

List of processing activities for which a DPIA is to be carried out

No.	Relevant description of the processing activity	Typical fields of application	Examples
1	<p>Processing of biometric data for the unique identification of natural persons if at least one of the following criteria from WP 248 Rev. 01 applies:</p> <ul style="list-style-type: none"> • Data concerning vulnerable data subjects • Systematic monitoring • Innovative use or application of new technological or organisational solutions • Evaluation or scoring • Matching or combining datasets • Automated decision making with legal or similar significant effect • When the processing in itself prevents data subjects from exercising a right or using a service or a contract 	Use of biometric systems for access control or billing purposes.	<p>A company uses fingerprint sensors for access control in certain areas.</p> <p>A school canteen offers students "payment by fingerprint".</p>
2	<p>Processing of genetic data within the meaning of Article 4 No. 13 DSGVO, if at least one of the following criteria from WP 248 Rev. 01 applies:</p> <ul style="list-style-type: none"> • Data concerning vulnerable data subjects • Systematic monitoring • Innovative use or application of new technological or organisational solutions • Evaluation or scoring • Matching or combining datasets • Automated decision making with legal or similar significant effect • When the processing in itself prevents data subjects from exercising a right or using a service or a contract 	<p>Early detection of hereditary diseases</p> <p>Genetic databases for genealogical research</p>	<p>A clinic uses DNA tests for the early detection of hereditary diseases in newborns.</p> <p>A company offers a service through which customers can compare their own genetic data with those of third parties in order to learn more about their own ancestry. For this purpose, the company maintains a database with genetic data of a large number of persons.</p>
3	<p>Large-scale processing of data subject to social, professional or special official secrecy, even if it is not data in accordance with Art. 9 para. 1 and 10 GDPR</p>	<p>Operation of an insolvency register</p> <p>Large providers of social services</p> <p>Large law firms</p>	<p>A company offers a comprehensive directory of private insolvencies.</p> <p>Large law firm specialising in family law matters.</p>
4	Large-scale processing of personal	Vehicle data processing - Car	A company offers a car sharing

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	data about the location of natural persons	Sharing / Mobility Services Vehicle data processing – Centralized processing of measured values or images from vehicle sensors Offline tracking of customer movements in department stores, shopping centres, etc. Traffic flow analysis based on location data of the public mobile network	service or other mobility services and processes extensive position and accounting data for this purpose. A company collects personal data that vehicles generate about their environment and uses this data, for example, to determine free parking spaces or to improve algorithms for automated driving. A company processes the GPS, Bluetooth and/or mobile phone signals of passers-by and customers in order to be able to track routes and shopping behaviour.
5	Matching or combining of personal data from various sources and processing of the data thus aggregated, provided that <ul style="list-style-type: none"> • the merging or processing is carried out on a large scale, • for purposes for which not all of the data to be processed have been collected directly from the data subjects, • include the use of algorithms that are incomprehensible to the persons concerned, and • serve to produce data bases which can be used to take decisions which have legal effect concerning the data subjects or which may have a similarly significant impact on them 	Fraud prevention systems Scoring by credit agencies, banks or insurance companies	To prevent fraud cases, the operator of an online shop processes extensive amounts of data. The result of the check is a risk value that decides whether or not the purchase on account is offered to a buyer as a method of payment. A credit agency carries out scoring with regard to the trustworthiness of persons. A bank performs scoring to determine the default risk of repayments by individuals. An insurance company carries out scoring to determine a person's risk with regard to certain characteristics or activities of the person to determine the amount of an insurance policy.
6	Mobile optical-electronic recording of personal data in public areas, provided that the data from one or more recording systems are centrally consolidated on a large scale.	Vehicle data processing - Environmental sensors	A company collects personal data that vehicles generate about their environment and uses this data, for example, to determine free parking spaces or to improve algorithms for automated driving.
7	Large-scale collection and publication or transfer of personal data used to evaluate the behaviour and other personal aspects of individuals and	Operation of rating portals Debt collection services - receivables management	An online portal offers users the opportunity to publicly and finely granularly evaluate the services of the self-employed. Online

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	which may be used by third parties to make decisions that have legal effect concerning the individuals assessed or that have a similarly significant impact on them.	Debt Collection services - factoring	<p>evaluation portal e.g. for doctors, self-employed or teachers.</p> <p>A company processes personal data of debtors for its customers on a large scale, in particular contract data, invoice data and data on the financial circumstances of debtors for the assertion of claims. Data may be transmitted to credit agencies.</p> <p>A company has a large number of claims transferred in order to assert them at its own risk. It processes contract data, invoice data, scoring data and information on the financial circumstances of debtors in particular. Data may be transmitted to credit agencies.</p>
8	Large-scale processing of personal data on the conduct of employees, which can be used to evaluate their work activities with legal or similar significant effect	Use of data loss prevention systems that generate systematic profiles of employees Geolocation of employees	<p>Central recording of activities (e.g. Internet traffic, mail traffic and the use of removable media) at the workplace with the aim of detecting undesirable behavior (e.g. sending internal documents) on the part of the person responsible.</p> <p>A company has movement profiles of employees created (using RFID, mobile phone tracking or GPS) to secure personnel (security guards, firefighters), to protect valuable property of the employer or a third party (truck with cargo, cash transport) or to coordinate work assignments in the field.</p>
9	Creation of comprehensive profiles on the interests, the network of personal relationships or the personality of data subjects	Operation of dating and contact portals Operation of large social networks	A web portal creates profiles of users to generate the most suitable contact suggestions.
10	Matching or combining of personal data from various sources and processing of the data thus aggregated, provided that	Big data analysis of customer data enriched with information from third parties	A company with a large base of natural persons as customers, analyzes data on the purchasing behaviour of customers and the use of its own web offers includ-

