VERBAND DER INTERNETWIRTSCHAFT E.V.

STATEMENT ON TEMPLATE [2026] FOR DATA PROTECTION IMPACT ASSESSMENT ('DPIA') VERSION 1.0 ADOPTED ON 10 MARCH 2026 BY THE EUROPEAN DATA PROTECTION BOARD (EDPB)

Cologne, 01.06.2026

On 14 April 2026, the European Data Protection Board (EDPB) published the first harmonised template for Data Protection Impact Assessments (DPIA) under the General Data Protection Regulation (GDPR). In an attempt to facilitate GDPR compliance and a harmonized enforcement approach across the EU, the template is a significant and important tool since the entry into force of the GDPR in 2018.

Executive Summary:

On 14 April 2026, the European Data Protection Board (EDPB) published the first harmonised template for Data Protection Impact Assessments (DPIA), marking a significant step towards consistent GDPR enforcement across the EU. eco – Association of the Internet Industry welcomes this initiative as a valuable tool for supporting companies in GDPR compliance. Overall, eco member companies do not see major elements missing from the template and appreciate the detailed guidance it provides. To further strengthen its practical utility, eco suggests refining sections on sub-processor reporting, confidentiality of DPIA contents, and the level of technical detail required. This will ensure proportionality and full alignment with the requirements of Article 35 GDPR.

We support the objective of a practical and consistent DPIA approach and welcome guidance and standardisation that helps our member companies identify, assess and mitigate risks to data subjects. Detailed descriptions of processing are helpful tools for companies to model their DPIA templates. Measures outlined in §2.3 a that support compliance with data protection principles is also perceived as helpful. Overall, our membership does not see major points missing from the template.

At the same time, it will be important to ensure that the DPIA Template, if adopted in its current form, does not inadvertently lead to DPIAs becoming overly prescriptive technical, contractual, or operational catalogues beyond what Article 35 of the GDPR requires. This could create unnecessary administrative burden for companies and may require disclosure of sensitive technical and operational information that is not necessary for a DPIA under the current practice.

eco – Association of the Internet Industry would like to address the draft DPIA Template of the European Data Protection Board (EDPB) as follows:

Remove redundant reporting obligations on sub-processors

The DPIA template should not require detailed listing of processors and sub-processors, and contractual tasks already addressed through Article 28 of the GDPR. Data processor and sub-processor details should be risk-relevant, not exhaustive or redundant with existing GDPR obligations such as Article 28. (Section 0.2)

Limit reporting to what's in the scope of DPIAs

The scope of the DPIA template should focus exclusively on what is covered by a DPIA and not start listing what is out of scope. The DPIA template should only address aspects typically not covered by the DPIA in order to assess what needs to be covered. Requiring the documentation of processing that is not covered in the DPIA, and why it is not covered, risks creating an unnecessary inventory of features, configurations, integrations and deployment choices that are outside a particular use case without added value. It is also not prescribed by the GDPR. (Section 0.5)

Ensure confidentiality of DPIA reporting

Publication or external sharing of the DPIA should be discretionary. The Template DPIA should not imply that its publication or external sharing is expected, because DPIAs may contain confidential information about our controls, infrastructure, risk assumptions, mitigation strategies, contractual arrangements, system architecture and operational dependencies. (Section 0.5)

Share only at the appropriate level of detail

Architecture and supporting assets should be described at the appropriate level of detail. The Template DPIA should not require granular or exhaustive infrastructure details such as asset-level hardware, network components, software modules, technical layers or functions. Requiring that level of detail may be unnecessary for the DPIA and may raise security or confidentiality concerns on our side. (Section 1.3)

View data quality requirements in context

Data quality requirements should be contextual. The Template DPIA should focus on measures to ensure accuracy rather than requiring prescriptive metrics, thresholds or quantified justifications for each data item without clear added value. (Section 2.2.b)

Conclusion

Overall, we applaud the EDPB's effort at supporting harmonised application of the GDPR. The DPIA template is an appropriate and helpful step in this direction. Nevertheless, the template in its current shape leaves some room for interpretation in places were it could lead to overtly strict reporting requirements that go beyond the intended scope. Adjusting the specific sections mentioned above would help improve the DPIA template further and make it fit for usage across the Internet industry.