

# DPIA Template — Full Workbook

Scoping · Data mapping · Risk register · Sign-off

4 modules · Expand matching sections on [DPOCertification.Org/resources](https://DPOCertification.Org/resources)

## Phase A — Scoping & necessity

| Field                  | Guidance                                  | Response |
|------------------------|-------------------------------------------|----------|
| Project name & ID      | Link to Jira / change ticket              | —        |
| Processing description | Plain language for Board                  | —        |
| Lawful basis           | Consent / legal / contract — cite section | —        |
| Necessity test         | Why less intrusive alternatives fail      | —        |
| Proportionality        | Data minimisation measures                | —        |

## Phase B — Data mapping

| Category         | Subjects               | Volume | Sensitive? | Source        |
|------------------|------------------------|--------|------------|---------------|
| Identity         | Customers              | 2.1M   | No         | App signup    |
| Financial        | Loan applicants        | 450K   | Yes        | Credit bureau |
| Behavioural      | Web visitors           | 8M/mo  | No         | Analytics SDK |
| Special category | Health (if applicable) | —      | Yes        | Partner API   |

## Phase C — Risk register (expandable)

| ID   | Risk                                | L | I | Score | Mitigation                               | Owner       | Target |
|------|-------------------------------------|---|---|-------|------------------------------------------|-------------|--------|
| R-01 | Profiling without opt-out           | M | H | 12    | Purpose limitation + DPO consent refresh |             | —      |
| R-02 | Cross-border without TIA            | L | H | 8     | Whitelist + SCC pack                     | Legal       | —      |
| R-03 | Children without verifiable consent | M | H | 12    | Age gate + parental flow                 | Product     | —      |
| R-04 | Processor sub-processors unknown    | M | M | 9     | TPRM + ROPA sync                         | Procurement | —      |
| R-05 | Automated loan denial bias          | L | H | 8     | Human review + model audit               | Risk        | —      |

## Phase D — Residual risk & sign-off

### Sign-off matrix

- DPO recommendation: Proceed / Proceed with conditions / Do not proceed
- CISO security review attachment
- Legal opinion on lawful basis
- Board / SDF committee date & minutes reference