

Contribution of the EDPB to the report on the application of the GDPR under Article 97

Adopted on 12 December 2023

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General EDPB policy messages¹

The application of the GDPR in the first 5 and a half years has been successful. The GDPR has strengthened, modernised and harmonised data protection principles across the EU. Awareness of data protection rights and obligations was raised significantly among data subjects, as well as public and private organisations. Additionally, supervisory authorities (SAs)² are using their investigative and corrective powers whenever appropriate and have reinforced their cooperation. The GDPR is also contributing to an increased global visibility of the EU legal framework and is often considered as a model by countries outside the EU who are revising their own legal framework, or adopting data protection legislation for the first time

Since 2018, the EDPB has consolidated its position as the EU body in charge of ensuring the consistent application of the GDPR, making use of the full set of instruments at its disposal. In this regard, the EDPB has adopted 40 guidelines and recommendations and 190 consistency opinions³, in order to clarify fundamental provisions of the GDPR and to ensure consistency in the application of the GDPR by SAs⁴. This demonstrates the important role played by the EDPB in providing guidance to stakeholders and data subjects on key aspects of the GDPR, thus promoting and facilitating compliance with its provisions. Furthermore, **the EDPB built a framework in order for new compliance tools such as codes of conduct and certification mechanisms to become operational in a consistent manner and thereby facilitate compliance.**

The EDPB also has a unique role in the EU digital landscape as it provides the dispute-resolution mechanism under the GDPR. The Board demonstrated its readiness and ability to resolve disputes between SAs on enforcement of cross-border matters and to ensure a consistent application of the GDPR, by adopting 11 Binding Decisions (Articles 65 and 66), among which 2 were urgent binding decisions. The increasing number of cases reaching the EDPB are a logical consequence of the growing complexity and quantity of cases at the national level. Besides, the rise in the number of complaints and investigations by SAs, as well as their increasing legal and technical complexity, have also underlined the importance of cooperation in order to achieve a consistent enforcement of the GDPR.

The EDPB is convinced that effective and efficient cooperation between data protection authorities leads to a common data protection culture and consistent enforcement practices. The EDPB considers that the existing tools in the GDPR have the potential to achieve such a goal, although this requires that they are used in a sufficiently harmonised way. In particular, there are several challenges while implementing the cooperation and consistency mechanism, as the EDPB underlined in the previous report⁵. In this respect, **the EDPB welcomes the draft European Commission's Proposal for a Regulation of the European Parliament and of the Council laying down additional procedural**

¹ This text has been drafted in the context of the EDPB contribution to the Commission's report on the application of the GDPR, notably concerning Chapters V and VII of the GDPR in accordance with Article 97 GDPR. References to "EU" and "Member States" made throughout this document should be understood as references to "EEA" and "EEA Member States" respectively.

² In some parts of this document, the abbreviation "DPA" is also used.

³ Data until 1 December 2023.

⁴ See Section 4.3 of this document, which provides a detailed overview.

⁵ See Section 4.1 of this document.

rules relating to the enforcement of Regulation (EU) 2016/679 (hereinafter ‘the Proposal on procedural rules’) which took account of the views expressed by the EDPB in the so-called ‘Wish list’⁶. At the same time, the EDPB **highlights the need to ensure harmonisation of the rules and efficiency of the tools**, as clarified in the EDPB-EDPS Joint Opinion 1/2023 on the Proposal on procedural rules (hereinafter ‘Joint Opinion 1/2023’). The EDPB also reiterates the need to address the existing practical obstacles to efficient cooperation between the national SAs and the EDPS⁷.

Furthermore, the EDPB recalls that additional cooperation actions in the area of GDPR enforcement are essential in order to ensure a consistent application of the law. The EDPB and the SAs are paying special attention to this matter and have committed to different actions in order to achieve this goal. Several concrete actions have been taking place following the adoption of the [Vienna Statement on enforcement cooperation](#)⁸ in which the EDPB members highlighted their commitment to cross-border cooperation. These actions include the creation of case-specific taskforces, the launch of several coordinated enforcement actions, the Support Pool of Experts, the adoption of a template for complaints⁹, and the exchange of information on national enforcement strategies in order to agree on annual enforcement priorities at EDPB level. The SAs have also committed to prioritising cases of strategic importance and taking the necessary actions to ensure efficiency and a transparent and timely exchange of information and discussions. Additionally, SAs agreed to an increased use of consistency opinions by the EDPB in order to provide clarity on matters of general application.

The EDPB and the SAs will continue their efforts in enhancing enforcement cooperation and achieve more efficient and consistent results within the current legal framework, including with the further harmonisation that will be provided by the Proposal on procedural rules.

There are, however, considerable challenges ahead.

The technological landscape is continuously evolving and new technologies emerge regularly. The GDPR fully applies to emerging technologies and provides rules which foster innovation while, at the same time, ensuring the protection of personal data. The EDPB and SAs will continue to develop guidance on new and emerging technologies and are following regulatory developments closely. The importance of data in the digital economy is undeniable and new legislation has been introduced which provide additional rules to create a safer digital space, establish safe data sharing or access and a level playing field for businesses. In the context of those laws, **new responsibilities may be placed upon the SAs and/or EDPB with regard to the supervision and enforcement of new legal acts, such as the Data Governance Act (DGA), Digital Services Act (DSA), Digital Markets Act (DMA) and the**

⁶ See EDPB Letter to the EU Commission on procedural aspects that could be harmonised at EU level sent on 10 October 2022. Available at: https://edpb.europa.eu/our-work-tools/our-documents/letters/edpb-letter-eu-commission-procedural-aspects-could-be_en

⁷ See Section 9 of the EDPB-EDPS Joint Opinion 1/2023.

⁸ EDPB Statement on enforcement cooperation adopted on 28 April 2022. Available at: https://edpb.europa.eu/system/files/2022-04/edpb_statement_20220428_on_enforcement_cooperation_en.pdf

⁹ Template Complaint form and Template Acknowledgement of receipt adopted on 20 June 2023.

Proposal for an Artificial Intelligence Act¹⁰. However, it is important to note that the resources of the SAs and EDPB are not increasing at the same pace as their responsibilities and tasks.

In addition, there is a lack of harmonisation with regard to the powers of the SAs under the new regulations adopted in the context of the Commission's Digital Strategy and the European Data Strategy. This lack of clarity in the implementation of the powers of the SAs may lead to fragmentation and legal uncertainty on the supervision and enforcement of those regulations. Likewise, the cooperation between the SAs and other competent authorities may lack clarity and result in greater fragmentation. Therefore, for proposals that are still under negotiation, the EDPB calls on the co-legislators to work towards greater clarity and homogeneity as to the role and powers of the SAs.

The EDPB also acknowledges that the implementation of the GDPR has been challenging for other stakeholders, especially for small actors, most notably SMEs. The EDPB and the SAs have been developing several tools to support SMEs in complying with the GDPR¹¹. In particular, the EDPB launched the [Data Protection Guide for Small Business](#) to raise awareness of the GDPR and to provide practical information to SMEs about GDPR compliance in an accessible and easily understandable format¹². **The EDPB and SAs are committed to continue working on supporting the implementation of the GDPR by SMEs**, and more generally on raising awareness of the GDPR, and to deliver documents and tools accessible to a wider public audience.

It stems from the above that the EDPB and SAs are facing a rapidly evolving technological and legal landscape that not only requires the performance of the tasks envisaged in the GDPR, but also of new tasks at national and EU level, more cooperation among the SAs and more involvement of the EDPB. The success in the performance of such tasks relies largely on the resources available to the SAs and to the EDPB, including via its Secretariat. With regard to the SAs, the increased complexity of the topics and number of complaints, the new competences attributed under new legal acts as well as the raising number of legal challenges at both national and EU level have a great impact on their resources. In fact, most of the SAs and the EDPB consider that their resources are insufficient¹³, from a human, technical and financial perspective. In this respect, very specialised technical knowledge is required, in particular with regard to new and emerging technologies, while the financial resources available to SAs and the EDPB cannot compete with those of the private sectors. Therefore, **it is of the utmost importance that all SAs are provided with sufficient resources by the Member States to carry out their tasks effectively.**

The EDPB, meanwhile, is also entrusted with new tasks under new legal acts and its tasks under the GDPR continue at an increased intensity. In particular, its role providing the dispute-resolution mechanism has increased significantly and will likely continue to do so as enforcement is growing at

¹⁰ Respectively: Regulation (EU) 2022/868 of the European Parliament and of the Council of 30 May 2022 on European data governance and amending Regulation (EU) 2018/1724; Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC; Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 and the Proposal for a Regulation of the European Parliament and the Council laying down harmonised rules on artificial intelligence.

¹¹ See Section 6 of this document on promoting awareness.

¹² Available at: https://edpb.europa.eu/sme-data-protection-guide/home_en

¹³ See section 4.4.

national level. Its role as the body in charge of ensuring the consistent application of the GDPR is gaining even more significance, with the adoption of a high number of consistency Opinions, Binding Decisions and guidance since the entry into application of the GDPR. Finally, given the impact of its decisions which weigh in on difficult legal questions and on the amounts of significant fines eventually imposed by the SAs, the EDPB is facing a significant number of legal challenges before the EU Courts. **Therefore, it is also essential to ensure that the EDPB Secretariat is provided with the necessary resources, as it plays a key role in the preparation and execution of many of the current and future tasks entrusted to the EDPB under EU legislation¹⁴, and thus in harmonising the guidance, procedures, enforcement processes and practices of SAs across Member States.**

Regarding international transfers, the EDPB expects the Commission to finalise its work on the review of the adequacy decisions adopted under Directive 95/46/EC. It also underlines **the importance to continue to develop, expand and multiply adequacy decisions with third countries and international organisations.** The EDPB will continue to pay special attention to the correct implementation of the recent adequacy decisions and will contribute to the evaluation of current adequacy decisions and the adoption of future ones. With regard to transfer tools under Article 46, the EDPB recalls the adoption of several documents aimed at providing guidance¹⁵, as well as its swift reaction after the Schrems II judgement to provide clarity with regard to the supplementary measures that may complement transfer tools. The EDPB welcomes the adoption by the Commission of the new set of SCCs and welcomes its commitment to develop SCCs covering transfers to controllers and processors subject to Article 3(2) GDPR. The Commission should also consider the development of SCCs that cover transfers to international organisations and take into account the specificities of these organisations. **The EDPB further encourages the Commission to continue developing international cooperation for the protection of personal data and underlines the importance of effective enforcement cooperation.** Finally, the EDPB underlines the continuous need to ensure that trade agreements are not used to challenge existing and future EU law on the protection of personal data and privacy, which are fundamental rights in the EU.

In conclusion, 5 and a half years after the entry into application of the GDPR, **the EDPB takes a positive view of the implementation of the GDPR including its capacity to also stand the test of new technological and societal developments.** Therefore, the EDPB considers that **there is no need to revise the legislative text at this point in time.**

The EDPB calls upon the EU legislators, as well as the European Commission, to work towards greater clarity and homogeneity as to the new roles and powers entrusted to the SAs and the EDPB under new legislation, and to take the necessary actions to ensure that SAs and the EDPB have sufficient human, technical and financial resources. The adoption of the new Regulation laying down additional procedural rules relating to the enforcement of the GDPR should also be given priority, taking into consideration the proposals of the EDPB and EDPS in Joint Opinion 1/2023.

¹⁴ Including in the context of new legal acts such as the Data Governance Act and the Data Act, which envisage a specific role for the EDPB within the European Data Innovation Board.

¹⁵ See section 3 on international transfers.

Questionnaire on the application of the GDPR under Article 97

Contribution of the European Data Protection Board¹⁶

In addition to the general policy messages above, the EDPB would like to provide a synthesis of the contributions and replies provided by its members to the Questionnaire sent by the European Commission. This allows the EDPB as a single body to convey some additional messages with an EU-wide perspective.

3. CHAPTER V

The elements presented below constitute a summary answer of the EDPB's general view on the international transfer tools as a response to the Commission's questions, while specific answers to these questions can be found in the national contributions.

Adequacy decisions

Adequacy decisions are a durable means to ensure the continuous protection of personal data transferred from the EEA to third countries and international organisations.

In this context:

- The EDPB welcomes the interest of third countries and international organisations to engage with the EU in the context of an adequacy decision and the subsequent evaluation of relevant data protection frameworks by the Commission.

- The EDPB expects the Commission to finalise its work on the review of the adequacy decisions adopted under Directive 95/46/EC.

- The EDPB recommends the Commission to develop, expand and multiply adequacy negotiations, particularly, where feasible, with European countries that are not part of the EU, but also with other third countries and international organisations whose legal frameworks are essentially equivalent to that in the EU. In this context, countries who play an important role in the global digital economy and to which a particularly large amount of personal data is transferred from the EEA should be especially taken into consideration.

¹⁶ With regard to Section 3 of the EDPB Contribution, it reflects the input provided by the national SAs and the EDPS. Sections 4, 5 and 6 reflect the replies provided by the national SAs to the questionnaire sent by the European Commission. Some SAs may not gather certain statistics requested in the questionnaire. Thus, when specific data was not provided by the SA or is not available, it is reflected in the tables as “-” and in the charts as a blank space. With respect to Germany, the data provided by the different German SAs has been compiled and presented as a single set of information as “DE SA”. With respect to the Greek SA, it is referred to as “EL” or “GR” indistinctively throughout the document. Finally, the figures corresponding to the year 2023 may not be final in several instances, since the data was retrieved before the end of the year and, therefore, was still subject to changes.

- The EDPB recommends the Commission to consider expanding the scope of certain adequacy decisions, where appropriate, in particular to include public authorities and bodies when the data protection legislations are expanded to those sectors.

The EDPB will continue to pay special attention to the correct implementation of the recent adequacy decisions and will contribute to the evaluation of current and future adequacy decisions.

Regarding the procedure for consulting the EDPB when preparing adequacy decisions, the EDPB welcomes the improvements made concerning the transmission of all relevant documents sufficiently in advance and translated into English, as this facilitates informed and useful discussions before the final adoption of adequacy decisions.

The EDPB further encourages the Commission to continue developing international cooperation in the framework of Article 50 GDPR agreements and underlines the importance of effective enforcement cooperation, in particular with those countries where the largest portion of the entities subject to the GDPR according to Article 3(2) are established. Among those countries, the EDPB would like to point out the G7 countries and countries benefiting from adequacy decisions for the negotiation of enforcement agreements.

In particular, the EDPB recommends that the Commission takes due account of progress in the EU accession talks with EU candidate countries, as the gradual integration of the EU acquis in the field of data protection may facilitate the negotiations of cooperation agreements. In this regard, the EDPB has developed a toolbox of essential data protection safeguards to be concluded in addition to or inserted in an enforcement cooperation agreement¹⁷.

Other transfer tools

Since 2018, the EDPB supported the deployment of new GDPR tools, such as codes of conduct and certification. It considers those new tools as promising transfer tools and encourages interested stakeholders to develop appropriate codes of conduct and certification schemes.

On Codes of Conduct and Certification as tools for transfers, the EDPB has contributed to the exchange of best practices and the streamlining of the procedures via the adoption of documents and guidelines for interested stakeholders, including, among others, Guidelines 07/2022 on certification as a tool for transfers¹⁸, Guidelines 04/2021 on Codes of Conduct as tools for transfers¹⁹, the EDPB Document on the procedure for the adoption of the EDPB opinions regarding national criteria for certification and European Data Protection Seals and the EDPB Document on the procedure for the development of informal “Codes of Conduct sessions”²⁰.

¹⁷ Available at: https://edpb.europa.eu/system/files/2022-03/toolbox_on_essential_data_protection_safeguards_for_enforcement_cooperation_with_third_country_s_en.pdf

¹⁸ Available at: https://edpb.europa.eu/our-work-tools/our-documents/guidelines/guidelines-072022-certification-tool-transfers_en

¹⁹ Available at: https://edpb.europa.eu/our-work-tools/our-documents/guidelines/guidelines-042021-codes-conduct-tools-transfers_en

²⁰ Both available at: https://edpb.europa.eu/our-work-tools/support-cooperation-and-enforcement/consistency-and-cooperation-procedures_en

The EDPB further recalls its work on the Guidelines 05/2021 on the Interplay between the application of Article 3 and the provisions on international transfers as per Chapter V of the GDPR²¹ and Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data²².

Contractual clauses ensuring appropriate data protection safeguards can be used as a tool for data transfers from the EU to third countries, according to the GDPR. This includes standard contractual clauses (SCCs) adopted by the European Commission. The EDPB welcomes the adoption by the Commission of the new set of SCCs for data transfers from controllers or processors in the EU subject to the GDPR to controllers or processors established outside the EU and not subject to the GDPR, in 2021, following the corresponding EDPB-EDPS Joint Opinion 2/2021. The EDPB remains committed to advise the Commission for the elaboration of new sets of SCCs.

The EDPB welcomes the Commission's commitment to adopt additional sets of SCCs for data transfers to controllers or processors established outside the EU whose processing operations are directly subject to the GDPR, and recommends that it also considers tailor-made SCCs covering transfers to international organisations. Moreover, the EDPB welcomes the fact that SCCs are increasingly being developed also by other countries and regional organisations (e.g. the Council of Europe, the Ibero-American Network, ASEAN).

The EDPB considers that BCRs are a good tool for transfers available for groups of companies. Since the coming into force of the GDPR, the EDPB has adopted 80 positive Opinions on national decisions approving BCRs²³. In addition, the EDPB has updated the referential and application form for controller BCRs²⁴, building upon the agreement reached by the SAs in the course of BCRs' approval procedures and providing additional guidance. Currently, the EDPB is conducting the same exercise with regard to processor BCRs.

International convergence

The EDPB acknowledges the increase in cross-border transfers of data through the globalization of economic and social activities, due to the ubiquitous opportunities offered by digital technologies. While recognizing the benefits that may arise from cross border transfers of data, the EDPB also highlights that these transfers may raise serious challenges to the protection of personal data and privacy.

In this context, the EDPB takes note of the different international initiatives and ongoing work in various international forums.

The EDPB emphasises that ensuring 'trust', including a high standard of protection of personal data, is a fundamental requirement and prerequisite to facilitate the free flow of data.

²¹ Available at: https://edpb.europa.eu/our-work-tools/our-documents/guidelines/guidelines-052021-interplay-between-application-article-3_en

²² Available at: https://edpb.europa.eu/our-work-tools/our-documents/guidelines/guidelines-052021-interplay-between-application-article-3_en

²³ This information reflects figures until 1 December 2023.

²⁴ Available at: https://edpb.europa.eu/our-work-tools/our-documents/recommendations/recommendations-12022-application-approval-and_en

In this respect, the EDPB underlines the continuous need to ensure that trade agreements cannot be used to challenge existing and future EU law on the protection of personal data and privacy, which are fundamental rights in the EU. The EU's horizontal provisions for cross-border data flows and for personal data protection, which the Commission has repeatedly stated as non-negotiable, allow the EU to include measures to facilitate cross-border data flows in trade agreements while preserving individuals' fundamental rights to data protection and privacy.

4. CHAPTER VII²⁵

4.1. Cooperation mechanism

4.1.1. One-stop-shop mechanism (OSS) - Article 60 GDPR

Since 2018, the EDPB has continued working on constantly improving cooperation within the existing legal framework and ensuring its efficiency. This work is also based on the significantly increased experience of the SAs with the one-stop-shop mechanism since the beginning of the GDPR's application.

In the 2019 evaluation report, the EDPB identified a number of challenges in the framework of the OSS mechanism, namely the different national administrative procedures, the different interpretations of concepts relating to the cooperation mechanism and the diverging approaches of the Lead Supervisory Authorities (LSAs) as regards the start of the cooperation procedure, the timing of involvement of the Concerned Supervisory Authorities (CSAs) and the communication of relevant information to them.

In order to remedy the problems identified, the EDPB has, as committed, further clarified the applicable procedural steps under Article 60 GDPR and worked towards a common interpretation of key concepts and terms of the OSS mechanism and the cooperation procedure. To this end, the EDPB has adopted a number of guidelines or documents, among which worth mentioning are:

- Guidelines 09/2020 on relevant and reasoned objection under Regulation 2016/679
- Guidelines 2/2022 on the application of Article 60 GDPR
- Guidelines 6/2022 on the practical implementation of amicable settlements
- Guidelines 8/2022 on identifying a controller or processor's lead supervisory authority
- EDPB Document 1/2021 on the application of Article 62 GDPR – Joint Operations
- EDPB Document 6/2020 on preliminary steps to handle a complaint: admissibility and vetting of complaints
- EDPB Document 1/2019 on handling cases with only local impacts under Article 56.2 GDPR

²⁵ The figures corresponding to the year 2023 may not be final in several instances, since the data was collected before the end of the year and, therefore, is still subject to changes. When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

- Template Complaint form

In addition, during a high-level meeting in Vienna in April 2022, the EDPB members agreed to further enhance cooperation on strategic cases and to diversify the range of cooperation methods used. Following the meeting, the EDPB adopted a Statement on enforcement cooperation²⁶ reiterating their commitment to strengthened cross-border cooperation and started implementing targeted actions to enhance cooperation further, such as the identification of strategic cases for which cooperation is prioritised.

An important outcome of the meeting was the decision to draft a list of concrete aspects in national procedural law that the EDPB wishes to see harmonised at EU level in order to maximise the positive impact of GDPR cooperation. This so-called ‘Wish list’ was sent to the European Commission for its consideration on 10 October 2022.

The European Commission took swift action and on 4 July 2023, it published the Proposal on procedural rules. The EDPB and EDPS were formally consulted in accordance with Article 42(2) of Regulation (EU) 2018/1725 and adopted Joint Opinion 1/2023 on 19 September 2023.

As highlighted in this Joint Opinion, the EDPB very much welcomes that the Proposal on procedural rules aims to foster effective enforcement of data protection rules and harmonise the rights of the parties, and intends to give effect to many of the suggestions contained in the EDPB’s ‘Wish list’. The EDPB also welcomes the Proposal’s objective to strengthen consensus finding at an early stage. However, the EDPB and EDPS made detailed recommendations for improvement that would allow the new Regulation to attain the objectives pursued.

In the context of the current evaluation, following the request made by the European Commission, the EDPB also gathered some relevant statistics on the OSS mechanism, collected on the Internal Market Information system (IMI), which is used to ensure the cooperation with the data protection authorities.

4.1.1.1 The functioning of the OSS and statistics²⁷

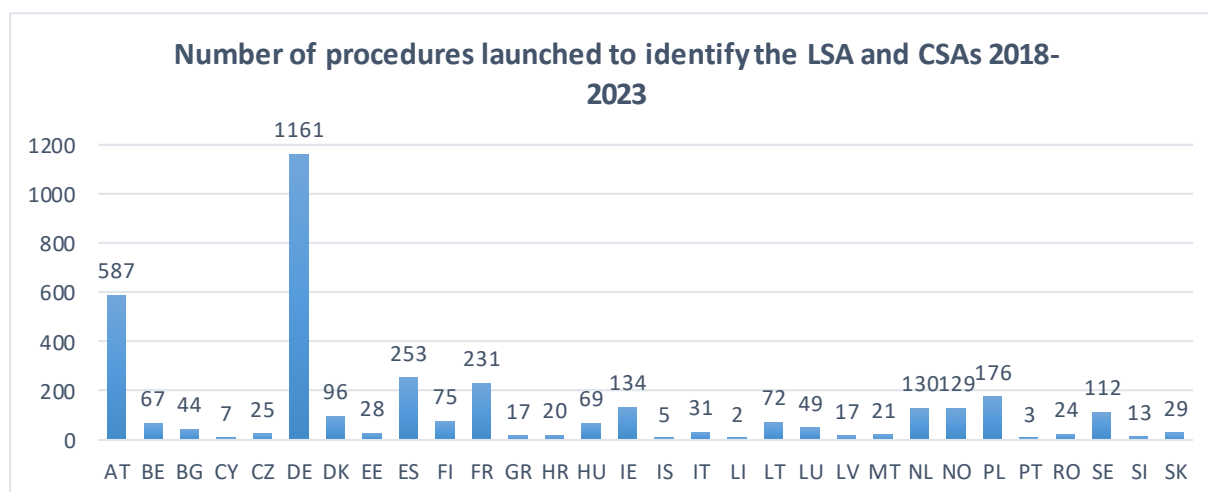
Number of procedures launched to identify the LSA and CSAs

It should be recalled from the outset that, when a processing is of cross-border nature (within the meaning of Article 4(23) GDPR), there is a need to identify the LSA and the CSAs that will be involved in the cooperation process. A dedicated workflow has been provided within IMI to facilitate exchanges and decision-making by SAs on this matter.

²⁶ https://edpb.europa.eu/our-work-tools/our-documents/statements/statement-enforcement-cooperation_en

²⁷ The statistics collected by the EDPB on IMI reflect the state of play until 3 November 2023.

As reflected in the table below²⁸, between 25 May 2018 and 3 November 2023, 3813 procedures were initiated to identify the LSA and CSAs. SAs from all Member States²⁹ have been identified at least once as an LSA or a CSA.



Number of case entries in the Case register

Between 25 May 2018 until 03 November 2023, 2397 case entries have been registered in IMI. All the cases with a cross-border component are registered in a central database (IMI Case register) from which cooperation and consistency procedures can be initiated. Not all cases which are registered in Case register concern One-stop-shop procedures. References to case register entries in these statistics do not have a 1-to-1 correlation to the number of cross-border complaints handled per country as multiple complaints may be bundled in one case register entry, depending on the SA's practices. Thus, a single case entry may relate to multiple cross-border cases and may lead to several national decisions³⁰.

In addition, the IMI case register does not include those cross-border cases that are still in the preliminary phase of identifying the roles of the LSAs and CSAs and not all cross-border complaints filed at individual SAs may have been uploaded onto IMI yet. Therefore the IMI statistics may differ from the national reporting by the SAs as the national case management systems are usually organised around the individual complaints.

An entry in the Case register may:

- refer to one complaint and can lead to Article 60 procedure;
- refer to several complaints and in consequence can lead to the several Article 60 procedures and therefore to several SA decisions;

²⁸ When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

²⁹ References to “Member States” made throughout this document should be understood as references to “EEA Member States”.

³⁰ An entry in the case register may also be done for launching a Mutual Assistance request of general nature, which will not lead to any SA decision. Therefore, the number of case entries does not, in itself, provide information on the cooperation behind them but rather reflects the way in which SAs organise their work in the IMI.

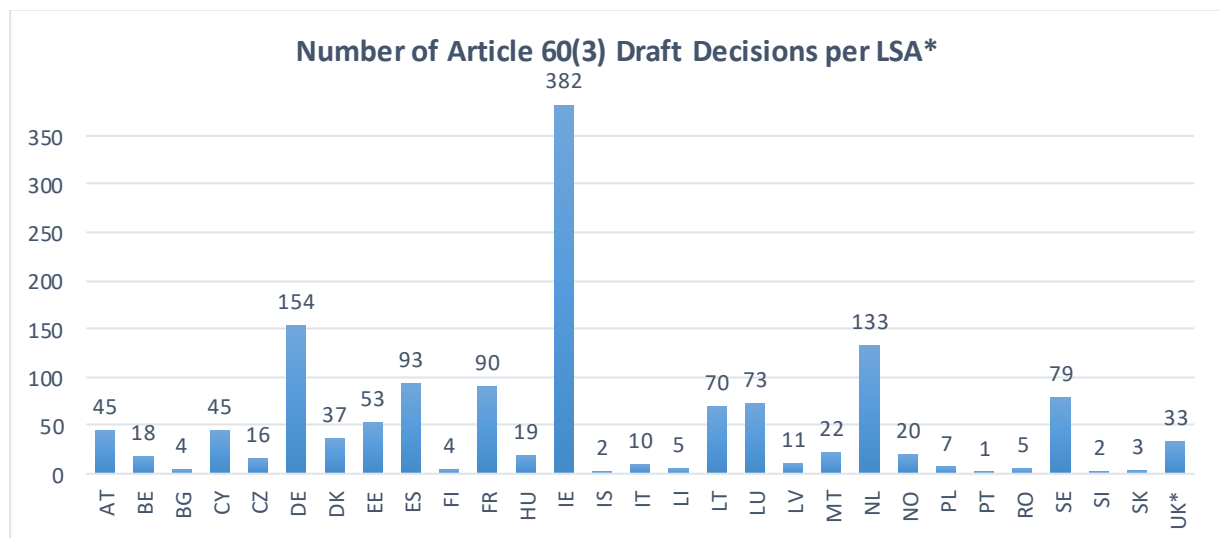
- relate to consistency procedures (Articles 64, 65 or 66), Article 61 (Voluntary) Mutual Assistance or Article 62 Joint Operations which will not necessarily lead to any One Stop Shop Article 60 procedures neither to any SA decision;
- also be used for cross border communications, i.e. for transferring the complaints that do not concern the cross-border processing in accordance to Article 4 (23) GDPR and in consequence does not lead to Article 60 procedure.

