

Tel.: +357 22 818 456

## INDICATIVE LIST OF PROCESSING OPERATIONS SUBJECT TO DPIA REQUIREMENTS UNDER ARTICLE 35(4) OF THE GDPR

The following list is not exhaustive and will be updated. The Commissioner may add new processing activities which are subject to data protection impact assessment (DPIA) requirements.

- Combination of filing systems: the combination involves special categories of personal data or data relating to criminal convictions and offenses or is to be carried out using the identity card number or other universal identifier (as provided for in article 10 of national law 125(I)/2018)
- 2. **Restrictions of data subject's rights:** where controllers or processors intend to apply measures to limit, in whole or partly, the rights referred to in Articles 12, 18, 19 and 20 of the Regulation (as provided for in article 11 of national law 125(I)/2018)
- 3. **Data breach notification:** in cases where the responsibility of the controller to notify the data breach to the data subject is wholly or partly waived for one or more of the purposes referred to in paragraph (1) of Article 23 of the Regulation (as provided for in article 12 of national law 125(I)/2018)
- 4. **Laws and bylaws:** Prior to the adoption of a law or a bylaw providing for a particular processing or series of processing operations (as provided for in article 13 of national law 125(I)/2018)
- 5. **Transfers of data**: the transfer of special categories of personal data to a third country or to an international organisation, carried out by a controller or processor on the basis of the derogations provided for in Article 49 of Regulation (as provided for in article 18 of national law 125(I)/2018)
- 6. **Credit reference:** the establishment of credit reference database or a national level credit rating or fraud database
- 7. **Monitoring employees:** Systematic monitoring of employees' activities, including the monitoring of the employees' work station, internet activity and the use of GPS on employees' vehicles

- 8. **Health data:** Hospital processing patients' genetic and health data (hospital information system)
- 9. **CCTV:** systematic and large-scale monitoring of public places by means of cameras
- 10. **Profiling**: Gathering of public social media data for generating profiles
- 11. **New technologies**: the use of new technologies for data processing. This includes the processing of large amount of data obtained via smart devices
- 12. **Applications**: applications which offer to the users the possibility to store documents, emails, diaries, notes from e-readers equipped with note-taking features, and very personal information contained in life-logging applications
- 13. **Biometric and genetic data**: any processing activities involving biometric and genetic data