



- Name subject (and article GDPR)
- Example applicable technique
- Underlying documentation

Why this framework?

In the General Data Protection Regulation, Data Protection by Design is an explicit requirement for the processing of personal data (art. 25 GDPR). Data Protection by Design means that organisations pay attention to the protection of personal data when developing (new) products and services. The implementation of privacy enhancing measures in the early stages of development saves costs because it prevents more expensive interventions later on and it facilitates compliance earlier on. In practice, however, it is often unclear how compliance with the requirement of Data Protection by Design can be accomplished.

How to use this framework?

This framework provides a practical guide to Data Protection by Design based on several requirements that are spread over the General Data Protection Regulation. Whenever possible, anonymised data should be used. If that is not an option, the other columns of the framework can be followed. In all cases there will be a technical/organisational component with supporting documentation or organisational measures. By using the framework and administering which aspects have been taken into account, an overview of the way your organisation complies with Data Protection by Design emerges. Since there might be situations where not all technical aspects can be met, some alternative safeguards are suggested.

Incorporate this framework into your organisation

The framework can be used within an organisation as a part of the overall privacy and data governance. To safeguard compliance we suggest regular audits based on the framework. In addition, a data protection impact assessment can help make clear which measures are needed when new products or services are developed or new personal data processing activities are started. Data Protection by Design only encompasses a part of the whole privacy governance. Consider internal privacy awareness, internal policy, assignment of responsibilities, transparency towards data subjects and collaboration with third parties and processors (including contracts and data processing agreements).