

DPIA checklist for AI tools — AVGfilter

Practical checklist to prepare a data protection impact assessment · Version 1.0 · Not legal advice.

1. Description of the processing

- Which categories of personal data enter the AI tool?
- Through which channels (chat, email, documents, WhatsApp)?
- Which employees and processes use it?

2. Recipients and locations

- Which parties (AI provider, sub-processors) process the input?
- In which countries does processing and storage take place?
- Is input used to train models?

3. Retention and data subject rights

- How long are input, output and logs retained?
- Can data subjects effectively obtain access or erasure?

4. Risks and measures

- What is the risk of unauthorised access or transfer outside the EU?
- Which technical measures limit processing to what is necessary (e.g. tokenization before the AI call)?
- Is the processing demonstrable in an audit (which data was or was not shared)?
- What happens when the safeguard fails — is the process fail-closed?

5. Decision

- Residual risk after measures assessed and accepted by management?
- DPO or privacy officer consulted?
- Re-assessment scheduled (annually or when the tool changes)?