Repository of action grants and useful links

Report

Executive Summary

The EU General Data Protection Regulation has been in force since 2018, offering the world's strongest legal protection for personal data. Despite seven years of being enforced, there remains a dearth in knowledge, and confidence, about adhering to the provisions of the legislation. The AWARE project, funded through the Citizens, Equality, Rights and Values programme, has identified this need to be addressed for Small and Medium Enterprises, particularly in the private healthcare and beauty sector. As part of the AWARE project, a repository of 100 resources from across the European Union Member States providing information and advice on adherence to GDPR for SMEs has been compiled.

This document has been prepared as Deliverable 2.1 of the AWARE project. This document presents the AWARE project repository, the method that was used to develop it and guidance on how to use the repository to efficiently identify information most relevant to users. The repository is available in English and Hungarian language. It also provides an analysis of the content of the repository to enable users and stakeholders to quickly identify the emerging trends of GDPR guidance documents for SMEs, particularly in the private health and beauty sectors.

This document is intended as a guidance to users of the repository – people working in, supporting, and availing of services from SMEs in the private healthcare and beauty sector. This can include business owners, employees, Chambers of Commerce and enterprise promoting organisations at local, national or European level. It can also be of interest to patients and clients of private healthcare and beauty SMEs as data subjects. The information contained within this document, and the repository, is also applicable to all organisations and actors subject to GDPR regulations.

Glossary

CERV	Citizens, Equality, Rights and Values Programme
DPA	Data Protection Authority
EC	European Commission
EDPB	European Data Protection Board
EU	European Union
GDPR	General Data Protection Regulation
IDPC	Information and Data Protection Commissioner (Malta)
NAIH	Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information)
SME	Small and Medium Enterprises
TRI	Trilateral Research

Introduction

As described in the Grant Agreement, this report meets the requirements of Task 2.1, outlining the process and findings from the development of a repository focused on GDPR resources. The task is described as: "The partners will create a repository of useful links of previous results and action grants and the tools they developed. The repository will be made available on NAIH's website. Stakeholders and visitors will be able to access the repository via the AWARE project website[1]. The online repository will comprise three parts. The first part is a list and a description of each action grant awarded in the past and their key deliverables. The second part is a description of the various tools of ongoing value developed in the previous projects. The description will include links to where the tools can be accessed. The third part is a detailed briefing paper summarising the key findings from the other action grants and the AWARE consortium's comments on those findings. The repository will be in Hungarian and English." Considering the intended end users of the repository, i.e., members of SMEs and organisations concerned with data protection for businesses, we extended the repository beyond outputs from research projects, to also include guidance documents and other key outputs from other sources, in particular documents developed by Data Protection Authorities.

Since the introduction of the GDPR in May 2018, businesses in the healthcare and beauty sectors have been required to adhere to the data protection and privacy rules. The GDPR is the strongest data protection law in the world, and as such there is a significant onus on controllers and processors. Data relating to customers and patients which relate to their identity and health warrants protection. Recent cyberattacks on national health systems[2] and 309 cybersecurity incidents have been reported in Europe between 2023 and 2025. These developments highlight the vulnerabilities and need for GDPR to be fully adhered to. Connected to this, the Commission has expressly identified the healthcare sector as needing increased data protections[3].

This repository is primarily targeted at staff and other stakeholders of private healthcare and beauty businesses. Based on preliminary qualitative research connected to the AWARE project, there remains significant gaps in awareness and confidence in adhering to GDPR standards among these sectors. This will be further explored in other project work packages to be finalised over the course of the AWARE project.

This report first outlines the methodologies used for compiling the repository and conducting the analysis on the content of the repository. It then provides guidance on how to use the repository and the various search options contained within it. The next section provides an overview of the data contained within the repository and analysis of the primary trends

---

[1] https://www.naih.hu/aware/eredmenyek and https://www.naih.hu/aware-project/deliverables, last accessed 29 July 2025

[2] European Commission, Cybersecurity in healthcare, **Cybersecurity of hospitals and healthcare providers** https://commission.europa.eu/cybersecurity-healthcare_en, last accessed 1 July 2025.

[3] Directorate General for Communication, Bolstering the cybersecurity of the healthcare sector, 15 January 2025, https://commission.europa.eu/news-and-media/news/bolstering-cybersecurity-healthcare-sector-2025-01-15_en, last accessed 1 July 2025.

emerging. The report then identifies eight unique resources within the repository which are considered by the AWARE project team to be particularly useful and effective in providing guidance on GDPR. The report then provides a brief discussion of the content of the repository and conclusions. The Annex is a Briefing Paper which summarises the content of this report and is also available as a standalone document.

Methodology

This section describes how the repository has been compiled for use by the public and how the data within the repository has been analysed.

Compilation of the repository

To create this repository, the partners conducted an extensive search of the resources available in the European Union. The aim was to list all the tools available to help SMEs achieve and maintain compliance. To this end, they researched the National Data Protection Authorities throughout the European Union, as well as public and private bodies. They then analysed, classified and prioritised them to propose what would really be useful to SMEs.

The search was divided across multiple categories to compile the repository. The terms 'GDPR' and 'guidance' were searched along with variations of the keywords 'SME', 'small business', 'private health organisation', 'beauty business', 'beauty industry', 'private healthcare sector'. Where the language of the resource was not English or Hungarian, the DeepL translation tool was used during the search.

Search criteria:

- o Tools from Data Protection Authorities or the European Data Protection Body
- o Projects across Europe with a focus on data protection training, resources, awareness raising, analysis of implementation of GDPR.
- o Tools from the private sector.
- o Tools from the public sector beyond DPAs or EDPB.
- o Websites that have listed tools relating to GDPR implementation, discussion and awareness raising. These had to be tempered as they are not always maintained and can be hijacked by cybercriminals.

The search was conducted between January and May 2025. Sources for the search included Google Search, CORDIS, DPA websites, and the European Commission.

