestion: Following the AP and CNIL recommendations of "context" including "the relationship between data subjects and the controller." We support including enough information to understand the power balance in relationnships,
- 1.3 Means of processing, supporting assets, and underlying architecture
    - Suggestion: Apply the CNIL bar of listing supporting assets as part of the security analysis.
- 2.2.b Data quality: The metrics for data quality, including thresholds, are excessive for a base DPIA template.

    - Suggestion: Following the ICO, CNIL, and AP advice on accuracy, which is less prescriptive.
- 2.3.b Measures supporting the exercise of data subjects' rights
    - Suggestion: Recognising a simple checkbox is not compliant, follow the AP and CNIL references to effectiveness of measures and justifications.
- 4.1.b Method
    - Suggestion: Risk metrics are often highly confidential. Using a recognised method in general (as per CNIL suggestions) that may be adapted for the company (per the AP) should be an expectation, but the details should live with the security and risk assessment.
- 4.2.c Plan: this section necessitates operationalization of compliance based on the DPIA findings, with detailed specificities required.
    - Suggestion: Ensuring an action plan is in place is a key part of the DPIA process and of privacy by design. However, that plan can exist outside of the walls of the DPIA, and timelines (etc) should not be required within the DPIA itself.

As a final note, we welcome the explicit section on DPO advice, views of data subjects, and conclusion - including the recommendations of outcomes named in section 6. These measures particularly meet the right balance between descriptive and prescriptive in order to be well implemented.

We appreciate the ability to provide some feedback on this template, and remain available to connect with the EDPB for any further discussions or clarifications.