The number of decisions under Article 60 GDPR

The IMI system offers different steps to follow when handling Article 60 procedures:

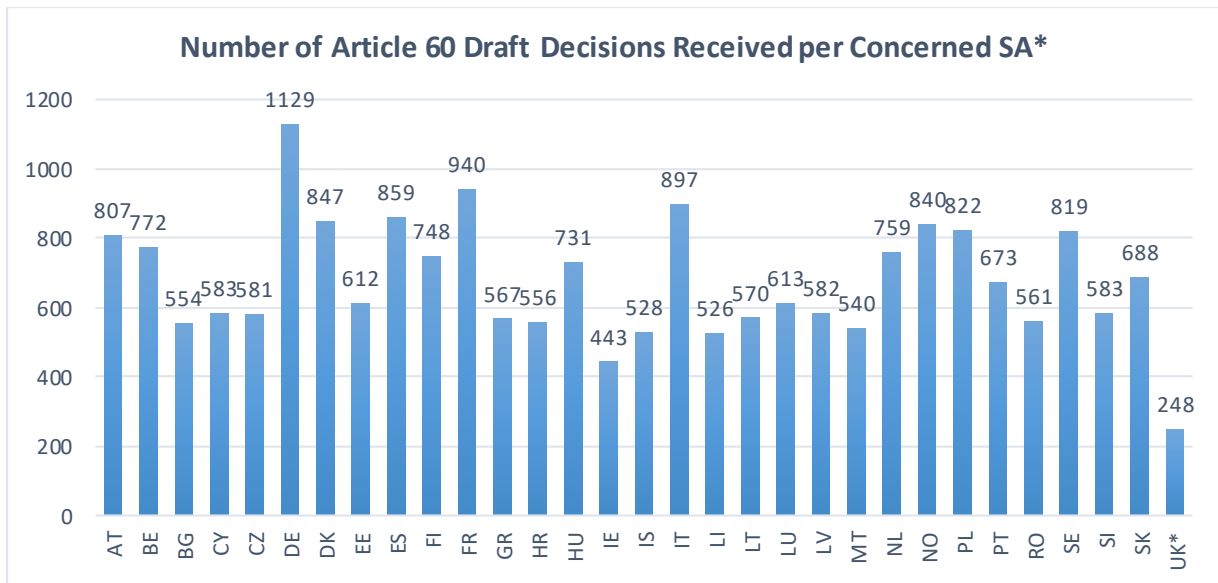
- informal consultation to exchange information and enable the cooperation between involved SAs prior to the submission of the draft decision;
- draft decision submitted by the LSA to the CSAs which triggers the formal OSS procedure;
- revised draft decision submitted by the LSA to the CSAs in case the CSAs raised (a) relevant and reasoned objection(s);
- final decision submitted to all EDPB members.

Between 25 May 2018 and 3 November 2023, LSAs issued 1436 draft decisions under Article 60(3), out of which **990 resulted in final decisions under Article 60(6)**. The detailed breakdown is available below³¹.



**UK: Prior to leaving the EU and the EDPB*

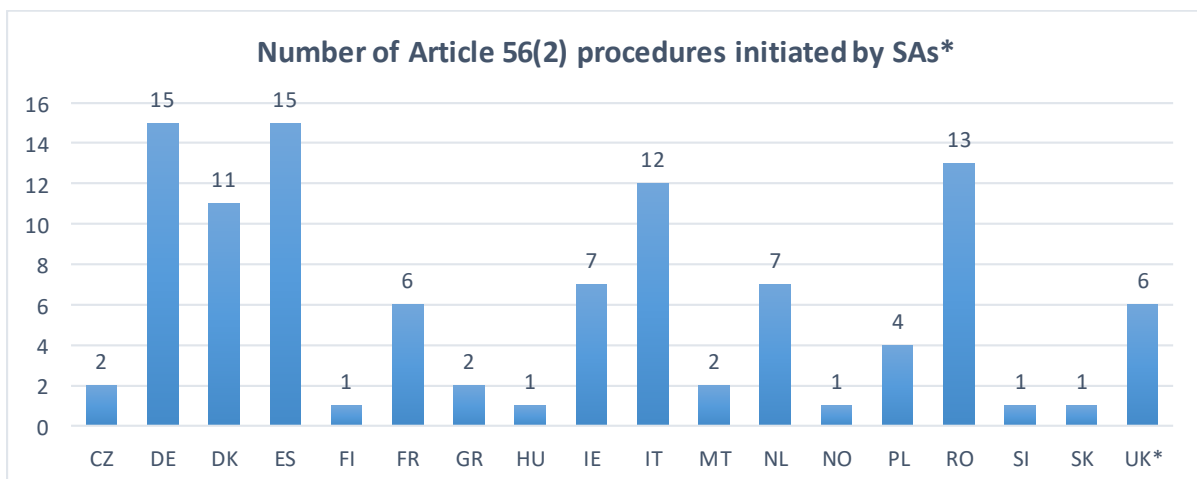
³¹ When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.



*UK: Prior to leaving the EU and the EDPB

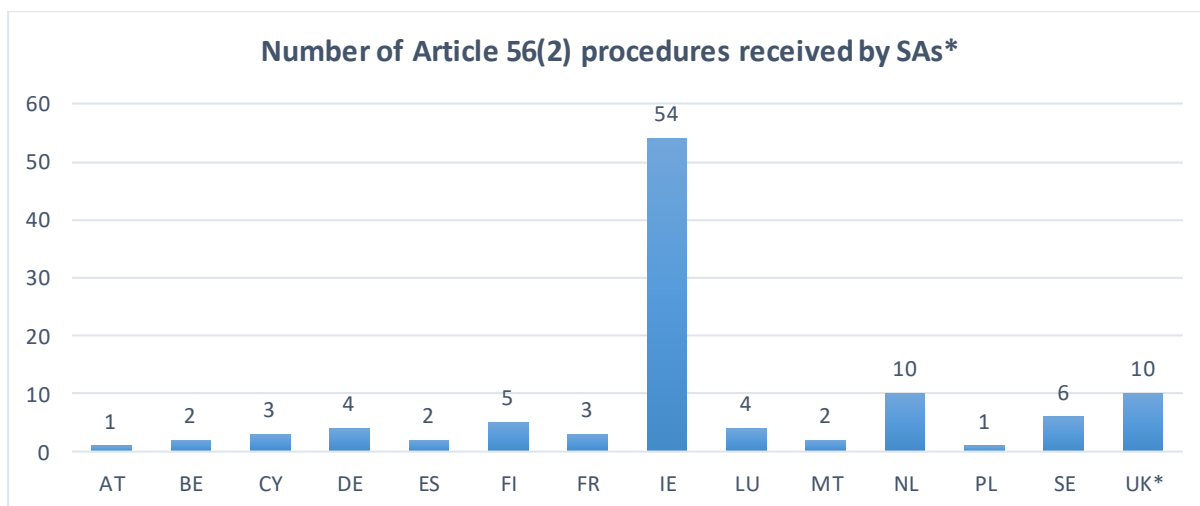
4.1.1.2 Statistics and experience with regard to the identification and handling of local cases under Article 56(2) GDPR

Article 56 (2) GDPR relates to the so-called “local cases”, i.e. cases involving cross-border processing that have only local impacts in the Member State of the SA where the complaint was first lodged or that first detected a possible infringement, which enables the SAs to agree that the local competent SA will handle the complaint, instead of the LSA. The SAs used the Article 56(2) GDPR procedure 107 times. The detailed breakdown is available below³².



*UK: Prior to leaving the EU and the EDPB

³² When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.



*UK: Prior to leaving the EU and the EDPB

Following the question raised by the European Commission, only 4 SAs had comments with respect to the identification and handling of local cases under Article 56(2) GDPR.

One SA shared that it is sometimes difficult to distinguish Article 56(2) GDPR cases from non-cross-border processing cases because if a case can be identified as a local one, it could also be interpreted as a non-cross-border case. An SA highlighted the practical importance of the local cases procedure, especially for smaller enforcement actions, and stressed it would be useful to have it clarified further, including for the case of groups of undertakings. The same SA also considers that the absence of an objection by the LSA should be interpreted as sufficient for the competent SA (CompSA) to proceed. Another SA expressed the view that, when the LSA has decided not to handle a case in accordance with Article 56(5) GDPR, the IMI system should provide a mechanism preventing other SAs from declaring themselves as concerned SAs (CSAs). In their view, the fact that other SAs declare themselves as CSAs should not bring into question the assessment made by the receiving SA, as the competent SA, and the LSA when deciding to handle the case as a local one. Finally, one SA pointed out that the time required for obtaining the views of the LSA has usually been considerable and there have been several exchanges of documents and information even after the initial submissions.

4.1.1.3 Did you raise relevant and reasoned objections?

SAs from 18 Member States have indicated that they have raised relevant and reasoned objections in accordance with Article 60(4) GDPR.

4.1.1.4 and 4.1.1.6. In how many cases did you raise relevant and reasoned objections and in how many did you reach consensus with the LSA?³³

SA	In how many cases did you raise relevant and reasoned objections?	In how many did you reach consensus with the LSA?*	%
AT	12	-	-
BE	5	-	-
DE	101	15	14,85%
DK	2	-	-
EE	1	-	-
ES	5	1	-
FI	10	7	70%
FR	18	12	66.67%
HU	3	-	-
IE	13	-	-
IT	16	2	12.50%
LV	1	1	100%
NL	8	2	25%
NO	8	3	37.5%
PL	49	49	100%
PT	33	29	87.88%
SE	2	-	-
SI	2	1	50%

*Some cases may still be pending and may still be subject to consensus without the need to trigger the dispute resolution mechanism.

4.1.1.5 Which topics were addressed?

The relevant and reasoned objections that have been raised by the SAs concern the identification of additional or alternative infringements of the GDPR and the action envisaged with regard to the controller and/or processor.

In terms of topics addressed, the most recurrent ones are the legal basis for processing, the controller's information and transparency obligations, failure to notify a personal data breach, rights of the data subject, and reliance on derogations under Article 49 GDPR. The concept of personal data and the legal qualification of infringements of the general principles of processing (in particular lawfulness and fairness of processing and accountability) have also been the subject of objections pursuant to Article 60(4) GDPR.

As to the action proposed by the LSA, objections have been raised with regard to the use of corrective measures and/or the calculation and amount of the administrative fines, the scope and thoroughness of the investigation led by the LSA, including the dismissing of complaints by the LSA without investigating them.

³³ When data was not provided or is not available, it is reflected in the tables as "-" and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

4.1.2. Mutual assistance

The GDPR provides the possibility for SAs to provide mutual assistance to each other, sending, for instance, relevant information and requests for supervisory measures, as well as requests to carry out prior authorisations and consultations, inspections and investigations.

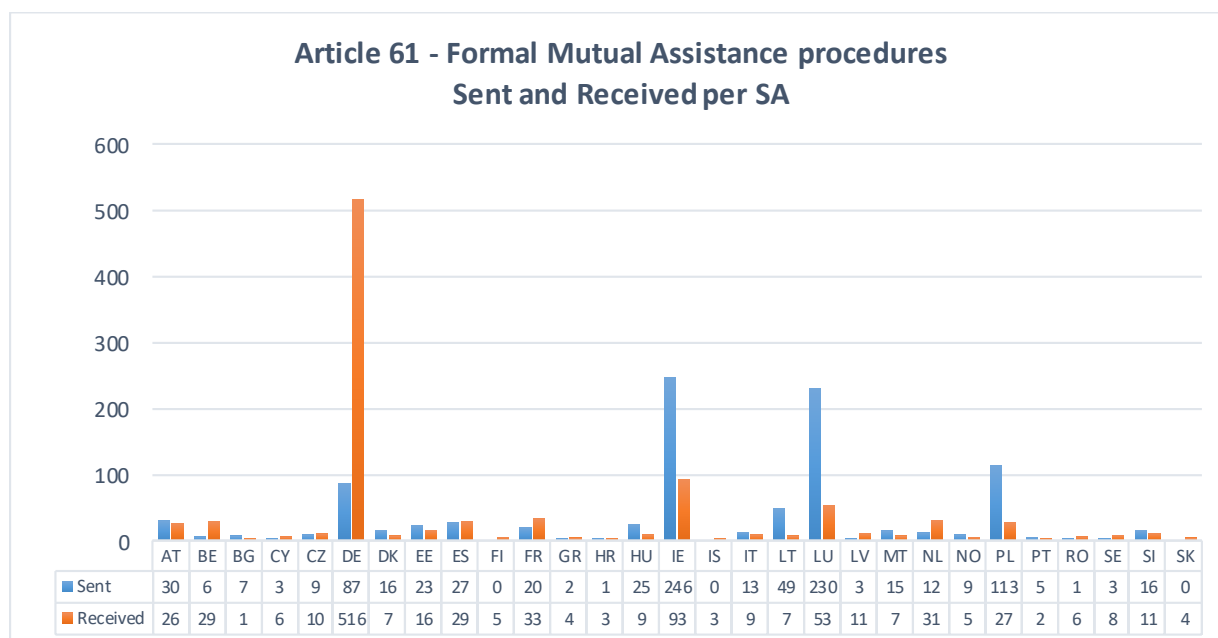
In the IMI system, two choices are offered to SAs, either to rely on a “Formal Mutual Assistance request” under Article 61 GDPR, which entails a legal deadline of 1 month to reply to the request received or to rely to an “Informal Mutual Assistance request”, which will not be framed by this legal deadline but it is rather based on the general spirit of good cooperation.

The SAs have triggered 971 procedures under Article 61 GDPR (“Formal Mutual Assistance”).

Furthermore, the SAs have launched 12313 procedures to assist each other on a voluntary basis (“Voluntary Mutual Assistance”). While designing the GDPR modules in IMI, SAs introduced this procedure to enable a more flexible mutual assistance for matters not needing a tight deadline, as it is based on the general principle of cooperation between SAs.

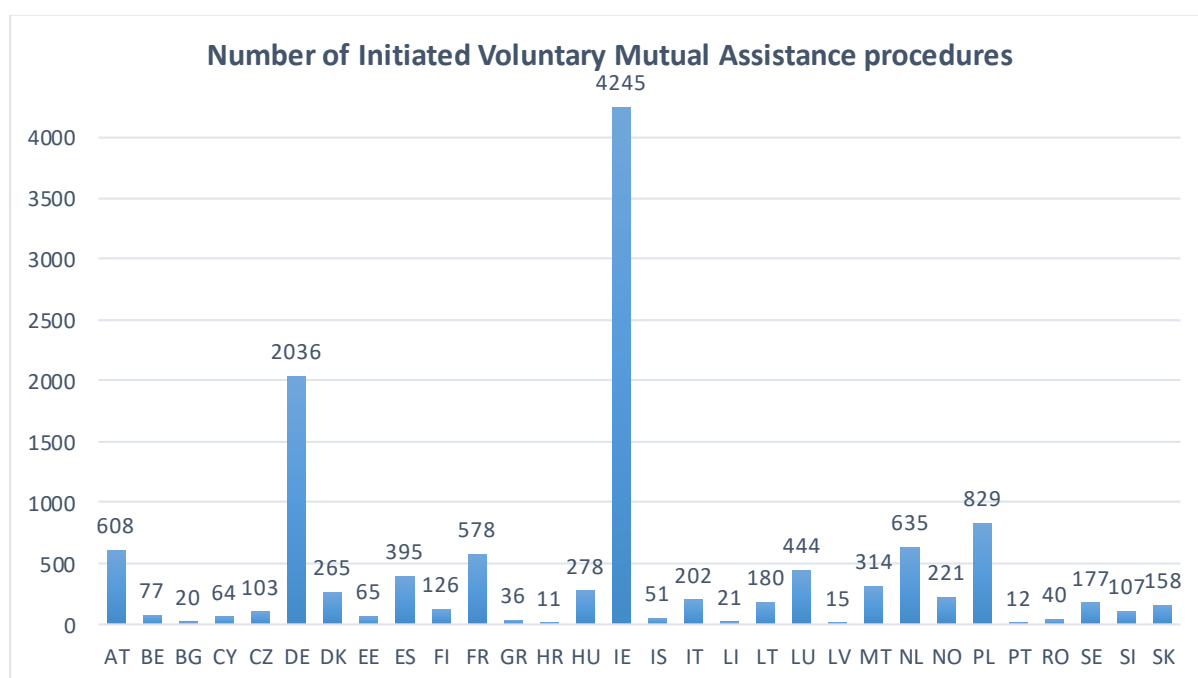
A detailed breakdown is provided below³⁴.

Article 61 Formal Mutual Assistance



³⁴ When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

Article 61 Voluntary Mutual Assistance



4.1.2.1 Did you ever use the Formal Mutual Assistance in the case of carrying out an investigation?

Most of the SAs (83%) already used the Formal Mutual Assistance in the case of carrying out an investigation.

4.1.2.2 Could you explain why you have never used Mutual Assistance - Article 61 procedure for carrying out an investigation?

All SAs used Voluntary Mutual Assistance for carrying out an investigation.

The few SAs that have never used Formal Mutual Assistance in the context of an investigation found the voluntary mutual assistance mechanism more appropriate to deal with their cases.

4.1.2.3 Did you ever use this tool in the case of monitoring the implementation of a measure imposed in another Member State?

Eight SAs from eight Member States used this tool for monitoring the implementation/enforcement of a measure imposed in another Member State.

4.1.2.4 Could you explain why you have never used Mutual Assistance - Article 61 procedure for monitoring the implementation of a measure imposed in another Member State?

The SAs that have never used the Formal Mutual Assistance for monitoring the implementation of a measure imposed in another Member State generally did not find it relevant or necessary for that particular purpose.

4.1.2.5 What is your experience when using Mutual Assistance - Article 61 procedure?

The vast majority of SAs find the Formal Mutual Assistance a very useful tool for cooperation to either receive information or initiate action with other authorities and have not encountered any particular obstacle in applying the Mutual Assistance Procedure.

The voluntary mutual assistance exchange, not entailing a legal deadline and strict duty to answer, is more frequently used and generally effective. In this regard, while the use of the 'formal' mutual assistance is more limited because of the possible legal consequences in case of non-compliance with an assistance request, SAs usually rely on the 'Voluntary' Mutual Assistance to inform another SA about a received complaint concerning a private body or a non-public body, to submit legal inquiries or to provide updates on the state of play of a case, exchange documents or request other kinds of information and assistance. In practice, the SAs reply to voluntary mutual assistance request within the same deadline as a formal request.

Another advantage of the voluntary mutual assistance is that it allows SAs to discuss and solve general legal questions, which are raised in the context of concrete cases. SAs' regular participation, high commitment and expertise in analysing these questions contribute to the uniform understanding and application of the GDPR across the EEA.

One SA recalled that the Mutual Assistance Procedure is a multi-purpose procedure which can be used both in cross-border cases to assist or exchange information, as well as in other assistance requests related to national cases and commented that there are less requests relating to purely national matters. Another SA noted that, despite the overall success of the procedure, in limited cases the Voluntary Mutual Assistance requires additional actions on the side of the broadcasting SA i.e. either to answer follow-up questions the receiving SA might have. According to this SA, these additional steps relating to Mutual Assistance Requests can sometimes lead to longer delays in handling the cases.

Lastly, one SA pointed out that clarifications on certain aspects of Mutual Assistance under Article 61 GDPR are necessary, but that the Mutual Assistance Request Guidance that the EDPB is working on is expected to be able to provide most of those clarifications.

4.1.3. Joint operations – Article 62

4.1.3.1 Did you ever use this tool (both receiving staff from another DPA or sending staff to another DPA) in the case of carrying out an investigation?

Five joint operations have been initiated on which SAs from 7 Member States have been involved in total.

4.1.3.2 Could you explain why you have never used Joint Operations - Article 62 procedure for carrying out an investigation?

The vast majority of the SAs that have never used Joint Operations procedure for carrying out an investigation did not find it relevant or necessary in the context of the cases they dealt with. Three SAs highlighted the lack of enough resources in order to use the Art 62 procedure.

Two SAs pointed out the practical and legal obstacles mostly under national law including the lack of national provisions implementing Article 62 GDPR³⁵, while one SA noted the lack of clarity regarding

³⁵ In particular, the AT SA underlined that the national law does not contain any provision implementing Article 62 GDPR. The BE SA also referred to the legal obstacles under national law.

the application of the procedures and the complexities of the procedure that requires long preparations and paper work.

4.1.3.3 Did you ever use Joint Operations in the case of monitoring the implementation/enforcement of a measure imposed in another Member State?

No SAs have used Joint Operations in the case of monitoring the implementation/enforcement of a measure imposed in another Member State.

4.1.3.4 Could you explain why you have never used Joint Operations - Article 62 procedure for implementation/enforcement of a measure imposed in another Member State?

The vast majority of the SAs that have never used Joint Operations procedure for implementation/enforcement of a measure imposed in another Member State did not find it appropriate for that purpose. Some SAs repeated the lack of sufficient resources.

4.1.3.5 What is your experience when using Joint operations - Article 62 procedure?

The SAs do not have enough practical experience to reply to this question. However, three SAs involved in a strategic case for which this procedure was used agreed that, so far, the experience has been very positive from both a legal and a technical perspective. One of them noted that the EDPB approved format for a Joint Operation Action Plan³⁶ strikes a good balance between, on the one hand, the required structure to work together, and on the other hand, an appropriate degree of freedom to make appropriate work plan for the case at hand. Another SA pointed out that the Article 62 procedure has been used to handle cooperation also outside of the OSS mechanism.

In contrast, one SA found the procedure very impractical mostly due to difficulties with language and some challenges in agreeing protocols.

The EDPB has adopted Document 1/2021 on the application of Article 62 GDPR – Joint Operations in order to provide more clarity and consistency with regards to the practical implementation of this tool³⁷.

³⁶ See Internal EDPB Document 1/2021 on the application of Article 62 GDPR – Joint Operations (review of Article 29 WP document), adopted on 14 January 2021 and published on EDPB website: https://edpb.europa.eu/system/files/2022-07/internal_edpb_document_1_2021_on_art_62_joint_operations_en.pdf, p. 13.

³⁷ See Internal EDPB Document 1/2021 on the application of Article 62 GDPR – Joint Operations.

4.2. Consistency mechanism

4.2.1. Urgency Procedure – Article 66 GDPR

Only 4 SAs have adopted provisional measures under the urgency procedure (Article 66(1) GDPR) and 2 of them have requested the EDPB to intervene in accordance with Article 66(2) GDPR, as reflected in the table below.

SA	Number of measures adopted under the urgency procedure	Urgent binding opinion or decision of the EDPB requested under Article 66(2) GDPR
DE	1	Yes
FI	1	No
IT	4	No
NO	1	Yes

4.3. European Data Protection Board

The main documents adopted by the EDPB

The EDPB is committed to ensure the consistent application of the GDPR. The majority of the tasks of the EDPB are listed in Article 70(1) GDPR. Below, the EDPB provides a general overview of the main documents adopted in the past five years in the fulfilment of its tasks.

One of the core tasks of the EDPB is the adoption of consistency Opinions and Binding Decisions. In particular, the EDPB has adopted 190 consistency Opinions (Article 64)³⁸ and 11 Binding Decisions (Articles 65 and 66)³⁹, thus fulfilling its tasks under letters (a), (o), (p), (t) and (x) of Article 70(1) GDPR⁴⁰. In addition, the EDPB has adopted 8 Opinions and 2 Documents providing advice to the European Commission⁴¹, under letters (b) and (s) of Article 70(1) GDPR and Article 51(1)(g) of Directive (EU) 2016/680 and, together with the EDPS, 12 joint opinions addressed to the Commission⁴².

The EDPB also issues general guidance to clarify the law and promote a common understanding of EU data protection laws. The EDPB has adopted 35 Guidelines, out of which 29 were subject to public consultation, and 5 Recommendations, out of which 2 were subject to public consultation, fulfilling its tasks under letters (c), (e), (f), (g), (h), (i), (k) and (n) of Article 70(1) GDPR⁴³. The EDPB is also completing

³⁸ Available here: https://edpb.europa.eu/our-work-tools/consistency-findings/opinions_en (by selecting Art 64 opinions in the filter available on the page). https://edpb.europa.eu/our-work-tools/consistency-findings/opinions_en (by selecting Art 64 opinions in the filter available on the page).

³⁹ Available here: https://edpb.europa.eu/our-work-tools/consistency-findings/binding-decisions_en. https://edpb.europa.eu/our-work-tools/consistency-findings/binding-decisions_en.

⁴⁰ The figures correspond to data until 1 December 2023.

⁴¹ In particular: [Response of the EDPB to the European Commission's targeted consultation on a digital euro](#) and [EDPB Document on response to the request from the European Commission for clarifications on the consistent application of the GDPR, focusing on health research](#).

⁴² Available here: https://edpb.europa.eu/our-work-tools/consistency-findings/opinions_en?f%5B0%5D=opinions_publication_type%3A553 (by selecting EDPB/EDPS Joint opinions in the filter available on the page).

⁴³ The figures correspond to data until 1 December 2023.

its tasks under Article 70 (1)(l) GDPR, reviewing the practical application of these guidelines and recommendations.

Strengthening enforcement cooperation between SAs and promoting effective exchanges among them is also an important task of the EDPB. To this end, it has adopted 6 Documents to streamline specific procedures and actions⁴⁴, 14 Internal Documents⁴⁵, 1 Toolbox on enforcement cooperation and a Letter to the Commission (the 'Wish list'), in accordance with letters (b), (e) and (u) of Article 70(1) GDPR. In addition, the EDPB has prepared 3 reports in the context of coordinated enforcement actions and taskforces and 2 templates⁴⁶.

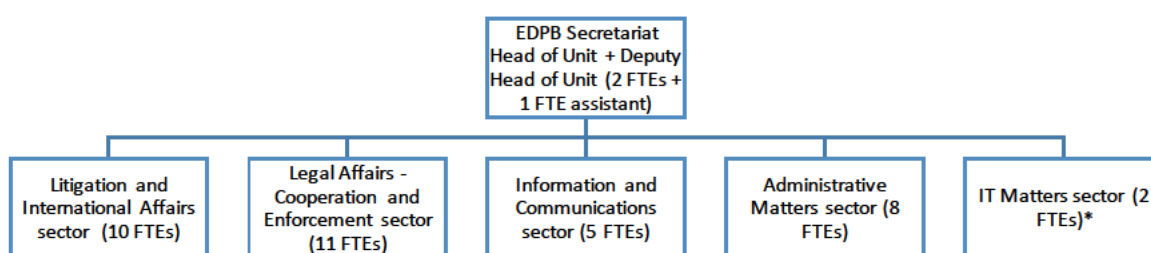
Finally, the EDPB is ready to deal with developments which impact the application of the GDPR, including proposal of new legislations, as it has already done on several occasions in the last 5 years. In this respect, the EDPB has issued 22 Statements and 6 Information notes, under letters (b), (e), (i) and (u) of Article 70(1) GDPR.

The EDPB also provides the register referred to in Article 70(1)(y) GDPR⁴⁷, as well as a register of decisions adopted by the SAs under the cooperation mechanism⁴⁸.

The EDPB Secretariat

a. Resources of the EDPB Secretariat

The EDPB Secretariat is composed of a multifaceted team, which facilitates the Board's fair and effective decision-making and acts as a gateway for clear and consistent communications among the members and also externally. To this end, a team currently composed of 39 FTEs provides analytical, administrative and logistical support to the EDPB and performs its tasks exclusively under the instructions of the Chair of the EDPB⁴⁹. A more detailed representation of the team's composition can be found below:



*6 external contractors are also currently taking part in IT activity, in charge of the website and the development and maintenance of IT tools used by the EDPB and the Secretariat.

⁴⁴ Available here: https://edpb.europa.eu/our-work-tools/support-cooperation-and-enforcement/gdpr-cooperation-and-enforcement_en and here: https://edpb.europa.eu/our-work-tools/support-cooperation-and-enforcement/consistency-and-cooperation-procedures_en.

⁴⁵ The EDPB made them publicly available here: https://edpb.europa.eu/our-work-tools/other-documents/internal-documents_en?page=0.

⁴⁶ Available here: https://edpb.europa.eu/our-work-tools/support-cooperation-and-enforcement/gdpr-cooperation-and-enforcement_en.

⁴⁷ https://edpb.europa.eu/our-work-tools/consistency-findings/register-for-decisions_en.

⁴⁸ https://edpb.europa.eu/our-work-tools/consistency-findings/register-for-article-60-final-decisions_en.

⁴⁹ Articles 75(5) and 75(2) GDPR, respectively.