Initially, over 400 resources were identified where the guidance was directly or indirectly targeted at SMEs in the private health and beauty sectors.[4] The search was then refined based on the relevance of the resources for the target audience of this project, their availability in English and Hungarian language, to reflect a geographical spread across Europe, to reflect diversity in resource output type and to reflect the varying levels of existing knowledge with GDPR requirements and practices. Some tools are aimed at users assuming no prior knowledge, whereas others assume some familiarity with GDPR.

---

[4] The complete collection of resources is published at https://www.naih.hu/aware/eredmenyek and https://www.naih.hu/aware-project/deliverables.

Where the links are provided, these are live as of the time of publication and NAIH will endeavour to ensure the resource is updated regularly. This includes monitoring the ongoing projects for outputs to be made publicly available and checking for links.

The repository has been initially prepared in English language and translated to Hungarian by NAIH staff, using the European Commission's e-Translation tool.

Analysis of data within the repository

The repository was refined through three rounds of data cleaning for conformity and clarity. Thematic analysis was used to determine the most frequently occurring terms within each resource, with keywords being identified in line with the parameters of the repository purposes. Thematic analysis is a basic method in qualitative research, involving identifying, organizing, and interpreting patterns of themes across a defined piece of data – the 100 resources within the repository. Quantitative analysis within Excel was used to analyse the frequency of appearance of the other columns of data, allowing for an overview of the most commonly occurring data values within the repository.

Structure of the repository

Number	Title	Link	Source	Source type	Resource type	Length	Language(s)	Country of	Brief description	Starting	Date	Keyword 1	Keyword 2	Keyword 3	Keyword 4	GDPR article (if applicable)	Output (for research projects
1	The EDPB data protection guide for small business	https://www.edpb.europa.eu/sme-data-protection-guide/home_en	EDPB	Public body	Guidance document	Website	All EU languages	EDPB	The EDPB has launched a Data Protection Guide to help small business owners on their way to become more data protection compliant. Topics: Understand data protection basics Respect individuals' rights Be compliant Secure personal data	2025	updated	Data subject rights	Security of processing	Personal data	Processing		

Figure 1. Snapshot of Repository

The data set is published by NAIH online as a downloadable resource in Microsoft Excel format.

The image above shows the first resource included in the repository and the 16 column titles.

The NAIH are hosting the resource at https://www.naih.hu/aware/eredmenyek and https://www.naih.hu/aware-project/deliverables.

The Repository contains 100 resources which provide guidance in the form of word documents, checklists, learning resources such as quizzes and questionnaires, videos or downloadable applications. The resources included in the repository are specifically aimed at small businesses, private healthcare organisations and beauty businesses.

Using the drop-down buttons on each column, users can search for criteria specific to them. For example, users can search for resources from a specific country, or a specific language, etc.

How to use the repository

The repository is divided into two sections – informational resources and projects. For informational resources there are 15 searchable columns of data. The columns included in the 'Informational Resources' section are:

Title of the document
Online link
Source organisation that generated the resource
Source type
Type of document
Length of the resource
Language
Country of issuance
Brief description of the resource
Date of publication
Keyword 1
Keyword 2
Keyword 3
Keyword 4
Most relevant GDPR Article

The 'Projects' section contains 16 columns of searchable data.

Title of the document
Online link
Source organisation that generated the resource
Source type
Type of document
Length of the resource
Language
Country of issuance
Brief description of the resource
date of publication
Keyword 1
Keyword 2
Keyword 3
Keyword 4
Most relevant GDPR Article
Output (for research projects only)

The brief description of the resource was taken directly from the resource's own description. No analysis has been conducted on the brief description column, as it is important for repository users to know exactly what the resource contains. Within the other columns there are defined options for searching. These are described in tables below.

Searchable Options

Source Type

Source type refers to the organisation that funded the resource to be developed. The searchable options under the column 'Source type':

DPA
EU - Horizon Europe
EU - Other
EU- H2020
European project
Law firm
National
Private company
Public body
Research project

Source

The source column refers to the name of the organisation that produced the resource. The searchable options under the column 'Source':

Belgium DPA
Germany DPA
France DPA
EDPB
Private Company
Greece DPA
Spain DPA
Italy DPA
Denmark DPA
Hungary DPA
Ireland DPA
Malta DPA
Slovenia DPA
Latvia DPA
Lithuania DPA
Estonia DPA

Netherlands DPA
Luxembourg DPA
European Project
Portugal DPA
Sweden DPA
Norway DPA
Austria DPA

Resource Type

The searchable options under the column 'Resource type':

Application
Checklist
Database
Guidance document
Mobile application
Online tool
Project
Self-assessment tool
Self-assessment checklist
Software
Template
Video

These options were allocated based on the description of the resource itself.

Resource Length

There are various lengths of resources, and they have been categorised by page length where possible. Where the resource is a website with no discernible page length or is a video, this is indicated in the repository.

Language

This indicates the primary languages which the resources are available – sometimes it is only one, sometimes there are many language versions. This does not preclude the potential for the website itself to generate the content in the language of the user, depending on the search engine settings.

The searchable options under the column 'Language':

All European Union languages
Danish
Dutch
Dutch/French
English
English/Dutch
English/French
English/German
English/German/French
English/Greek
English/Hungarian
English/Italian/Belgian/ French/ German
English/Latvian
English/Lithuanian
English/Norwegian
English/Portuguese
English/Slovenian
English/Spanish
English/Swedish
Estonian
French
German
Greek
Hungarian
Italian
Latvian
Slovenian
Spanish

Country of Issuance

This indicates what country issued the guidance, either individually or jointly, and where projects are funded by the European Commission, they have been categorised as guidance issued by 'Europe'. There are two resources that have two recognised countries of issuance between Croatia and Ireland, Croatia and Italy.