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	<ul style="list-style-type: none"> • the merging or processing is carried out on a large scale, • for purposes for which not all of the data to be processed have been collected directly from the data subjects, • include the use of algorithms that are incomprehensible to the persons concerned, and • serve the discovery of previously unknown connections inside the data for purposes that are not predetermined 		ing its own web shop, linked to creditworthiness data from third parties and data from the advertising approach via social media, including data provided by the operator of the social media on the members addressed, in order to obtain information that can be used to increase sales.
11	Use of artificial intelligence to process personal data to control interaction with the data subject or to evaluate personal aspects of the data subject	Customer support through artificial intelligence	A call center automatically evaluates the mood of callers. A company uses a system that interacts with customers through conversation and processes personal data by artificial intelligence to advise them.
12	Unintended use of sensors of a mobile phone in the possession of the persons concerned or of radio signals transmitted by such devices to determine the whereabouts or movement of persons over a substantial period of time	Offline tracking of customer movements in department stores, shopping centres, etc. Traffic flow analysis based on location data of the public mobile network	A company processes the WLAN, Bluetooth or mobile phone signals of passers-by and customers in order to be able to track routes and shopping behaviour.
13	Automated evaluation of video or audio recordings to evaluate the personality of those affected	Telephone call evaluation using algorithms	A call center automatically evaluates the mood of callers.
14	Creation of comprehensive profiles on the movement and purchasing behaviour of those affected	Recording the purchasing behaviour of different groups of people for profile building and customer retention with the aid of prices, price discounts and rebates.	A company uses customer cards that record customers' purchasing behavior. As an incentive to use the customer card, the customer receives loyalty points with every purchase. With the help of the acquired data, the provider creates comprehensive customer profiles.
15	Anonymisation of personal data pursuant Article 9 of the GDPR, not only in individual cases (in relation to the number of data subjects and the information per data subject) for the purpose of transmission to third par-	Anonymization of personal data pursuant Article 9 of the GDPR for research purposes	Extensive special personal data is anonymised by a processing centre of an association of pharmacies or of an insurance company and processed for other purposes or passed on to third

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	ties		parties.
16	Processing of personal data in accordance with Art. 9 para. 1 and Art. 10 GDPR - even if it is not to be regarded as "large scale" within the meaning of Art. 35 para. 3 lit. b) - provided that non-recurring data collection takes place by means of the innovative use of sensors or mobile applications and these data are received and processed by a central office.	Use of telemedicine solutions for detailed remote processing of health data	A physician uses a web portal or app to communicate with patients via video telephony and to collect and process health data systematically and in detail using sensors (e.g. blood sugar, oxygen mask,...).
17	Processing of data in accordance with Art. 9 para. 1 and Art. 10 GDPR - even if it is not to be regarded as "large scale" within the meaning of Art. 35 para. 3 lit. b) - provided that the data are used by the providers of new technologies to determine the performance of the persons.	Central storage of measurement data from sensors installed in fitness wristbands or smartphones	A company offers a service that processes data from fitness wristbands to improve training.

Notes

1. This list is not exhaustive, but complements the general rules contained in paragraphs 1 and 3 of Article 35 GDPR.

As a general rule, where any form of processing, in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall, prior to the processing, carry out an assessment of the impact of the envisaged processing operations on the protection of personal data, in particular in the cases referred to in paragraph 3. This list is based on the general approach described in *Working Paper 248 Rev. 01 Guidelines on Data Protection Impact Assessment (DPIA) and determining whether processing is "likely to result in a high risk" for the purposes of Regulation 2016/679*. It complements and concretizes this general approach.

The guideline contains the following nine relevant criteria from WP 248 Rev. 01 for the classification of processing operations:

- (a) Sensitive data or data of a highly personal nature
- (b) Data concerning vulnerable data subjects
- (c) Data processed on a large scale
- (d) Systematic monitoring
- (e) Innovative use or application of new technological or organisational solutions
- (f) Evaluation or scoring

- (g) Matching or combining datasets
- h) Automated decision making with legal or similar significant effect
- (i) When the processing in itself “prevents data subjects from exercising a right or using a service or a contract”

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