

Lawfulness, Fairness and Transparency: Controller must identify their legal basis (or bases) for processing data and ensure the data subject is aware of the processing prior to when it occurs¹. If the legal basis is consent, then consent must be obtained prior to the processing².

Purpose Limitation: Controller must ensure that data is not processed beyond the purposes disclosed to the data subject.³

Data Minimization: Controller must ensure that no data is collected / processed beyond what is required to achieve the identified purpose(s).⁴

Accountability: Controller must be able to demonstrate that they comply with GDPR Principles.⁵

¹ See: Article 29 Working Party

Guidelines on transparency under Regulation 2016/679, Section 6 & 7 (as adopted by the EDPB) (<https://ec.europa.eu/newsroom/article29/items/622227>); Irish Data Protection Commission guidelines on the Right to be Informed.

(<https://www.dataprotection.ie/en/individuals/know-your-rights/right-be-informed-transparency-article-13-14-gdpr>)

² See EDPB Guidelines, 05/2020, Guidelines 05/2020 on consent under regulation 2016/679, Section 3.3

³ See UK Information Commissioner's Office guidelines on Purpose Limitation, (<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles/purpose-limitation/>)

⁴ See EDPB Guidelines, 04/2019, Data Protection by Design and by Default, Section 3.5 (https://edpb.europa.eu/sites/default/files/files/file1/edpb_guidelines_201904_dataprotection_by_design_and_by_default_v2.0_en.pdf)

⁵ See: Irish Data Protection Commission guidance on Accountability (<https://www.dataprotection.ie/en/organisations/know-your-obligations/accountability-obligation/>); See EDPB Guidelines, 04/2019, Data Protection by Design and by Default, Section 3.9 (https://edpb.europa.eu/sites/default/files/files/file1/edpb_guidelines_201904_dataprotection_by_design_and_by_default_v2.0_en.pdf)