

AI & Data Governance · Switzerland

Swiss Federal Act on Data Protection (FADP) – Data Protection Checklist

For organisations processing personal data under the Swiss Federal Act on Data Protection (FADP) – with a focus on AI-supported processing.

Manage your AI risks

- ☐ Keep a record of processing activities, including AI.
- ☐ Identify sensitive personal data and high-risk profiling.
- ☐ Map data flows abroad and assess destination countries.
- ☐ Identify automated individual decisions and ensure human review.

Assign ownership

- ☐ Define internal responsibility for data protection.
- ☐ Regulate processor relationships contractually under the FADP.
- ☐ Define who approves new purposes and high-risk processing.

Build evidence

- ☐ Build data protection into new systems and AI applications from the start.
- ☐ Conduct data protection impact assessments where risk is high.
- ☐ Keep privacy notices current and clear.
- ☐ Implement appropriate technical and organisational measures.
- ☐ Document data breaches and organise notifications to the FDPIC.

Prepare for audits

- ☐ Handle access, correction and deletion requests within deadlines.
- ☐ Test the data breach procedure annually.
- ☐ Review vendor and cloud contracts for transfers abroad.
- ☐ Keep evidence of employee training.

This checklist provides general orientation and does not constitute legal advice. dujzba · dujzba.com