The searchable options under the column 'Country of Issuance':

Austria
Belgium
Cyprus
Croatia, Ireland
Croatia, Italy
Denmark
EDPB
Estonia
Europe
Finland
France
Germany
Greece
Hungary
International
Ireland
Italy
Latvia
Lithuania
Luxembourg
Malta
Netherlands
Norway
Portugal
Slovenia
Spain
Sweden
UK

Keyword

Keyword searches were coded under 39 themes, indicating the breadth of the topics covered by the resources included in the project. Themes were coded based on the researcher's determination of the dominance of the theme in descending order. So, Keyword 1 featured most heavily, then the resource was themed as the Keyword 2, Keyword 3 and Keyword 4. The keywords determined by the researchers were themed along the GDPR requirements and

based on the perceived needs of the target audiences, e.g., data concerning health or women's data.

The searchable options under the columns 'Keyword' and a brief description of the code designated by the research team:

Automated decision-making	The process of making decisions using automated systems without human intervention. These systems utilize data, algorithms, and machines to generate decisions for various applications, such as loan approvals, fraud detection, or even within public administration.
Biometric data	Information like fingerprints, face scans or voice patterns used to identify a person.
Children's data	Personal information about individuals under the age of 18.
Controller	The person or organization that decides why and how personal data is used.
Cross-border transfers to non-EU countries	Moving personal data from the EU to countries outside the EU.
Data breach	When personal data is lost, stolen or seen by someone who should not have access to it.
Data concerning health	Information about a person's physical or mental health, including medical records.
Data processing agreements	Contracts between companies (controller company and processor company) about how personal data will be handled.
Data protection by design	Making sure privacy and data safety are built into procedures, products and company policy from the start.
Data protection impact assessment	A check to see how a process, product or project might affect people's privacy or personal data and how to reduce risks associated with it.
Data protection officer	A person in charge of making sure an organization handles personal data properly.
Data subject	The individual whose personal data is being collected or used.

Data subject rights	The rights people have over their personal data, like accessing it or asking for it to be deleted or objecting against the use of it.
Employee data	Personal information about someone employed by a company.
Fines	Monetary penalties given when data protection rules are broken.
Information to be provided by controller	Details the controller must give people about how their data is used.
Joint controllers	Two or more organizations that decide together how and why personal data is used.
Legal basis - consent	When someone clearly agrees to their data being used for a specific reason.
Marketing	Using personal data to promote or sell products or services.
Micro-SMEs	Very small businesses, usually with fewer than 10 employees.
National frameworks	Each country's own rules and systems for applying EU data protection law.
Personal data	Any information that can identify a person, like their name, email or ID number.
Principle - accountability	Organizations must be able to show that they follow data protection rules.
Principle - integrity and confidentiality	Personal data must be kept safe and protected from unauthorized access.
Principle - lawfulness, fairness and transparency	Data must be collected and used legally, fairly, and openly.
Principle – purpose limitation	Personal data should only be collected and processed for specified, explicit, and legitimate purposes. If you collect data for one purpose, you cannot use it for another, unrelated purpose.
Principle - storage limitation	Data should not be kept longer than necessary.
Processing	Any action done with personal data, like collecting, using or storing it.

Processor	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller
Records of processing activities	A list of how personal data is used and managed by a company.
Right of access	People can ask to see what personal data an organization has about them.
Right to erasure	People can ask for their personal data to be deleted in certain cases.
Right to object	People can say no to their data being used in certain ways, like for marketing.
Security of processing	Steps taken to keep personal data safe from harm or misuse.
SMEs	Small and medium-sized businesses, usually with fewer than 250 employees.
Special categories of personal data (sensitive data)	Personal data that needs extra protection, like race, religion, health info, political views or sexuality.
Supervisory authorities	Official public bodies in each EU country that enforce data protection laws.
Video surveillance data	Images or recordings of people captured by security cameras.
Women's data	Personal information related specifically to women's identity, status, health, etc.

Dates of Production

The dates of the resources being developed range from 2018 to 2025. Some of the projects are ongoing and resources will be developed throughout the lifetime of the project. The longest running project included within the repository is scheduled to be competed in 2027. Some of the resources have a single year of production listed, such as when a guidance document was published. Others have a time range, for example 2018-2020 to indicate the duration of a project which developed the resources.

Data analysis findings

This section provides an overview of the data contained within the repository. While this cannot be conclusive due to the limitations of inclusion for the repository, particularly language limitations, some trends emerge about the origins and types of resources which have been developed across Europe to provide guidance on GDPR to private healthcare and beauty providers.

Keywords

The keyword analysis can offer insight into the priorities of the producers of the resources and what they have identified as the topics of most importance for people seeking information on GDPR.

In total there were 39 keywords across four columns of prominence used to analyse the priority themes contained within the resources of the repository. The total number of codes across the four columns was 372. The keywords in the repository will enable users to search by topic that are most relevant to them. The table below shows the ten most frequently occurring keywords in the repository.

Figure 2. Top 10 Keywords

'Small and Medium Enterprises' (11%) was the primary keyword across all four columns, recognising the narrow focus of the search and analysis. 'Processing' and 'Controller' appear next in frequency (both 9%) highlighting the importance of business actors understanding their roles. 'Personal data' (8%) and 'data subject rights' (7%) indicates the focus of the information within the repository on client's entitlements when they interact with the businesses. 'Security of processing' (6%) and 'data protection by design' (5%) suggests that producers of GDPR guidance are placing emphasis on holistic approaches to data protection, and increasing awareness of the technicalities of GDPR and who 'data subjects' (4%) and

'processors' (3%) are as well as compliance with 'records of processing activities' (3%) for GDPR purposes.

Source findings

The source of the resources being produced is important as it indicates which organisation are identifying and responding to the needs for GDPR specific information for our target group. European projects are the primary developer of resources within our repository, followed by the Spanish, German, Greek and Dutch Data Protection Authorities. Resources from private companies represent 3% of the content of the repository.

