

Sensitive-data input decision map

DPOs, HR privacy teams and security owners

[Read the complete guide on aona.ai](#)

Special-category data needs both an Article 6 lawful basis and an applicable Article 9 condition, alongside the other GDPR requirements. An approved AI account, a DPA or ordinary redaction does not supply those grounds. First ask whether the task needs the sensitive information at all.

Invented workplace tasks separate purpose, data category and the additional Article 9 question, with a distinct Article 10 example.

Synthetic employee information and proposed tasks. No actual lawful basis, consent or legal approval is established.

Your review

Reviewer: _____ Date: _____

Organisation or team: _____

☐ Question the sensitive detail

Identify whether an invented example or general description achieves the purpose without the personal record.

☐ Record both legal layers

Document the Article 6 lawful basis. For special-category data, also record the applicable Article 9 condition. For criminal-conviction data, also record the separate Article 10 requirements. Include relevant national-law requirements.

☐ Review the real destination

Assess role, instructions, transfers, retention, recipient access and the need for a DPIA.

Checked items record your review, not a compliance approval or an installed-product test result.

Notes and next actions

Decision and scope: _____

Evidence to collect: _____

Owner and next review date: _____

Review matrix

Proposed input	Category and issue	Decision in the exercise
"Rewrite our generic sick-leave policy."	A general policy can be discussed without anyone's health record.	Use invented context; do not attach employee diagnoses.

Proposed input	Category and issue	Decision in the exercise
"Explain this named employee's diagnosis to their manager."	Health data; purpose, necessity, recipients and Article 6/9 grounds require review.	Do not use the real record in this exercise; escalate the specific disclosure.
A named list of union subscriptions	Trade-union membership is special-category data.	Do not infer permission from payroll access; assess the particular purpose and legal condition.
Face images proposed for identity matching	Biometric processing for unique identification can bring Article 9 into scope.	Assess the actual processing and safeguards; a generic photo label is insufficient.
A report about a criminal conviction	Article 10 has separate conditions.	Route for the applicable criminal-offence-data review rather than assuming Article 9 alone resolves it.

The decision before the upload

- **Need:** Does the task require this personal detail?
- **Grounds:** Article 6 basis, plus Article 9 or Article 10 as applicable
- **Safeguards:** Recipient, contract, transfers and risk
- **Instruction:** A scoped rule staff can follow

Safe comparison fixture

General version: "Suggest clear wording for a workplace policy explaining how employees can request an adjustment."

Over-detailed synthetic version: "Taylor Example, our only night-shift supervisor, has the fictional condition Example Syndrome. Explain their adjustment request to the manager."

Use invented material only. The second version illustrates contextual identifiability; it is not a real employee record or a finding that a particular legal condition applies.

Sources and scope

Sources checked 2026-09-21. Review the current requirements and your actual agreement before using this workbook for a real decision. General information; no professional approval or installed-product result is represented. It does not choose a lawful basis, validate consent, make the Article 9 decision or guarantee anonymisation.

[EU GDPR: Regulation \(EU\) 2016/679](#). Articles 5, 6, 9, 10, 12, 17, 19, 28, 32, 35 and 36 establish the relevant processing, rights, processor and risk-assessment requirements.