The Secretariat deals with a wide range of tasks, such as: drafting EDPB documents including EDPB binding decisions and consistency opinions, ensuring compliance with the legal framework applicable to the EDPB as an EU body, providing IT solutions to ensure transparent communications, handling media and press relations, planning and organising meetings and carrying out tasks related to the EDPB's budget and finances.

The Litigation and International Affaires sector and the Legal Affairs - Cooperation and Enforcement sector are **Legal sectors**. They provide analytical legal support wherever needed to fulfil the tasks of the Secretariat under Article 75(6) GDPR. In particular, a large part of the legal officers' time is dedicated to providing support to the Board in relation to the drafting of opinions⁵⁰, binding decisions⁵¹ and other texts adopted by the Board, pursuant to Article 75(6)(g) GDPR. The Secretariat has, so far, led the drafting of a very significant number of documents adopted by the EDPB⁵². This includes the drafting of 10 out of 11 of the binding decisions adopted on the basis of Article 65 GDPR and the 2 urgent binding decisions adopted on the basis of Article 66 GDPR, as well as most of the EDPB opinions adopted on the basis of Article 64 GDPR.

Besides, legal officers provide support in relation to litigations involving the EDPB. In particular, they defend the EDPB decisions that are challenged before the CJEU⁵³, and work on litigation cases that may have an interest for the EDPB⁵⁴.

Other tasks carried out by the Legal sectors include, inter alia: implementing the EDPB's decision to further enhance enforcement cooperation on strategic cases and to diversify the range of cooperation methods used⁵⁵; contributing to the legal discussions in EDPB meetings; preparing summaries of SAS' one-stop-shop final decisions and making those national decisions publicly available to a wider audience⁵⁶ in a public register⁵⁷ and elaborating, developing and implementing document management policies and procedures⁵⁸. The legal officers' tasks also involve administrative activities, for instance linked to communications between EDPB members, or in relation to the preparation of EDPB meetings, carried out in close cooperation with the coordinators of Expert Subgroups and

⁵⁰ Adopted under Articles 64 or 70 GDPR.

⁵¹ Adopted under Articles 65 or 66 GDPR.

⁵² In particular, EDPB Secretariat led the drafting for 67% of the documents adopted in 2018 and 2019; over 60% of the documents in 2020 and over 35% of those adopted in 2021 (including Recommendations 01/2020, the EDPB Binding Decisions and the EDPB Strategy) and contributed to a further 25%. In 2022, it led the drafting of 26 documents and contributed to other 23. The figures for 2023 will be reflected in the 2023 Annual Report.

⁵³ To date, the EDPB has been defendant in 11 cases brought by controllers before the General Court following the adoption of binding decisions; in one appeal brought by a controller before the Court of Justice following the adoption of a binding decision; and in one case brought by an individual following the EDPB's refusal to access to a file.

⁵⁴ For example, on the EDPB's application to intervene in Case C-413/23 *EDPS v SRB*, which addresses the concept of 'personal data'.

⁵⁵ EDPB Statement on enforcement cooperation, adopted on 28 April 2022, available at: https://edpb.europa.eu/system/files/2022-04/edpb_statement_20220428_on_enforcement_cooperation_en.pdf.

⁵⁶ Due to some national legal restrictions, not all decisions can be made publicly available or before they are made available, data concerning natural and/or legal persons needs to be redacted.

⁵⁷ Final One Stop Shop Decisions available at https://edpb.europa.eu/our-work-tools/consistency-findings/register-for-article-60-final-decisions_en.

⁵⁸ See, for example, the EDPB's decision on records management (adopted on 20 September 2023).

Taskforces and with the Chair for Plenary meetings, and with the support of the Administrative Matters sector.

In addition to the core tasks of the EDPB Secretariat defined by the GDPR, its staff assists the EDPB with its compliance obligations. In practice, three legal officers are entrusted with DPO activities in addition to their other legal responsibilities, two staff members are also in charge of information security (LISO), and the legal officers support the transparency officer to handle requests for public access to documents under Regulation 1049/2001. Besides, legal officers work on requests for information and media enquiries and regularly present the activities of the EDPB in external engagements.

Furthermore, the EDPB Secretariat provides the Secretariat of the Coordinated Supervision Committee (CSC)⁵⁹. At the moment, 4 legal officers provide analytical and administrative support to the CSC in addition to their other tasks within the EDPB Secretariat.

The **Administrative Matters sector** provides administrative and logistical support to the Board, fulfilling the tasks entrusted to the Secretariat under Article 75(6) GDPR, especially by organising all meetings and events of the Board (over 1.351 physical, hybrid and remote EDPB meetings since 2020)⁶⁰, and coordinating the translation and proofreading of all official EDPB documents in all official EU languages pursuant to Article 75(6)(e) and (f) GDPR.

The tasks of the Administrative Matters sector also include, among others, the management of the members' contact lists for efficient and secure communication; the operational initiation of financial files, for instance linked to public procurement; participation in the preparation, monitoring and review of the EDPB budget as well as its implementation; and collaboration with the EDPS, the European Commission and the European Parliament on matters of administration and service provided to the EDPB.

The **IT Matters sector** develops, supports and enhances the IT systems for internal and external communications of the EDPB, in line with Article 75(6)(d) GDPR. It also provides IT services for the EDPB Secretariat's functioning. With the external consultants' help, the IT sector manages EDPB IT Tools⁶¹, including the provision of comprehensive training and user guides; compiling relevant usage statistics; and providing of IT support for the organisation of EDPB meetings, such as the plenary voting system.

The **Information and Communications sector** aims at ensuring transparent and timely communication with third parties. Its tasks, in light of Article 75(6)(c) GDPR, cover *inter alia*: day-to-day media relations and drafting and distributing press releases; coordinating external communications with the EDPB communications network which gathers the communications officers of the EDPB members; ensuring

⁵⁹ The CSC was formally established within the framework of the EDPB in December 2019. It is a group of national supervisory authorities and the European Data Protection Supervisor (EDPS) to ensure coordinated supervision of large scale IT systems and of EU bodies, offices and agencies, in accordance with Article 62 of Regulation (EU) 2018/1725 or with the EU legal act establishing the large scale IT system or the EU body, office or agency. This role is a legal duty transferred from the EDPS to the EDPB Secretariat.

⁶⁰ This number includes plenary, expert subgroup, taskforce and drafting team meetings.

⁶¹ Among others: the EDPB website, the EDPB Information Exchange HUB used to communicate information and documents between EDPB members (more than 1420 active users), the EDPB IMI Information system for SA's GDPR cooperation and EDPB consistency (1030 active users), the EDPB Contact and Meeting manager and the EDPB Videoconferencing system.

EDPB's online presence; producing EDPB publications, including the annual report and a stakeholder survey pursuant to Article 71(2) GDPR; coordinating public information and public awareness events; replying to information queries from the general public on a wide range of topics; coordinating and preparing the speaking engagements of the Chair and Deputy Chairs; and managing relations with external stakeholders and with other institutions.

In line with the MoU agreed with the EDPB, the **EDPS** is responsible for ensuring that the EDPB receives adequate human resources, working place and infrastructure, financial resources and support where needed. To that effect, **7 EDPS FTEs under EDPB budget** provide the support to the EDPB and its Secretariat in relation to: finance and procurement, HR, other horizontal matters (including building management, ethics, internal control and liaison with different auditing stakeholders), and graphic design.

b. Secretariat resources devoted to Article 65 and 66 procedures (including assessment of completeness, assessment of admissibility of RROs and drafting of the documents)

Pursuant to Article 75(6)(g) GDPR and the EDPB Rules of Procedure⁶², one of the Secretariat's core legal tasks is drafting EDPB documents within the consistency mechanism, i.e. opinions and binding decisions.

The Secretariat has played a key role in shaping the Article 65(1)(a) GDPR⁶³ procedure and methods for the preparation and drafting of the binding decisions, including the work on the relevant EDPB guidelines⁶⁴. Often, EDPB binding decisions concern high profile cases leading to the imposition of large administrative fines. The questions that are subject to EDPB dispute resolution require a careful legal analysis and in-depth discussions among the members of the EDPB within a tight legal timeframe. Consequently, whenever a LSA requests a binding decision to the EDPB, the legal officers working on such request have to dedicate all or most of their time to this process and most of their regular tasks must be allocated to other legal officers, which creates a very high work pressure on the whole Secretariat⁶⁵. The first step in the process is assessing the completeness of the file submitted by the LSA in order to make sure that the EDPB has all information necessary to adopt a binding decision, as well as to ensure compliance with Article 41 of the Charter⁶⁶.

Procedures under Article 65(1)(a) GDPR require, on average, the use of 3.5 FTEs⁶⁷, for an average duration of 3 months. The assessment of the completeness of the file by the EDPB Secretariat on

⁶² Article 10(6) and 11(5) of the EDPB Rules of Procedure, as last modified on 6 April 2022.

⁶³ No binding decisions pursuant to Article 65(1)(b) and 65(1)(c) GDPR have been adopted by the EDPB so far.

⁶⁴ EDPB Guidelines 09/2020 on RROs, where the Secretariat was lead rapporteur, and EDPB Guidelines 03/2021 on Article 65(1)(a), where the Secretariat was co-rapporteur.

⁶⁵ While this was an occasional activity that started in 2020, with 1 or 2 cases a year, since 2022, the impact of this activity on the rest of legal activities was more important, with 3 to 5 decisions in a year.

⁶⁶ EDPB Guidelines 03/2021 on Article 65(1)(a), paragraph 18, 25.

⁶⁷ Binding decisions cover different legal questions to address and in order to meet the legal deadlines, the work has to be split between different legal officers, which are working in very close cooperation with each other's.

behalf of the Chair⁶⁸ has taken, on average, 1 month and 2 weeks⁶⁹. In 2023, the average time for this assessment was 1 month. Once the completeness phase is over, the preparation of a binding decision under Article 65(1)(a) GDPR includes assessing the admissibility of the objections raised by the concerned SAs (in this regard, a proposal is usually prepared by the EDPB Secretariat, and then discussed by the EDPB members), drafting the text of the binding decision which is then discussed with the EDPB members, and that leads to its adoption at an EDPB plenary meeting. Until now, the work of the EDPB Secretariat has always enabled the EDPB to meet the tight⁷⁰ legal deadline for the adoption of the binding decision (normally one-month deadline, extendable to 2 months).

The EDPB Secretariat may also need to devote resources to Article 65 files that do not, in the end, lead to a binding decision as the file is eventually withdrawn by the referring SA. For instance, an Article 65(1)(b) GDPR procedure was triggered by an SA that eventually withdrew it, hence it did not lead to the adoption of a decision by the EDPB. 2 FTEs worked on this file for the 2 months duration between submission and withdrawal, including on the assessment of the completeness of this file, the analysis and presentation of the subject matter and on the related exchanges with the SAs. Further, auxiliary work took place for 4 months⁷¹, requiring the allocation of at least 0.25 FTE during that period.

The preparation and adoption of urgent binding decisions or urgent opinions under Article 66 GDPR require an even more intense workload on the side of the Secretariat, given the shorter timeframe afforded by the GDPR (two weeks)⁷². Procedures under Article 66(2)⁷³ GDPR require, on average, the use of 6.5 FTEs, for an average duration of 1 month. Such duration covers an average of 2 weeks⁷⁴ to assess the completeness of the file by the EDPB Secretariat on behalf of the Chair⁷⁵, and the 2-week

⁶⁸ So far, the procedures under Article 65(1)(a) and Article 66(2) GDPR led to the adoption of 11 binding decisions. For each of them, the EDPB Secretariat, when assessing the completeness of the file on behalf of the Chair, identified information and/or documents missing in order to enable the EDPB members to have all the elements of fact and law to make a decision on the case at hand. This information and/or documents was requested by the EDPB Secretariat to the LSA, or another CSA, as appropriate. The type of clarifications and/or documents requested varied depending on the specificities of each case (e.g., seeking confirmation that the controller had been granted its right to be heard on all the documents provided by the LSA to the EDPB; requesting the addition of documents mentioned in other documents but not included as part of the documents originally provided by the LSA to the EDPB, etc.). Therefore, the time referred to also includes the time that it took for the SAs to provide the information requested.

⁶⁹ This average duration of the completeness of the file by the EDPB Secretariat also includes one request for a binding decision under Article 65(1)(a) GDPR that was eventually withdrawn by the LSA, hence that did not lead to the adoption of a decision by the EDPB.

⁷⁰ Binding decisions usually relate to complex legal questions on which the LSA and the CSAs did not manage to find consensus. There is no limit on the objections that can be raised by CSAs, nor a limitation of CSAs having the opportunity to raise objections. Therefore, this may lead to an important number of legal questions to be addressed within the legal deadline.

⁷¹ Including 3 months preparatory work prior to submission and 1 month follow up after the procedure was withdrawn.

⁷² The two weeks deadline starts running when the file is considered complete by the Chair of the EDPB and the SA that submitted it, and shared with all the EDPB members.

⁷³ So far, no SA has requested the EDPB to adopt an urgent opinion under Article 66(3) GDPR.

⁷⁴ This average duration of the completeness of the file by the EDPB Secretariat also includes one request for an urgent binding decision that was eventually withdrawn by the requesting SA, hence that did not lead to the adoption of a decision by the EDPB.

⁷⁵ So far, the procedure under Article 66(2) GDPR led to the adoption of 2 urgent binding decisions. For each of them, the EDPB Secretariat, when assessing the completeness of the file on behalf of the Chair, identified information and/or documents missing in order to enable the EDPB members to have all the elements of fact

legal deadline to draft the substance of urgent binding decisions and discuss it with EDPB members until adoption.

The resources of the SAs allocated to participating in EDPB activities (FTEs)⁷⁶

SA ⁷⁷	2020	2021	2022	2023	2024 (forecast)
AT	3.5	3.5	3.5	3.5	3.5
BE*	-	-	-	3.8	3.8
BG	7	7	7	7	7
CY	1.4	2	2.6	3	3.5
CZ	2.2	2.7	2.3	2.3	2.7
DE*	16	16	17	26	25
DK*	-	-	-	2.7	2.7
EE	1	1	1.5	3.5	4
ES	6	6	7	8	10
FI	4	4	4	4	5
FR	9	9	11	12	14
GR	1.33	1.33	1.60	1.73	1.87
HR	0.5	1	1	1	2
HU	5	5	5	5	5
IE	13	14	14	16	17
IS	1	1	1	1.5	1.5
IT	8	8	8	8	8
LI	2	2	2	2	2
LT	3	3	4	4	4
LU	5	5.5	6	6.5	9
LV	1	1	2	2	3
MT	1	1	1	1	1
NL	7	8	9	10	11
NO	3	4	4	3.5	3.5
PL	11	11	11	11	11
PT	1.65	1.9	2.3	2.6	2.9
RO	1	1	1	1	1
SE	5	5	5	5	5
SI	3-4	4	4-5	5-6	6
SK	3	3.2	3	2.5	2.5

and law to make a decision on the case at hand. This information and/or documents was requested by the EDPB Secretariat to the LSA, or another CSA, as appropriate. In those 2 procedures, the EDPB also requested submissions from the controllers concerned. The type of clarifications and/or documents requested varied depending on the specifics of each case (e.g., seeking confirmation that the controller had been granted its right to be heard on all the documents provided by the requesting SA to the EDPB; requesting the addition, by the requesting SA and/or the LSA, of documents mentioned in other documents but not included as part of the documents originally provided by the requesting SA to the EDPB, etc.).

⁷⁶ The figures reflect the FTEs involved in EDPB activities (i.e. participation to EDPB meetings, working on EDPB documents, including EDPB Opinions and Binding Decisions) but not cooperation activities under Articles 60, 61 and 62 GDPR.

⁷⁷ When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

DE: The figures reflect a sum of the data provided by most of the DE SAs. Three DE SAs did not provide figures. Thus, the total number for Germany is higher.

BE: The SA underlined the challenges due to the lack of resources. The figure provided is a very broad estimate and corresponds to the time currently allocated to the EDPB activities.

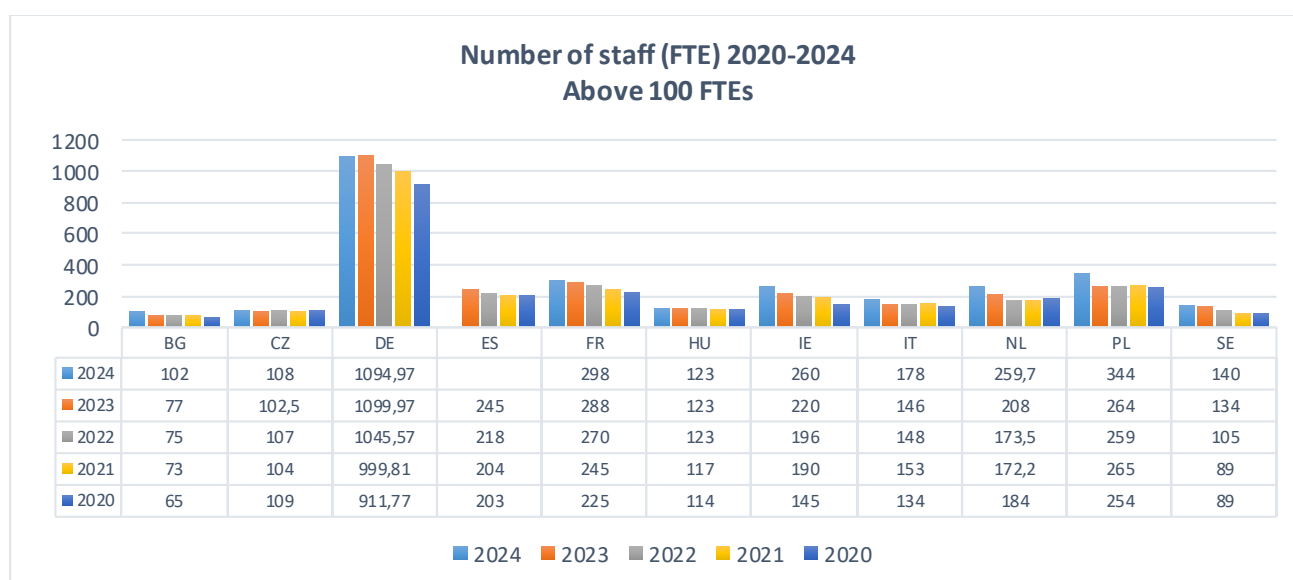
DK: The SA started registering time on each task in 2023. It is not possible for the SA to separate the time allocated to EDPB activities from other international activities in the previous years.

4.4. Human, technical and financial resources for effective cooperation and participation to the consistency mechanism

As already underlined in the previous report, the EDPB notes that the effective application of the GDPR and the success of the one-stop-shop mechanism is largely dependent on the time and resources that SAs have at their disposal. It is therefore of the utmost importance that the Member States provide SAs with strengthened human, financial and technical resources. This would enable the SAs to perform their increased missions properly and meet the expectations of the legislator and of the public.

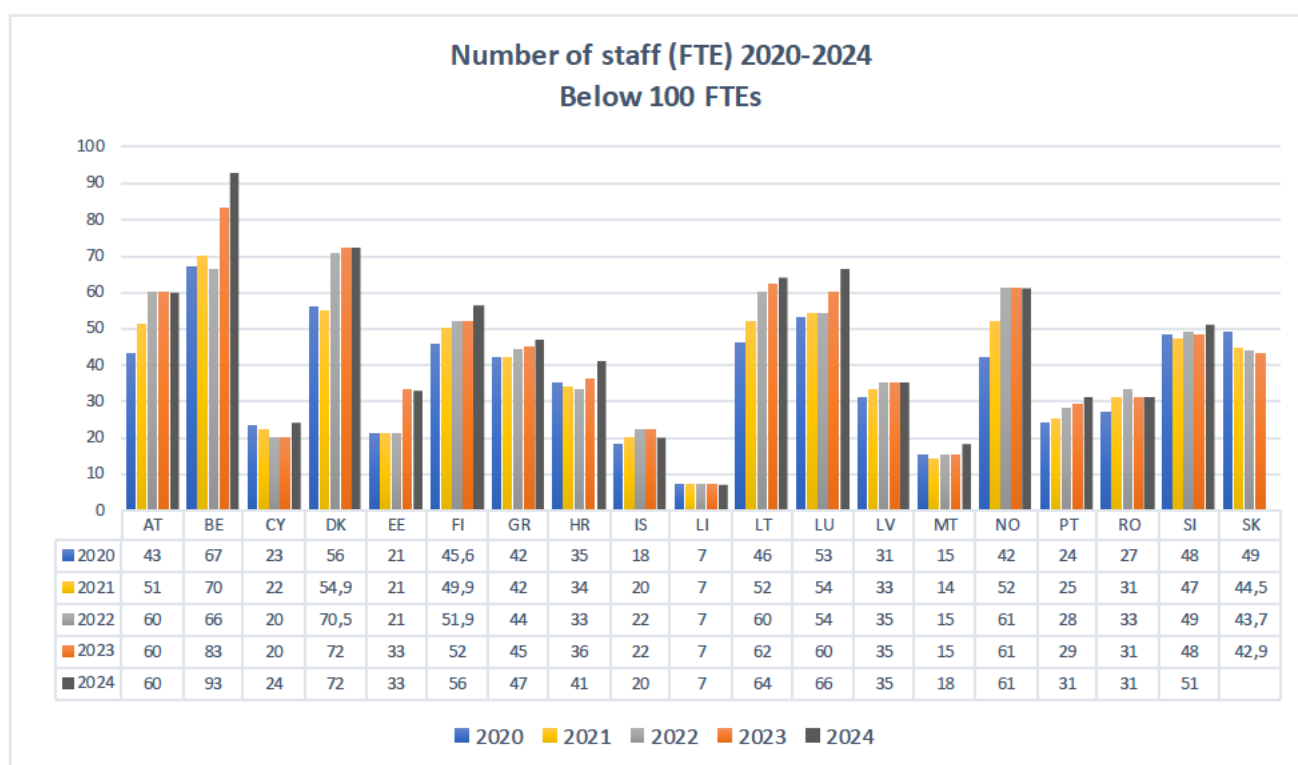
The need for sufficient resources also applies to the EDPB Secretariat, which plays a key role in the preparation and execution of many of the tasks entrusted to the EDPB. The resources of the EDPB Secretariat have a direct impact on the efficiency of the EDPB but also on the possibility for the EDPB to support SAs national enforcement activities and to create synergies on this matter.

4.4.1 How many staff (full-time equivalent) has your DPA?⁷⁸



CZ SA: 17% of the staff of the CZ SA is entrusted to activities unrelated to data protection.

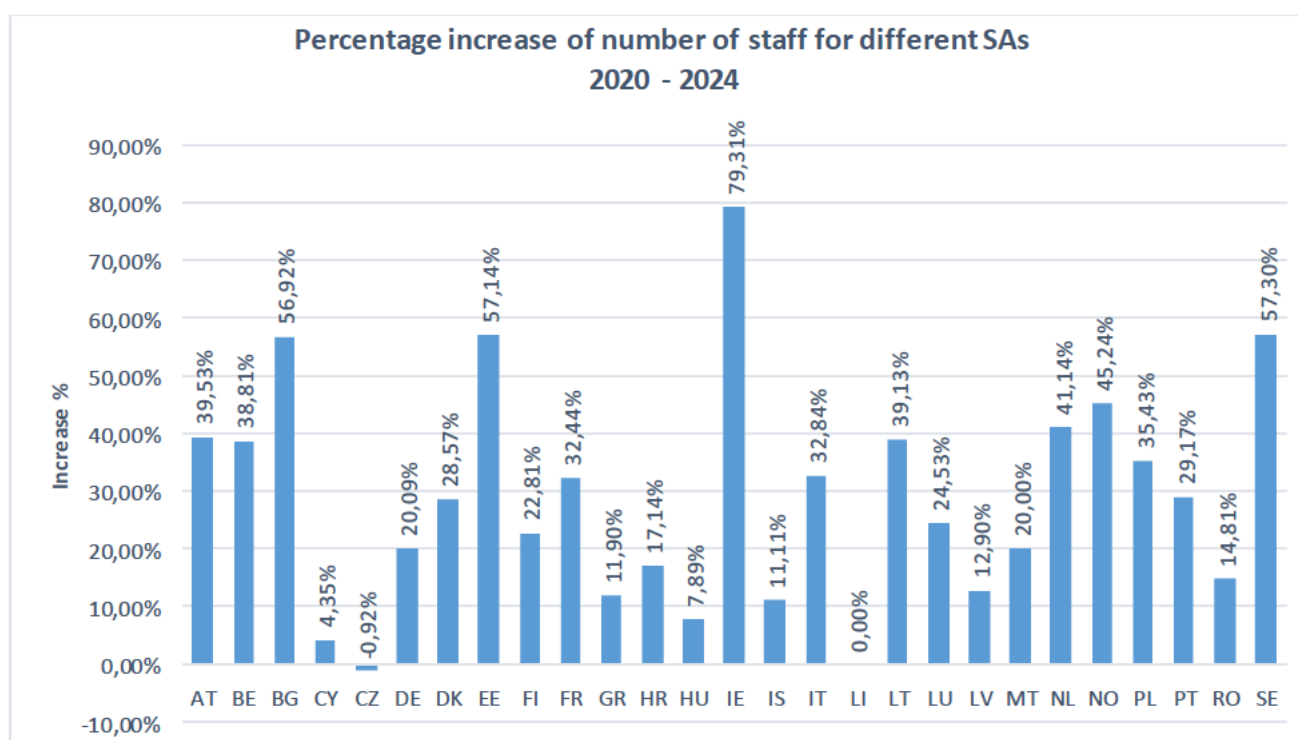
⁷⁸ When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.



LT SA: The information reflects the figures of the two SAs in Lithuania: The Office of the Inspector of Journalist Ethics and the State Data Protection Inspectorate of the Republic of Lithuania

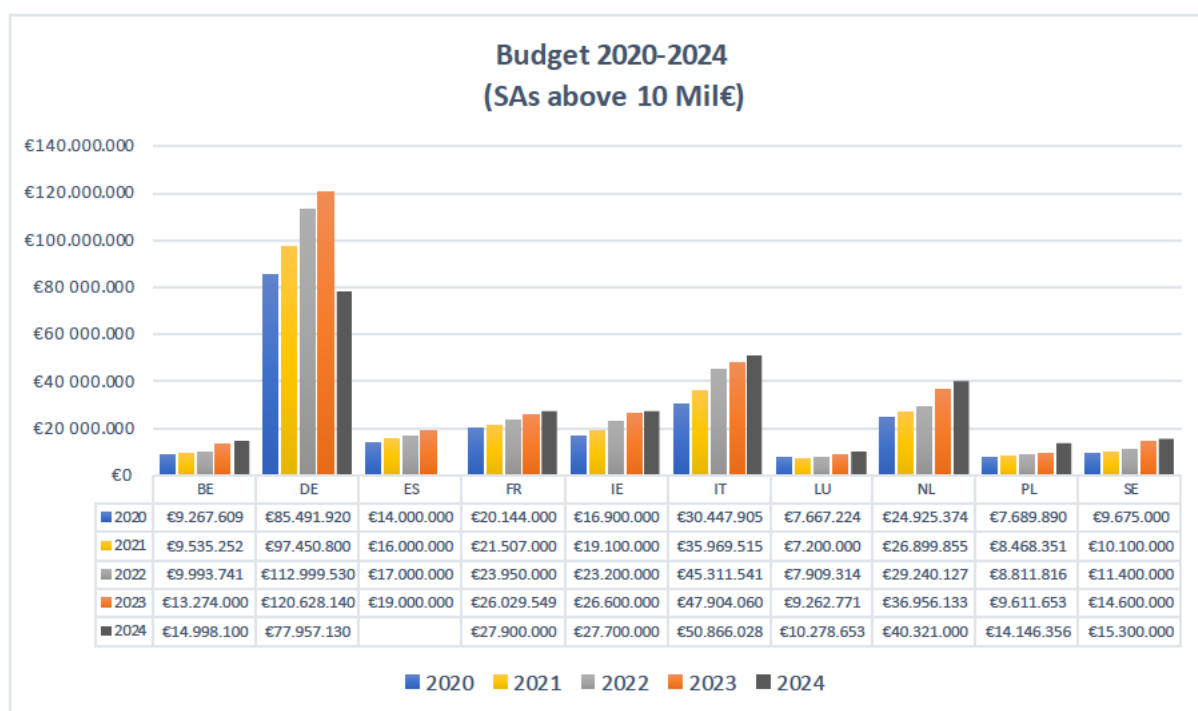
SI SA: For each year, approximately 1/3 of the staff work in access to public information and 2/3 in data protection, whereas the general and support services are shared. In 2023, approximately 30 experts work on data protection related issues.