Figure 3. Source Organisations

Language Findings

For the purposes of analysis, the frequency of the national language of the country of issuance was analysed. For example, if a resource was available in English and German, it was categorised as being German language. This provides a clearer overview of the diversity of the national languages. English is the predominant language at 35%, followed by German at 10%, Greek at 7% and French also at 7% of the total resources. There are four resources which are available in all European languages, representing 5% of the resources. Where there are dual or multiple languages considered, English + Greek are the most frequently occurring.
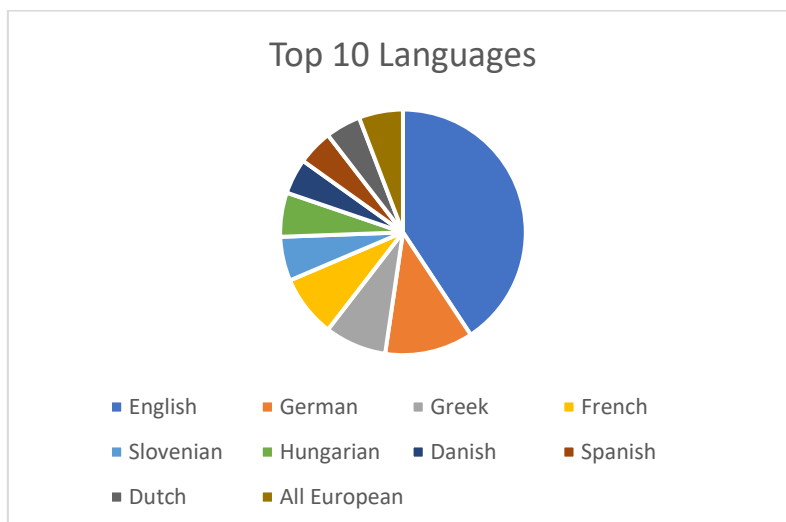
Figure 4. Top 10 Languages

Country representations

There are 30 geographical locations identified within Europe and one international resource. Some resources are coded with multiple countries, acknowledging the inter-country collaboration without a clear lead. Europe overall features as the most common location. This is due to the categorisation of European Commission funded projects as 'Europe' in the 'country of issuance.' Content issued from Germany, Greece and Spain appeared most frequently in terms of individual countries.
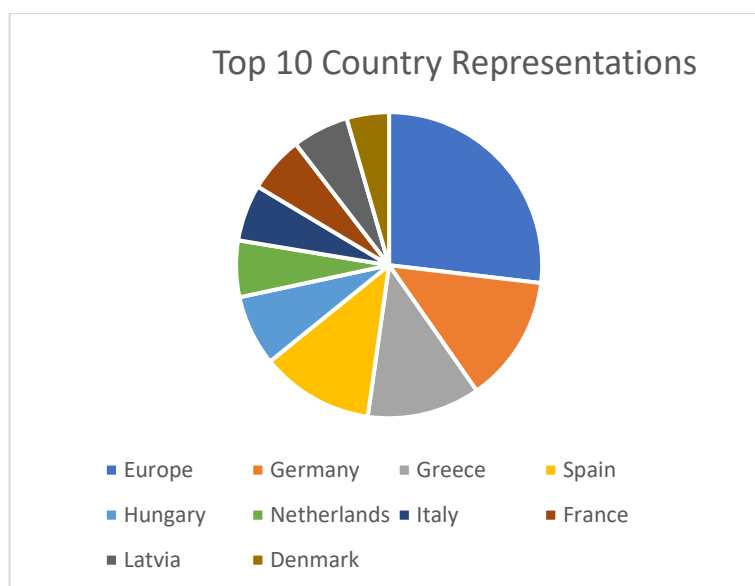

Figure 5. Top 10 country representations

Funding representations

The identified funding sources are Data Protection Authorities, European Commission funds through Horizon 2020, Horizon Europe, other European funds such as the Citizen, Equality,

Rights and Values Fund, private funding, national agencies and private law firms. Where the funding source is identified as a law firm, this indicates that the private firm developed the resource from their own time and expertise rather than providing funding externally.

Data Protection Agencies are the primary sources of funding for resources on GDPR compliance for our target groups. This is followed by unidentified European Commission funds and Horizon 2020. This is influenced by the timing of the introduction of the GDPR in 2018 and the eligibility of projects to be funded under Horizon 2020.
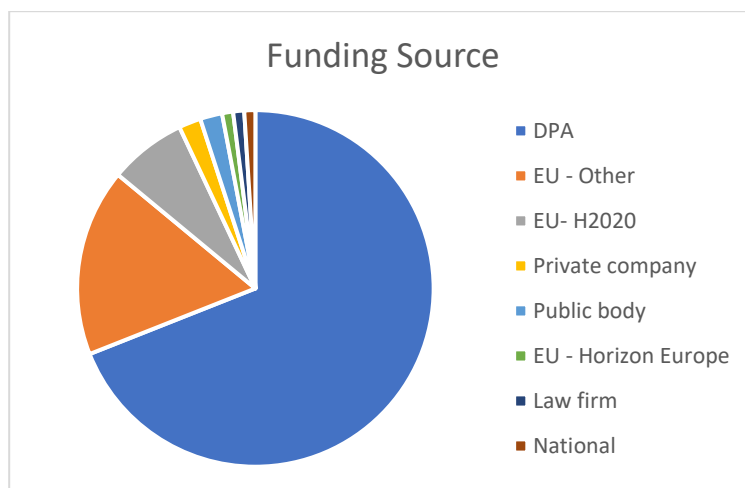

