



ŽELEZNICE SLOVENSKEJ REPUBLIKY
GENERÁLNE RIADITEĽSTVO
Department of Legal relations
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Váš list číslo/zo dňa

Naše číslo
39217/2026/O130

Vybavuje/linka
Mgr. Michaela Barišová

Bratislava
26.05.2026

Dear European Data Protection Board,

as DPO at Department of Legal relations, Generálne riaditeľstvo Železnice Slovenskej republiky in Slovakia I would like to provide some amendments to the Template [2026] for Data Protection Impact Assessment ('DPIA'), version 1.0.

The entire template may seem confusing and unclear due to overly general items, which may make it seem like information needs to be provided duplicated in different sections – description of processing, purposes, data categories, assets, risks, etc. Completing the template could take a little longer and seem to be less efficient. Some of the instructions also seem insufficient, for example the template must include an explanation, measures or data quality, but do not specify a minimum scope or indicators. This may result that DPOs or others who need to carry out a DPIA completing the template without any real value.

Besides, some requirements for describing processing, assets, processes, risks, and measures can be very burdensome for organizations. The template may represent excessive administration. For example, there has to be a team involved in conducting this DPIA (providing details of their roles, tasks, responsibilities, etc.), although the explainer does not consider which parts of the template should be from IT security, legal, operations teams, management or DPO. These people will need to be trained and/or coordinated in filling out the information in the template, which will be time-consuming and organizationally demanding.

The section "0.5 - DPIA technical sheet" provide a version log. It supposed to be a chronological record of modifications, updates, and fixes made to a project, software, or document, but in the explainer are missing further details that should be fulfilled. If an update is needed, there is no information and procedures provided on how to modify an existing template.

Moreover, the obligatory "discussion of appropriateness and effectiveness" may prove inefficient, as its outcomes might only become apparent at a later stage. In the section "3.2 Assess the necessity of the processing" there is also an evaluation and provided evidence that

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cannot be filled in the same time the DPIA is fulfil. There is also no list of evidence that will be considered as proven in relation to the various alternatives considered.

Last but not least, the template recommends considering publishing a DPIA but also warns about the risk of publishing sensitive information (e.g. security measures). Companies may therefore struggle to find the right balance between transparency and security. The template documentation does not provide any guidance or recommendations on what steps to take in such a case.

Best regards,

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