

Template [2026] for Data Protection Impact Assessment (“DPIA”)

We transmit the comments of the Industry Division of the Austrian Federal Economic Chamber:

“We appreciated the template provided by the EDPB, which offers better clarity for organizations. Overall, it seems very comprehensive and structured.

At the same time, we believe there could be some opportunities for improvement, particularly with a view to making the template more user-friendly and less burdensome for business colleagues, who often have little background in data protection.

In particular, following enhancements could be considered:

- *providing more practical guidance and concrete examples to support completion of the template (e.g. in italic)*
- *including the full text of the referenced GDPR articles (e.g. in italic)*
- *making certain sections more narrative and less rigidly structured, to facilitate understanding and completion.*

Some examples:

1.1 High-level description of the processing

1.1.a Processed personal data

	Processed personal data (item or element)	Explanation (data type, data subject category, additional details)	Special category of personal data
1			☐ No Yes: ☐ Data revealing racial or ethnic origin, political opinions, religious or

- *Practical guidance and examples could be provided*

1.1.c Secondary or compatible uses

	Secondary or compatible uses of the data	Personal data involved (considering personal data listed in 1.1.a), under what conditions and assessment of compatibility
1		

Practical guidance and examples could be provided

- *Par. 4: too structured and long, could be shortened and made more narrative*
- *Potentially complicated and not filled out properly:*

0.5 DPIA technical sheet

Current version and version log (explaining the history of changes made to the information contained in the DPIA template for this processing, if any)	
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Potentially complicated and not filled out properly:

2.2.b Data quality

Processed personal data (item or element, considering table 1.1.a)	Quality metrics, requirements or thresholds	Justification

*Furthermore, under clause 6 (Conclusion and Decision), the second bullet point (“**Consultation, the processing will be consulted with the SA**”) refers to section 6.2. However, there is no section 6.2 in the document. We kindly suggest deleting this reference to avoid any misunderstanding.”*

Kind regards,

Dr. Rosemarie Schön
Director

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