Figure 6. Funding sources

Resource representation

The resources which are available have been categorised as they were described by the authors. Where resources are categorised as project, they also have information relating to project outputs. Often projects have multiple ongoing resources and outputs being developed which are not easily categorised for our analysis purposes. Guidance documents in Word format are the more popular type of resource developed, followed by project and template. Templates enable users to identify the type of data they store and process, and to put in place a structure for data storage, processing and protection. Checklists and self-assessment checklists are convenient methods of quickly identifying GDPR requirements as they apply to the user. Databases, applications, mobile applications and software are more complex tools that can be installed onto organisational hardware to support the collection, storage, processing and protection of data in a GDPR compliant manner.
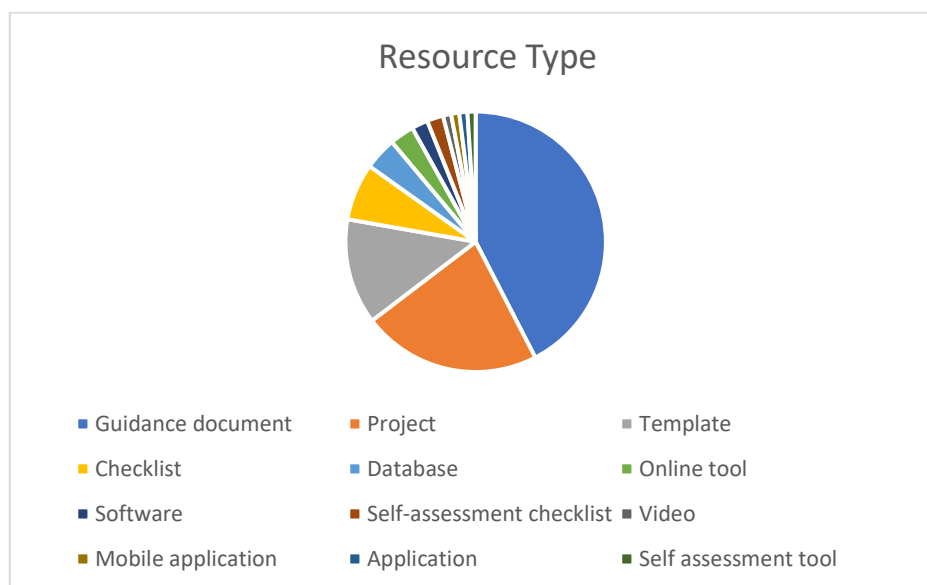
Figure 7. Resource Types

Date of Resource Production

To stay within the scope of the GDPR timeline, the years that resources were developed ranged from 2018 to 2025. Where it was not possible to determine the date of original publishing of content, such as on website, the date on the website last being updated, was included. In most cases, this was in 2025. There is information within the repository where projects are running across multiple years. For analysis purposes, the starting year was taken as the year of production as some projects have not yet completed their resource development. There are 33 resources produced, or in the process of being produced in 2025 so the repository reflects very current information. Content developed in 2020 (16%) and 2021 (15%) are the next most frequently occurring resources in the repository.
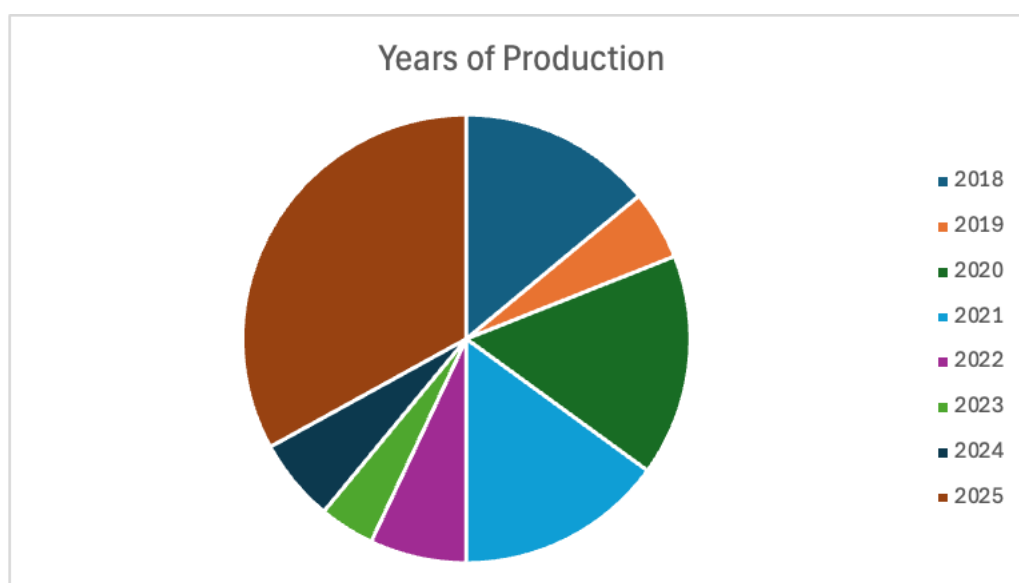
Figure 8. Years of production

Length of resource

For analysis purposes, the lengths of resources were categorised as up to 5 pages, up to 10 pages, up to 20 pages, up to 50 pages, up to 100 pages, up to 200 pages, up to 300 pages, video and website. Websites are the most dominant length of resource (56%), followed by documents up to 5 pages in length (25%) and up to 50 pages in length (10%). This might indicate that there is demand for varying degrees of substance and depth to information on GDPR from the target group. The resources available on the repository provide a mixture of both brief, high level information and longer, in-depth information to maximise the relevance of the repository to the different needs of repository users.
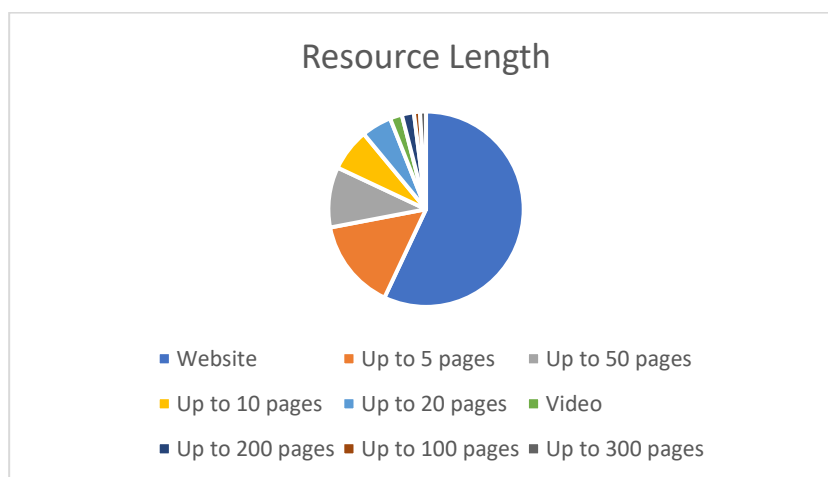
Figure 9. Resource Length

Highlights on Critical Findings

This section identifies some of the resources within the repository which the AWARE team consider to be useful for users who are new to GDPR regulations. There are a wide variety of formats of guidance within these highlighted resources with information that is easily accessible and understood.

