

Exercise Winter Term 2025/26

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

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Scenario Description

Startup Company CVDistributer, based in Germany, develops the system with the following properties:

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. 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.

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

Imagine you and three friends from your university want to build this start-up together. You take on the role of Chief Technology Officer (CTO), while your friends assume the positions of Chief Executive Officer (CEO) and Chief Marketing Officer (CMO). In your startup you are the most technical person. Since you have not raised any funding yet, it is your task to do the Data Privacy Impact Assessment (DPIA) and Fundamental Rights Impact Assessment (FRIA)

Group 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/571976?lang=en> and fill the demographic questions, do not close the survey.
- b) Please open <https://svs.uhh-net.de/> 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.

Group 2: Fundamental rights impact assessment (FRIA)

- a) Please open the survey: <https://m-chair.survey.uni-frankfurt.de/index.php/184759?lang=en> and fill the demographic questions, do not close the survey.
- b) Please open <https://svs.uhh-net.de/> 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.

The participation in the Lime survey is anonymous and voluntary.

Hint:

Annex III: High-Risk AI Systems Referred to in Article 6(2)

4. Employment, workers management and access to self-employment:

- (a) AI systems intended to be used for the recruitment or selection of natural persons, in particular to place targeted job advertisements, to analyse and filter job applications, and to evaluate candidates;
- (b) AI systems intended to be used to make decisions affecting terms of work-related relationships, the promotion or termination of work-related contractual relationships, to allocate tasks based on individual behaviour or personal traits or characteristics or to monitor and evaluate the performance and behaviour of persons in such relationships.