

These guidelines are enlightening but still need clarification. My note is related to "essential means" and "non-essential means". The limit between the two remains blurred. In the "Flowchart for applying the concepts of controller, processor and joint controllers in practice", it is stated that the Processor can make "decisions about certain non-essential means to be used (e.g., what IT systems or other technical means to use for the processing or details of the security measures based on the general security objectives set by the other party)". The notion of "general safety objectives set by the other party" does not clearly distinguish the scope of action of the Processor while respecting the Controller's instructions. Indeed, in terms of security, to what extent can the Processor take decisions under its responsibility? What do you mean by general security objectives? Is it the technical and operational measures to be implemented, more specific or even broader? In my opinion, this notion should be further defined or a non-exhaustive list of examples should be given to set an idea of the expected degree of accuracy of Controller in instructions.