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PRW Consulting GmbH – Leonrodstraße 54 – 80636 München

München, January 15, 2020
Kaiserslautern

Comments on EDPB Guidelines 4/2019

Dear Sirs, L.S.,,

Please find our comments below.

On the Key design principles

Comment on Consideration 63:

Key design principles and default elements may include:

- * Relevance – The correct legal basis shall be applied to the processing
- * Differentiation – The controller shall differentiate between the legal basis used for each processing activity ... ETC.

The word “Key” is ambiguous in Data Protection and IT, it also means “a token” as in communications security or “a pointer” as in database technology. Both working fields are closely related to Data Protection. This is also not about “Key design”. Please avoid the word “Key”.

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The same problem exists in:

Consideration 65

Consideration 67

Consideration 71

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We are looking forward to your comments and are available for contact by means of telephone or e-mail as stated in the letter head.

Sincerely, Best Regards,

PRW Consulting GmbH

Ralph Bösling

Henk Kluvers CIPP/E, CIPM