

## Supplementary materials

### Survey for data protection officers\*

<p>1. Please estimate how many requests from citizens/respondents who want to exercise their rights under the GDPR have you received since serving as Data Protection Officer?</p> <p>a. None b. 1 to 9 c. 10 to 50 d. More than 50 e. I cannot estimate; we do not officially file that information g. Another answer:</p>
<p>2. Please estimate how many complaints of citizens/respondents regarding the processing of their personal data have you received since performing the duty of data protection officer?</p> <p>a. None b. 1 to 9 c. 10 to 50 d. More than 50 e. I cannot estimate; we do not officially file that information g. Another answer: (open-ended response)</p>
<p>3. Question only for data protection officers in scientific research institutions: If you received them, who sent you questions related to data protection (multiple answers possible)?</p> <p>a. Junior researchers b. Senior researchers (mentors; principal investigators) c. Administrative personnel d. Members of the research ethics committee of your institution e. Another person or an entity – please describe: (open-ended response)</p>
<p>4. When you have some issues or concerns related to data protection, how often do you seek help or response from the following sources of information? Please rank these sources of information from 1 to 5, where 1 indicates the highest frequency and 5 the lowest frequency</p> <p>a. AZOP – Croatian Personal Data Protection Agency - rank from 1 to 5 b. Professional literature - rank from 1 to 5 c. Colleagues who are not data protection officers - rank from 1 to 5 d. Other data protection officers - rank from 1 to 5 e. Internet - rank from 1 to 5 f. Your institution's legal department - rank from 1 to 5</p>
<p>5. Are you able to perform your job as a data protection officer in an independent manner? Yes No</p>
<p>6. If not, please explain what obstacles you encounter. (open-ended response)</p>
<p>7. What experience did you have in the field of data protection before you were appointed as a data protection officer? (open-ended response)</p>
<p>8. How did you train/educate yourself for the position of a data protection officer (formal and non-formal education)? (open-ended response)</p>
<p>9. Do you think that you need additional education in the field of data protection? Yes No</p>

10. How were you selected for the position of Data Protection Officer?

- a. A call for recruitment of a new employee
- b. Appointment of an existing employee to the position of DPO
- c. External contractor

11. Please can you answer the following questions:

- a. What is the key difference between pseudonymization and anonymization? (open-ended response)
- b. The privacy policy must include (tick any answers you deem correct):
  - 1) identity and contact details of the data controller/ the controller's representative
  - 2) contact of the data protection officer
  - 3) legal basis for the processing
  - 4) the purposes for which personal data are collected and processed
  - 5) recipients or categories of recipients of personal data
  - 6) the storage period or, if this is not possible, the criteria by which that period was determined
  - 7) data subject rights
  - 8) information on whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data
  - 9) the existence of automated decision-making/development and meaningful information about the logic in question, as well as the importance and anticipated consequences of such processing for the respondent
  - 10) information on whether the data is transferred to third countries and the existence or non-existence of a European Commission adequacy decision, and if applicable, information on appropriate safeguards

12. Have you conducted an analysis of personal data processing activities in your organization in order to comply with the data protection legislation?

- a. Yes
- b. No
- c. Partially

13. If you have conducted an analysis of processing activities, have you made a recommendation (s) to modify the business processes in order to comply with the provisions of the GDPR?

- a. Yes
- b. No
- c. Partially

14. Do you keep records of processing activities, or do you participate in keeping records of processing activities?

- a. Yes
- b. No
- c. Not applicable

15. Have you ever conducted a data protection impact assessment or participated in a data protection impact assessment?

- a. Yes
- b. No

16. Have you ever conducted or participated in conducting a proportionality (balance) test?

- a. Yes
- b. No

<p>17. In order for the controller to demonstrate reliability or compliance with the General Data Protection Regulation, it is necessary, among other things, to adopt internal data protection policies. In line with your advisory task, have you proposed the drafting and adoption of such documents?</p> <p>a. Yes b. No</p>
<p>18. Do you think that the employees in your organization are aware of the importance of personal data protection of individuals (clients/users/employees)?</p> <p>a. Yes b. No c. to a lesser degree d. I do not know</p>
<p>19. In your opinion, what is the biggest challenge for your organization in complying with the General Data Protection Regulation?</p> <p>a) technical data protection measures b) organizational measures for the protection of personal data c) insufficient level of awareness of data protection among employees d) insufficient level of awareness on data protection at the management level e) reporting on personal data breaches f) development of regulations and data protection policies g) mapping and analysis of processing procedures h) data protection impact assessment i) Something else, please state what _____ (open-ended response)</p>
<p>20. Does your institution have an Ethics Committee or a similar body (related to ethics)?</p> <p>a. Yes b. No c. I do not know</p>
<p>21. Are you involved in the work of that committee in any way?</p> <p>a. Yes b. No</p>
<p>22. If yes, how: (open-ended response)</p>
<p>23. Does the Ethics Committee contact you in cases when they need advice or assistance in making decisions related to personal data protection?</p> <p>a. Yes, often b. Yes, sometimes c. No, never</p>
<p>24. Approximately how many requests for opinion/queries have you received from the Ethics Committee so far?</p> <p>In total, approximately: On a yearly basis:</p>
<p>25. Do you consider that the Ethics Committee of your institution is competent enough to decide on issues related to the protection of personal data?</p> <p>a. Yes b. No c. I do not know</p>
<p>26. Do you consider yourself competent enough in relation to your training in the field of personal data protection and experience to be able to answer all the questions they send you to the Ethics Committee?</p> <p>a. Yes</p>

<p>b. No</p> <p>c. I do not know</p>
<p>27. If not, can you briefly explain to us what would help you and your institution to be more effective in the tasks set before you, especially by the Ethics Committee. (open-ended response)</p>
<p>28. Do you think that the GDPR has caused significant changes for data controllers/processors and data subjects?</p> <p>a) yes, for data controllers</p> <p>b) yes, for data subjects</p> <p>c) partly for data controllers/processors</p> <p>d) partly for data subjects</p> <p>e) the changes are insignificant</p>
<p>29. If the answer to the previous question is affirmative, please indicate what the changes are _____ (open-ended response)</p>
<p>30. Your level of education</p> <p>a. High school</p> <p>b. Bachelor's degree</p> <p>c. Master degree</p> <p>d. Specialist postgraduate study</p> <p>e. Scientific postgraduate study – master of science</p> <p>f. Scientific postgraduate study – PhD</p>
<p>31. Age: _____ years</p>
<p>32. Sex</p> <p>a. Man</p> <p>b. Woman</p>
<p>33. Total years of lifetime employment: ..... years, ..... months</p>
<p>34. For how long have you been serving as a data protection officer? ..... years, ..... months</p>
<p>35. You are a data protection officer in:</p> <p>a) Research institution</p> <p>b) Educational institution</p> <p>c) a Government body</p> <p>d) Public body</p> <p>e) Private sector</p>

\*The authors allow free, nonrestricted re-use of the questionnaire. Please cite this article, when re-using the questionnaire.