

COMPLIANCE WORKING RECORD

# DPO requirement assessment pack

Fictional sample. Requires tailoring and responsible review.

Document control

| Field              | Value                                     |
|--------------------|-------------------------------------------|
| Document type      | DPO requirement assessment pack           |
| Document reference | FICTIONAL-PRIVACY-1                       |
| Jurisdiction       | Customer-selected EU exercise scope       |
| Version            | 1                                         |
| Status             | Named privacy decision workpaper prepared |
| Prepared by        | Fictional responsible privacy reviewer    |
| Prepared on        | 2026-10-09T18:00:00Z                      |
| Rule pack          | 2026-10-09.privacy-decision.1             |
| Generated          | October 9, 2026                           |

## Purpose and boundary

Assemble an explicit DPO requirement assessment with source-linked trigger facts, large-scale reasoning and a recorded decision.

Compare customer-confirmed public-authority, judicial, core-activity, systematic-monitoring and sensitive-data triggers. Keep unknown facts and national extensions explicit. Apply only the selected Article 37 assessment method and retain the responsible approval.

This workpaper applies exact customer-selected rules to supplied facts and prepares source-linked decisions and drafts. The customer confirms jurisdiction, coverage, operative rule version, populations and approvals. It does not certify legal applicability, exemption, consent authenticity, DPO appointment, notice delivery or a permitted transaction. Exact originals stay browser-local unless explicitly saved through paid private cloud saving.

Approved scope and privacy decision method

Fictional exercise only. Exact selected cases, operative rules and source records. Replace every fact, rule and decision before use.

Scope approval. FICTIONAL-SCOPE-1

Approved method. Fictional privacy preparation procedure 1. Source. f1. Locator. /methodVersion. Approver. Fictional authorized preparation-method approver. Approval date. 2026-01-02T12:00:00Z

Population statement. Declared complete population. Customer-declared case count. 1

DPO requirement assessment and trigger workpaper case inputs

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

| ID | Facts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Case ID. CASE-1 Description. Fictional exact selected privacy case. Replace every fact and rule before use. Entity Id. ENTITY-1 Jurisdiction. Customer-selected EU exercise scope Regime. GDPR Instrument. Fictional customer-approved operative instrument Provision. Fictional selected preparation provision 1 Rule Version. Fictional operative rule 1 Operative rule source file ID. f1 Operative rule source locator. /rules/0/ruleVersion Rule effective from. 2026-01-01 Rule effective through. Rule Approved By. Fictional authorized rule reviewer Rule approval timestamp. 2026-01-02T12:00:00Z Activity Id. ACTIVITY-1 Data Category. Fictional selected records Approved Scope Basis. Fictional exercise scope only. No real applicability is inferred. Population Mode. Declared complete population Declared Row Count. 1 Original source file ID. f2 Original JSON record pointer. /cases/0 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-cases-CASE-1"] |

DPO trigger assessments

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

| ID | Facts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Assessment Id. DPO-1 Case ID. CASE-1 Public Authority. No Judicial Capacity. No Core Processing. Yes Regular Systematic Monitoring. Yes Large Scale Monitoring. Yes Special Category Processing. No Criminal Data Processing. No Large Scale Sensitive. No Large Scale Basis. Fictional approved population, duration and geographic scope assessment. Local Dpo Duty. No Local Duty Basis. Recorded Decision. DPO indicated Reason. Fictional selected core monitoring trigger is confirmed. Original source file ID. f3 Original JSON record pointer. /dpoAssessments/0 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-dpoAssessments-DPO-1"] |

## Decisions

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

| ID | Facts                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Decision Id. DEC-dpoAssessments-DPO-1 Case ID. CASE-1 Record Type. dpoAssessments Record Id. DPO-1 Outcome. Prepared for review Basis. Fictional source-supported review of this exact named record. Reviewed By. Fictional responsible privacy reviewer Reviewed At. 2026-10-09T18:00:00Z Original source file ID. f3 Original JSON record pointer. /decisions/0 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-decisions-DEC-dpoAssessments-DPO-1"] |

## Evidence

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

| ID | Facts                                                                                                                                                                                                                                                                                                                                     |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Evidence Id. PROOF-cases-CASE-1 Record Type. cases Record Id. CASE-1 File Id. f2 Source Sha256. ac2279af4268160585774d1d7e0238dc44d05f13451ea501b722e7ec29eb8b41 Locator. /cases/0 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z                                                 |
| 2  | Evidence Id. PROOF-dpoAssessments-DPO-1 Record Type. dpoAssessments Record Id. DPO-1 File Id. f3 Source Sha256. af0f8131306f93cce2c27134be68eb725ae93911a977c7aa228f43177731e52e Locator. /dpoAssessments/0 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z                        |
| 3  | Evidence Id. PROOF-decisions-DEC-dpoAssessments-DPO-1 Record Type. decisions Record Id. DEC-dpoAssessments-DPO-1 File Id. f3 Source Sha256. af0f8131306f93cce2c27134be68eb725ae93911a977c7aa228f43177731e52e Locator. /decisions/0 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z |

