

Concerning page 18:

Risk = probability/likelihood * impact

Currently the categorization for high-risk is very much likelihood based.

This makes sense to identify the high-risk sectors.

However an impact-based approach is needed to identify the high-risk applications, so that also low probability/high impact applications are considered as high risk. In addition this will also allow application in non-high-risk-sectors to be classified as high-risk, based on their impact, also in accordance with significant or legal impact in article 22 in the GDPR.

Therefor the sentence "The assessment of the level of risk of a given use could be based on the impact on the affected parties." should be rephrased to "has to be based on impact and likelihood".

Also on page 18, there is the sentence: "that produce effects that cannot reasonably be avoided by individuals or legal entities": this probably needs some more clarification

On page 20, there is the mention "in certain justified cases": this also needs clarification: which kind of cases, what is the criterion for justification?

On page 21: "Whilst EU data protection legislation already contain certain rules of this kind 54" : also reference to article 14 in the GDPR needed