

Article 5(2) GDPR				Article 24 GDPR			Article 25(1)(3) GDPR		
	Proposal (Article 5(f))	Parliament (Art 5(f))	Council (Art. 5(2))	Proposal (Article 22)	Parliament (Art. 22)	Council (Art. 24)	Proposal (Art. 23(1)(3)(4))	Parliament (Art. 23(1))	Council Art. 25(1)(3)
Personal scope	Controller	Controller	Controller	Controller	Controller	Controller	Controller	Controller and processor	Controller
Substance of the obligation	Responsibility and liability	Responsibility and liability	Responsibility	Adoption of policies and implementation of appropriate measures (Art. 22(1)) Implementation of mechanisms to ensure the verification of the effectiveness of the measures [...]. If proportionate, this verification shall be carried out by independent internal or external auditors (Art. 22(3))	Adoption of appropriate policies and implementation of appropriate and demonstrable technical and organisational measures (Art. 22(1)) Implementation of compliance policies and procedures that persistently respect the autonomous choices of data subjects (Art. 22(1a)) Ability to demonstrate the adequacy and effectiveness of the measures referred to in paragraphs 1 and 2 (Art. 22(3))	Implementation of appropriate technical and organisational measures (Art. 24(1))	Implementation of appropriate technical and organisational measures and procedures (Art. 23(1))	Implementation of appropriate and proportionate technical and organisational measures and procedures (Art. 23(1))	Implementation of appropriate technical and organisational measures (Art. 25(1))
Examples of measures	/	/	/	The measures [...] shall in particular include: (a) keeping the documentation pursuant to Article 28; (b) implementing the data security requirements laid down in Article 30; (c) performing a data protection impact assessment pursuant to Article 33; (d) complying with the requirements for prior authorisation or prior consultation of the supervisory authority pursuant to Article 34(1) and (2); (e) designating a data protection officer pursuant to Article 35(1) (Art. 22(2))	/	Where proportionate in relation to processing activities, the measures referred to in paragraph 1 shall include the implementation of appropriate data protection policies by the controller (Art. 24(2))	/	Systematically focusing on comprehensive procedural safeguards regarding the accuracy, confidentiality, integrity, physical security and deletion of personal data (Art. 23(1))	Such as pseudonymisation (Art. 25(1))
Objective of the measures	Ensure and demonstrate compliance with the provisions of this Regulation	Ensure and be able to demonstrate compliance with the provisions of this Regulation	Ensure and demonstrate compliance with paragraph 1	Ensure and be able to demonstrate that the processing of personal data is performed in compliance with this Regulation (Art. 22(1))	Ensure and be able to demonstrate in a transparent manner that the processing of personal data is performed in compliance with this Regulation (Art. 22(1))	Ensure and be able to demonstrate that processing is performed in accordance with this Regulation (Art. 24(1))	Meet the requirements of this Regulation and ensure the protection of the rights of the data subject (Art. 23(1))	Meet the requirements of this Regulation and ensure the protection of the rights of the data subject, in particular with regard to the principles laid down in Article 5 (Art. 23(1))	Implement data-protection principles, such as data minimisation, in an effective manner and integrate the necessary safeguards into the processing in order to meet the requirements of this Regulation and protect the rights of data subjects (Art. 25(1))
Elements to be taken into account	/	/	/	/	The state of the art, the nature of personal data processing, the context, scope and purposes of the processing, the risks for the rights and freedoms of the data subjects and the type of the organisation (Art. 22(1))	The nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons (Art. 24(1))	The state of the art and the cost of implementation (Art. 23(1))	The state of the art, current technical knowledge, international best practices and the risks represented by the data processing (Art. 23(1))	The state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing (Art. 25(1))
Timing	/	/	/	/	Both at the time of the determination of the means for processing and at the time of the processing itself (Art. 22(1))	/	Both at the time of the determination of the means for processing and at the time of the processing itself (Art. 23(1))	Both at the time of the determination of the purposes and means for processing and at the time of the processing itself (Art. 23(1)) Data protection by design shall have particular regard to the entire lifecycle management of personal data from collection to processing to deletion (Art. 23(1))	Both at the time of the determination of the means for processing and at the time of the processing itself (Art. 25(1))
Delegated acts and other supplementing instruments	/	/	/	The Commission shall be empowered to adopt delegated acts in accordance with Article 86 for the purpose of specifying any further criteria and requirements for appropriate measures referred to in paragraph 1 other than those already referred to in paragraph 2, the conditions for the verification and auditing mechanisms referred to in paragraph 3 and as regards the criteria for proportionality under paragraph 3, and considering specific measures for micro, small and medium-sized enterprises (Art. 22(4))	/	Adherence to approved codes of conduct as referred to in Article 40 or approved certification mechanisms as referred to in Article 42 may be used as an element by which to demonstrate compliance with the obligations of the controller (Art. 24(3))	The Commission shall be empowered to adopt delegated acts in accordance with Article 86 for the purpose of specifying any further criteria and requirements for appropriate measures and mechanisms referred to in paragraph 1 and 2, in particular for data protection by design requirements applicable across sectors, products and services (Art. 23(3)) The Commission may lay down technical standards for the requirements laid down in paragraph 1 and 2. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 87(2) (Art. 23(4))	/	An approved certification mechanism pursuant to Article 42 may be used as an element to demonstrate compliance with the requirements set out in paragraphs 1 and 2 of this Article (Art. 25(3))

The table uses colours to denote the type of modification, using the definitive version of the Regulation as a reference point. Passages in red have been cut from the final text. Those written in orange have made it through the trialogue, but in a slightly different form. In these cases, the modified version corresponds to the orange text in the “Council” column. Those written in green represent additions brought by the Council that were neither included in the original proposal, nor mentioned in the Parliament’s position at first reading. Lastly, those written in blue have been kept, but moved to a different provision. Here again, the blue text under the “Council” column shows where the said passage has been integrated.