

GDPR & AI Act Checklist for Development Projects

Placeholder content. The final version contains fully worded checkpoints, practical examples and templates. Version: placeholder · Alicja Wilczek, easydatenschutz.com

1. Privacy by design - before the first commit

- ☐ Purpose and legal basis documented
Placeholder: document purpose, legal basis and retention per feature.
- ☐ Data minimisation reviewed in the data model
Placeholder: which fields are truly required? Is pseudonymisation possible?
- ☐ Deletion concept and retention jobs planned
Placeholder: automated deletion instead of manual processes.
- ☐ Data subject rights technically feasible
Placeholder: export, rectification and erasure as API capabilities.

2. Roles, processing agreements, international transfers

- ☐ Roles clarified
Placeholder: controller, processor or joint controllers?
- ☐ DPAs in place for all vendors
Placeholder: cloud, analytics, support tooling, AI providers.
- ☐ Third-country transfers assessed
Placeholder: SCCs, transfer impact assessment, supplementary measures.
- ☐ Sub-processor chain documented
Placeholder: approval process and notification duties.

3. AI Act - risk classification in five steps

- ☐ Role in the AI value chain determined
Placeholder: provider, deployer, importer or distributor.
- ☐ Use case classified
Placeholder: prohibited, high-risk, transparency obligations or minimal.
- ☐ Transparency obligations met
Placeholder: labelling AI-generated content, user-facing notices.
- ☐ Data governance for training data
Placeholder: provenance, quality, bias testing, documentation.

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- ☐ Human oversight defined
Placeholder: intervention options and escalation paths.

4. Security & incident readiness

- ☐ Technical and organisational measures documented and tested
Placeholder: access control, encryption, logging, backups.
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- ☐ Breach notification process (72 hours)
Placeholder: responsibilities, contact chain, documentation template.
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- ☐ Emergency contact on file
24/7 emergency line: +49 (0) 211 / 50 66 99 46 · sos@easydatenschutz.com

Next step

This checklist is not legal advice. For an assessment of your specific project, book a free 30-minute intro call: easydatenschutz.com/en/contact · info@easydatenschutz.com