The chart below illustrates the percentage increase of staff in different SAs and it shows that there is a tendency of increase of the human resources. However, generally, the growth rate continues to be insufficient to tackle all the additional tasks and responsibilities entrusted to the SAs.

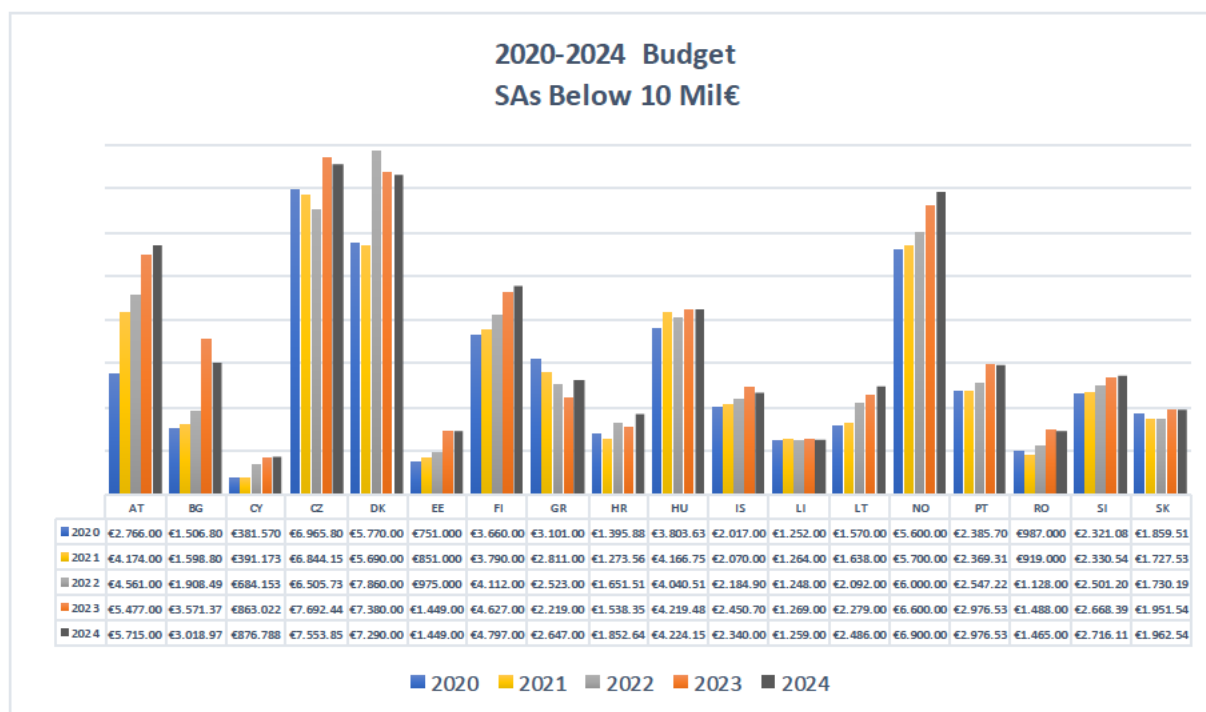


Only SAs that have provided figures for both 2020 and 2024 are represented in the above chart

4.4.2 What is the budget of your DPA? Please provide the figures (in euro)^{79,80}



The DE figures from 2020-2023 cover the following SAs: BfDI, BB, BE, BW, BY-LDA, BY-LfD, HB, HE, HH, MV, NI, NW, RP, SH, SI, SN, ST, TH. The 2024 figures are without BfDI.



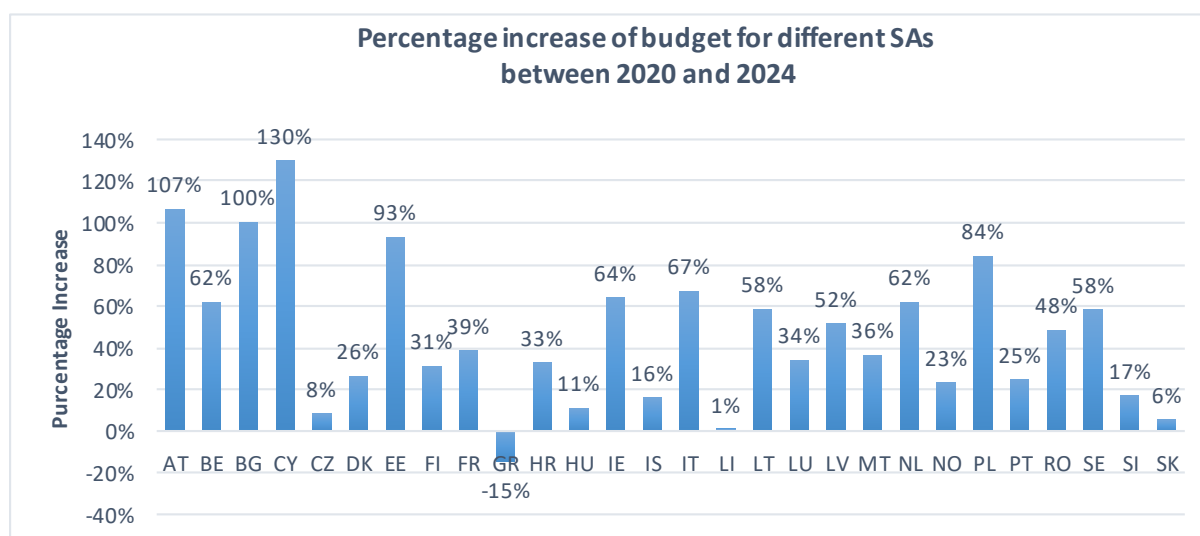
CZ SA: 30% of the total budget of the CZ SA is destined to activities unrelated to data protection.

⁷⁹ For those Member States with a currency other than the Euro, exchange rates have been applied. Thus, the amount reflected in Euros is an approximation on the basis of the exchange rate applied at a specific point in time.

⁸⁰ When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

LT SA: The information reflects the figures of the two SAs in Lithuania: The Office of the Inspector of Journalist Ethics and the State Data Protection Inspectorate of the Republic of Lithuania.

The chart below illustrates the percentage increase of budget for different SAs. As the chart shows, there is a tendency to increase the financial resources. However, generally, the growth rate continues to be insufficient to tackle all the additional tasks and responsibilities entrusted to the SAs. Some SAs have barely seen their budget increase, whereas one SA has even less budget, despite the increase of tasks.



Only SAs that have provided full figures for both 2020 and 2024 are represented on the above chart

4.4.3 Is your DPA dealing with tasks beyond those entrusted by the GDPR, including under the new EU legislation adopted under the Data Strategy?

Whereas GDPR-related tasks still have a prominent role in the tasks carried out by the SAs, all the SAs carry out other tasks beyond those entrusted by the GDPR.

4.4.4 Please provide an indicative breakdown between those tasks and those entrusted by the GDPR; 4.4.5. Please explain, if needed

The majority of the SAs have underlined their tasks regarding the supervision and enforcement of the Law Enforcement Directive (LED)⁸¹, the enforcement of the national legislation implementing the Directive on privacy and electronic communications (e-Privacy Directive)⁸² and the coordinated supervision of EU agencies and large-scale systems. There are discrepancies regarding the tasks entrusted to SAs under new EU legislation adopted in the framework of the Data Strategy remain. Some SAs are already in charge of new tasks under the DSA, the DMA or the DGA, whereas a similar

⁸¹ Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA

⁸² Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications) as amended by Directive 2006/24/EC and Directive 2009/136/EC

number of SAs expressed uncertainty on whether and if so, the type of tasks they will be entrusted to perform in that respect, as well as with regard to the Proposal for an AI Act and the Data Act⁸³. The lack of harmonisation in this regard may lead to legal uncertainty and discrepancies in the application and enforcement of the relevant legislation⁸⁴.

Some SAs also mentioned other tasks they perform on the basis of EU legislation, such as the PNR Directive⁸⁵, Regulation 2021/1232 on a temporary derogation for the purpose of combating online child sexual abuse⁸⁶, Regulation 2019/493 regarding the protection of personal data in the context of elections to the European Parliament⁸⁷ and the Whistleblowing Directive⁸⁸, among others.

Finally, a variety of other tasks are assigned to them by national laws. For example, several SAs underline that they are also in charge of requests for access to documents, supervision of credit information or of national security activities, among others. A more detailed overview is provided by the individual answers of the SAs.

4.4.6 How would you assess the sufficiency of the resources from your DPA from a human, financial and technical point of view?

The vast majority of SAs have explicitly stated that they do not have enough resources while there are few SAs who do not see a need for further resources at this stage. See below the detailed breakdown.

⁸³ Regulation of the European Parliament and of the Council on harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act).

⁸⁴ See Section the EDPB policy messages above.

⁸⁵ Directive (EU) 2016/681 of the European Parliament and of the Council of 27 April 2016 on the use of passenger name record (PNR) data for the prevention, detection, investigation and prosecution of terrorist offences and serious crime.

⁸⁶ Regulation (EU) 2021/1232 of the European Parliament and of the Council of 14 July 2021 on a temporary derogation from certain provisions of Directive 2002/58/EC as regards the use of technologies by providers of number-independent interpersonal communications services for the processing of personal and other data for the purpose of combating online child sexual abuse.

⁸⁷ Regulation (EU, Euratom) 2019/493 of the European Parliament and of the Council of 25 March 2019 amending Regulation (EU, Euratom) No 1141/2014 as regards a verification procedure related to infringements of rules on the protection of personal data in the context of elections to the European Parliament.

⁸⁸ Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

SA	Human Resources	Financial Resources	Technical Means
AT	Insufficient	Sufficient	Sufficient
BE	Insufficient	Insufficient	Insufficient
BG	Insufficient	Sufficient	Sufficient
CY	Insufficient	Sufficient	Sufficient
CZ	Insufficient	Insufficient	Insufficient
DE*	Insufficient	Insufficient	Insufficient
DK	Insufficient	Insufficient	Insufficient
EE	Insufficient	Insufficient	Insufficient
ES	Insufficient	Insufficient	Insufficient
FI	Insufficient	Insufficient	Insufficient
FR	Insufficient	Insufficient	Insufficient
GR	Insufficient	Insufficient	Insufficient
HR	Insufficient	Insufficient	Insufficient
HU	Sufficient	Sufficient	Insufficient
IE	Sufficient	Sufficient	Sufficient
IS	Insufficient	Insufficient	Insufficient
IT	Insufficient	Insufficient	Insufficient
LI	Sufficient	Sufficient	Sufficient
LT	Insufficient	Insufficient	Insufficient
LU	Sufficient	Sufficient	Sufficient
LV	Insufficient	Insufficient	Insufficient
MT	Insufficient	Sufficient	Sufficient
NL	Insufficient	Insufficient	Insufficient
NO	Insufficient	Insufficient	Sufficient
PL	Insufficient	Insufficient	Insufficient
PT	Insufficient	Insufficient	Sufficient
RO	Insufficient	Insufficient	Insufficient
SE	Sufficient	Sufficient	Insufficient
SI	Insufficient	Insufficient	Insufficient
SK	Insufficient	Insufficient	Sufficient

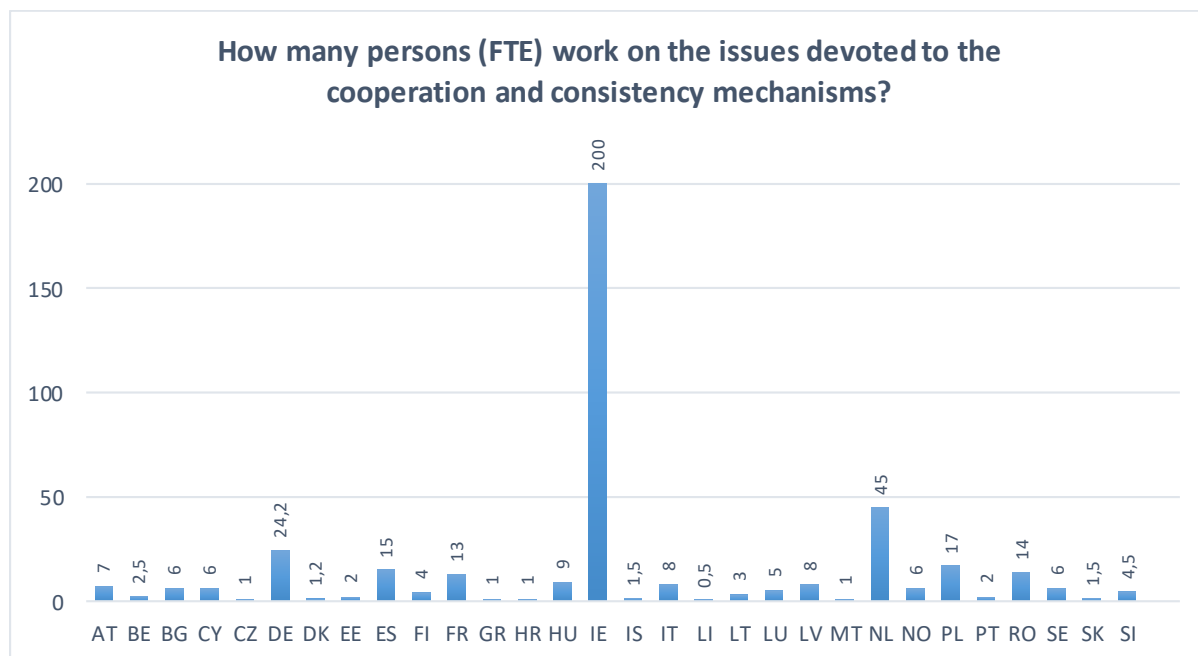
*DE: The majority of the German Länder DPAs stated that the current staffing is not found to be sufficient.

4.4.7 Is your DPA properly equipped to contribute to the cooperation and consistency mechanisms?

More than half of the SAs (57%) stated that they are not properly equipped to contribute to the cooperation and consistency mechanism.

4.4.8 How many persons (FTE) work on the issues devoted to the cooperation and consistency mechanisms?⁸⁹

The number of staff members working on these matters varies among the SAs. A breakdown is provided below. For further details, please check the individual answers provided by the SAs.



⁸⁹ When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

5. ENFORCEMENT⁹⁰

5.1. Complaints

5.1.1 The number of complaints (excluding requests for information) received by your DPA⁹¹

SA	2018	2019	2020	2021	2022	2023
AT	1036	2102	1603	6051	1915	1732
BE	385	459	685	1928	604	560
BG	784	1600	1279	1327	1164	1140
CY	562	433	358	498	453	316
CZ	2531	1454	1695	1720	1528	1134
DE	20220	28337	22776	37090	32300	19197
DK	1478	2416	2676	2237	1817	1328
EE	468	619	716	707	947	759
ES	13005	11590	10324	13905	15128	16762
FI	896	1393	1597	1902	1800	1424
FR	11077	14137	13585	14143	12193	12800
GR	672	983	973	1160	1250	1191
HR	383	383	102	259	271	279
HU	675	1924	2307	3099	1755	1330
IE	2864	7215	4718	3149	2710	1962
IS	98	145	125	135	140	84
IT	7458	9689	9665	12921	30880	-
LI	47	41	63	58	40	38
LT	713	939	1223	1276	992	1104
LU	447	608	479	507	481	487
LV	1206	1236	941	973	708	647
MT	112	147	497	542	649	992
NL	11413	27854	25590	18914	13133	8890
NO	-	-	-	600	600	-
PL	5565	9304	6442	8318	6995	5288
PT	551	968	1127	1263	1797	1513
RO	2922	5808	5082	4634	3899	3215
SE	1805	3519	2776	2329	2142	2489
SI	648	1136	1208	1299	1188	242
SK	282	486	542	573	627	732

⁹⁰ The figures corresponding to the year 2023 may not be final in several instances, since the data was collected before the end of the year and, therefore, is still subject to changes.

⁹¹ When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

Notes on the figures provided:

PT: Up to Q3 2023

IS: Up to 31.10.2023

FI: Up to 3.10.2023

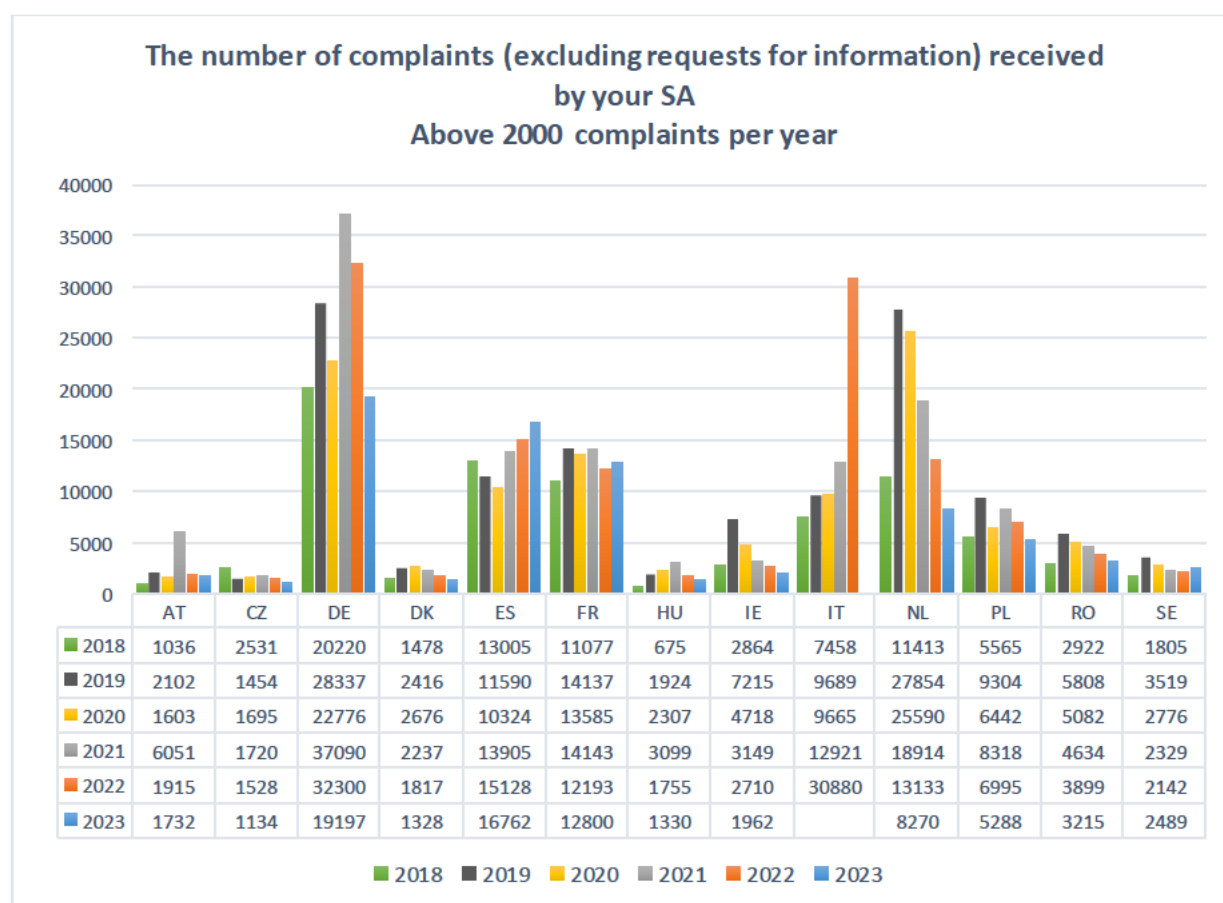
ES: Up to 27.10.2023

BE: Up to 25.10.2023 (the 2021 figures include Facebook data leak complaints)

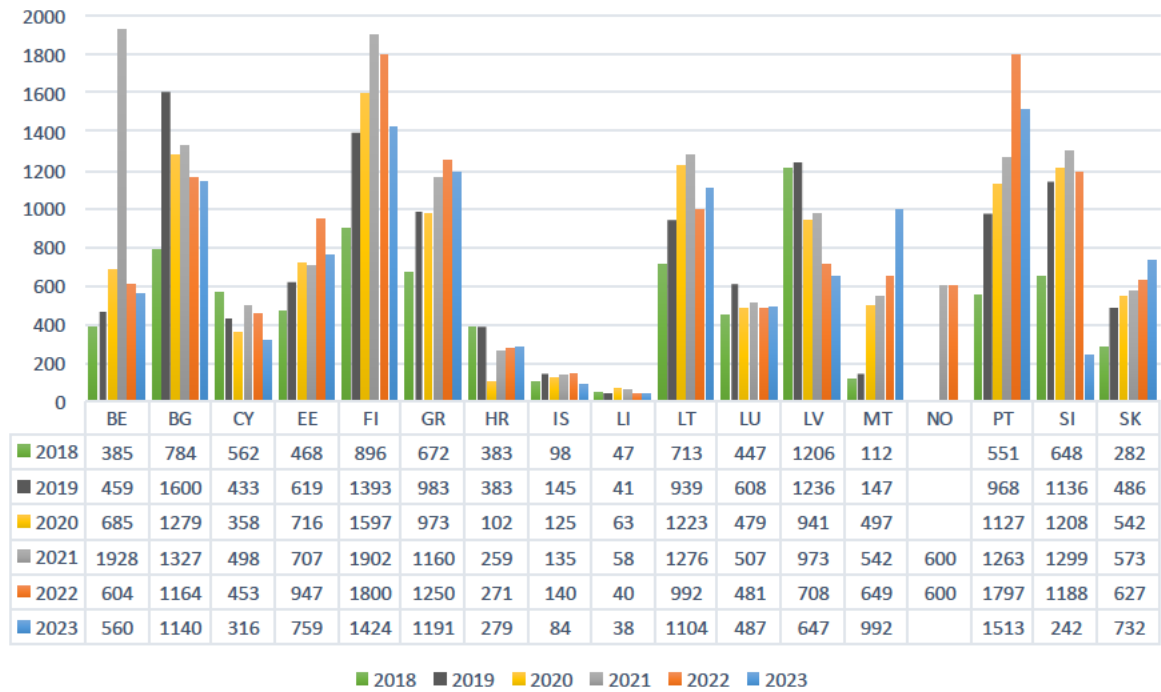
BE: The 2021 figures include 1.120 complaints regarding the Facebook data leak)

FR: Up to 27.10.2023

NL: Up to and including Q3 2023



**The number of complaints (excluding requests for information) received by
your SA
Below 2000 complaints per year**



5.1.2 The number of complaints where your DPA was in the lead⁹²

Complaints received directly from the complainant						
SA	2018	2019	2020	2021	2022	2023
BG	0	0	0	0	0	0
CY	0	0	0	0	0	0
CZ	0	0	0	0	0	0
DE*	13	35	25	55	22	7
DK	0	3	2	0	0	0
EE	-	-	1	-	-	1
ES	5	0	4	10	1	0
FR	17	77	60	44	16	14
GR	0	2	1	2	5	7
HR	0	0	0	0	0	0
HU	1	0	2	0	1	0
IE	70	180	105	100	55	25
IS	98	145	125	134	140	84
IT	1	0	0	0	0	0
LI	0	0	0	0	0	0
LT	0	0	0	0	0	0
LU	376	381	324	360	355	418
LV	0	0	0	0	0	0
MT	0	0	0	0	0	0
NL	21	167	178	132	94	80
NO	1	6	4	10	9	2
PL	-	-	0	0	0	0
PT	0	3	5	4	3	2
RO	0	1	1	4	-	5
SE	0	6	0	2	-	1
SI	0	0	0	0	0	1
SK	0	0	0	0	0	0

*These are the total numbers from the German supervisory authorities that were able to provide numbers (i.e. 9 out of 18 DE SAs for 2018 and 10 out of 18 DE SAs for 2019 - 2023). The total number for Germany is therefore higher.

⁹² When data was not provided or is not available, it is reflected in the tables as "-". The SAs that have not provided or do not gather statistics in this regard, are not reflected in the table.

Received from another DPA through the OSS						
SA	2018	2019	2020	2021	2022	2023
AT	1	14	34	26	19	9
BE	18	20	11	18	8	17
BG	0	0	2	2	7	7
CY	0	12	23	16	18	11
CZ	2	5	4	10	13	10
DE	12	51	33	39	18	29
DK	1	12	8	4	26	11
EE	3	10	15	14	11	8
ES	13	19	23	35	16	25
FR	13	57	49	59	31	30
GR	0	2	6	2	12	2
HR	0	0	0	0	0	0
HU	0	1	4	1	1	1
IE	86	220	201	170	114	63
IS	0	0	0	1	0	0
IT	2	8	6	6	2	3
LI	1	3	2	2	3	0
LT	3	1	5	12	65	35
LU	71	227	155	147	126	69
LV	-	5	7	6	5	6
MT	7	25	22	27	39	79
NL	27	57	100	63	79	31
NO	1	1	10	3	6	11
PL	-	-	10	5	4	3
PT	0	3	5	4	3	2
SE	17	35	46	34	110	13
SI	0	0	3	2	7	2
SK	0	1	4	3	5	4

5.1.3 The number of complaints received by your DPA and forwarded to the lead DPA⁹³.

SA	2018	2019	2020	2021	2022	2023
AT	153	177	219	402	236	313
BE	30	30	10	10	13	14
BG	0	1	1	5	4	7
CY	0	1	0	0	1	0
CZ	6	6	4	3	4	4
DE	134	305	421	376	255	152
DK	16	35	12	6	5	4
EE	0	3	5	6	4	7
ES	56	52	120	75	51	57
FR	-	-	-	-	70	100
GR	2	4	7	1	1	2
HR	0	3	4	3	5	5
HU	7	12	15	18	9	11
IE	21	97	48	30	48	26
IS	0	0	2	0	0	0
IT	0	7	2	3	1	16
LI	0	0	1	1	0	1
LT	3	15	7	10	14	12
LU	9	16	9	13	7	2
LV	1	1	4	6	3	1
MT	29	6	5	6	15	4
NL	-	233	276	219	152	-
PL	-	-	50	63	61	30
PT	0	0	0	1	4	3
RO	3	10	3	5	2	1
SE	1	10	0	11	19	74
SI	0	14	22	22	11	3
SK	1	3	10	8	10	11

⁹³ When data was not provided or is not available, it is reflected in the tables as “-“. If an SA has not provided any data for a specific question, it is not included in the table.

5.1.4 The number of complaints relating to national cases resolved through a decision adopted by your DPA⁹⁴.

SA	2018	2019	2020	2021	2022	2023
AT	340	828	852	1036	4806	853
BE	13	41	98	160	193	150
BG	552	955	374	629	648	317
CY	43	27	27	51	44	54
DE	5310	8209	9809	9379	8291	6316
DK	700	2282	2382	2341	1956	1541
EE	462	606	695	687	927	389
ES	11665	11182	10443	14098	14937	15234
FI	-	-	-	-	-	92
FR	11066	13849	13259	13574	11412	12344
GR	29	48	58	61	69	34
HR	313	106	92	214	257	109
HU	52	214	133	197	137	12
IE	576	3987	3856	2932	2097	1580
IS	-	44	44	71	59	-
IT	5330	8092	8984	9184	9218	-
LI	0	11	9	10	14	12
LU	5	5	5	5	5	5
LV	-	-	38	18	97	122
MT	-	23	66	124	53	36
PL	-	-	1823	1992	1936	1237
PT	206	120	298	677	500	424
RO	2	116	67	69	90	64
SE	74	33	47	33	104	69
SI	751	1050	1206	1202	1279	133
SK	126	197	219	218	231	189

⁹⁴ When data was not provided or is not available, it is reflected in the tables as “-“. If an SA has not provided any data for a specific question, it is not included in the table.

5.1.5 The number of complaints relating to cross-border cases, resolved through an Article 60 GDPR decision adopted by your DPA. Please indicate a breakdown of the decisions adopted under Article 60(7), (8) or (9) GDPR⁹⁵.

SA	Article 60(7)					
	2018	2019	2020	2021	2022	2023
BG	-	-	-	-	-	8
CY	0	5	3	6	5	8
CZ	-	-	-	-	3	1
DE	2	11	28	19	26	12
DK	0	1	4	3	5	3
EE	0	2	3	6	2	9
ES	0	0	10	4	20	12
FI	0	0	0	0	1	0
FR	1	9	9	15	15	16
GR	0	0	0	0	0	0
HR	0	0	0	0	0	0
HU	0	0	0	0	0	0
IE	136	329	200	76	145	172
IS	0	0	0	0	0	0
IT	-	-	1	2	2	1
LI	0	3	0	0	0	0
LT	-	-	-	-	1	2
LU	0	0	0	0	17	34
LV	0	0	0	0	0	0
MT		4	6	7	9	1
NL	3	15	8	6	6	42
NO	-	-	-	-	5	9
PL	-	-	0	4	2	2
PT	0	0	0	0	0	0
RO	0	0	0	1	0	1
SE	0	0	0	0	3	10
SI	0	0	0	0	0	2
SK	0	0	0	0	4	0

⁹⁵ When data was not provided or is not available, it is reflected in the tables as “-”. If an SA has not provided any data for a specific question, it is not included in the table.

