

European Data Protection Board (EDPB) Public Consultation on the Template DPIA
4/14/26

- **Section 2: Analysis of the Processing (pages 9-14)**

- o Subsection 2.2.b covers data quality (e.g., quality metrics, requirements, or thresholds and justification).
- o **Question:** What in 2.2.b is being specifically measured for, within this data quality chart? 1.1.a covers processed personal data. In other words, is this subsection intended to list how the quality of data is measured? Or conversely, whether the data is of high quality itself?
- o **Question:** Under 2.2.b, should the second column “Quality metrics, requirements, or thresholds” be broken down into three separate column categories instead? (E.g., “Quality Metrics” then a category “Quality Requirements” then “Quality Thresholds”)? It appears as if this one column is measuring multiple aspects.
- o **Question:** Under 2.2.b, further, should the second column then be broken into “Quality Metrics (e.g., quality thresholds)”? And, is there a preferred measurement protocol or standard preferred?
- o **Question:** Under 2.3.a “Measures supporting compliance...” provide examples as to discussion of appropriateness and effectiveness. Discussions typically denote a paragraph of language or upwards. Is this seeking 1-2 concise sentences as to how the processing’s list of supporting measures, for instance, adheres to the fairness principle as to its appropriateness and effectiveness? Note that DPIAs are typically conducted prior to processing so any such effectiveness would be an estimation. Should this read as “Brief description of supporting measures’ appropriateness and estimated effectiveness”?
- o **Question:** Under the same 2.3.a table, presuming the prior question’s train of thought as to estimated effectiveness, how would the fourth column’s “Implementation status” be operationalized in a live environment?
 - **In other words:** How often would this chart have to be updated, just between pre-deployment to initial deployment alone? Everything in theory would be planned as to implementation status but the moment deployment happens, all these categories would have to be updated, then updated a third time within the same review cycle for once fully implemented, (and later a fourth time). Seems unusually onerous.
 - **Note:** These qualities should in theory be embedded throughout the questionnaire versus as stand-alone theoretical concepts. Both are theoretically possible, but places a higher compliance burden on respondents who may not have the organizational bandwidth to complete each of these questionnaires (times 100) to this granular level of detail.
 - **Observation of linguistic awkwardness:** Framing the “Fairness” principle as “partially implemented,” for instance, is linguistically awkward and conceptually misleading in a governance or DPIA context. Instead, frame controls, evidence, or operationalization as partial or evolving. Fairness is a principle and normative privacy standard rather than a concrete ‘feature’ per se. What can be considered partial, in this instance, is how optimally one has operationalized or evidenced compliance with it. Denoting that fairness is

‘partially implemented’ suggests that an entity accepts unfairness as a temporary state or that fairness is optional or incremental, neither of which are particularly ideal.

- **Overall Recommendation:** Instead of “list of supporting measures,” consider aligning to ISO standards and similar, stating instead “List of supporting controls” and “Identified gaps and mitigation measures” in the subsequent column. Consider this for any/all columns labelled as such and standardize appropriately.
- **Section 4: Analysis of the Processing (page 17)**
 - **Comment:** Under 4.2.a “Additional mitigating measures,” at column 4 “Implementation status (...)” standardize language to read “Implementation status.”
- **Section 5: Involvement of Interested Parties (page 17)**
 - **Spelling error:** Under 5.2 at 2nd bullet, correct spelling to read “...including explanations as to why...” (or similar).