TRANSPARENCY OF PERSONAL DATA PROCESSING

Information notice provided to individuals whose personal data is processed reflecting the data processing specifics, including prior to obtaining consent (if this is the processing basis).

MAIN ASPECTS TO CONSIDER

1. **FORM OF THE INFORMATION NOTICE**
   - Structured text or visual methods (e.g. infographics). Entire information notice at once or layered approach.

2. **BRINGING TO THE ATTENTION OF INDIVIDUALS**
   - Generally, at the outset of data collection/establishing new processing purpose. Easily accessible (e.g. pop-up) at the outset and for future consultation.

3. **PROCEDURAL STEPS**
   - Make sure individuals read it (e.g. tick box for acknowledgement of reading). Keep proof of this action (e.g. logs). Keep versioning history.

4. **CONTENT OF INFORMATION NOTICE**
   - Concise, clear (no interpretable phrases), intelligible, easy to understand based on specifics of individual (e.g. child).

5. **MAIN DETAILS TO BE INCLUDED**
   - Scope and basis for processing. Disclosure to other organizations. Storing period before deletion. Types of personal data processed. Transfers outside the EU. Details on automated decisions.

6. **CONSENT MANAGEMENT**
   - Allow easy withdrawal of consent. No pre-checked boxes for obtaining consent. Retake consents after a period of time.

7. **CONTENT OF CONSENT**
   - Granularity, for each processing purpose. Specifically detailed for the processing purpose. Proper information notice before obtaining consent.

8. **CONDITIONS FOR TAKING CONSENT**
   - Clear action of the individual. Freely given (no conditioning, subordination, or negative consequences if consent not given).