

Guidelines 8 /2022 on identifying a controller or processors lead supervisory authority

Response 2022

Submission Timeframe:

Tuesday 8 November 2022

Amendment

2.1.3: 29 -34

Take note of 2.1.3 point 30 describes the associated ways of creating the decisions of the joint controller within terms of understanding and creating the documentations which addresses the needs of who takes responsibility of carrying out tasks within an organisation. This section is quite clear within terms of understanding the use of creating the documentations within terms of the EDPB and the GDPR. The GDPR is quite transparent within terms of taking note of allowing joint controllers within organisations to create these compliances while adhering to the documentations associated with the EDPB and the GDPR.

The review of these sections of each paragraph clearly details the information required of the joint controller and highlights the key elements of the report where it is identified by the information provided for the joint controller.

Annex: d – ii, iii

The information that have been discussed in this section describes important aspects of how the joint controller is used to establish its compliances is quite vague. It clearly details information about providing information on where the central admin is at. The aim to identify the location of the central admin does not quite provide adequate information within terms of understanding on the role of using this as a data strategy for both the organisation and the EDPB and GDPR. There still needs further clarification on this paragraph to ensure that the joint controller understands on what grounds the supervisory has within terms of data collection and its uses of taking note of the important requirements associated with the data collection.