## Actions

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

## DPO requirement assessment and trigger workpaper

The first 20 prepared output rows appear here. Complete rows remain in Excel and JSON.

| ID    | Result                                                                                                                                                                                                                                                                                                                                              |
|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| DPO-1 | Item. DPO-1 Case ID. CASE-1 Public authority trigger. False Core monitoring trigger. True Core sensitive-data trigger. False National extension. False Assessment candidate. DPO indicated Large-scale basis. Fictional approved population, duration and geographic scope assessment. Recorded decision. DPO indicated Result. Prepared for review |

## Owned privacy decision actions and dependencies

The first 20 prepared output rows appear here. Complete rows remain in Excel and JSON.

## Named privacy decision draft sections

The first 20 prepared output rows appear here. Complete rows remain in Excel and JSON.

| ID                       | Result                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| DEC-dpoAssessments-DPO-1 | <p>Item. DEC-dpoAssessments-DPO-1 Case ID. CASE-1 Decision. Prepared for review Draft text. Privacy decision working record. Prepared for review</p> <p>Case. CASE-1. Exact record. dpoAssessments/DPO-1.</p> <p>Customer decision basis. Fictional source-supported review of this exact named record.</p> <p>Responsible reviewer. Fictional responsible privacy reviewer. Review instant. 2026-10-09T18:00:00Z.</p> <p>This workpaper applies exact customer-selected rules to supplied facts and prepares source-linked decisions and drafts. The customer confirms jurisdiction, coverage, operative rule version, populations and approvals. It does not certify legal applicability, exemption, consent authenticity, DPO appointment, notice delivery or a permitted transaction. Exact originals stay browser-local unless explicitly saved through paid private cloud saving.</p> |

Privacy decision draft. DEC-dpoAssessments-DPO-1. Prepared for review

Complete exact draft text remains in Excel and JSON.

Privacy decision working record. Prepared for review

Case. CASE-1. Exact record. dpoAssessments/DPO-1.

Customer decision basis. Fictional source-supported review of this exact named record.

Responsible reviewer. Fictional responsible privacy reviewer. Review instant. 2026-10-09T18:00:00Z.

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Review findings

1 selected case scopes. 1 named result rows. 0 unresolved findings.

The first 100 findings and 1000 characters per displayed field appear here. Complete findings remain in the data exports.

| Kind                           | ID                       | Result  | Finding                                                           |
|--------------------------------|--------------------------|---------|-------------------------------------------------------------------|
| Original cases source          | CASE-1                   | Matched | Every declared named fact matches the exact original JSON record. |
| Original dpoAssessments source | DPO-1                    | Matched | Every declared named fact matches the exact original JSON record. |
| Original decisions source      | DEC-dpoAssessments-DPO-1 | Matched | Every declared named fact matches the exact original JSON record. |

Selected exact attachments

| ID | Filename                                     | Bytes | SHA-256                                                          |
|----|----------------------------------------------|-------|------------------------------------------------------------------|
| f1 | fictional-approved-privacy-rules.json        | 134   | 51b7709466b97e6e69561465b32120cb6d00e7355e99beadea6e27d0f995d81e |
| f2 | fictional-original-privacy-cases.json        | 850   | ac2279af4268160585774d1d7e0238dc44d05f13451ea501b722e7ec29eb8b41 |
| f3 | fictional-original-privacy-task-records.json | 945   | af0f8131306f93cce2c27134be68eb725ae93911a977c7aa228f43177731e52e |

## Unresolved items and limitations

The first 100 unresolved items appear here, with 1000 characters per preview. Complete findings remain in Excel and JSON.

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## Limitations

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## Official sources

| Source                                       | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Date            | Link                                                                                                                                                              |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EDPB: Guidelines on Data Protection Officers | Endorsed Article 37, 38 and 39 guidance. Large-scale and core-activity assessments remain source-supported customer judgments, with national extensions supplied separately.. Compare customer-confirmed public-authority, judicial, core-activity, systematic-monitoring and sensitive-data triggers. Keep unknown facts and national extensions explicit. Apply only the selected Article 37 assessment method and retain the responsible approval. No automated legal applicability or consent authenticity is inferred. | October 9, 2026 | <a href="https://www.edpb.europa.eu/documents/guideline/data-protection-officer_en">https://www.edpb.europa.eu/documents/guideline/data-protection-officer_en</a> |