Article 60(8)						
SA	2018	2019	2020	2021	2022	2023
BE	-	-	-	-	-	1
BG	-	-	-	-	-	0
CY	0	0	0	0	0	1
CZ	0	0	0	0	0	4
DE	-	1	-	-	3	17
EE	0	0	0	0	0	0
ES	0	21	14	19	8	2
FI	0	0	0	0	1	0
FR	0	0	0	0	1	4
GR	0	0	0	0	0	0
HR	0	0	0	0	0	0
HU	0	0	0	0	0	0
IE	9	25	16	8	10	1
IS	0	0	0	0	0	0
IT	-	-	-	-	-	2
LI	0	0	0	0	0	1
LT	-	-	-	-	-	4
LU	0	0	0	0	0	7
LV	0	0	0	0	0	0
MT	0	0	0	0	0	3
NL	3	15	8	6	12	29
NO	-	-	-	-	0	6
PL	-	-	0	10	4	1
PT	0	0	0	0	0	0
RO	0	0	1	0	0	0
SE	-	-	-	-	-	5
SI	0	0	0	1	0	0
SK	0	0	0	0	0	0

Article 60(9)						
SA	2018	2019	2020	2021	2022	2023
BG	-	-	-	-	-	0
CY	0	0	0	0	0	1
CZ	0	0	0	0	0	0
DE	0	0	0	0	1	0
EE	0	0	0	0	0	0
ES	0	0	0	0	0	0
FI	0	0	0	0	0	0
FR	-	-	-	-	-	1
GR	0	0	0	0	0	0
HR	0	0	0	0	0	0
HU	0	0	0	0	0	0
IE	-	-	1	0	2	0
IS	0	0	0	0	0	0
LI	0	0	0	0	0	0
LT	-	-	-	-	-	50
LU	0	0	0	0	0	0
LV	0	0	0	0	0	0
MT	0	0	0	0	0	0
NL	0	0	0	0	0	1
NO	-	-	-	-	0	0
PL	-	-	0	0	0	0
PT	0	0	0	0	0	0
RO	0	0	0	0	0	1
SE	-	-	-	-	-	0
SI	0	0	0	0	0	0
SK	0	0	0	0	0	0

5.1.6 The total number of complaints resolved through amicable settlement⁹⁶

SA	2018	2019	2020	2021	2022	2023
AT	169	577	480	385	1714	1727
BE	-	-	-	-	8	-
BG	0	0	0	0	0	0
CY	0	0	0	0	0	0
DE	8	20	12	53	26	3
DK	0	0	0	0	0	0
EE	0	0	0	0	0	0
ES	0	0	0	0	0	0
FR	0	4	2	6	22	34
GR	0	0	0	0	0	0
HR	0	0	0	0	0	0
HU	625	1684	2044	2825	1400	1062
IE	115	623	581	636	638	578
IT	-	-	-	-	-	1
LI	32	18	36	32	18	17
LT	3	6	2	5	31	44
LU	403	426	341	364	357	413
LV	0	0	0	0	0	0
MT	-	-	-	2	2	3
PL	0	0	0	0	0	0
PT	0	0	0	0	0	0
RO	0	0	0	0	0	0
SE	0	0	0	0	0	0
SK	0	0	0	0	0	0

5.1.7 What kind of communication or request do you qualify as a complaint?

With regard to the definition of a complaint for the purposes of Article 77 GDPR, the SAs are generally relying on such provision and therefore consider that a complaint is a submission to an SA by an identified natural person - or a not-for-profit body, organization or association that fulfils the conditions provided by Article 80 GDPR - who considers that the processing of personal data relating to them infringes the GDPR.

Thus, as stated by the EDPB⁹⁷, the definition of a complaint is not restricted to a breach of the rights of the data subject under chapter III of the GDPR but, more generally, it relates to an infringement of the GDPR in the context of the processing of the complainant's personal data.

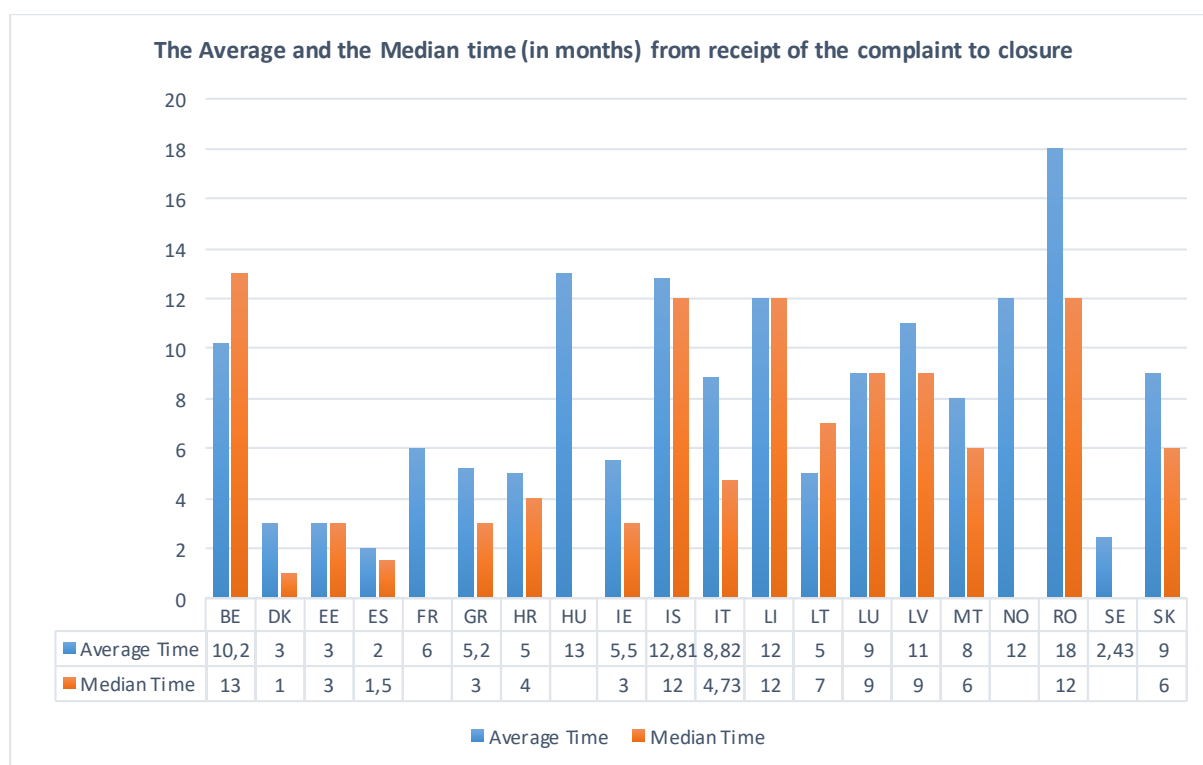
⁹⁶ When data was not provided or is not available, it is reflected in the tables as "-". If an SA has not provided any data for a specific question, it is not included in the table.

⁹⁷ See https://edpb.europa.eu/system/files/2022-07/internal_edpb_document_062020_on_admissibility_and_preliminary_vetting_of_complaints_en.pdf

Several SAs provide online complaint forms or complaint templates on their website. In addition, the EDPB has also published a template complaint form and a template for acknowledgment of receipt⁹⁸, as detailed above⁹⁹.

There is a general agreement that complaints can be communicated by post and by email. One SA clarified that anonymous reports are also accepted and may give rise to investigations, but are not considered or counted as complaints as such.

5.1.8 For complaints handled by your DPA which you consider to be closed, provide the average and the median time (in months) from receipt of the complaint (either directly from the complainant or from another DPA) to closure (e.g. by decision or amicable settlement)¹⁰⁰



*BE: the numbers provided are based on the files created in 2022 and 2023

⁹⁸ See https://edpb.europa.eu/our-work-tools/our-documents/other/template-complaint-form-and-template-acknowledgement-receipt_en.

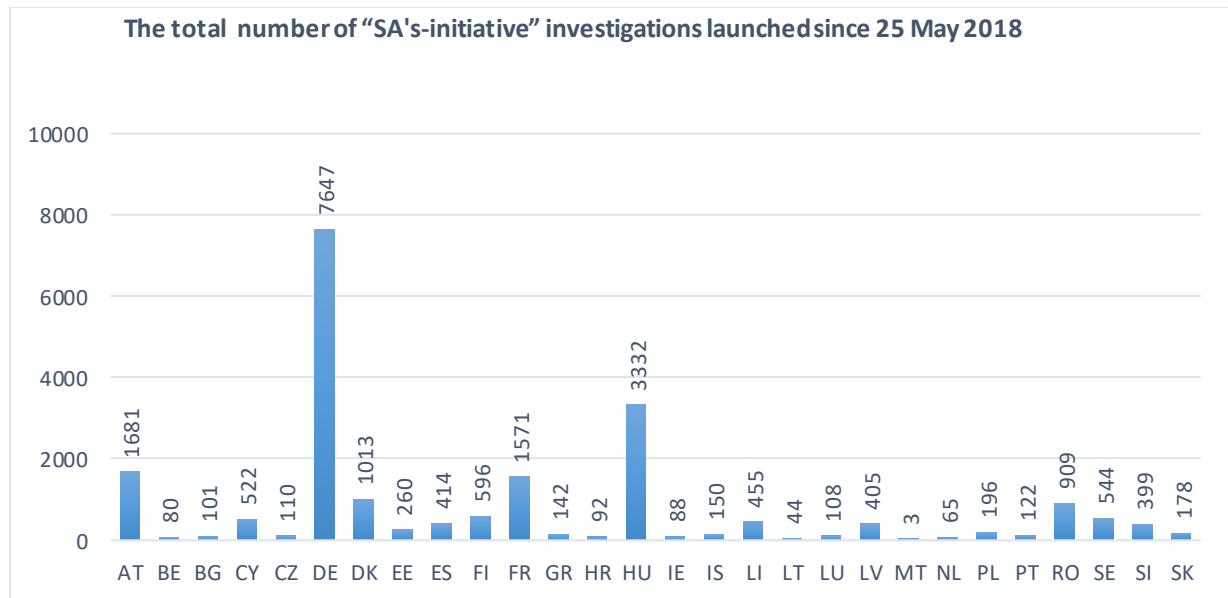
⁹⁹ Section 4.1.1.

¹⁰⁰ When data was not provided or is not available, it is reflected in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the graph.

5.2. Own-initiative investigations

5.2.1 The number of “own-initiative” investigations launched by your DPA since 25 May 2018¹⁰¹

The number of own-initiative investigations launched varies among SAs. Several factors may impact the possibility and/or suitability to launch an own-volition investigation, including the availability and amount of resources. However, it is clear in the graph below that a significant number of investigations have been launched at the initiative of the SAs.



¹⁰¹ When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

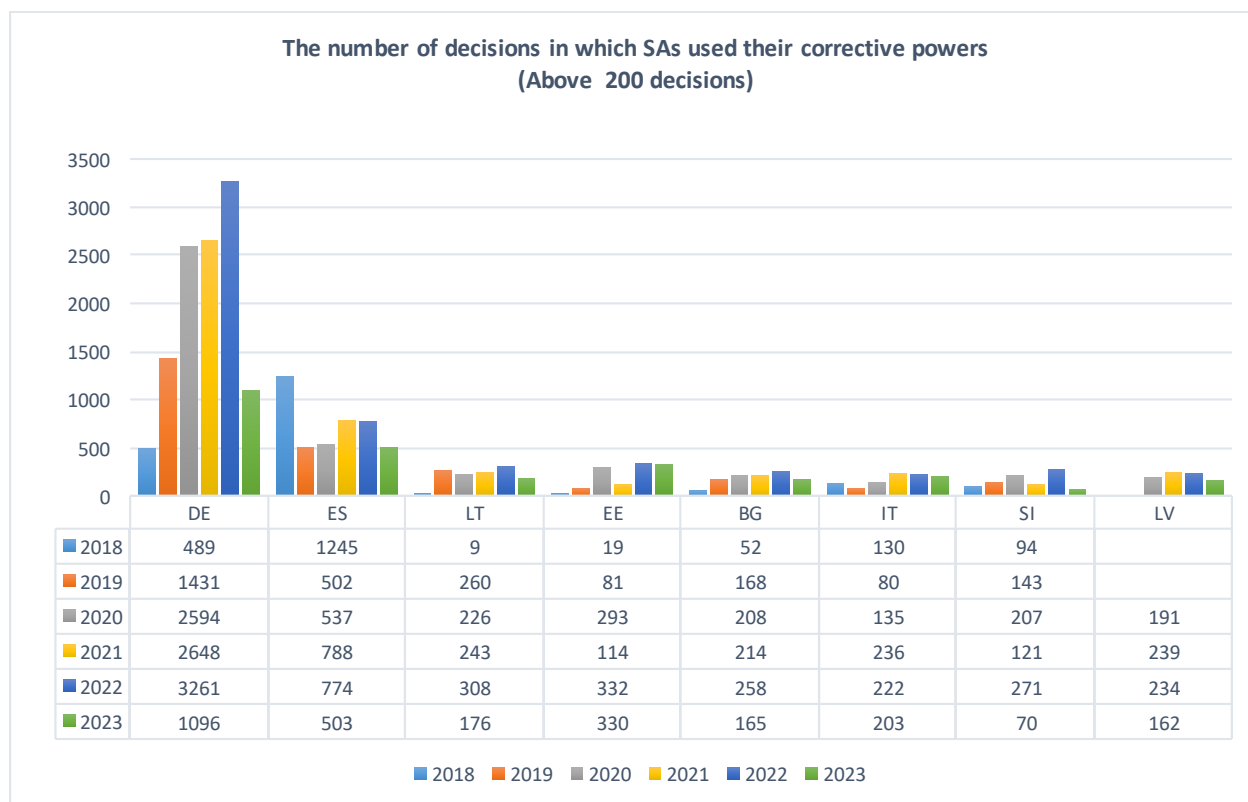
5.2.2 The number of these investigations that you consider to be closed. Provide the average and the median time (in months) from launch of the investigation to closure¹⁰²

		BG	CY	DK	EE	ES	FI	FR	GR	HR	HU	IE	IS	LI	LU	LV	MT	NL	PL	RO	SE	SI	SK
2018	Total Closed	358	8	163	15	-	467	23	1	1358	-	0	15	0	34	-	0	0	-	24	74	42	292
	Avg. Time	-	-	13	-	-	-	8	2,5	5	13	0	11.53	0	18-24	-	0	-	0	18 to 24	4,4	-	10
	Med. Time	30	-	12	-	-	-	-	2,5	3	-	0	10	0	14	-	0	-	0	12	-	-	7
2019	Total Closed	955	105	111	25	33	-	200	66	2065	-	1	24	0	41	-	0	21	-	152	33	41	508
	Avg. Time	-	-	16	-	7	-	8	14	4	13	12	5.42	0	18-24	-	0	-	0	18 to 24	9,4	-	10
	Med. Time	80	-	18	-	5	-	-	11	2	-	12	4	0	14	-	0	-	0	12	-	-	7
2020	Total Closed	742	-	144	28	62	-	232	7	1570	-	9	67	10	10	36	0	17	-	204	47	36	532
	Avg. Time	-	-	9	-	9	-	8	17,5	4	13	15	12.88	6	18-24	11	0	-	5	18 to 24	10,48	-	10
	Med. Time	62	-	8	-	8	-	-	18,8	3	-	16	11	6	14	9	0	-	4	12	-	-	7
2021	Total Closed	714	-	173	29	103	-	231	5	1938	-	6	11	9	1	226	2	15	-	171	33	107	564
	Avg. Time	-	-	9	-	10	-	6	8,5	4	13	26	9.45	6	18-24	11	10	-	6	18 to 24	10,55	-	10
	Med. Time	60	-	7	-	10	-	-	7,5	3	-	25	9	6	14	9	6	-	6	12	-	-	7
2022	Total Closed	750	-	157	37	49	-	293	33	641	-	14	13	6	8	83	1	5	-	191	104	60	633
	Avg. Time	-	-	6	-	10	-	6	13	4	13	23	4.69	6	18-24	11	10	-	4	18 to 24	7,3	-	10
	Med. Time	63	-	5	-	10	-	-	10	2	-	21	4	6	14	9	6	-	3,5	12	-	-	7
2023	Total Closed	820	-	33	14	27	-	191	-	1289	-	9	11	19	0	37	0	0	-	97	69	15	222
	Avg. Time	-	-	1	-	11	22	4	-	3	-	39	1.09	6	18-24	11	0	-	3	18 to 24	-	-	10
	Med. Time	91	-	1	-	10	6	-	-	2	-	32	0	6	14	9	0	-	3	12	-	-	7

¹⁰² When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

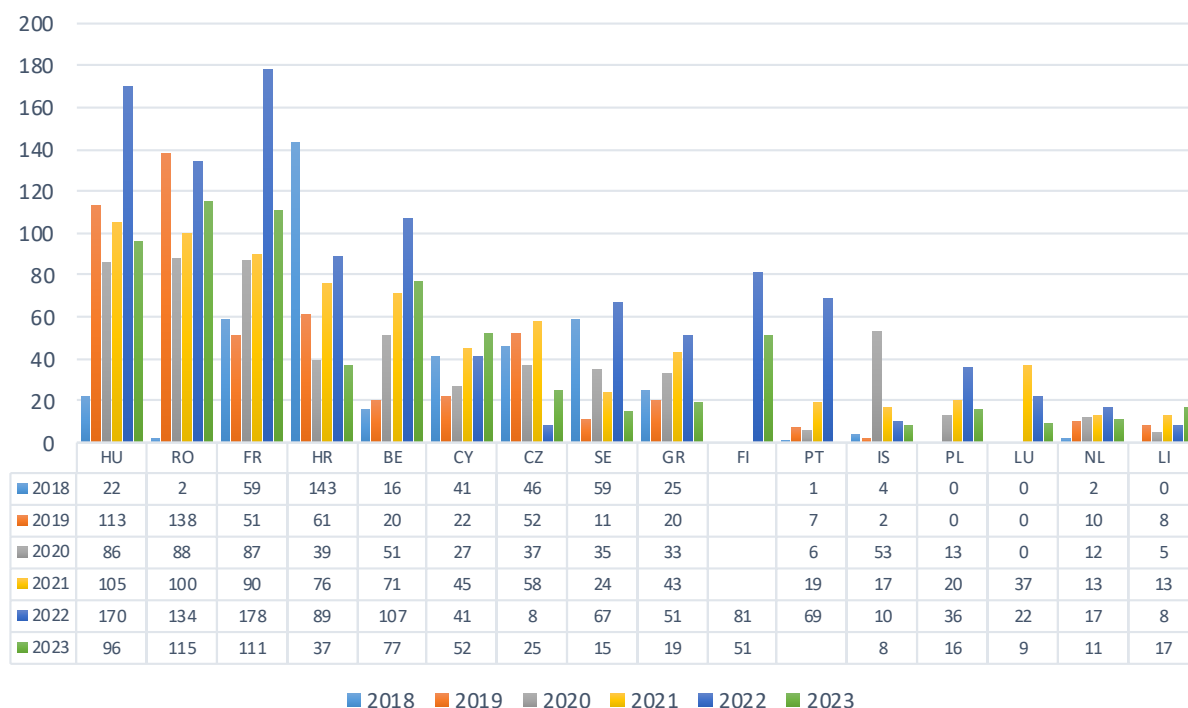
5.3. Corrective measures

5.3.1 The number of decisions in which you used your corrective powers¹⁰³



¹⁰³ When data was not provided or is not available, it is reflected in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the graph.

**The number of decisions in which SAs used their corrective powers
(Below 200 decisions)**



5.3.2 The number of times you used any other corrective power other than fines. Please specify the type of measure by reference to Article 58(2) GDPR¹⁰⁴

The data provided in the table below shall be read with respect to the following categories:

- 1) *Issue warnings to a controller or processor that intended processing operations are likely to infringe provisions of this Regulation*
- 2) *Issue reprimands to a controller or a processor where processing operations have infringed provisions of this Regulation*
- 3) *Order the controller or the processor to comply with the data subject's requests to exercise his or her rights pursuant to this Regulation*
- 4) *Order the controller or processor to bring processing operations into compliance with the provisions of this Regulation, where appropriate, in a specified manner and within a specified period*
- 5) *Order the controller to communicate a personal data breach to the data subject:2018*
- 6) *Impose a temporary or definitive limitation including a ban on processing*
- 7) *Order the rectification or erasure of personal data or restriction of processing pursuant to Articles 16, 17 and 18 and the notification of such actions to recipients to whom the personal data have been disclosed pursuant to Article 17(2) and Article 19*
- 8) *Withdraw a certification or to order the certification body to withdraw a certification issued pursuant to Articles 42 and 43, or to order the certification body not to issue certification if the requirements for the certification are not or are no longer met*
- 9) *Order the suspension of data flows to a recipient in a third country or to an international organisation*

¹⁰⁴ When data was not provided or is not available, it is reflected in the tables as “-“. If an SA has not provided any data for a specific question, it is not included in the table.

	YEAR	AT	BE	BG	CY	DE	EE	ES	FI	FR	GR	HR	HU	IT	LI	LT	LU	LV	NL	PL	PT	RO	SE	SI
1)	2018	1	0	0	7	373	10	-	0	-	12	0	1	1	0	0	0	-	0	0	0	0	0	-
	2019	0	1	3	4	653	62	-	0	2	11	0	9	0	0	0	0	-	1	0	0	0	1	-
	2020	1	2	1	4	1254	223	-	3	2	2	0	9	7	0	0	0	0	0	0	0	0	0	-
	2021	0	13	19	23	1406	214	-	1	2	11	0	10	8	0	2	0	0	0	0	1	1	2	-
	2022	0	27	9	19	1616	215	-	4	-	12	0	5	7	0	1	0	3	0	0	1	0	1	-
	2023	0	27	11	32	519	244	-	0	-	10	0	4	5	0	2	0	0	0	0	-	0	0	-
2)	2018	0	0	37	0	82	0	238	-	-	12	0	9	1	0	9	0	-	0	0	0	1	57	22
	2019	11	7	27	3	346	0	139	41	2	11	2	83	4	1	115	0	-	3	0	0	96	0	21
	2020	10	22	11	3	1004	21	163	36	38	2	16	71	45	1	106	0	21	4	18	0	60	0	31
	2021	7	23	21	4	778	50	222	59	45	11	9	68	43	3	154	7	13	4	33	0	86	6	19
	2022	2	31	41	13	835	53	126	53	29	2	1	65	44	7	174	1	12	10	45	5	110	31	41
	2023	3	11	16	8	324	44	46	39	41	10	1	22	47	7	92	7	2	8	22	-	95	5	-
3)	2018	-	16	1	0	7	-	641	-	48	-	75	8	2	0	5	0	-	0	0	0	3	0	-
	2019	-	8	3	0	13	-	251	-	47	-	58	35	18	3	32	0	-	0	0	0	27	0	-
	2020	-	21	6	0	34	-	202	-	53	-	13	26	21	0	14	0	22	0	0	1	11	0	-
	2021	-	39	6	2	78	-	302	-	50	-	21	16	23	0	57	0	28	0	0	2	15	0	-
	2022	-	42	7	0	60	-	263	6	152	-	47	12	28	1	19	0	30	0	0	1	28	0	-
	2023	-	47	1	0	43	-	165	6	55	-	1	3	19	0	12	0	26	0	0	-	17	0	6
4)	2018	-	0	20	0	18	9	-	-	-	-	74	-	1	0	0	0	-	1	0	0	4	2	-
	2019	-	2	60	4	30	14	42	3	-	-	16	25	7	4	109	0	-	2	0	0	104	7	-
	2020	-	18	124	10	103	37	45	33	-	-	48	25	18	4	94	0	151	2	11	2	51	13	-
	2021	-	12	121	6	95	30	77	36	-	-	64	30	31	12	57	41	207	1	3	2	41	8	-
	2022	-	16	157	5	96	52	63	23	-	-	54	38	35	4	94	26	202	2	7	48	56	28	-
	2023	-	2	118	4	21	41	121	14	-	-	32	8	28	14	54	3	89	3	3	-	62	3	2
5)	2018	-	0	0	0	5	-	-	-	-	-	0	-	1	0	0	0	-	0	0	0	0	0	-
	2019	-	0	0	0	13	-	-	39	-	-	0	5	3	0	2	0	-	0	0	0	2	0	-
	2020	-	0	1	0	7	-	-	40	-	-	0	2	2	0	1	0	0	0	5	0	0	0	-
	2021	-	0	0	0	6	-	-	29	-	-	0	1	0	0	0	0	0	0	3	0	0	0	-
	2022	-	0	0	0	32	-	-	11	-	-	0	2	3	0	0	0	0	0	3	0	0	0	-
	2023	-	0	0	0	17	-	-	2	-	-	0	-	3	0	1	0	0	-	6	-	0	0	0
6)	2018	-	0	0	0	11	-	-	0	-	-	43	-	14	0	0	0	-	1	0	0	0	0	-
	2019	-	1	0	0	15	-	-	0	-	-	23	16	14	1	22	0	-	0	0	0	1	1	-
	2020	-	8	1	0	24	-	-	0	-	1	10	4	22	0	15	0	1	0	0	2	1	0	-
	2021	-	2	1	0	8	-	-	2	-	1	24	9	32	5	14	1	1	0	0	0	0	0	-
	2022	-	5	1	0	26	-	-	0	-	4	24	3	25	0	31	0	0	0	0	0	0	1	-
	2023	-	1	1	0	7	-	-	1	-	1	18	-	42	1	11	1	0	0	0	-	1	1	9
7)	2018	-	0	1	0	0	-	-	-	-	-	0	3	0	0	0	0	-	0	0	0	0	0	-
	2019	-	1	0	0	6	-	-	-	-	-	0	8	17	0	2	0	-	0	0	0	0	0	-
	2020	-	4	2	0	20	-	-	-	-	-	0	5	14	0	2	0	6	0	0	0	0	0	-
	2021	-	2	1	0	27	-	-	-	-	-	0	13	18	0	5	1	3	0	0	0	0	0	-
	2022	-	1	1	0	51	-	-	-	-	-	0	8	23	0	6	0	0	0	0	2	0	0	-
	2023	-	0	1	0	14	-	-	-	-	-	0	3	18	0	4	0	0	0	0	-	0	0	0
8)	2018	-	0	0	0	0	-	-	0	-	-	0	-	0	0	0	0	-	0	0	0	0	0	-
	2019	-	0	0	0	0	-	-	-	-	-	0	-	0	0	0	0	-	0	0	0	0	0	-
	2020	-	0	0	0	0	-	-	-	-	-	0	-	0	0	0	0	0	0	0	0	0	0	-
	2021	-	0	0	0	0	-	-	-	-	-	0	-	0	0	0	0	0	0	0	0	0	0	-
	2022	-	0	0	0	0	-	-	-	-	-	0	-	0	0	0	0	0	0	0	0	0	0	-
	2023	-	0	0	0	0	-	-	-	-	-	0	-	0	0	0	0	2	0	0	-	0	0	0
9)	2018	-	0	0	0	0	-	-	-	-	-	0	-	0	0	0	0	-	0	0	0	0	0	-
	2019	-	0	0	0	0	-	-	-	-	-	0	-	0	0	1	0	-	0	0	0	0	0	-
	2020	-	0	0	0	0	-	-	-	-	-	0	-	0	0	0	0	9	0	0	0	0	0	-

2021	-	0	0	0	0	-	-	-	-	-	0	-	0	1	0	0	0	0	0	1	0	0	-
2022	-	0	0	0	0	-	-	-	-	-	0	-	3	0	0	0	0	0	0	0	0	0	-
2023	-	0	0	0	0	-	-	1	-	-	0	-	0	0	0	0	0	0	0	-	0	3	0
YEAR	AT	BE	BG	CY	DE	EE	ES	FI	FR	GR	HR	HU	IT	LI	LT	LU	LV	NL	PL	PT	RO	SE	SI

5.3.3 The number of fines you imposed

SAs from 30 Member States made use of this corrective power issuing 6861 fines altogether. This figure will likely be higher by the end of 2023, since the data for 2023 was retrieved at a point in time between October and November 2023 and, therefore, the number of fines imposed may increase until the end of the year.

