

Exercise Winter Term 2025/26

Data Privacy Impact Assessment (DPIA) and
Fundamental Rights Impact Assessment (FRIA)

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Scenario Description

Company A, based in Germany, develops the following system:

Short system description: The system is hosted by a French hosting provider and operated only by the company's HR department. The only people who have access to the output are approved HR employees. The system parses CVs to automatically classify them into predefined job role categories (e.g., "Data Scientist," "Consultant," "Engineer") to support the initial recruitment screening phase. CVs typically include personal data (e.g., name, date of birth, contact information, gender, education history, professional experience) and may also reveal sensitive attributes under GDPR Art. 9 (e.g., ethnicity, political affiliation, trade union membership). The system has an accuracy of 95%. The classification itself takes place without any human oversight. Users are informed for the use of the automatic processing system and are also given detailed options about the ways they could turn in a complaint.

How is Artificial Intelligence (AI) being used?

A neural network model is trained on labelled CV data to assign job roles to participants in a classification task. The model uses features extracted from text fields such as work experience, education, and skills to predict the most suitable job role.

Exercise 1: Data privacy impact assessment (DPIA)

Please read the scenario description carefully!

- a) Please open the survey: <https://m-chair.survey.uni-frankfurt.de/index.php/915877?lang=en> and fill the demographic questions, do not close the survey.
- b) Please open <https://ki-dsfa.surge.sh/> and follow the steps in the AI-IA tool to conduct a DPIA
- c) Please go back to the survey and fill the questionnaire about the DPIA tool.

Exercise 2: Fundamental rights impact assessment (FRIA)

- a) Please open <https://ki-dsfa.surge.sh/> and follow the steps in the AI-IA tool to conduct a FRIA. (Or click on AI-IA to start a new project)
- b) Please go back to the survey: <https://m-chair.survey.uni-frankfurt.de/index.php/915877?lang=en> and fill the questionnaire about the FRIA tool

The participation in the Lime survey is anonymous and voluntary.