Annex C Data protection and safeguarding checklist

A checklist, not a form and not legal advice. Each item names the rule in section 2.5. Work through it with your DPO or legal adviser before the first session. Keep the completed list on file.

#	Item	Rule	Done
1	Purpose written down for each tool: what data, why, for how long	2.5 (1)	☐
2	Legal basis decided and documented for each use (not assumed to be consent)	2.5 (2)	☐
3	If consent: freely given, specific, informed; refusing has no effect on selection; withdrawal as easy as giving	2.5 (2)	☐
4	Parents involved for minors; national age of digital consent checked with the data protection authority (DPA); proportionate check of parental consent	2.5 (3)	☐
5	Players told, on reaching the national age, that they can confirm or withdraw consent	2.5 (3)	☐
6	Wearable and heart-rate data treated as health data; Article 9 exception identified with the DPO	2.5 (4)	☐
7	DPIA question answered: national DPA list checked; DPIA done if required or in doubt	2.5 (5)	☐
8	Rule written and known: no selection or release decision is taken by a tool alone; a named person decides and records it	2.5 (6)	☐
9	Plain-language information given to players: what, why, who sees it, how long	2.5 (7)	☐
10	Video: internal analysis and publication separated; separate legal basis and information for any clip posted online; withdrawal route	2.5 (8)	☐
11	Tool checked for face recognition, emotion recognition or other biometric functions; DPO consulted if present	2.5 (8), AI Act box	☐
12	Security: player codes where possible; strong passwords; encrypted laptops and phones; backups; access limited to named staff	2.5 (9)	☐
13	Retention period set for each data type; deletion routine exists	2.5 (1)	☐
14	Supplier contract covers data processing (who is controller, who is processor, where data is stored)	2.5 (1), (9); Glossary	☐
15	Applicable law confirmed: GDPR and national law in EU partners; KVKK in Türkiye	2.5 (10)	☐
16	AI tool: staff briefed on what it does and its limits (AI literacy)	AI Act box	☐

Date: _____ Completed by: _____ Reviewed with DPO / adviser: _____

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