SA	2018	2019	2020	2021	2022	2023	Total
AT	5	38	30	36	38	30	177
BE	0	6	18	8	14	3	49
BG	17	78	63	44	47	61	310
CY	37	17	7	11	18	8	98
CZ	19	33	30	40	5	15	142
DE	29	168	335	411	769	394	2106
DK	0	0	0	0	0	0	0
EE	0	5	12	10	12	1	40
ES	371	112	167	258	378	310	1596
FI	0	0	5	7	5	3	20
FR	10	7	9	13	17	23	79
GR	25	9	33	43	51	8	169
HR	0	0	1	4	14	26	45
HU	0	35	50	38	44	42	209
IE	0	0	9	10	29	11	59
IS	0	0	2	4	3	6	15
IT	51	40	58	163	152	134	598
LI	0	0	2	0	0	1	3
LT	0	6	20	26	8	11	71
LU	0	0	0	25	20	3	48
LV	26	16	11	5	9	1	68
MT	17	8	4	3	5	2	39
NL	1	4	7	11	9	3	39
NO	14	11	12	26	17	6	86
PL	0	8	11	17	19	19	74
PT	1	7	1	13	12	40	74
RO	0	25	28	29	60	51	193
SE	0	2	15	8	5	9	39
SI	0	0	0	0	0	0	0
SK	19	28	54	53	52	28	234
Total	642	663	994	1316	1816	1249	6680

5.3.4 Please provide examples of the type of circumstances and infringements that normally resulted in a fine and include the provisions of the GDPR breached.

The SAs have imposed fines for the infringement of various substantive provisions of the GDPR. Most of the fines were imposed for infringing the GDPR provisions on lawfulness of processing (Article 6 GDPR) and security of processing (Article 32 GDPR), as well as the principles relating to processing of personal data (Article 5 GDPR); for unlawful processing of special categories of personal data (Article 9 GDPR); for failure to comply with the obligations with regard to the rights of the data subjects (Article 12 to 22 GDPR), especially in relation to transparency, information and access to personal data (Article 12-15 GDPR); for breach of the requirement for data protection by design and by default (Article 25 GDPR); for failure to cooperate with the supervisory authorities (Article 31 GDPR) and in relation to personal data breaches (Articles 33 and 34 GDPR).

Fines have also been imposed for the breach of the conditions for valid consent (Article 7 GDPR); of the obligations related to controllers and processors (Articles 28 and 29 GDPR), as well as in relation to the requirement of keeping records of processing activities (Article 30 GDPR); to conducting DPIA (Article 35 GDPR); to the requirements in relation to the data protection officers (Article 37 and 38 GDPR) and finally, in relation to the general principles for transfers of personal data (Article 44 GDPR).

Typically, fines have been imposed when large-scale processing and a high number of data subjects have been at stake; when special categories of personal data and in particular, health-related data, have been concerned; when multiple provisions of the GDPR have been infringed or the infringements have had serious consequences; in case of non-compliance with previous compliance orders or administrative decisions of the SAs, as well as in case of failure to cooperate with the SAs and provide them with information.

The DK SA highlighted that the legal system of Denmark does not allow for administrative fines as set out in the GDPR and only the national courts are competent in this regard.

The SI SA indicated that it has not imposed any fines under the GDPR yet, due to missing national implementing legislation that was passed only in 2023, but had nevertheless imposed fines under the Slovenian Data Protection Act ZVOP 1 in the relevant period.

Finally, the CZ SA underlined that their national legislation does not allow the CZ SA to impose administrative fines on public authorities and bodies.

5.3.5 The average and median level of fines and the total amount of fines imposed by your DPA¹⁰⁵

The table below provides an overview¹⁰⁶ of the total amount of fines imposed by the SAs¹⁰⁷ under Article 83 GDPR or the corresponding national provision. For concrete figures on the average and median numbers, please check the individual contributions.

¹⁰⁵ When data was not provided or is not available, it is reflected in the tables as “-” and in the graphs as a blank space. If an SA has not provided any data for a specific question, it is not included in the table/graph.

¹⁰⁶ For those Member States with a currency other than the Euro, exchange rates have been applied. Thus, the amount reflected in Euros is an approximation on the basis of the exchange rate applied at a specific point in time.

¹⁰⁷ The figures reflect the situation at a specific point in time when the data was retrieved, between October and November 2023. Thus, the final figures for 2023 may vary.

SA	2018	2019	2020	2021	2022	2023	TOTAL
IE	€0,00	€0,00	€785.000,00	€225.261.500,00	€1.077.583.000,00	€1.551.782.500,00	€ 2.855.412.000,00
LU	€0,00	€0,00	€0,00	€746.319.500,00	€48.375,00	€6.500,00	€746.374.375,00
IT	€2.992.675,00	€15.904.790,00	€60.635.147,00	€50.015.863,00	€42.850.782,00	€24.658.900,62	€197.058.157,62
FR	€1.196.000,00	€51.370.000,00	€3.489.300,00	€3.856.000,00	€25.122.900,00	€46.834.500,00	€131.868.700,00
ES	€13.180.655,00	€6.295.923,00	€8.018.800,00	€35.074.800,00	€20.775.361,00	€16.828.710,00	€100.174.249,00
DE ¹⁰⁸	€142.083,50	€16.783.838,05	€48.168.314,88	€2.676.162,14	€5.894.641,20	€6.177.051,50	€79.842.091,27
AT ¹⁰⁹	€9.500,00	€18.106.700,00	€17.650,00	€24.730.660,00	€50.650,00	€26.350,00	€42.941.510,00
GR	€625.000,00	€777.000,00	€48.000,00	€364.000,00	€30.060.000,00	€541.000,00	€32.415.000,00
SE	€0,00	€51.900,00	€12.700.000,00	€2.751.000,00	€823.000,00	€10.133.037,00	€26.458.937,00
NL	€0,00	€2.535.000,00	€2.043.500,00	€5.280.000,00	€4.840.000,00	€1.975.000,00	€16.673.500,00
NO	€0,00	€279.000,00	€506.000,00	€6.961.000,00	€1.550.000,00	€8.123.000,00	€17.419.000,00
HR	€0,00	€0,00	€145.995,09	€103.191,99	€528.369,49	€8.261.000,00	€9.038.556,57
PT	€400.000,00	€12.000,00	€2.000,00	€131.200,00	€4.496.500,00	€261.950,00	€5.303.650,00
BG	€186.775,00	€3.633.240,00	€530.414,00	€224.023,00	€652.971,00	€70.756,00	€5.298.179,00
PL	€0,00	€958.654,26	€805.440,06	€482.923,61	€1.669.304,28	€115.398,28	€4.031.720,49
HU	€0,00	€298.016,00	€808.098,00	€178.307,00	€1.297.355,00	€1.024.074,00	€3.605.850,00
FI	€0,00	€0,00	€207.500,00	€780.000,00	€1.195.300,00	€464.600,00	€2.647.400,00
BE ¹¹⁰	€0,00	€39.000,00	€885.000,00	€301.000,00	€738.900,00	€80.000,00	€2.043.900,00
CY	€113.300,00	€142.600,00	€103.000,00	€1.069.500,00	€105.750,00	€65.750,00	€1.599.900,00
LV	€10.230,00	€163.522,59	€92.894,80	€109.627,18	€1.223.059,13	€22.600,00	€1.621.933,70
RO	€0,00	€489.000,00	€184.550,00	€66.900,00	€212.200,00	€268.900,00	€1.221.550,00
IS	€0,00	€0,00	€28.471,00	€132.424,00	€46.659,00	€537.356,00	€744.910,00
CZ ¹¹¹	€151.582,00	€58.191,00	€84.347,00	€243.147,00	€8.516,00	€122.141,00	€667.924,00

¹⁰⁸ The figures provided represent the total amount imposed by the DE SAs that were able to provide data.

¹⁰⁹ Due to the preliminary ruling proceedings on C-807/21 filed with the ECJ on 21/12/2021, all fining proceedings against legal entities are suspended by the AT SA until the ECJ's ruling.

¹¹⁰ The figures provided reflect all the fines imposed by the BE SA, independently of whether they were successfully challenged afterwards.

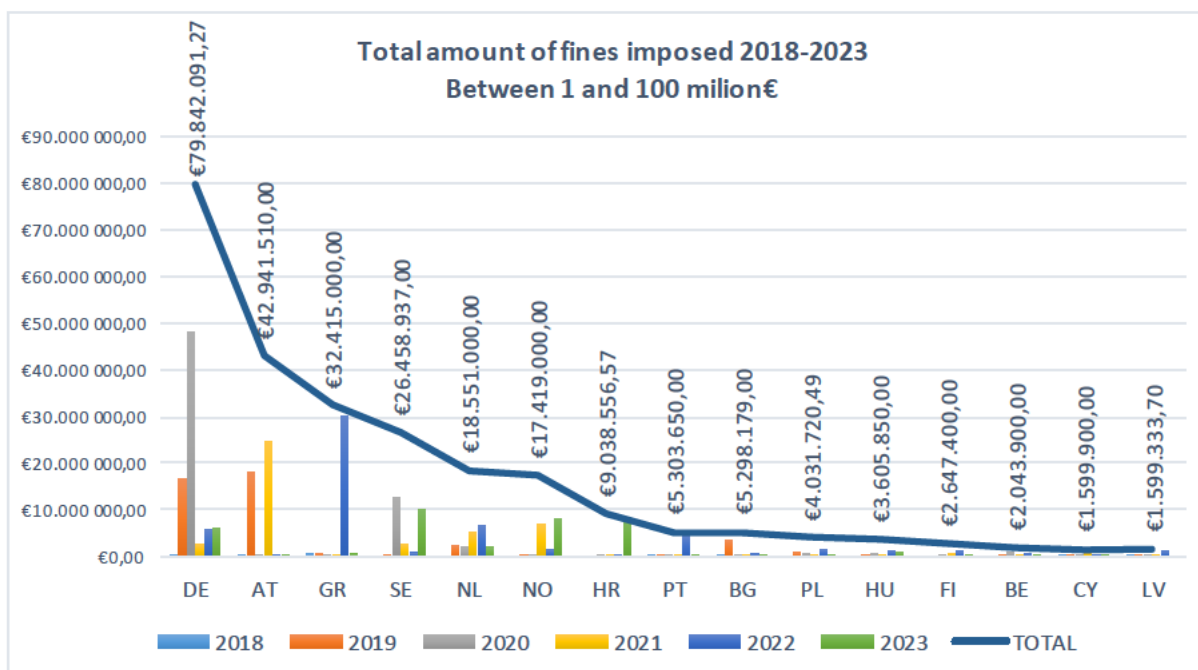
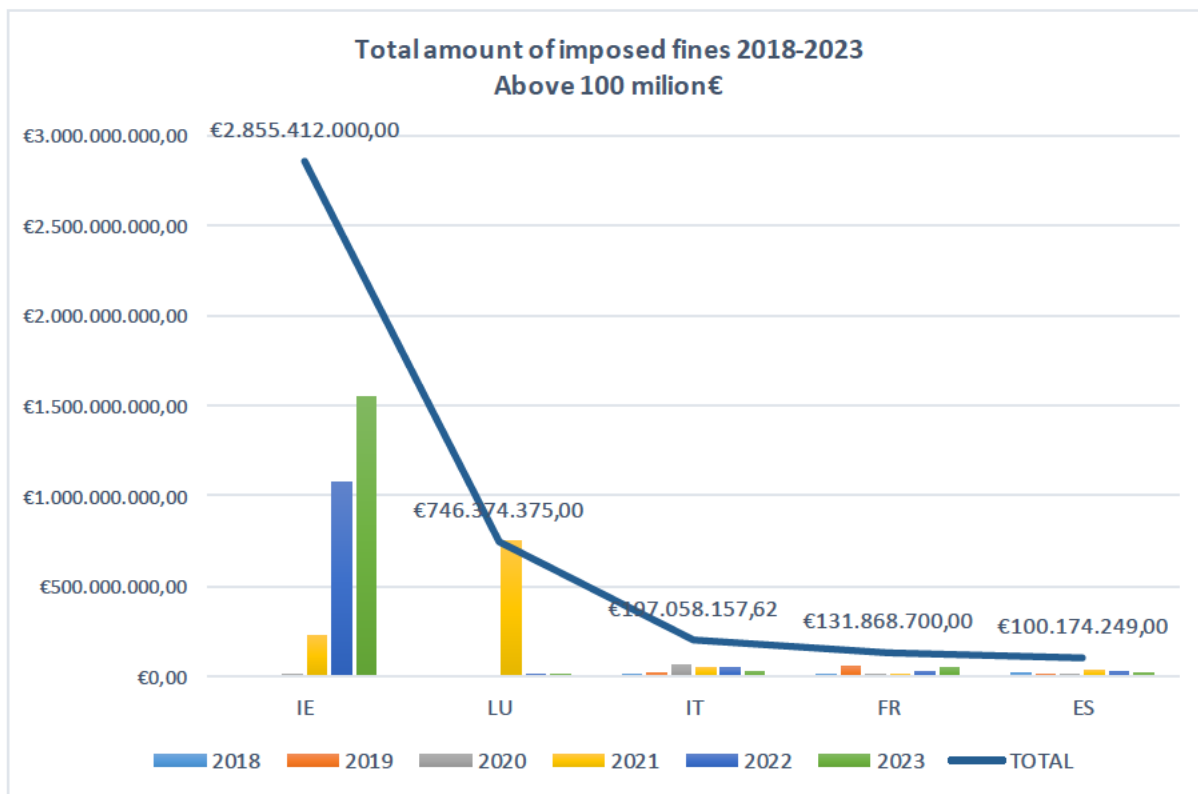
¹¹¹ The figures provided by the CZ SA do not reflect fines imposed that haven't become final as they are subject to legal challenges.

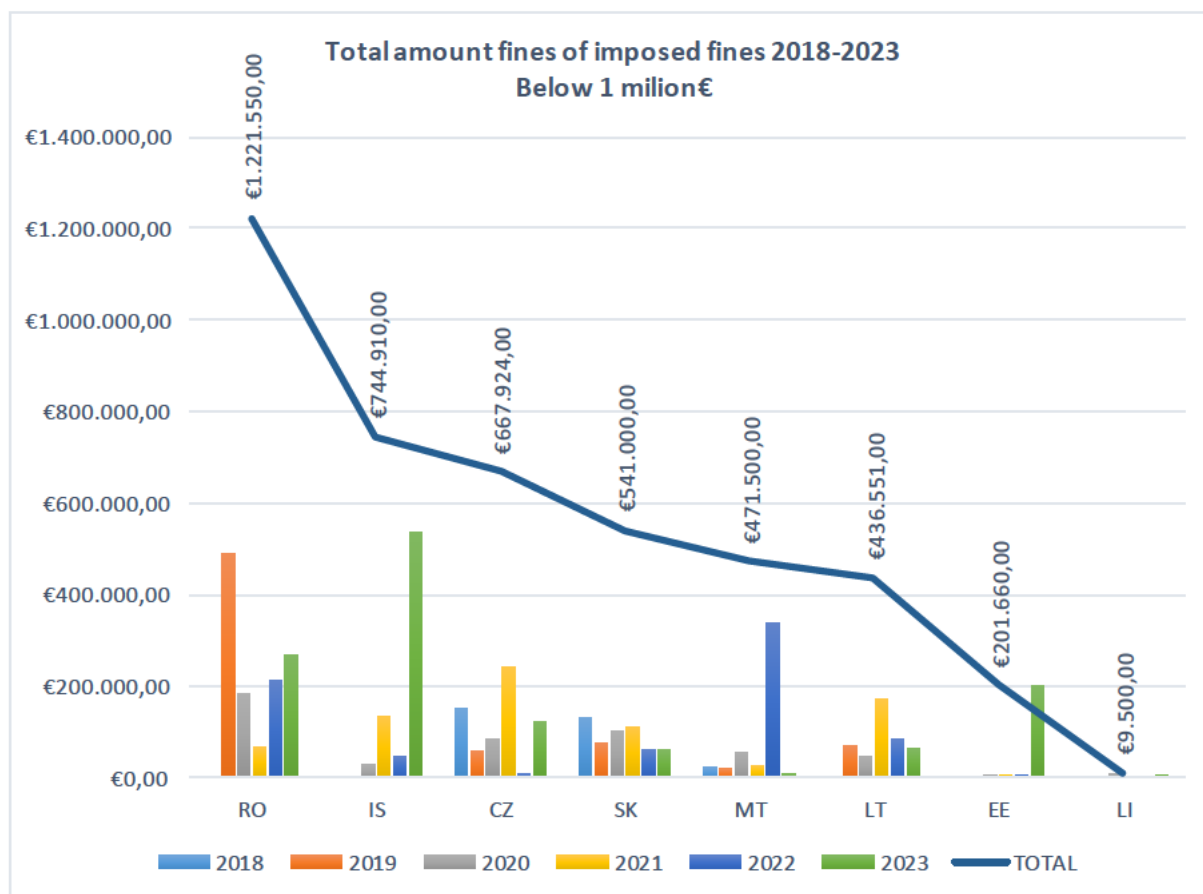
SK ¹¹²	€132.000,00	€75.000,00	€103.000,00	€110.000,00	€60.600,00	€60.400,00	€541.000,00
MT	€23.500,00	€20.000,00	€56.000,00	€27.000,00	€337.500,00	€7.500,00	€471.500,00
LT	€0,00	€68.895,00	€47.125,00	€173.163,00	€84.568,00	€62.800,00	€436.551,00
EE	€0,00		€428,00	€484,00	€748,00	€200.000,00	€201.660,00
LI ¹¹³	€0,00	€0,00	€9.000,00	€0,00	€0,00	€500,00	€9.500,00
	2018	2019	2020	2021	2022	2023	TOTAL
Total	€19.163.300,50	€118.062.269,90	€140.504.974,83	€1.107.423.375,92	€1.222.257.009,10	€1.678.712.274,40	€4.286.100.604,65

In addition to the totals presented above, some SAs also issued fines on the basis of the national transposition of article 5(3) of Directive 2002/58/EC (ePrivacy directive).

¹¹² The data provided by the SK SA for 2018 corresponds to the period from 25/05/2018 to 24/05/2019. The data from 2019 corresponds to the rest of the year 2019.

¹¹³ The figures provide and reflect the fines that are final.





5.4. Challenges to decisions in national courts

5.4.1 How many of your decisions finding an infringement of the GDPR have been challenged in national courts? Please provide the absolute figure and the percentage¹¹⁴

SA	Decisions finding an infringement of GDPR challenged in national court: Absolute figure	Decisions finding an infringement of GDPR challenged in national court:%	Successful challenges: Absolute figure	Successful challenges:%
BE	36	10.53%	14	38.9%
BG	225	-	207	-
CY	25	11%	1	4%
CZ	7	30%	0	0%
DE ¹¹⁵	463	-	48	-
DK	0	0%	0	0%
ES	181	6%	12	7%
FR	14 ¹¹⁶	2.4%	2	22%
GR ¹¹⁷	31	16.23%	1	11%
HR	152	13.93%	17	1.56%
HU	136	8.35%	18	13.24%
IE	20 ¹¹⁸	-	0	-
IS	1	-	1	-
IT	661	-	98	-
LI	11	18.6%	1	1.7%
LT ¹¹⁹	18	13%	5	4%
LU	3	4.40%	-	-
LV	22	2.66%	2	11%
NL	15	23.4375%	1	1.5625%
NO	1	0.1%	0	0%
PL	872	9.49	191	21.90%
RO	26	100%	5	19.23%
SE	60	-	7	-
SI	41	-	8	-
SK	12	-	-	-

¹¹⁴ When data was not provided or is not available, it is reflected in the tables as “-”. If an SA has not provided any data for a specific question, it is not included in the table.

¹¹⁵ The DE SAs’ figures include also pending cases and do not include challenges regarding only administrative fines.

¹¹⁶ FR SA: currently, 5 challenges are still pending before the national courts.

¹¹⁷ EL SA: currently, 22 challenges are still pending before the national courts.

¹¹⁸ IE SA: currently, 12 challenges are still pending before the national courts.

¹¹⁹ LT SA: the information relates only to figures of the Office of the Inspector of Journalist Ethics.

5.4.2 Where challenges were successful, what were the reasons of the national courts?

Generally, the reasons were related to procedural aspects or to the decision to impose a fine, or the amount thereof. In one case, another type of sanction was also repealed by the national court. With regard to substantive reasons, they are related to different interpretations of the law with regard to a variety of topics such as the legal basis, the right of access to personal data or the weighing of the mitigating and aggravating factors.

A more detailed overview is provided by the individual answers of the SAs.

6. PROMOTING AWARENESS OF RIGHTS AND OBLIGATIONS

Promoting awareness of the rights and obligations stemming from the GDPR is a task to which the EDPB and the SAs dedicate extensive resources. In this regard, they have developed several materials, activities and initiatives since the entry into application of the GDPR:

6.1. At EDPB level

Various activities aimed at promoting awareness of data protection rights and obligations among the public and data controllers and processors have been undertaken at EDPB level. An overview of the most important ones is provided below.

Press releases: The EDPB publishes a press release after each plenary meeting, as well as ad hoc press releases, to inform about documents that have been adopted by the EDPB. In addition, news from SAs is gathered and published on the EDPB website: https://edpb.europa.eu/news/news_en. On average, 35 press releases per year covering EDPB activities are published and 70 press releases from SAs.

Information queries from the general public: The EDPB Secretariat replies to information queries from the general public on a wide range of topics. These queries are submitted via e-mail or via the dedicated contact forms: https://edpb.europa.eu/about-edpb/more-about-edpb/contact-us_en. On average, the Secretariat replies to 1.400 queries per year.

Data Protection Guide for Small Business: The Guide is one of the EDPB's awareness raising actions for 2023 and was included as a key initiative in the EDPB 2021-2023 Strategy. It helps small businesses (SMEs) navigate the GDPR, offering practical examples, videos and infographics on key aspects of the GDPR. The Guide is available on the EDPB website: https://edpb.europa.eu/sme-data-protection-guide/home_en

The English version of the Guide was launched in April 2023. Currently, 17 additional languages versions are under preparation. The feedback from stakeholders to the Guide has been very positive and it is among the most visited pages on the EDPB website with 13.758 unique visitors (April-November 2023). The Guide has also been added on the "youreurope" website: <https://europa.eu/youreurope/business/>.

Data Protection Day : Annually, the EDPB organises an awareness campaign on various aspects of the GDPR on the occasion of the International Data Protection day on 28 January. The campaigns include a video that is produced in collaboration with the press officers of the SAs, and a series of social media posts, shared by the EDPB and SAs. Examples:

- 2023: https://edpb.europa.eu/news/news/2023/data-protection-day-2023_en
- 2022: https://edpb.europa.eu/news/news/2022/edpb-celebrates-data-protection-day_en
- 2021: https://edpb.europa.eu/news/news/2021/edpb-celebrates-data-protection-day_en

Open Day European Institutions : Each year, the EDPB takes part in the Open Days of the European Institutions. Via an interactive information stand, staffed by EDPB and SA staff, visitors can learn more about the activities about the EDPB and data protection in general. Awareness raising activities include: a Facial detection tool, a series of videos on Data Protection Day, the Guide for SMEs, and an online quiz. In 2023, we also developed and included a deepfake gamification tool. On average, 13.000 visitors attend the Open Day every year.

Information stands at other conferences: The EDPB makes a systematic effort to set up an information stand at relevant conferences, to inform and engage with stakeholders about its activities and to distribute information material. Examples of relevant conferences:

- CPDP: <https://www.cdpconferences.org/about-us>
- EDPS Conference: <https://www.edpsconference2022.eu/en/conference/programme.html>

Public speaking engagements:

The Chair and Deputy Chairs of the EDPB engage with other EU institutions or bodies, and represent the EDPB at conferences and multi-stakeholder platforms. Staff from the EDPB Secretariat also participate in events to promote EDPB's activities. As such, the EDPB participates in various groups and summits, such as the Global Privacy Assembly, the G7 DPA roundtable, ENISA Advisory Group, Stakeholder Cybersecurity Certification Group.

On average, the Chair and Deputy Chairs have 30 speaking engagements per year. These include presentations and panel discussions for a range of institutes, academic forums and policy agencies. Around 40 events per year are attended both physically and virtually by the EDPB Staff. These events are hosted by, amongst others, universities, law firms, companies and EU institutions.

Publications: The EDPB publishes an annual report summarising the Board's, the SAs' and the EDPB's activities in a given year. The Annual report includes a stakeholder survey about EDPB guidance. The Annual reports are available at: https://edpb.europa.eu/about-edpb/about-edpb/annual-reports_en

6.2. At national level

The SAs attach great importance to promoting awareness of data protection rights and obligations among the public and data controllers and processors and dedicate considerable resources to achieve this objective. All SAs replied that they have taken awareness-raising initiatives and provided examples. While a very wide range of activities have been mentioned, the most recurrent ones are the organisation of educational events, conferences and information campaigns; the publication of newsletters, press releases and other materials online; the organisation of data protection-related events (with the most frequently mentioned one being the Data Protection Day); the provision of direct consultations in writing and via phone, as well as data protection -related trainings and workshops.

In terms of topics, most of the SAs have undertaken activities focusing on the protection of children's privacy, SMEs, video surveillance, health and Covid19, security and data breaches.