1. The EDPB data protection guide for small business:[5]

The Data Protection Guide for Small Business developed by the European Data Protection Board is a practical, accessible, and trustworthy toolkit that empowers small businesses to achieve GDPR compliance without becoming overwhelmed. It is especially tailored to the unique needs and constraints of SMEs, written in a clear and concise language without legal jargon and provides straightforward explanations that align with the business processes of small companies.

---

[5] EDPB, Data Protection Guide for Small Business, https://www.edpb.europa.eu/sme-data-protection-guide/home_en last accessed 29 July 2025.

It is structured in easy-to-digest modules covering aspects like data protection basics, legal basis, data subject rights, security measures, record-keeping, data breaches etc. Users can quickly access the parts most relevant to their business—no need to read the GDPR.

The guide includes videos, checklists, self-assessment questionnaires and practical resources that help businesses implement GDPR principles without outside legal help.

2. OLIVIA – Virtual assistant for GDPR compliance: [6]

Olivia is a free, SME-focused, interactive GDPR toolkit developed by the ARC2 Project (Awareness Raising Campaign for SMEs) consortium including the Croatian and Italian data protection authorities and the University of Zagreb, Florence and Brussels. OLIVIA is an e-learning platform comprising 15 GDPR courses, each consisting of theoretical and practical modules. These 15 courses cover explanations of all the obligations of controllers and processors, educational materials and videos, knowledge tests, webinars, presentations and templates for creating documents to demonstrate GDPR compliance. There is a certification process too where the passing score for the test is 80% or higher. If the user achieves a score of 80% or above, Olivia will automatically generate a certificate of successful completion of the theoretical module.

Olivia is available in Croatian, Italian, and English but built to support expansion into other EU languages and legal systems. It is fully accessible at no cost to SMEs, with open-source code that allows customization for national laws and addition of new languages or modules, promoting adaptability and improvement across the EU. The digital tool is designed according to the needs of Italian and Croatian SMEs.

3. SMEDATA II Project:

3.1. "GDPR in Your Pocket" mobile application[7]:

The purpose of the "GDPR in Your Pocket" mobile application, developed by SMEDATA Project, is to introduce GDPR to citizens and SMEs in an easy-to-use and easy-to-understand way, and to give them practical knowledge and advice with respect to their rights and obligations under the EU data protection law. The app simplifies complex legal language into accessible summaries and guidance and because of its portable nature, users can quickly consult GDPR information anytime, anywhere, directly from their smartphones. Its 4 modules are "Legal library", "GDPR dictionary", "Guide for citizens" and "Guide for SMEs". The application content was supplemented with relevant legislation and case law in the field of personal data protection and includes a large collection of legal documents of the European Union and four EU Member States – Bulgaria, Italy, Germany and France. The user interface is available in English, Italian, Bulgarian, German and French; thus, it reaches more than 42% of the EU population in their mother language. "GDPR in your pocket" was developed as a hybrid application that can be installed on both iOS and Android devices and Windows 10/11 devices.

3.2. Self-Assessment Tool[8]:

The Self-Assessment Tool is tailored for SMEs' needs as it aligns GDPR compliance checks with their actual workflows and sector-specific data processing practices. The tool offers a multiple-choice two-tier questionnaire (Introduction & Main Section) in an easy-to-use format that guides non-expert users through GDPR topics step by step. It covers core GDPR concepts like principles of processing, privacy-by-design, record-keeping, right to access and co-operation with the supervisory authorities. It combines self-assessment with learning modules and further reading, supporting ongoing staff and stakeholder education. It is ideal for integrating GDPR into day-to-day business, adapting to new processes, services or tech.

3.3. Awareness Tool:[9]
The Awareness Tool offers structured modules (Introduction, Main Section, Further reading) tailored to SMEs, covering GDPR fundamentals and practical daily application. It provides clear explanations, to help users understand and implement concepts like privacy-by-design, legal grounds for personal data processing or handling data subject rights. The tool also offers a case law overview and training methodology for SMEs. It promotes continuous learning as each section links to further reading (official guidelines, case studies, best practices), enabling deeper exploration as needed. The tool is available online at no cost, making GDPR awareness and ongoing training easily accessible to SMEs across the EU.

4. DAAZ - The intuitive path to data protection:[10]

DAAZ ("Data Accountability from A to Zen") is a free, online GDPR-compliance platform launched by the Luxembourg data protection authority. It is designed to help startups and SMEs in Luxembourg and across the EU understand and implement GDPR requirements in an intuitive and engaging way with tailor-made training for SMEs based on real examples. DAAZ follows the adventure of Dominique Schummer, a fictional dynamic businessperson faced with challenges of the GDPR. Supported by his team, Dominique will discover and implement the GDPR to ensure a lawful handling of the data subjects.

DAAZ was built based on feedback from several entrepreneurs to directly address challenges faced by small businesses: limited legal/cybersecurity expertise, budget constraints, evolving regulations. It offers a 4-level journey (Basics, Design, Implementation and Governance 2.0) and comes with templates and practical guides to help users build real GDPR-compliant workflows. It uses "story learning" where users progress through modules filled with quizzes and real-world scenarios, at their own pace while staying anonymous and may return anytime. DAAZ is currently available in French, German, and English, with more languages planned. The DAAZ eLearning platform has been shortlisted for an award at the Global Privacy Assembly's Global Privacy and Data Protection Awards 2024.

5. GDPR Guidance for SMEs:[11]

The Irish Data Protection Commission's "GDPR Guidance for SMEs" offers SMEs a clear, practical roadmap to understand and comply with the GDPR. The guide begins with concise explanations of key GDPR terminology, essential for SMEs and DPOs to grasp core concepts

---

[9]SME Data, GDPR in your pocket https://smedata.eu/self_asses/en/awareness/index.html, last accessed 29 July 2025.

