
**STAR-2**
Support Small and Medium Enterprises on the Data Protection Reform
project-star.eu

**Questionnaires**

**Interview templates for interviewing DPAs, SMEs, and SME Associations**

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Table of Contents

[Background to the STAR-2 project 4](#_Toc529608902)

[List of Abbreviations 5](#_Toc529608903)

[1 Methodological recommendations to interviewers 6](#_Toc529608904)

[2 Interview Questions’ Templates 6](#_Toc529608905)

[2.1 General introductory formula 6](#_Toc529608906)

[2.2 Template for interviewing Data Protection Authorities 7](#_Toc529608907)

[2.2.1 Part 1 - SMEs 7](#_Toc529608908)

[2.2.2 Part II - Awareness campaigns 8](#_Toc529608909)

[2.2.3 Part III – Hotlines and helpdesks 8](#_Toc529608910)

[2.2.4 PART IV – handbook 9](#_Toc529608911)

[2.3 Template for interviewing SME association 9](#_Toc529608912)

[2.4 Member States’ Allocation 11](#_Toc529608913)

# Background to the STAR-2 project

The STAR-2 ….

# List of Abbreviations

|  |  |
| --- | --- |
| DPA | Data Protection Authority |
| SME | Small or Medium Enterprise |
| STAR-2 | Support Small and Medium Enterprises on the Data Protection Reform |

# Methodological recommendations to interviewers

According to the STAR-2 Project’s Annex 1 (tasks Nos 2.1 and 2.2), the Consortium must carry out semi-structured, qualitative interviews.

Due to the semi-structured nature of the interviews, it is highly advisable go through all questions of the script addressing the category the interviewee belongs to. Nonetheless, interviewers are encouraged to adapt the order of the questions to the circumstances, and to formulate the questions in a natural way. They are also allowed to add further questions to expand and clarify aspects of particular relevance to the research.

Spreadsheets to be filled in with the interviewees’ answers will be provided by TRI alongside this list of questions.

Before starting, please

* address confidentiality, by explaining that every precaution will be taken to respect and safeguard confidentiality, and that – while the information gathered through the interviews will be published on the project website as a final report on the outcomes of the interviews – the Consortium will make sure that it will not be possible for readers to attribute statements to any specific interviewee, unless expressly allowed otherwise during the interview.
* remind the interviewee that participation to this interview is voluntary. Should they decide to take part, they will still be free to withdraw at any time and without giving a reason.
* address the matter of audio-recording. It is highly recommended to record the audio of the interview and to store the files. To this purpose, please make sure to have the interviewee’s consent before recording.
* ask the interviewee if any doubt or question arose concerning the methodological approach to interviewing.

Please do not forward this entire file to the interviewees. If the interviewees wish to see the questions in advance or answer in writing, please extract the relevant questions and forward just those alongside the general introductory formula.

Please note that this section does not apply to the portion of this stask

# Interview Questions’ Templates

## General introductory formula

*Hi, my name is [name] from [VUB/TRI/NAIH], and we are a partner in the STAR-2 project (Support Small and Medium Enterprises on the Data Protection Reform), which has been funded by the European Union, to support data protection authorities’ and other stakeholders with their awareness-raising activities targeting SMEs. The first stage of the project consists of the scoping and the engagement of stakeholders to capture the necessary requirements for data protection awareness-raising activities and materials. In later stages, based on the gathered information, activities will be planned and materials will be drafted. These activities include the creation of a helpline and the drafting of a handbook.*

*To this end, I have a few questions I would like to ask you. I will probably need about half an hour of your time to go through the questions.*

*Before we start, I wish to address confidentiality. The consortium will take every precaution to respect and safeguard confidentiality. While the information we gather through these interviews will be used to draft a general report that we will publish on the project website, we will ensure that we will anonymise the contribution so that readers will not be able to attribute any statement to any specific interviewee, unless consent is given. Would you like your statement to be anonymised prior citation?*

*We also remind you that your participation in this interview is voluntary. You will still be free to withdraw at any time without giving a reason.*

*Do you agree for us to audio-record this interview? We will store the files on our computers and make them available to the other project partners, [VUB/TRI/NAIH], but we will not disseminate them in any way.*

*Do you have and doubts or questions you may wish me to address before we start?*

*Please answer to the questions as freely as possible, thoroughly and in details.*

## Template for interviewing Data Protection Authorities

### Part 1 - SMEs

STAR II is focused upon support to small and medium sized enterprises in understanding and meeting their GDPR obligations.