SA	Activities undertaken
AT	The AT SA's activities include: — Public campaign for kids: "Privacy 4 Kids" (together with the University of Vienna) — Website (FAQs, online complaint form) — Newsletter (4 per year) — Consultations on the procedure of the SA (telephone service) — Regular presentations, lectures
BE	For minors and youth: — maintenance and update of a website on data protection for children, parents and teachers (teaching material, videos, information for children and youth, awareness raising): https://www.jedecide.be/; — presentation to school teachers on data protection; — awareness raising of minors via media events promoting data protection (contest on data protection topic with concert tickets as prize, theatre piece on data protection); — printing awareness raising material and sending it to schools. For data protection professionals / SMEs: — publication of a toolbox for DPOs and SMEs, including a cookies checklist, a template for record of processing activities, FAQs... (https://www.autoriteprotectiondonnees.be/professionnel/premiere-aide/toolbox) — recommendations (on direct marketing, data transfers from the public sector, data sanitization and destruction techniques, and biometric data). — webinar on data protection for SMEs; — publication of an updated cookie checklist for controllers. For the broader audience: — information material on many topics of data protection, FAQs (https://www.autoriteprotectiondonnees.be/citoyen/themes); — template letters for exercising data subject rights (https://www.autoriteprotectiondonnees.be/citoyen/vie-privee/quels-sont-mes-droits) — answering individual requests for information from a broad audience; — giving tailored presentations and trainings in various fora
BG	Relevant information about the BG SA awareness rising activities and data protection rights promotion can be found on the CPDP's official site on the following link: https://www.cdpd.bg/en/index.php With regard to the specific activities, the BG SA provided the following information per years from 2018-2023: 2018 — 'Awareness campaign' in four cities in Bulgaria – Plovdiv, Veliko Tarnovo, Varna and Burgas, from February till April 2018- https://www.cdpd.bg/en/index.php?p=news_view&aid=1194 (in English); — T4DATA: Training Data Protection Authorities and Data Protection Officers' under the Rights, Equality and Citizenship Programme of the European Union with partnership from the DPAs of Italy, Spain, Poland and Croatia;

	— E-OpenSpace – European innovative open platform for electronic exchange of information and sustainable provision of education for adults in the field of personal data protection and privacy- with partnership from Italy, Poland and Croatia 2019 — T4DATA: Training Data Protection Authorities and Data Protection Officers' under the Rights, Equality and Citizenship Programme of the European Union with partnership from the DPAs of Italy, Spain, Poland and Croatia- published guide for the DPOs on the Regulation (EU) 2016/679 implementation and specialized training for data protection officers in the public sector in Burgas, Sofia, Plovdiv and Veliko Tarnovo. — E-OpenSpace – European innovative open platform for electronic exchange of information and sustainable provision of education for adults in the field of personal data protection and privacy- with partnership from Italy, Poland and Croatia- intellectual products- Guide for the electronic realization of informal personal data protection digital trainings, General study plan, Open educational resources for informal data protection digital training, single pilot platform for trainings, coordination and cooperation between the participating DPA. — Study of the challenges of SME and their associations by the GDPR application- organized 13 trainings in Blagoevgrad, Wratsa, Plovdiv, Sofia, Varna, Burgas, Pleven and Veliko Tarnovo, international conference on the SME challenges by the GDPR application and the free mobile application "GDPR in your pocket"- with interface suitable for both Android and iOS systems and information accessible in three languages- Bulgarian, Italian and English. — AI-Trans: Increasing AI Transparency Through Digital Alternative Learning of Privacy Training under the Erasmus + program with focus on the privacy and personal data protection when using new technologies, specifically AI and Internet of Things (IoT) with participation of 3 other countries- Italy, Poland and Moldova. 2020 — SMEDATA - Ensure the highest level of protection of privacy and personal data under the Rights, Equality and Citizenship Programme - published guides on: — Personal data processing by SME in accordance with the requirements set as a result of the Covid-19 pandemic; — Good practices of SME personal data processing — Pseudonymisation, security and personal data breaches — SME internet-based self-evaluation instrument. 2021 — Guidelines of the CEC (Central Election Commission) and CPDP on the processing and protection of personal data in the election process- https://www.cdpd.bg/userfiles/file/Documents_2021/Joint_Instructions_CEC-CPDP_2021_En.pdf - in English — SMEDATA II- Ensure the highest level of protection of privacy and personal data- upgrading the GDPR in your pocket application and the official site of the project "smedata.eu"- for individuals with reduces vision. — AI-Trans: Increasing AI Transparency Through Digital Alternative Learning of Privacy Training- 8 educational modules on IoT technical concepts, smart appliances, medical and fitness carry on appliances, smart games, dark patterns etc. Also published is a Code for best practices of the private sphere DPOs on confidentiality.
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	2022 — SMEDATA II-3 trainings in Varna, Plovdiv and Sofia and 6 explanatory training events in Italy and Bulgaria for the SME and international conference Future Opportunities for Privacy Minded Enterprises in Brussels. — VR-eOpenSpace – Open Space Virtual Reality Learning and Education- preparation of chat bot and virtual reality instrument in order to promote the data protection among young people- with partners from Croatia, Serbia, Greece, Italy, Moldova and Romania
CY	The CY SA activities include press releases, presentations, speeches, interviews and workshops. — Since 2018, the Commissioner issued 141 press releases. They are available on the CY SA website: https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/news02_gr/dpnews02_gr07?opendocument — Since 2018, the Commissioner delivered 91 presentations and speeches, addressed to organizations in the public and the private sector. They are available at the following link: — https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/news04_gr/news04_gr?opendocument — In addition, since 2018, the Commissioner gave numerous tv, radio and written interviews and organized several workshops, addressed to the public and the private sector Annual European Data Protection Day: campaigns, competitions or other events for promoting the awareness of target groups. Each year, a different target group is selected.
CZ	The CZ SA activities include: — Infoline by phone twice a week (since 2018); — Office's website featuring section Consultancy ("Poradna" in Czech) offering manifold guidance for citizens and professionals; — Educational seminars for DPOs (taken place at different cities across the republic) – 7 events in 2018; — Lectures and speeches at different events (organized e.g. by the Czech Data Protection Association); — GDPR Academy organized by the Czech Transport Union in cooperation with the Ministry of Industry and Trade, under the Office's auspices. Series of seminars for professionals in 2017 as a run-up to the GDPR entry into force. — Series of thematic seminars for data protection professionals offered in hybrid form in-person and remotely (since spring 2023, to continue in 2024 as well); — Leaflets (on cookie consent, on how to lodge a complaint, on how to seek consultation with the Office); — Methodology on video surveillance (document submitted to public consultation in 2023 with a great resonance from the professional public); — Brochure "Do not be afraid of the GDPR" (2018) – targeted at general public; — Brochure "Data protection management for municipalities and cities";

	— Leaflet on internet privacy – targeted at children and young people; — Leaflet “Protect your Privacy” – for general public.
DE	BfDI (Federal Commissioner for Data Protection and Freedom of Information) - examples: publications: — press releases (https://www.bfdi.bund.de/DE/DerBfDI/Presse/Pressemitteilungen/pressemitteilungen_node.html) — news (https://www.bfdi.bund.de/DE/DerBfDI/Presse/Kurzmeldungen/kurzmeldungen_node.html) — different digital and printed publications (https://www.bfdi.bund.de/DE/Service/Publikationen/Flyer-digital/flyer-digital_node.html; https://www.bfdi.bund.de/DE/Service/Publikationen/Flyer/flyer_node.html; https://www.bfdi.bund.de/DE/Service/Publikationen/Broschueren/broschueren_node.html) — annual activity report (https://www.bfdi.bund.de/EN/Service/Publikationen/Taetigkeitsberichte/taetigkeitsberichte_node.html) — internal documents like opinions on laws or inspection reports (https://www.bfdi.bund.de/DE/DerBfDI/Dokumente/dokumente_node.html) events: — organized several in presence discussion events with additional live-stream (https://www.bfdi.bund.de/DE/Service/Mediathek/Veranstaltungen/Veranstaltungen-node.html) — organized several in presence meetings and events for data controllers and processors social media: — running an account on Mastodon (https://social.bund.de/@bfdi / 43k followers) — running and moderating a forum related to data protection and privacy topics (https://bfd.bund.de/forum) kids and teens: — publishing and promoting a book and video series on data protection and privacy (https://www.bfdi.bund.de/EN/Service/Mediathek/Pixi/Pixi-node.html) — co-publishing a website for teenagers (https://youngdata.de/) — organised an event at a local library for kids on world children's day (https://www.bfdi.bund.de/SharedDocs/Kurzmeldungen/DE/2023/23_Weltkindertag.html) BB SA Brandenburg (Lander Commissioner for Data Protection and the Right for Access to Information)

general activities in DSK framework, published guidance (leaflets, guidelines, ... on topics like DPO, Home Office, DBN, Data Subject Rights), press statements, joint awareness activities with schools, participation in consumer protection strategy

SA Berlin (Berlin Commissioner for Data Protection and Freedom of Information)

- Start-up School: Online training on data protection for Berlin start-ups and associations (<https://www.datenschutz-berlin.de/themen/unternehmen/start-up-schule/>) - Data protection workshops at Berlin elementary schools (<https://data-kids.de/fuer-lehrkraefte/datenschutz-workshop>) - Media education symposium on "Data protection meets media knowledge" in cooperation with jugendnetz.berlin
- Publication of the 2023 annual report (<https://www.datenschutz-berlin.de/jahresbericht-2022>)
- Publications website: Sample letter on information, correction, deletion and objection to data processing (<https://www.datenschutz-berlin.de/service/musterschreiben/>), privacy law info on Google Street View recordings (<https://www.datenschutz-berlin.de/buergerinnen-und-buerger/selbstdatenschutz/internetdienste/google-widerspruch/>), on the adequacy decision for EU-U.S. Data Privacy Framework (<https://www.datenschutz-berlin.de/themen/unternehmen/datenexporte>), on data collection for a new rent review (<https://www.datenschutz-berlin.de/themen/wohnen/mietspiegel>)
- Social media series with application notes on passwords, IFG requests, applicant data, ID copies, online platforms, camera surveillance, right of access (<https://social.bund.de/@blnbdi>)
- Relaunch of the YoungData website, the youth portal on data protection and freedom of information (<https://youngdata.de/>)
- Republica 2023: Lecture on political targeting

BW SA Baden-Württemberg (Lander Commissioner for Data Protection and Freedom of Information)

The DPA DE/BW founded an education centre in July 2020 and thus supports the statutory advisory and information mandate with a wide range of events (such as seminars, panel discussions or workshops). The events offered for controllers, processors and citizens generally meet with great interest. In 2022, for example, around 110 events were offered, with more than 4,000 registrations. More information is available at <https://www.baden-wuerttemberg.datenschutz.de/bildungszentrum/>. With the "Schule digital" ("school digital") and "Datenschutz geht zur Schule" ("Data protection meets school") training series, radio play and promotion of Youngdata, the education centre has designed and established a series specifically for the school sector and will expand its range in the future with a more comprehensive self-study offer. The DPA DE/BW uses various media for its outreach work. In addition to its own website, it operates its own Mastodon server (<https://bawü.social/@lfdi>) for direct communication with citizens - on the DPA's Mastodon instance, around 100 public authorities from Baden-Württemberg now use a data protection-friendly communication channel with their own account. The DPA DE/BW also runs its own peer-tube server at <https://tube.bawü.social/>, where it streams live events and makes lectures and discussions available to the public.

The DPA DE/BW publishes numerous brochures, FAQs and flyers concerning specific topics at <https://www.baden-wuerttemberg.datenschutz.de/praxishilfen/> and <https://www.baden-wuerttemberg.datenschutz.de/faqs/>.

We inform citizens and controllers about our work with its own podcast "Datenfreiheit" ("data freedom") (<https://www.baden-wuerttemberg.datenschutz.de/datenfreiheit/>). The DPA DE/BW is present at various events and also organises its own events, such as the AI Weeks 2022 and 2023 with numerous speakers from politics, business and research (<https://www.baden-wuerttemberg.datenschutz.de/ki-woche-2022/> and <https://www.baden-wuerttemberg.datenschutz.de/ki-woche-2023/>). In addition, the DPA DE/BW carries out a competition where local authorities are invited to submit creative and innovative proposals that facilitate, explain and implement data protection (<https://www.baden-wuerttemberg.datenschutz.de/kommunaler-datenschutzwettbewerb-2022-mitmachen-und-datenschutz-gestalten/> and <https://www.baden-wuerttemberg.datenschutz.de/preistraeger-des-kommunalen-datenschutzwettbewerbs-2022-gekuert/>)

BY-LDA SA Bavaria - Private Sector (Bavarian Lander Office for Data Protection Supervision)

We are involved in a large number of activities dedicated to promoting awareness of data protection requirements, obligations, and rights, both with data controllers and processors and data subjects. This includes, among others: specific information campaigns for young people in schools; regular and request scheduled meetings with representatives of controllers/processors, and in particular with working groups consisting of Data Protection Officers, of both industry/sector-specific and general nature (e.g. insurance companies, health sector, advertising industry, real property companies, car manufacturers, IT service providers, etc.). We regularly attend both EU-wide and national/regional conferences on data protection and participate as speakers or on panels in events dedicated to data protection. On the occasion of our numerous own-initiative investigations we publish the check lists which we use for such investigations so that they can serve as models to be used by (further) controllers/processors for internal compliance checks of their own; the recent topics of such investigations include raising awareness for factors that facilitate the risk of data breaches, with a specific focus on small and medium enterprises (SME).

BY-LfD SA Bavaria - Public sector (Lander Commissioner for Data Protection)

Comprehensive information on the website (<https://www.datenschutz-bayern.de/>); Data protection events; Training opportunities for DPOs of public bodies

HE SA Hesse (Hessian Commissioner for Data Protection and Freedom of Information)

Our current focus is on increasing data privacy compliance at key points by providing intensive advice to individual key institutions (such as the central IT service provider of the state

administration) in such a way that breaches are avoided and the number of complaints is reduced.

HH SA Hamburg (Hamburg Commissioner for Data Protection and Freedom of Information)

- Publications on our website (e.g. <https://datenschutz-hamburg.de/news/neue-bilder-bei-google-street-view-1>)
- In cooperation with the DPA Mecklenburg-Vorpommern a special information campaign for families is launched (online seminars, on site workshops, videos, Podcasts, brochures and website www.digitale-vorbilder.eu).

MV SA Mecklenburg-Western Pomerania (Lander Commissioner for Data Protection and Freedom of Information)

- Lectures and counseling
- Detailed activity report each year (<https://www.datenschutz-mv.de/datenschutz/publikationen/taetigkeitsberichte/>)
- Guidance on data protection for non profit clubs in cooperation with a regional volunteer foundation (<https://www.datenschutz-mv.de/datenschutz/publikationen/Hilfe-für-Vereine/>)
- Project to promote awareness for teenagers while spending a weekend with experts and other kids to become trainees spread their knowledge: Mediencouts MV (<https://www.mediencouts-mv.de/>)
- Project comparable to Mediencouts MV but directed to parents: Medienguides MV (<https://medienguides-mv.de/>)
- annual public conferences and policy statements in a regional network of partners in data protection literacy: Medienaktiv MV (<https://www.medienaktiv-mv.de/>)
- EU funded project in cooperation with HmbBfDI for data protection awareness through lectures, workshops and digital materials: Digitale Vorbilder (digital role models; <https://datenschutz-hamburg.de/digitalevorbilder/index.html>)
- Guidance and recommendations by the DSK (Organisation of all German SAs) on topics from data subject rights to cookies (<https://www.datenschutzkonferenz-online.de/>)

NI SA Lower Saxony (Lander Commissioner for Data Protection)

Publication of 169 documents on their website, including position papers and resolutions of the DSK, handouts, guidance documents and much more: (<https://lfd.niedersachsen.de/startseite/>)

Their staff conducted more than 200 lectures, workshops etc. - main topics:

- 2018: Requirements of the GDPR
- 2019: Requirements of the GDPR
- 2020: Requirements of the GDPR, practice of fines (Article 83 GDPR), home office, video conferencing.
- 2021: Digitalisation, employee data protection, practice of fines, international data traffic, GDPR and how European DPAs work together
- 2022: New Telecommunications Telemedia Data Protection Act (TTDSG), international data traffic, practice of fines
- 2023: Digitalisation, practice of fines, artificial intelligence

	Other campaigns worth mentioning: — Educational work in schools, campaign: “Data protection goes to school” — Educational work for employees in public authorities at our Data Protection Institute (DsIN) — Hosting a symposium on the topic “Cars and their data – Future of autonomous driving” with panel discussion — Publication of a video series on our website about data protection topics <i>RP SA Rhineland-Palatinate (Lander Commissioner for Data Protection and Freedom of Information)</i> — Publication of Guidelines of the German Data Protection Conference (https://www.datenschutzkonferenz-online.de/orientierungshilfen.html) — Publication of FAQs on specific Topics, such as GDPR, data protection with regards to associations, kindergardens, school, video surveillance, et cetera (https://www.datenschutz.rlp.de/de/themenfelder-themen/infothek/faqs/) — Information Events for specific Categories of Controller and data subjects — Podcast-Series "Daten-Funk" (https://www.datenschutz.rlp.de/de/themenfelder-themen/online-services/podcast/) <i>SH SA Schleswig-Holstein (Lander Commissioner for Data Protection Schleswig-Holstein)</i> — Information Material: https://www.datenschutzzentrum.de/informationmaterial/ — Templates and Examples for the documentation of processing of personal data: https://www.datenschutzzentrum.de/dokumentation/ — Online-Forms for complaints, data breach notifications and registration of data protection officers: https://www.datenschutzzentrum.de/meldungen/ — Education: https://www.datenschutzzentrum.de/akademie/ <i>SL SA Saarland (Independent Data Protection Center Saarland - Lander Commissioner for Data Protection and Freedom of Information)</i> We do not have special activities; with the exception of the general activities within the framework of DSK. <i>SN SA Saxony (Saxon Data Protection Commissioner)</i> — Press relations (publication of press articles in trade journals) on data protection issues — Participation in (online) events with presentations on various data protection topics (health, technology, basics, etc.) for data protection officers, public administration employees, students/teachers and citizens — Expansion of online communication, especially the information offered on the website and through social media (Mastodon) <i>St SA Saxony-Anhalt (Commissioner for Data Protection)</i> — Guidance documents, Leaflets and Templates on various topics (videosurveillance, Advertisements, DPO), FAQ's for SME and associations; all of which can be retrieved via: https://datenschutz.sachsen-anhalt.de/datenschutz-in-sachsen-anhalt
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	— Several presentations on various topics (e.g. general introduction to the GDPR, customer data protection, data protection in associations or video surveillance). — Annual consultations on current topics for company representatives, e.g. the professional chambers of commerce or the DPO's of banks. — Press releases on health and employee data protection issues — Publication of notices on the website on topics in the health sector (especially Corona), employee data protection and in the school sector. TH SA Thuringia (Thuringian Lander Commissioner for Data Protection and Freedom of Information) Six in-service training Vicos for all school headmasters and vocational school headmasters; Karl-Volkmar-Stoy-Schule: State Vocational School Centre for Economics and Administration Jena: 8th Data Protection Day; VWT Cybercrime: Entrepreneur dialogue in Erfurt; Event on "AI and school" with 270 participants (educators and pupils): https://www.tlfdi.de/fileadmin/tlfdi/presse/Pressemitteilungen_2023/Save_the_Date_PM_13092023.pdf; and publications under https://www.tlfdi.de/infothek/publikationen/broschueren-des-tlfdi/ https://www.tlfdi.de/wir/veranstaltungen/
DK	The Danish SA published 39 guidelines targeted at the data subject or the data controller and processor since the entry into force of the GDPR: https://www.datatilsynet.dk/hvad-siger-reglerne/vejledning/vejledninger-i-pdf-format The Danish DPA is continuously updating the Danish DPA's website with guidance, recommendations and also decisions from the DPA. A big tv-campaign targeted at data subjects in general to inform them about the importance of the right to data protection – even if they have nothing to hide: https://www.datatilsynet.dk/borger/hemmeligheder A podcast, which today has 25 episodes. In each episode, different employees from the Danish DPA talk about a topic that is particularly relevant for small and medium-sized organisations: https://www.datatilsynet.dk/hvad-siger-reglerne/podcast To the smaller organisations, the Danish DPA has created a “GDPR-universe” on the DPA's website. The “universe” is built on the idea of providing the smaller organisations with easy-to-understand examples and material by giving them 7 steps to follow to better understand the rules: https://www.datatilsynet.dk/hvad-siger-reglerne/vejledning/gdpr-univers-for-smaa-virksomheder Formal meetings with stakeholders in two contact committees to discuss data protection matters- four times a year, twice with the industry and twice with the Danish municipalities and regions. Furthermore, the Danish DPA has created another contact committee for stakeholders from both the industry and the public sector who are interested in following our international work. In these meeting the Danish DPA informs about pending cases and current

	issues in the international area of data protection. We also have a contact committee with stakeholders from the scientific world where we discuss the rules on data protection in relation to scientific research and statistic. A game called “the Data Challenge” to promote awareness about data protection amongst children. The game is available for free on the Danish DPA’s website and comes along with a teacher’s guide and a PowerPoint presentation for teaching, so it can be used in schools as well: https://www.datatilsynet.dk/english/data-challenge. The game won two prizes during GPA 2022 in Istanbul (Education & Awareness and People’s Choice).
EE	Since 2020, the EDPI has continued its efforts to raise awareness. We have especially focused on public speaking at conferences and seminars and taking into account the complex Covid restrictions, we decided to organize more online events and prepare video courses. 2020: — Guideline on “Legitimate interest”: https://www.aki.ee/sites/default/files/dokumendid/oigustatud_huvi_juhend_aki_26.05.2020.pdf — Informative materials and videos on the EDPI’s website: Use of cameras on residential area — Printed leaflets on the use of cameras and informative video surveillance signs — Creating a generator of video-surveillance signs: https://melon.rik.ee/videovalve-sildi-genereerija — Video seminar for schools — Conference on freedom of information, including presentation on the issuing of personal data (conference was recorded and the presentation is available on our Youtube channel, being the most popular video of all times) — 3 general informative letters on specific issues: to schools regarding the use of virtual environments, to schools about distance learning — Direct consultations in written format 1759, helpline calls 1222, consultations and trainings on-site/on-line 71 2021 — Guideline on video surveillance: https://www.aki.ee/sites/default/files/dokumendid/kaamerate_juhend_10.11.2021.pdf — Refreshing a guideline on “Informing about a child in need” (partnership with Chancellor of Justice): https://www.aki.ee/sites/default/files/dokumendid/juhend_-_abivajavast_lapsest_teatamine_ja_andmekaitse_jaanuar_2021.pdf — Video seminar for apartment associations — Video course on public information and freedom of information matters (consisted of 4 videos) — Video course on video-surveillance and analytics (consisted of 3 videos) — 2 general informative letters: to insurance companies and to political parties — Direct consultations in written format 1813, helpline calls 1350, consultations and trainings on-site/on-line 69 2022 — Guideline on Publication of personal data in media: Data Protection Inspectorate’s intervention criteria:

	https://www.aki.ee/sites/default/files/dokumendid/aki_meediavaidlusse_sekkumise_kriteeriumid_veebuar_2022.pdf — Guideline on Disclosure of payment defaults https://www.aki.ee/sites/default/files/dokumendid/maksehairete_avaldamine_2022.pdf — Celebrating Data Protection Day with video seminar on using of cameras — Celebrating Freedom of Information Day with a video seminar on public information — Being a partner in the Estonian Human Right's awareness project "Every click counts, including personal data" – informative materials and short videos about data protection rights. — Direct consultations in written format 1325, helpline calls 1028, trainings on-site/on-line 17 2023 (until November 2023) — Celebrating Data Protection Day with video seminar on employment relationships — Conference on 5 years of GDPR — Being a partner in the Estonian Human Right's awareness project "Cybergram" – informative video stories with popular influencers (materials for the teachers were also prepared): https://cybergram.humanrights.ee/ — 4 general informative letters: to family doctors, to schools, to DPOs, to public sector on e-mail boxes — 6 training videos on the "Data Protection ABC": https://www.aki.ee/et/teavitusejuhis/andmekaitse-abc — Celebrating Freedom of Information Day with a video seminar on public information — 3 on-site seminars for museums and educational institutions — Direct consultations in written format 944, helpline calls 736, trainings on-site/on-line 27, consultations on-site/on-line has been over 30
EL	Promoting the awareness of data subjects about their understanding of the risks, rules, safeguards and rights related to the processing of personal data, as well as controllers and processors of their obligations, has over time been one of the main pillars of the Authority's mission, which is expressly provided for in the GDPR. EUROPEAN PROJECTS — "Facilitating compliance with the GDPR for Small and Medium-Sized Enterprises and promoting data protection by design on ICT products and services (byDesign)". The 2-year project (2020-2022) was carried out in collaboration with the University of Piraeus and the Greek ICT company Abovo and is co-funded by the European Commission. More information at the project's website: https://bydesign-project.eu/. The Authority was awarded the People's Choice Award of the 45th Global Privacy Assembly held in Bermuda from 15 to 20 October 2023. The prize was awarded for the GDPR compliance toolkit developed in the frame of this project. — "Aware by default: promoting awareness of critical social and professional groups (children and privacy professionals) – byDefault". On-going 2-year project (2022-

	2024) carried out in collaboration with the University of Piraeus and the Greek ICT company Abovo. Funded by the European Commission. More information at the project's website: https://bydefault-project.eu/ INFORMATION DAYS — On the occasion of the celebration of the anniversary of the Data Protection Day, the Authority organizes each year (on January 28) an information day with speeches and presentations on data protection issues with the view of informing the public (controllers, processors and data subjects) on recent developments in the field of data protection and privacy. More information available at https://www.dpa.gr/el/enimerwtiko/ekdiloseis?field_year_from=&field_year_to=&field_keywords=&field_european_day=1 (in Greek) CAMPAIGNS — In view of the GDPR's first anniversary, on May 25 2019, the Authority cooperated with the Representation of the European Commission in Greece in order to create an outdoor campaign with Greek airport ads for the rights of citizens under the GDPR. The campaign was launched in May at Athens International Airport and it ended in October, at Kos island Airport. WORKSHOPS/SEMINARS — The Authority organised in 2019 a GDPR workshop for junior secondary school pupils on the "Protection of Personal Data" in collaboration with the Foundation for Research and Technology and Stavros Niarchos Foundation Cultural Center and the Foundation of Research and Technology. More information available at https://www.dpa.gr/el/enimerwtiko/ekdiloseis/ekpaideytiki-imerida-gia-tin-prostasia-ton-prosopikon-dedomenon (in Greek) — The training seminars carried out at the National Centre of Public Administration and Local Government on ""The General Data Protection Regulation: the obligations of the Public Administration"", with special scientists from the Department of Auditors of the Authority is still ongoing. More information and Guidance Material available at https://www.dpa.gr/el/enimerwtiko/ta_nea/ekpaideytiko-yliko-gia-enimerotiko-programma-toy-ekdda-me-titlo-genikos NEWSLETTER — The Authority issues every 3 months an e-newsletter on HPA latest news (2.080 subscribers until 25/10/2023). Newsletters available at https://www.dpa.gr/enimerwtiko/e-newsletter (in Greek). GUIDELINES/other documents and standard core documents on — Remote Work (No 2/2020) https://www.dpa.gr/el/enimerwtiko/prakseisArxis/kateythyntiries-grammes-gia-ti-lipsi-metron-asfaleias-sto-plaisio — Political Communication (No 1/2023) https://www.dpa.gr/el/enimerwtiko/prakseisArxis/kateythyntiries-grammes-12023-politiki-epikoinonia — Video surveillance (No 1/2011) https://www.dpa.gr/el/enimerwtiko/prakseisArxis/hrisi-systimaton-binteoeptirisis-gia-tin-prostasia-prosopon-kai-agathon
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	ANNUAL REPORTS — Each year the Authority publishes its annual report of activities (in Greek) available at https://www.dpa.gr/enimerwtiko/etisies-ektheseis and a summary thereof (since 2018) available at https://www.dpa.gr/en/enimerwtiko/annual-reports (in English). WEB PORTAL — In early 2021, the Authority's new online portal was put into full production operation, and its content is being continuously updated with information on current data protection issues. OTHER AWARENESS ACTIVITIES — Participation of the Authority's representatives in scientific conferences, workshops and training seminars — Issuance of press releases and announcements — Media interviews — Replies to questions raised by journalists — Publication of articles in the press and academic journals.
ES	The Spanish SA provides the information service to citizens on their rights through informative publications through the Spanish SA website (FAQ, guides, manual and other materials and contents) in addition to in person attendance, phone service as well as individualized written consultations and interactive Chatbot addressed to promote awareness as well as to provide answers in data protection issues addressed to data subjects and controllers. The catalogue of frequently asked questions will be kept updated and adapted to technological developments. These materials can be found in its website (http://www.aepd.es/) in different sections: data subject rights, controller and processor obligations, specific fields such as education and minors, health, Internet and social networks, video surveillance, non-solicited publicity, public administration, telecommunications, gender violence and innovation and technology (https://www.aepd.es/areas-de-actuacion/innovacion-y-tecnologia) where there is a repertoire of the tools developed by the Spanish SA to assist controller and processor in the compliance of their obligations under GDPR. The Spanish SA has enabled a consultation channel for DPO where written consultations made by DPOs should be accompanied by a report by the DPO concerned, analyzing the processing on which the processing is consulted and examining the risks associated with the processing operations, taking into account the nature, scope, context and purposes of the processing operation in accordance with the accountability principle. This channel will also be available to representative organisations and associations of controllers and processors providing data protection advisory services to their partners especially in the case of small and micro-enterprises, under the same conditions as for DPOs.

	Spanish SA has launched several publicity campaigns in order to raise awareness among data subjects in general, and, in particular, among parents, children and telecommunications providers about the necessary precautions and guidance when using mobile phones by minors. For instance, the campaign 'Change the Plan', launched recently by the Spanish SA together with the Spanish Association of Pediatrics, promotes the digital health of minors through the awareness of their parents, reducing the risks posed at a physical, mental and social level by intensive and uncontrolled use of digital screens. In this context Spanish SA supports the Family Digital Plan of the Spanish Association of Pediatrics. The initiative of the so-called priority channel (Canal prioritario - https://www.aepd.es/canalprioritario) that allows the urgent removal of sexual or violent content published on the Internet without the consent of the people who appear in it deserves to be highlighted.
FI	Website, press releases and guidelines — The Finnish DPA promotes awareness of data protection rights and obligations in many ways. The main communication channel is the constantly updated website tietosuoja.fi. • The website contains: • Information and guidelines about data protection to both private persons (https://tietosuoja.fi/en/private-persons) and organisations (https://tietosuoja.fi/en/organisations) • Answering questions about various themes in the FAQ section (https://tietosuoja.fi/en/frequently-asked-questions) • Press releases and news items covering recent decisions, infonotes, guidance and legislative reforms (267 press releases and news items were published between January 2020 and November 2023) • An annual report about the key events, decisions and statistics of the year — Decisions and other important news are communicated to the media via media service. — Examples of other guidance material: A handbook and an Excel tool for conducting a Data Protection Impact Assessment, a handbook of data protection in working life, guidance for private persons affected by a personal data breach, an information letter about notification obligations regarding personal data breaches in the social and health care sector, an information letter about data protection requirements to political parties. Events — An annual seminar is organised in Helsinki in connection to the international Data Protection Day. The seminar features topical speakers and themes in the field of data protection and brings together ca. 400 data protection professionals. — Speaking in seminars and conferences organised by both public and private sector entities (e.g. focusing on specific sectors such as health care and education). Participating in the planning of several events, such as Finland's largest digital security exercise arranged by the Finnish Digital and Population Data Services Agency. Social media and newsletters

	— Using social media channels X (https://twitter.com/Tietosuoja_DPA) and LinkedIn to reach different target groups (https://www.linkedin.com/company/tietosuojavaaltuutetun-toimisto/) — Sending a newsletter aimed at data protection officers and other data protection professionals six times a year (3 100 subscribers). The newsletter contains current news and guidance. — An awareness-raising social media campaign is launched yearly on the Data Protection Day. Projects — GDPR4CHLDRN – Ensuring data protection in hobbies (https://tieke.fi/en/projects/gdpr4chldrn/) is a two-year EU-funded project aiming to improve data protection competence of children and young people aged 13–17, their parents and associations organizing hobby activities. The project includes seminars, workshops, a newsletter as well as various information material to the target groups. — The EU-funded GDPR2DSM project supported SMEs in fulfilling data protection requirements. An online tool and other information for SMEs was published at https://www.tietosuojaapkyrityksille.fi/en/. The website is available in Finnish, English and Swedish. 17 webinars and 4 seminars were organized as part of the project. Direct consultation — The telephone guidance service provides general guidance in matters involving data protection. The Finnish DPA offers telephone guidance for both private persons and organisations (two separate phone numbers). In 2022, guidance was given in a total of 2 800 calls. — Consultation and guidance is also provided in written form via emails.
FR	The CNIL has published many Guides for data controllers since 2020: — Practical Guide to storage periods (July 2020) — Guide for Data Protection Officers — Guide “The responsibility of players in the context of public procurement” — GDPR awareness Guide for employee’s Unions (February 2023) — Cybersecurity booklet — Guide on data security (last update August 2023) — Recruitment guide The CNIL's public relations department has coordinated a practical GDPR awareness Guide for associations (downloaded 9,304 times from our website in 2022), following the lead of the Guide for small businesses (downloaded 20,947 times from our website in 2022) and local Authorities (downloaded around 1,000 times from our website in 2022). The CNIL has developed and updated the ""Besoin d'aide"" (“Need help”) online tool, which is a FAQ dedicated to professionals (234 Q/A) and individuals (317 Q/A). A new activity has been created in Spring 2023: a mission to raise awareness of privacy rights among the general public, in an effort to reach out to audiences who do not contact our DPA, with for example the creation and development of a network of organisations in contact with the public in order to disseminate a culture of privacy and provide information on exercising rights.