[10] Luxembourg Data Protection Authority, Data Accountability from A to Zen, https://daaz-gdpr.lu/, last accessed 29 July 2025.

[11]Ireland's Data Protection Commission, Guidance Note, GDPR Guidance for SMEs, July 2019, https://www.dataprotection.ie/sites/default/files/uploads/2019-07/190708%20Guidance%20for%20SMEs.pdf, last accessed 29 July 2025.

quickly. It emphasizes assessing organisations' processing activities by considering scale and sensitivity, guides SMEs to apply data protection by design and default and to identify high-risk areas requiring a DPIA. It contains a comprehensive checklist tool that will take organisations through more detailed questions in the areas of personal data, data subject rights, accuracy and retention, transparency requirements, other data controller obligations, data security, data breaches and international data transfers. It is specifically tailored for SMEs lacking extensive legal or compliance teams and makes GDPR accessible and implementable without needing major external support.

6. IDPC Online Self-Assessment Compliance Tool:[12]

The Online Self-Assessment Compliance Tool provided by Malta's Information & Data Protection Commissioner (IDPC) guides users through an 11-step evaluation covering core GDPR topics. The questionnaire is composed of multiple mandatory questions to prompt users to proceed with the evaluation and produce a result. While completing the questionnaire, an information symbol offers to give more information on the respective term or topic. Upon completion of the questionnaire, the online self-assessment compliance tool will generate a report indicating the user's overall self-assessment risk levels (low, medium, high) based on their answers, as well as recommendations and best practices to improve the users' understanding of the GDPR and make appropriate suggestions to mitigate non-compliance risks. The compliance tool also has a document library which is available only to users who have fully completed and submitted the online-self assessment questionnaire. The document library offers downloadable documentation, sample policies, and templates (e.g., privacy notices, record-keeping) that organisations can adapt for internal use. The tool is freely accessible via the IDPC website, designed not to collect any personal data, and streamlined for ease of use.

7. CNIL record of processing activities:[13]

The CNIL's record of processing activities is a comprehensive tool that helps organisations to be compliant with the recording obligations prescribed by article 30 of the GDPR. It allows controllers and processors to make an inventory of the data processing and to have an overview of what they are doing with the concerned personal data. The record is a document with inventory and analysis purposes which allows enterprises to precisely identify, among others:

- The actors involved (controller, processors, representative, joint controller, etc.) in the data processing;
- The categories of data processed;
- The purpose of the processing (what they do with the collected personal data), who has access and who are the recipients of the personal data;
- For how long they are retaining the personal data;

---

[12] Malta Information and Data Protection Commissioner, Welcome to the Online Self-Assessment Compliance Tool, https://idpc-compliance-tool.org.mt/, last accessed 29 July 2025.

[13] Commission Nationale de l'Informatique et des Libertés, Record of Processing Activities, 20 August 2019, https://www.cnil.fr/en/gdpr-toolkit/record-processing-activities, last accessed 29 July 2025.

- The technical and organizational security measures implemented.

The record template offered by CNIL meets the requirements of the GDPR and it is available in ODS format. The CNIL recommends, as far as possible, to complete the additional information records as well, to make it a more global complying tool.

8. STAR II Project:

8.1. Handbook – The GDPR made simple(r) for SMEs:[14]

The handbook is the outcome of the STAR II (SupporT small And medium enterprises on the data protection Reform II) research project implemented by a consortium of NAIH, the Vrije Universiteit Brussel and Trilateral Research Ltd. between August 2018 and December 2020. The STAR II consortium has conceived the handbook as a tool to simplify the GDPR for SMEs. It explains some of the primary features of the GDPR (e.g. its risk-based approach and legal provisions embedding it) in a simple language and provides case studies and practical examples to help SMEs meet core GDPR requirements. Chapter 1 (Navigating support section) provides an overview of the main public and private actors in the European data protection landscape. It describes the roles and responsibilities of public bodies and explains how SMEs could use their support to adhere to GDPR requirements. Chapter 2 (Personal data protection basics) explains the scope of data protection law and its application to SMEs. The chapter introduces concepts and principles that form the crux of personal data protection legal framework by answering the most asked questions. Chapter 3 (The theory and practice of a risk-based approach to personal data protection) addresses the responsibility of the controller (Article 24), principles of data protection by design and default (Article 25), documentation obligations (Article 30), security requirements (Article 32), personal data breach notifications (Articles 33 and 34), data protection impact assessment (Article 35) and the prior consultation procedure (Article 36). Each section provides practical examples, suggestions and recommendations for further reading. Where available, it refers to relevant decisions by DPAs. Chapter 4 (SMEs and employees' data) addresses data protection concerns for SMEs when processing their employees' personal data. The handbook is available in English and Hungarian.

8.2. SME Hotline:[15]

Within the framework of the STAR II project, NAIH operated an e-mail information hotline between 15 March 2019 and 15 March 2020 both in English and Hungarian, where the Authority provided general information to SMEs regarding the rules of the GDPR. During the one-year operation of the SME hotline, the Authority received 252 questions. The majority of the questions concerned the compliance of a specific data processing activity with the GDPR, followed by questions regarding the rules of video and audio recording, the processing of employees' personal data, the rights of the data subject and the legal basis for processing, as

---

[14] NAIH, The GDPR made simple(r) for SMEs, https://www.naih.hu/star-ii/starii-eredmenyek/kkv-kezikonyv-es-dpa-guidance, last accessed 29 July 2025.

[15] NAIH, Announcement on the results of the SME hotline operation, https://www.naih.hu/star-ii/starii-eredmenyek/kkv-hotline, last accessed 29 July 2025.

well as questions regarding the need for records of processing activities and the scope of the GDPR.

The questions received and experiences gained during the operation of the SME hotline served as the basis for the handbook described in 8.1 above. Based on the number and type of questions received by the hotline, as well as the positive feedback, it can be concluded that it achieved its goal and successfully supported the SMEs and other stakeholders in the sector. The "Frequently Asked Questions" of the hotline are available both in English and Hungarian.[16] The partners also prepared a guidance for data protection authorities on setting up hotlines for SMEs, available in English at https://www.naih.hu/star-ii/starii-eredmenyek/kkv-kezikonyv-es-dpa-guidance.

