

COMPLIANCE WORKING RECORD

EU DPIA screening and review record

DPIA complete for authorised review. 4 action-required and 0 unresolved findings.

Document control

Field	Value
Organisation	Harbour Field Services Limited
Document type	EU data protection impact assessment working document
Document reference	EU-DPIA-2026-004
Jurisdiction	European Union
Version	2026.08.07
Status	Ready for review
Classification	Compliance working record
Prepared by	Product and Data Protection Review Group
Prepared on	21 August 2026
Rule pack	2026.08.07
Sources reviewed	7 August 2026
Generated	21 August 2026

Recorded matter

Field	Value
Organisation	Harbour Field Services Limited
Reference	EU-DPIA-2026-004
Owner	Product and Data Protection Review Group
Summary	A proposed customer-risk scoring service combines account activity and support history to prioritise manual fraud review across three Member States. No automatic account closure or pricing decision is made.

Field	Value
Jurisdiction	European Union
Member State or lead establishment	Ireland, lead establishment
Supervisory authority	Data Protection Commission (Ireland)

Decision

DPIA complete for authorised review

A high-risk trigger is present and every supported assessment field has evidence.

- Have the responsible owner approve the DPIA.
- Monitor the recorded review triggers.

Screening

Check	Answer	Record status	Evidence
Systematic and extensive evaluation with significant effects	yes	recorded	The service scores customer behaviour at scale and affects review priority.
Large-scale special-category or criminal-offence data	no	Action required	The input schema excludes special-category and criminal-offence data.
Large-scale systematic monitoring of public areas	no	Action required	The service does not monitor publicly accessible areas.
Other processing likely to result in high risk	yes	recorded	Large-scale behavioural evaluation meets multiple EDPB high-risk criteria.

National route

Check	Answer	Record status	Evidence
Current Article 35(4) and 35(5) national lists checked	yes	recorded	The current DPC Article 35 list and EDPB register entry were checked and retained.

Check	Answer	Record status	Evidence
Processing appears on the current Article 35(4) mandatory DPIA list	yes	recorded	Systematic profiling used to prioritise fraud intervention is treated as within the mandatory route.
Processing appears on a current Article 35(5) no-DPIA list	no	Action required	No matching Article 35(5) no-DPIA entry was identified.

Assessment

Check	Answer	Record status	Evidence
Need, nature, scope, context and purposes described	yes	recorded	Nature, scope, context, purpose, fields, recipients, retention and scale are recorded.
Relevant consultation recorded	yes	recorded	DPO advice, operations review and representative views are recorded.
Necessity and proportionality assessed	yes	recorded	Less intrusive alternatives, minimisation, lawful basis and rights measures are compared.
Risks to people identified and assessed	yes	recorded	Nine risks are assessed for likelihood, severity and affected groups.
Measures and owners recorded	yes	recorded	Human review, exclusions, testing, access control and outcome monitoring have owners.

Decision

Check	Answer	Record status	Evidence
High residual risk remains after measures	no	Action required	No high residual risk remains after the planned measures.
Approval and review trigger recorded	yes	recorded	Review triggers cover new data, model changes, outcome disparity and national-list changes.

Approval record

Decision owner	Decision	Date	Signature
Product and Data Protection Review Group	To be approved	To be completed	To be completed

Assumptions

- The organisation and responsible owner supplied the recorded facts for reference EU-DPIA-2026-004.
- No answer has been inferred from a blank or uncertain response.

Limitations

- This tool records the user's screening and assessment evidence. It does not decide whether processing is necessary, proportionate or lawful.
- The organisation must check the current Article 35(4) and Article 35(5) lists published by the competent supervisory authority.
- If high residual risk remains, the controller must consult the competent supervisory authority before processing unless the risk is reduced.
- Member State law, sector-specific duties and processing outside the recorded scope require separate review.

Official sources

Source	Provision	Date	Link
Publications Office of the European Union: General Data Protection Regulation, Article 35	DPIA duty, minimum content and national supervisory-authority lists	7 August 2026	https://eur-lex.europa.eu/eli/reg/2016/679/art_35/oj
Publications Office of the European Union: General Data Protection Regulation, Article 36	Prior consultation with the competent supervisory authority	7 August 2026	https://eur-lex.europa.eu/eli/reg/2016/679/art_36/oj
European Data Protection Board: Data protection impact assessments: high-risk processing	WP248 rev.01, endorsed by the EDPB	7 August 2026	https://www.edpb.europa.eu/our-work-tools/our-documents/guidelines/data-protection-impact-assessments-high-risk-processing_en
European Data Protection Board: DPIA lists of processing activities	Register of Article 35(4) mandatory and Article 35(5) no-DPIA lists	7 August 2026	https://www.edpb.europa.eu/registers/register-of-consistency-and-of-accountability-tools/data-protection-impact-assessment_en