Data processing interest validation template

When preparing a DPIA, it's necessary to determine if current and planned data processing activities can potentially process PII and related confidential information. The following steps help determine if a legitimate reason for processing exists. If the results indicate such a legitimate interest, the next step is to fill out the DPIA template, which provides evidence on the types of processing to be performed and the impact on data either being processed or in a queue to be processed.

Step 1: Test for purpose of processing	
Questions to ask	Responses
What is the purpose for processing the data?	
What benefit(s) are expected from the processing?	
Who benefits from the data processing?	
What happens if the proposed processing cannot be performed?	
What compliance with data protection regulations, good practices and other guidance is demonstrated?	

Step 2: Test for importance of processing	
Questions to ask	Responses
How will the processing achieve the stated purpose?	
Specify how the processing will be sufficient to achieve	
the defined purpose.	
Specify alternatives to the proposed processing.	
What alternate processing (or no processing) options are	
available to achieve the original purpose?	

Questions to ask	Responses
What kind of personal data is to be processed, for	
example, personally private, professionally private,	
criminal offense data, children's data, etc.?	
What relationship is in place with the individual whose	
data is being processed?	
How often has data been obtained from the individual?	
What data has been collected from third-party	
organizations?	
What will be done with the data being collected?	
How new or innovative is the process?	
What evidence of potential expectations for the data has	
been identified?	
How will processing of personal data affect the	
individuals being assessed?	
What is the likelihood and severity of any potential	
impact from processing data?	
How will individual concerns for ensuring privacy of their	
personal information be handled?	
What measures can be established to minimize any	
negative impact?	

Step 4: Determine if the proposed processing is legitimate		
Questions to ask	Responses	
Have legitimate interests for processing personal data	□ Yes	
been demonstrated?		
	□ No	
What additional justification can be provided?		