Discussion

There has been considerable effort since the coming into force of the GDPR in May 2018 to raise awareness about the resulting obligations of private healthcare and beauty providers. GDPR can seem onerous and intimidating, particularly to small businesses who have not had direct training about data protection law. The resources contained within the repository addresses the needs of these target groups through the wide variety and detail of resources included. There are multiple resources available in many different European languages which either directly or indirectly target small businesses in the private healthcare and beauty sectors. The European Commission is the primary funder and promoter of projects across Europe developing resources on GDPR for small businesses. This common theme of the EC being the main source for GDPR resources could suggest that countries are reliant on the EC funded resources for clarity and guidance. However, at national level, Data Protection Authorities are also continually active in producing content to meet the needs of businesses within their country. Guidance documents being the primary resource for information on GDPR could suggest that plain language text is in high demand among the target group and that it is the preferred format for transferring information from the resource producers.

Conclusion

The repository identifies the plethora of resources available on GDPR and locates them conveniently into a single open access database. Users can search based on their unique knowledge or resource needs across different European Union languages for resources developed since 2018. Because of the target audience and the clientele of their businesses, there are some specific resources related to women and children's data but, the information contained within the repository will be of use to organisations outside of the target audience also.

---

[16]NAIH, Support for the SMEs in the GDPR compliance, available in English from https://www.naih.hu/files/SME-hotline-FAQs-I.pdf and in Hungarian from https://naih.hu/files/KKV-hotline-GyIK.pdf, last accessed 29 July 2025.

Annex 1: Briefing Paper on key findings from AWARE project repository

July 2025

"*An online repository of resources to support SMEs with their data protection obligations*"

<u>What is the repository?</u>
The AWARE project, funded by the European Commission, has developed a repository and a supporting guidance document to provide a central location for multiple European resources on GDPR. The repository contains links to 100 resources providing specific GDPR information for Small and Medium Enterprises, private healthcare and beauty organisations. The resources range from short text overviews and videos of GDPR to in-depth information, checklists and applications to support compliance with GDPR. Resources have been compiled across European member states, covering many different European Union language.

<u>Who is the repository aimed at?</u>
If you are a small business owner, private healthcare provider or beauty business operator, the AWARE repository is a vital tool to access relevant and direct information about GDPR obligations. The repository and the supporting guidance document will also be of interest to Data Protection Authorities, Chambers of Commerce, and SME associations who provide support to SMEs and promote awareness of the GDPR.

<u>What are some highlights from the repository?</u>
The AWARE project has identified the following resources as good starting points to increasing awareness of GDPR.

The ***EDPB data protection guide for small business*** provides practical, accessible, and trustworthy online modules covering data protection basics, including legal basis, data subject rights, security measures, record-keeping, data breaches, and does not require prior knowledge of the GDPR. The guide includes videos, checklists, self-assessment questionnaires and practical resources that help businesses implement GDPR principles without outside legal help.

The ***OLIVIA – Virtual assistant for GDPR compliance*** is a free, SME-focused, series of 15 courses, each consisting of theoretical and practical modules covering the obligations of data controllers and processors, educational materials and videos, tests and templates for documents to demonstrate GDPR compliance. Certification is available for completion of the courses.

The ***SMEDATA II Project*** has developed multiple resources to promote awareness and increase confidence in compliance with GDPR. There is a mobile application which simplifies legal terminology, a self-assessment tool to monitor workflows with GDPR compliance, an educational awareness tool with structured modules on topics including data protection by design and caselaw relating to GDPR.

The **"_Data Accountability from A to Zen_"** is a free, online GDPR-compliance platform designed to help startups and SMEs to understand and implement GDPR requirements with training based on real examples and in a journey-style story format.

"_GDPR Guidance for SMEs_" offers SMEs a clear, practical roadmap to understand and comply with the GDPR. The guide begins with concise explanations of key GDPR terminology, essential for SMEs and DPOs to grasp core concepts quickly. It contains a comprehensive checklist tool that will take organisations through more detailed questions in the areas of personal data, data subject rights, accuracy and retention, transparency requirements, other data controller obligations, data security, data breaches and international data transfers.

The IDPC Online Self-Assessment Compliance Tool guides users through an 11-step evaluation covering core GDPR topics. The questionnaire is composed of multiple questions out of which all of them are mandatory to prompt users to proceed with the evaluation and produce a result. A document library offers downloadable documentation, sample policies, and templates (e.g., privacy notices, record-keeping) that organisations can adapt for internal use.

The _CNIL's record of processing activities_ is a comprehensive tool that helps organisations to be compliant with the recording obligations prescribed by article 30 of the GDPR. It allows controllers and processors to make an inventory of the data processing and to have an overview of what they are doing with the concerned personal data.

The _STAR II Project_ developed a detailed handbook, _"The GDPR made simple(r) for SMEs,"_ which explains some of the main features of the GDPR in a simple language. Different chapters of the handbook summarize the main requirements that SMEs must abide by to lawfully process personal data in the EU. It also provides case studies and practical examples to help SMEs meet core GDPR requirements. Within the framework of the project, a hotline was operating between 15 March 2019 and 15 March 2020 to provide general information to SMEs regarding the rules of the GDPR.

What can the repository tell us about GDPR resources for SMEs in Europe?
In addition to compiling the repository, the AWARE project has analysed the content of the resources collected. This supports users to identify the most prominent countries, languages, funding sources, resource type and themes contained within the resources linked through the repository.

- English is the primary language of resources, but there are 36 resources available in more than one language.
- The European Commission is the primary producer of GDPR guidance included in the repository.
- National Data Protection Authorities are the primary funders of resources on GDPR for SMEs.
- Websites and text documents up to 15 pages long are the most frequently occurring format of resource within the repository.

The repository can be found on the NAIH website, https://www.naih.hu/aware/eredmenyek and https://www.naih.hu/aware-project/deliverables.