

SAMPLE

GDPR AI Compliance Kit

The opening of GDPR-AI-DPIA-Template.docx, one of 8 files in the kit. <https://solasai.net/products/gdpr-ai-compliance/>

Data Protection Impact Assessment for AI Processing

A template built on Article 35(7) GDPR with the screening criteria, an AI-specific risk register, the Article 36 decision, and a completed example

Product: GDPR AI Compliance Kit, version 3.0, 19 October 2026. **Classification:** Purchaser use only, customize before use. Solas AI, solasai.net.

How to use this document

Part A is the template. Its sections follow the four elements Article 35(7) requires in every DPIA: a systematic description of the processing and its purposes, an assessment of necessity and proportionality, an assessment of the risks to the rights and freedoms of data subjects, and the measures envisaged to address them. The screening step at the start tells you whether a DPIA is required at all. Part B is a completed example for a fictional dental group, written to show what a finished assessment looks like at the size of a small business. Replace every bracket; delete what does not describe your processing. Where a data protection officer has been designated, Article 35(2) requires that their advice be sought, and Article 35(9) asks you to seek the views of data subjects or their representatives where appropriate. The document is a template and reference, not legal advice.

Part A. Template

Controller: [Name, address, EU representative if established outside the EU (Article 27)] **Processing assessed:** [AI system or feature] **Assessor:** [Name, role] **DPO consulted:** [Yes, date / No DPO designated] **Date:** [] **Status:** Draft / Under review / Approved **Linked AI Act classification record:** [Reference to the worksheet]

A1. Screening: is a DPIA required?

Article 35(1) requires a DPIA where processing, in particular using new technologies, is likely to result in a high risk to the rights and freedoms of natural persons. Article 35(3) names three cases that always qualify: a systematic and extensive evaluation of personal aspects based on automated processing, including profiling, on which decisions with legal or similarly significant effects are

based; large-scale processing of special categories or criminal data; and systematic monitoring of a publicly accessible area on a large scale. The Article 29 Working Party's DPIA guidelines (WP248 rev.01, endorsed by the EDPB) add nine criteria, and processing that meets two of them will in most cases require a DPIA. Check your supervisory authority's own list under Article 35(4) as well.

Criterion (WP248 rev.01)	Present?	Note
Evaluation or scoring, including profiling and predicting		
Automated decision-making with legal or similarly significant effect		
Systematic monitoring		
Sensitive data or data of a highly personal nature		
Data processed on a large scale		
Matching or combining datasets		
Data concerning vulnerable data subjects (patients, employees, children)		
Innovative use or application of new technological or organisational solutions		
Processing that prevents data subjects from exercising a right or using a service or contract		

AI processing of personal data nearly always meets the innovative-use criterion, and in a healthcare, HR, lending, or insurance context meets at least one more. Record the conclusion: DPIA required / not required, with the reason. Where it is not required, keep this screening record for Article 5(2) accountability.

A2. Systematic description of the processing (Article 35(7)(a))

Field	Entry
Purpose or purposes of the processing	
Legitimate interest pursued, where Article 6(1)(f) is relied on	
Nature of the processing: what the AI system does with the data, step by step (input, retrieval, model inference, output, storage, human action)	
Categories of data subjects	
Categories of personal data, with any special categories (Article 9) or criminal data (Article 10) named	
Source of the data (collected from the data subject, from a third party, generated by the system)	
What the model receives (fields, documents, audio), and what it produces	
Whether outputs inform or make decisions about people, and who acts on them	
Recipients: the AI vendor (processor), its sub-processors (model provider, hosting, observability), any other recipient	

Field	Entry
Processing locations and any transfer outside the EEA (see the Transfer Mechanism Guide)	
Retention: for inputs, outputs, transcripts, logs, and derived data such as embeddings, at the controller and at each processor	
Scale: number of data subjects, volume, frequency, duration	
Technology description: model type and version, how it was trained (to the extent the vendor discloses), whether your data is used to train or improve it, whether the system learns from use	
EU AI Act classification and role (from the worksheet)	
Codes of conduct or certifications relied on (Article 35(8))	

The sample ends here. The full document runs about 3,071 words; the kit holds 8 files. Version 2.2, 19 October 2026. Buy it at <https://solasai.net/products/gdpr-ai-compliance/>, 14-day refund for any reason.