1. Does your authority collect any data on levels of GDPR awareness in i) the general public, or ii) SMEs?
	1. Is this published? Can we access it?
	2. What is the desired/target level of awareness?
2. Has the level of awareness changed from the previous legal regime / has the GDPR (has the increased press/media attention) had an impact?
	1. What are the levels of awareness of novel elements of the GDPR?
3. How well do you think your authority understands the needs of small and medium enterprises and the issues they face?
	1. What are those needs / issues?
	2. In what ways these needs are different from large businesses?
4. Do you categorise requests/queries/investigations by size of organisation?
5. Are there particular areas of confusion or uncertainty for SME's in relation to the GDPR?
	1. Are there particular areas where SME's are failing to reach a good level of awareness and/or compliance?
	2. What is your perception of the incidence of SMEs in the number of investigations and fines issued to them?
		1. What is the GDPR provision they tend to be investigated or fined on?
	3. Are there particular questions that SME's tend to have/ask repeatedly?
	4. Do the requests/questions from SMEs differ from those of large organisations? [It may concern quality (e.g., obscure or well-prepared, providing additional context, hypothetical), scope (concern over one operation/provision/notion, such as ‘adverse effect’ or the overall compliance) and frequency]
6. Does your authority provide any particular/specialised support to SMEs? If so, what type of support?
	1. Have you developed specific guidance for SMEs?
		1. If yes, can we access it?
	2. Have you cooperated with, or drawn upon guidance for SMEs produced by other EU DPAs?
	3. What is your perception of the value of the EC existing guidance to SMEs?
7. What are the key facts and messages that you would wish SME's to know about the GDPR?
8. Are you aware of any other sources of support for SMEs on GDPR?

### Part II - Awareness campaigns

*Intro: STAR II will be supporting the Hungarian DPA in developing a public awareness campaign*

1. What would you consider to be the most effective ways of increasing SME awareness of GDPR?
2. How have you adapted or changed your awareness raising strategies/methods over time?
3. Which of the following modalities has your authority used for awareness raising?
	1. TV
	2. Radio
	3. Print Media
	4. Social media
	5. Video
	6. Other (please describe)
4. STAR II will be supporting the Hungarian DPA, is there anything we should take into account when running an awareness raising campaign for SMEs?

### Part III – Hotlines and helpdesks

1. Does your authority operate any sort of helpline, helpdesk or contact for the public? If so can you describe this?
2. Does your authority operate any sort of specific helpline for SMEs?
	1. How does it work?
	2. What is your standard response time?
	3. How many employees are working on the service?
	4. How many languages are serviced?
3. How widely used is this service?
4. Did you consult formally/informally other DPAs before setting up a helpline?
5. Would you change anything of your helpline if funding and staffing were not issues?
6. Do you have internal guidance documents for these helplines?
7. If yes, would we be able to see them for best-practices-identification purposes?
8. What is your authority's stance on liability for the answers it gives?
9. i.e. do you have any formal disclaimer?
10. Is your staff trained to underline that you are not giving legal advice?

### PART IV – handbook

1. STAR II intends to produce a handbook for SMEs on the GDPR – would your authority be willing to comment on it/distribute / make use of this?
2. What are the core questions concerning the GDPR compliance should this handbook address?

## Template for interviewing SME association

The STAR II project is conducting research into the experience of small and medium enterprises with the General Data Protection Regulation (GDPR), and in particular how SMEs find information on data protection, and what are their key questions and challenges.

1. Has your association/organisation conducted any research into its members’ experiences with the GDPR?
2. Can you explain the methodology of this research?
3. How would you assess the current level of GDPR awareness of your members?
4. What are the key GDPR issues for your membership?
5. Can you describe the challenges your members face with the GDPR?
6. What did your members do to prepare for GDPR?
7. What do your members currently do when they have data protection questions?
8. Does your association offer any guidance or training on data protection / GDPR?
9. Under which form?
10. What would you consider to be the most effective way to capture your associates’ attention on compliance topics?
11. Has your association identified any useful guidance for SME's on data protection?
* What are the sources of this guidance?
* Do you receive adequate guidance from your national data protection authority?
1. Is this guidance proactively offered by the DPA? If yes, how would you evaluate their advertising
2. What actions could your DPA undertake that would facilitate the GDPR compliance at your membership?
3. What information on the GDPR would be useful to your membership? / to SME's?
4. What are the key questions that SMEs want answered by data protection authorities?
5. Are there data protection principles that require further guidance?
6. Are there data subject rights that require further guidance?
7. What specific concerns and considerations about the GDPR provisions does your membership have with regard to
8. direct marketing
9. employment context?
10. Would you consider a hotline/helpdesk service – offered by DPAs in coordination with other data protection experts from SMEs and academia – a useful tool?
11. Would your response change if this service were offered by a DPA from another EU MS?
12. Is your response to A influenced by
	* Prospective linguistic issues
	* Prospective issues with the content of the given advice
13. What would you want to see included in a GDPR/data protection handbook for SMEs?
14. What are the core questions that you would like to be addressed?
15. Would a handbook be a useful format?
16. If no, what would be better?
17. If yes, what technical format would you favour? Electronic? Print?
18. Would you be willing to share with us a list of your member companies, for us to map your stakeholder base and make better use of this interview data?
19. If no, would you be willing to circulate a link to a survey to your membership?

## Member States’ Allocation

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| --- | --- |
| NAIH | 1. Bulgaria
2. Croatia
3. Czech Republic
4. Hungary
5. Latvia
6. Lithuania
7. Romania
8. Slovakia
 |
| VUB | 1. Belgium
2. Finland
3. France
4. Luxembourg
5. Netherlands
6. Slovenia
 |
| TRI | 1. Austria
2. Cyprus
3. Denmark
4. Estonia
5. Germany
6. Greece
7. Ireland
8. Italy
9. Malta
10. Poland
11. Portugal
12. Spain
13. Sweden
14. United Kingdom
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