Another major campaign: in 2020, the publication of the guidelines and recommendation on cookies and other trackers was accompanied by the publication of a series of contents and tools for professionals, as well as the organisation of webinars for numerous associations. A fact sheet dedicated to individuals wishing to understand the issues surrounding cookies has also been published: "Changes in the rules governing the use of cookies: what changes for Internet users?".

In addition to redesigning its website (and its tree structure in 2023), the CNIL has also produced and published a number of videos to make Internet users aware of their rights and teach them how to control their personal data. At the same time, the CNIL is designing infographics and posters for the general public to make its publications easier to understand. Since 2020, the digital education Department is stepping up privacy awareness campaigns aimed at young people, parents and teachers, strengthening partnerships and creating new ones.

Education and awareness initiatives

- Training for trainers in other governmental Authorities, associations and sports federations, digital mediators
- Training for Heads of school and regional administrative managers
- Digital parenting : presentation to parent-employees in a company
- Presentations in primary and secondary school classes, including Safer Internet Day event
- CNIL's stand and workshops on digital citizenship at Educatech Show (2020-2022)
- Exhibition stand at Digital Games Show in Paris
- Partnerships
- The CNIL has many partnerships like for example « Educnum » national partners Group: co-creation of an escape game ""The Digital Guardians"" with a booklet for children parents and teachers
- To promote awareness to data controllers and processors, the CNIL offers several types of supports and tools

General awareness and supports

Mooc "l'atelier RGPD", Webinars (<https://www.cnil.fr/fr/comprendre-le-rgpd/les-webinaires-de-la-cnil-le-programme-de-septembre-decembre-2023>), GDPR Days

The CNIL provided support to individuals through the various phone hotlines. This support also takes the form of responses to individual requests for advice (1315 legal advices in 2022 and 800 for DPOs only) or in meetings that may be organised with the CNIL's services or through innovative support methods such as a regulatory sandbox or ""enhanced"" support for digital companies with strong economic development potential.

https://www.cnil.fr/sites/cnil/files/atoms/files/charter_support_professionals.pdf

HR	In the period from 2019 to 2019, the HR SA implemented the EU-funded project T4 Data, aimed at providing support to Data Protection Officers (DPOs) through training and developing guidelines on DPO tasks. From 2020 to 2022, the HR SA implemented the EU-funded project ARC, which aimed to support Small and Medium Enterprises (SMEs) in complying with the GDPR through training, workshops, and seminars. Currently, we are implementing the ARC2 project with the main goal of developing an innovative tool for SMEs to help them comply with the GDPR. Additionally, we conduct at least two GDPR training sessions on various topics and two workshops for DPOs each month. All materials developed for data controllers and processors to assist them in GDPR compliance are available at: — https://arc-rec-project.eu/hr/ — https://arc-rec-project.eu/edukativni-materijali/ — https://azop.hr/eu-project-t4data/ — https://azop.hr/edukativne-aktivnosti-azop-a/ Additionally, we occasionally organize workshops for citizens and also in schools for children. Within the SPE (pool of experts) project, we are developing a training program tailored to the needs of DPOs in the health and educational sectors because we have identified that these two sectors face the most challenges in complying with the GDPR: https://azop.hr/applications-for-a-free-online-workshop-dpo-tasks-and-personal-data-protection-in-the-healthcare-sector/. In addition we participate at panels, workshops organized by stakeholders as speakers. We were host of Spring Conference of European Data Protection Authorities in 2022 and we organize always high level conference on the occasion of Data Protection Day to raise awareness on personal data protection among all stakeholders.
HU	The Hungarian Authority has always paid special attention to informing citizens, children, businesses and the public. With the entry into force of the GDPR, it was important to draw attention to the new rules and their practical application. The most important projects of the past years are presented below: 1) STAR II project - support SMEs on the data protection reform II The project focused on providing support to the training activities of DPAs and data protection officers on the EU data protection reform, especially the GDPR. There was a need to assist EU data protection authorities in raising awareness among businesses, especially small and medium enterprises, on the new EU legal framework for personal data protection, particularly the GDPR, and assist these SMEs in ensuring compliance therewith. The new law and its novelties created much confusion and uncertainty as to its practical application, magnified by its upcoming applicability (May 2018). Some 22 million European SMEs – the core of EU enterprise policy – not only faced distinctive challenges from data protection law, but also – despite specific, often protective regulation – rarely could afford professional legal advice.

Thus they merited special support from public authorities. The STAR II project outputs included: an email hotline run by the HU SA (NAIH) in both Hungarian and English; a guidance document for DPAs on good practices in awareness-raising techniques among SMEs; a handbook for SMEs to help them comply with the GDPR.

These results were prepared in consultation with stakeholders (especially via validation workshops and the External Advisory Board) and widely disseminated. The outputs are freely available, openly accessible and copyright-unrestricted, thus easily reusable and adaptable. STAR II was addressed to 40+ EU DPAs and millions of EU SMEs. It delivered tangible and long-term results to SMEs, directly assisting them in compliance with the GDPR. More information is available online at: <https://naih.hu/projects-starii/general-information-on-the-star-ii-project>

2) Freedom of information

The special project of the HU SA entitled ""Mapping the domestic practice of freedom of information and increasing its efficiency"" supports the exploration of the domestic situation of freedom of information and the mapping of its practice by carrying out 4 targeted, target group-specific analytical researches. Its purpose is to conduct a comprehensive, in-depth, and complex investigation of the practical implementation of the obligation to disclose laid down in domestic legislation, as well as to formulate recommendations for legislators based on domestic and international experience and to disseminate the results. In connection with the enforcement of freedom of information as a fundamental right, a broad examination of the domestic practice has become timely in order to surface possible problems and hindering factors, which, after identification, can improve accessibility and optimize processes by formulating targeted solutions and proposals.

<https://www.naih.hu/news/396-press-release-comprehensive-development-project-launched-by-the-hungarian-national-authority-for-data-protection-and-freedom-of-information-for-the-enhanced-enforcement-of-freedom-of-information>

3) DPO Annual Conference

The National Data Protection and Freedom of Information Authority organizes the annual conference of Data Protection Officers every year. At the conference the most important results and experiences related to data protection and freedom of information are presented, link in Hungarian: <https://naih.hu/2021-evi-dpo-konferencia/dpo-konferencia-2021-videok>

4) Safer Internet Tent/ Awareness raising among children

As part of the children's day, the Safer Internet Tent is set up in the City Park every year, where the Hungarian authority is also represented. In the Safer Internet Tent, in addition to useful information materials, children and their companions can meet NAIH employees who will answer their questions about information rights, test their knowledge by completing a data protection test, crossword or puzzle, and participate in other adventure programs.

	https://www.gyermekmento.hu/Tartalmak/Hirek/varosligeti-gyermeknap-2023.-majus-27-28.---programok-terkep-infok In addition, representatives of the Authority give lectures on data protection and freedom of information at 6 universities in designated courses and specific training courses. Reshaping and content development of the website is in progress. The latest news, decisions, national and international projects, events and annual reports are published on our website: https://www.naih.hu/about-the-authority (English version of the website is in progress). In 2023 the Hungarian Authority hosted the Spring Conference in Budapest: https://www.springconference2023.hu/
IE	ARC Project In 2022 the DPC's successful participation in the EU-funded ARC project came to an end. The ARC Project had its inception in 2019, when the Croatian Data Protection Authority, AZOP, submitted a proposal to the EU Commission seeking funding for a project that would focus on supporting the compliance efforts of small-to-medium enterprises; specifically because the often limited resources of SMEs presented an additional challenge when complying with data protection legislation. Funding was awarded on the basis of a consortium approach, and AZOP approached the DPC and Vrije University, Brussels with an invitation to join them in their efforts to support SMEs. The DPC recognised this as an excellent opportunity for international cooperation and for providing support to one of its own key stakeholder groups. Having taken the decision to join the consortium, the project was formally launched in February 2020, with a full programme planned of national and international engagements and workshops. "...assessed as very good and no shortcomings were identified. The content of the deliverables is satisfactory and of high quality, despite the circumstances caused by the pandemic. The project can have long-term impact on the project groups and the society, as well as on EU Legislation and/or policies and can serve as a pool of knowledge for other Data Protection Authorities as well." More information regarding the ARC Project can be found on our website at https://dataprotection.ie/en/organisations/arc-sme-awareness Guidance The DPC regularly publishes guidance to promote awareness of data protection rights and obligations among the public. Over 65 pieces of guidance have been published under the headings: — General Guidance — Technological Issues — GDPR Requirements — Direct marketing/Electoral

— Covid-19

Published guidance can be found on our website at <https://dataprotection.ie/en/dpc-guidance>

Decisions

Over 40 decisions in larger-scale Inquiries where orders and fines considered and/or imposed have been published to our website.

Published decisions can be found on our website at <https://dataprotection.ie/en/dpc-guidance/law/decisions-made-under-data-protection-act-2018>

Notable DPC publications that can be found on our website include:

- Data Breach Trends from the First Year of the GDPR
- Report by the Data Protection Commission on the use of cookies and other tracking technologies
- DPC Ireland 2018-2020 Regulatory Activity Under GDPR
- Data Protection Commission Resource Allocation Audit January 2022
- One-Stop-Shop Cross-Border Complaints Statistics Report
- One-Stop-Shop Cross-Border Complaints Statistics Report to April 2023
- Case Studies 2018 – 2023
- Annual Reports 2018 - 2022

These publications, including our annual reports from 2018 -2022 can be found on our website at <https://dataprotection.ie/en/dpc-guidance/publications>

Podcasts and Blogs

The DPC regularly publish blogs and podcasts on topical issues and current affairs to bring awareness to the public

Podcasts can be found on our website at <https://dataprotection.ie/en/dpc-guidance/podcasts>

Blogs can be found on our website at <https://dataprotection.ie/en/dpc-guidance/blogs>

Social Media

The DPC engages the public with our social media presence across LinkedIn and X platforms. Followers of the DPC's social media can expect information including:

- Content from our website, including guidance for both individuals and organisations
- Press releases and statements from the DPC
- Coverage of events attended or organised by the DPC
- Press interviews with representatives of the DPC
- Content from our peer DPAs where appropriate
- Other practical information on data protection

Link to DPC X page <https://twitter.com/dpcireland>

	Link to DPC LinkedIn page: https://ie.linkedin.com/company/data-protection-commissioner-of-ireland Further examples of useful resources providing up to date guidance regarding data protection rights and obligations for individuals and businesses can be found on our website https://dataprotection.ie/ which is continuously updated.
IS	The IS SA has undertaken activities to promote awareness of data protection rights and obligation, including: — Published Q&A on-line, aimed towards data subjects and controllers/processors, see: https://www.personuvernd.is/einstaklingar/spurt-og-svarad/ https://www.personuvernd.is/fyrirtaeki-og-stjornsysla/spurt-og-svarad/ — Publication of guidelines on various topics in Icelandic, see: https://www.personuvernd.is/fyrirtaeki-og-stjornsysla/fraedsluefni/leidbeiningar-personuverndar — Publication of flyers on various topics, aimed towards data subjects and controllers/processors, see: https://www.personuvernd.is/einstaklingar/fraedsluefni/baeklingar-personuverndar-um-nyjar-personuverndarreglur-2018-einstaklingar https://www.personuvernd.is/fyrirtaeki-og-stjornsysla/fraedsluefni/baeklingar-personuverndar-um-nyjar-personuverndarreglur-2018 — Various public talks, seminars, conferences etc. — Project ""sandbox"" in the field of AI development, see: https://www.personuvernd.is/fyrirtaeki-og-stjornsysla/sandkassinn/ — Ongoing campaign promoting data protection rights to children in elementary schools, see: https://www.personuvernd.is/personuvernd/frettir/fraedsluferd-um-land-allt-um-mikilvaegi-personuverndar-midlalaesis-og-netoryggis-barna-i-stafaenni-tilveru
IT	The awareness-raising activities carried out by the IT SA over the past years can be grouped under four main areas. Books, vademecums and handbooks Several books have been published to collect proceedings of conferences organised by the Italian Garante (for instance, on the occasion of the European DP Day, where Metaverse and its challenges were addressed - https://www.gdpd.it/web/guest/home/docweb/-/docweb-display/docweb/9939113 - or else at a conference organised in July 2022 to celebrate the IT SA's 25 years of activity - https://www.gdpd.it/web/guest/home/docweb/-/docweb-display/docweb/9905382);

In addition, vademecums and handbooks have been also issued to collect, e.g., the EDPB Guidelines from 2019 to 2022 in an Italian version - <https://www.gpdp.it/web/guest/home/docweb/-/docweb-display/docweb/9887426> - or to provide key guidance on data protection in schools - <https://www.gpdp.it/temi/scuola> - or generally on application and interpretation of the GDPR - <https://www.gpdp.it/regolamentoue>.

Information campaigns

Several information campaigns have been implemented, both of a general nature and targeted at specific audience. Among the former, reference can be made to the campaign that started in 2022 in collaboration with the Ministry of enterprise and Made in Italy; 9 TV commercials were produced and broadcast on TV and radio channels, via digital billboards in stations and airports and through social media to disseminate information and awareness on various topics regarding data protection, digital education and IT security - <https://www.gpdp.it/finalmente-un-po-di-privacy>. Among the latter, campaigns were implemented on online dating - <https://www.gpdp.it/temi/internet-e-nuove-tecnologie/dating-online> -, sharenting - <https://www.gpdp.it/temi/minori/sharenting> -, cookies and privacy - [Cookie - Garante Privacy \(gpdp.it\)](https://www.gpdp.it/temi/minori/sharenting) - and many other issues – see [Campagne di comunicazione - Garante Privacy \(gpdp.it\)](https://www.gpdp.it/temi/minori/sharenting).

Events, meetings and conferences

Participation by the SA's Board Members and/or staff in various events, meetings and conferences was also an effective means for addressing data protection-related issues. This includes the annual conference organised by the SA on the occasion of the Data Protection Day (see <https://www.gpdp.it/web/guest/home/docweb/-/docweb-display/docweb/9848543>), the participation in the 'Forum PA' event, which is a fair on innovation in the world of the public administration, where workshops were held by the IT SA (see - <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9885957>) or in the Didacta Italy Fair 2023 (on innovation in the world of schools, where two workshops were organised by the IT SA - <https://www.garanteprivacy.it/temi/scuola>), and the conferences organised to address the DPOs' role and activity (<https://www.gpdp.it/web/guest/home/docweb/-/docweb-display/docweb/9901692>), the 'State of Privacy 2023' event (<https://www.garanteprivacy.it/state-of-privacy-2023>) dealing with data protection, digital technology, AI, digital education and IT security.

Training-oriented activities

Many training-oriented activities were implemented by the IT SA over the past years, starting from the awareness-raising campaign for SMEs (ARC I and ARC II projects, with the Croatian SA), the T4Data project (focusing on DPOs' training and competences) and the contributions provided via TAIEX-funded conferences and training initiatives (mainly involving DPAs in neighbouring and candidate countries).

LI	Activities: — Publication of guidance on website and in a newsletter — Lectures/ presentations in companies, organisations, associations, etc. — Workshops for data protection professionals — Networking meetings and lectures / presentations for DPOs — Presentations and panel discussions for the general public (data protection day) — Events at movie theaters incl. panel discussions for the general public — Lectures/ presentations at schools (teachers, parents, students) — Courses /lectures at university — Data protection survey in population of Liechtenstein — Media coverage / articles about data protection issues — - etc."
LT	Different activities to promote awareness of data protection rights and obligations are intensively carried out. As an example, The European Commission funded project ConCon (No.101005477, REC) aimed at removing the tension amid data protection and freedom of expression and information was implemented during 2021-2023. The project proactively engaged media entities, social media users, scientists, public authorities and the general public, providing them with free access to innovative tools and materials for ensuring GDPR compliance and balance between personal data protection and freedom of expression and information. Project achieved a very high level of engagement, benefiting a significant number of individuals from target groups across various sectors and empowering the target groups with the skills and knowledge required to strike a balance between these two fundamental freedoms. As a result, the project significantly increased data protection awareness in journalism, public administration, social media and academia. The main objectives of the Project were as follows: (1) to raise awareness on the responsibility to protect personal data for social media users via creation and dissemination of developed material (incl. video clips) through variety of social network canals, (2) to raise awareness on the responsibility of those who control personal data and are mandated to provide information related to the public interest (esp. public authorities) to balance data protection requirements with the freedom of information, (3) to ensure that the protection of personal data is fulfilled in conformity with journalists' right to collect and impart information (4) to identify common security and technical issues related to data protection in journalistic practice and prepare practical recommendations (e-tutorial) on the implementation of duties of data controllers acting for journalistic purposes, (5) to develop and launch mobile application, (6) to raise awareness on how to apply the GDPR in context of processing personal data for the academic and research purposes. The guidelines created while implementing the project activities are available via this links: https://repository.mruni.eu/handle/007/18916 (Lithuanian), https://repository.mruni.eu/handle/007/18917 (English). The constant communication via social networks campaigns is provided to raise the awareness of data protection rights and obligations.

	The Inspectorate: From 2021 annual event for DPOs' about data protection and e. Privacy; — 2021-2023 project "Solving Privacy Paradox 2: Promoting High Standards of Data Protection as a Fundamental Right at the Workplace" (co-financed by the European Commission). Project activities, e. g. 14 trainings for business, 6 trainings for the public sector, 3 guidelines, 10 podcasts, 3 scientific articles, APP — "ADA gidas" development and support, Closing conference. More information: https://vdai.lrv.lt/en/solpripa-2-work-project/, deliverables https://vdai.lrv.lt/lt/naudinga-informacija/solpripa-2-work-projektas/; — Various guidelines (https://vdai.lrv.lt/lt/naudinga-informacija/rekomendacijos-gaires-ir-kt/work/), e. g. Guidelines for personal data security measures and risk assessment for data controllers and data processors, Guidelines on data protection by design and by default in information system life cycle, Recommendation regarding the processing of debtors' personal data, Guidelines for the evaluation of requests for the provision of personal data, 20 steps for children and teenagers to protect their personal data online and etc. — FAQs' (https://vdai.lrv.lt/lt/kiti/klausimai-duk/) on various topics, e. g. video surveillance, direct marketing, data subject rights, personal data security breaches and etc.; — Publication of the summaries of investigation results (https://vdai.lrv.lt/lt/patikrinimu-rezultatu-apibendrinimai/vdai-patikrinimu-rezultatu-apibendrinimai-po-bdar-isigaliojimo/); — Publication of the summaries of the most important SA's decisions (https://vdai.lrv.lt/lt/naudinga-informacija/vdai-sprendimai-baudos-nurodymai-ir-kt/); — Various meetings with data controllers and processors, sectoral associations; — Providing general advise via official answers, e-mail, phone hotline and on the SA's premises. - Participation in conferences and events.
LU	Since 2020, the CNPD has continued its efforts to raise awareness through workshops, conferences, training courses, guidance material, and compliance tools. The CNPD organised or participated actively in more than 50 conferences, training sessions and workshops. For the past three editions of the International Data Protection Day, the CNPD organised the following conferences: « Cookies : Je tiens à ma vie privée ou je n'ai rien à cacher ? », « Protection des données et de la vie privée face à la numérisation du travail » and « Le métavers: quelle réalité pour les droits et libertés de la vie privée ? ». Every year, the CNPD is giving training courses for the INAP (National Institute of Public Administration), the CSSF (Commission de Surveillance du Secteur Financier), the CSL (Chambre des Salariés) / LLLC (Luxembourg Lifelong Learning Center), the EST (Ecole Supérieure de Travail) and Luxinnovation. The CNPD has also recently started providing training on data protection for the students of a newly created professional baccalaureate (BTS) on cybersecurity in a Luxembourg high school.

	The CNPD's DaProLab (Data Protection Laboratory) workshops allow data protection professionals to exchange knowledge and ideas on topics such as the security of transfers in the field of health, data protection impact assessments or data processing in the finance/insurance sector. The CNPD's celebration of its 20th anniversary represented another opportunity to communicate broadly on the importance of data protection in today's world. Since 2020, the CNPD has published or updated its guidance on the following topics: — Data protection in the context of the Covid-19 pandemic — The impact of Brexit on international data transfers — Cookies and other tracking technologies — Geolocation of vehicles made available to employees — Election campaigns and data protection The CNPD also published informative articles on data protection challenges regarding ransomware, artificial intelligence and the metaverse. Compliance tools — In May 2022, the CNPD launched its "GDPR-CARPA" certification scheme, the first GDPR certification scheme at the national and European level, allowing companies and other bodies established in Luxembourg to demonstrate that their personal data processing operations comply with the GDPR. The first entity authorised to issue the GDPR-CARPA certification was accredited by the CNPD in October 2022, followed by 2 other entities in 2023. In this context, the CNPD organised the launching conference "GDPR certification is coming to Luxembourg". With financial support from the European Commission, the CNPD, in collaboration with the Luxembourg House of Cybersecurity and the National Cybersecurity Competence Center, is conducting the ALTO project ("Data Protection Compliance Support Toolkit"). Its objective is to provide SMEs with a simple and free self-assessment tool to integrate the GDPR obligations into their daily activities. ALTO is aimed at all local very small and very small enterprises that need to comply with the GDPR, both as data controllers and data processors. The product will have the potential to be used after adaption outside of Luxembourg.
LV	2020 — To explain the boundary between freedom of expression and privacy in the digital age, a public awareness campaign was carried out. — Data State Inspectorate in cooperation with SIA "TNS Latvia" (Kantar) in November and December 2020 carried out a public opinion study "Public awareness and understanding of personal data protection". In the year 2020, the Inspectorate, in cooperation with non-governmental organisations, was involved in the development of sectoral guidelines and organisation of informative events on the issues of processing and protection of personal data among those:

	— Three sectoral guidelines (Association of finance, brokers and insurance where consulted on drafting guidelines) — A seminar organised by the Procurement Monitoring Bureau on 11 March 2020 for the staff of the institution on the General Data Protection Regulation and the latest trends in the protection of personal data; — Training organised by the Ministry of Foreign Affairs on 15 October 2020 for clerks of Latvian diplomatic and consular missions abroad – contract staff on the General Data Protection Regulation and current trends in the protection of personal data; — Data technology company SQUALIO in cooperation with the Latvian Personnel Management Association on 2 December 2020 at the webinar for the members of the Latvian Personnel Management Association on topical personal data protection issues in personnel management. — Recommendations and guidelines - In 2020 several general recommendations and guidelines were drafted. — Recommendation “Installation of video cameras and performance of video surveillance in the private property of a natural person”. — Recommendation “On transfer of personal data to non-EU or EEA Member States in accordance with the General Data Protection Regulation (GDPR)” — Recommendations on the end of the transition period with regard to the withdrawal of the United Kingdom from the European Union — Guidelines on criteria for determining the amount of administrative fines for undertakings and natural persons — The recommendations and guidelines developed during the reporting year are available at: https://www.dvi.gov.lv/lv/dvi — Explanations and opinions are available at: https://www.dvi.gov.lv/lv/skaidrojumi-un-viedokli 2021 Seminars - Many online seminars were carried out – among those: — A seminar for citizens on the performance of video surveillance for household needs and current developments in the activities of the Data State Inspectorate; — Online seminar “Employer’s right to process employee’s personal data in the context of COVID-19”; — Online seminar “Preventive inspection by state and local government authorities, cookies and recommendations on the use of cookies on the website”. Conference — International conference “PERSONAL DATA – THE FUTURE” PERSPECTIVE” was carried out. The conference records are available at www.dvi.gov.lv. Recommendations and guidelines — Guidelines on cookies available at: https://www.dvi.gov.lv/lv/dvi — Guidelines on the processing of personal data in an educational establishment for the purpose of providing face-to-face learning during COVID-19 — Manual on the processing of data of natural persons in the field of AML/TPFN and compliance with sanctions Explanations and opinions are available at: https://www.dvi.gov.lv/lv/skaidrojumi-un-viedokli
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	2022 Seminars - In order to provide the public with information on current developments in data protection and to answer the most frequently asked questions, in the reporting year the Inspectorate ensured participation in 33 seminars and conferences at national and international level, including organising online seminars on topical issues in data protection: 10 informative lectures in cooperation with State Employment Agency. Conference - In the reporting year, the Inspectorate organised an international conference "Personal Data – a Future Perspective! 2022". Information on the conference: https://www.dvi.gov.lv/lv/pdnp_2022 Virtual assistant - Virtual assistant Zintis was introduced as one of means for communication with general society Information campaign "Your Data – Your Security" https://www.dvi.gov.lv/lv/tavi-dati-tava-drosiba. Recommendations "Processing of personal data during pre-elections" - https://www.dvi.gov.lv/lv/jaunums/rekomendacijas-politiskam-for-the-party-and-community Manual on the processing of data of natural persons in the field of AML/TPFN and compliance with sanctions in collaboration with Latvian Bank: https://www.dvi.gov.lv/lv/jaunums/fktk-sadarbiba-ar-dvi-and-Fna-made-recommendations-financial-iestadem-physical-personal-data-recommendations
MT	The IDPC operates both an open telephone line available during specified business hours and a generic mailbox accepting queries on matters related to data protection and freedom of information. These services are available to private individuals, professionals, organisations, and public entities. During the years, the Commissioner has participated in several events, conferences, official meetings with controllers, both private organisations and public entities, operating within different sectors to try to reach the widest audience possible. 2020 A brand new, modern and user-friendly website was launched to provide to the public well-compiled information and guidance and easy-to-use essential tools to seek the assistance of the IDPC where needed. The MT SA website remains the main instrument to promote awareness. 2022

	In March an “Online Self-Assessment Compliance Tool” has been developed as part of the project entitled “GDPR awareness campaign and support to business organisations, in particular, SMEs — GDPRights”. This is a user-friendly tool to help SMEs to measure compliance of their processing operations with the General Data Protection Regulation (GDPR). It is available to controllers on the office's website. 2023 In February an awareness campaign designed to increase public awareness on the data protection rights was launched. The IDPC’s objective was to instil a culture where citizens of different age groups understand the importance of safeguarding their personal data and be well-informed about how to exercise their rights under the GDPR. A series of publicity material has been produced and published on different communication media, including on public buses and billboards. This project was co-financed by the European Rights, Equality and Citizenship Programme 2014-2020.																																								
NL	The NL SA has undertaken the following activities to promote awareness of data protection rights and obligations among the public and data controllers and processors. <table><tr><th></th><th>2020</th><th>2021</th><th>2022</th><th>2023 (until 30 September)</th></tr><tr><td>Codes of conduct</td><td>3</td><td>5</td><td>4</td><td>1</td></tr><tr><td>Prior consultations</td><td>8</td><td>10</td><td>4</td><td>2</td></tr><tr><td>Individual guidance requests from DPO’s</td><td>1214</td><td>1309</td><td>901</td><td>500 (estimate)</td></tr><tr><td>Certification</td><td>1</td><td>0</td><td>1</td><td>0</td></tr><tr><td>Compliance enhancing interventions</td><td>298</td><td>233</td><td>111</td><td>120 (estimate)</td></tr><tr><td>Permits for the processing of personal data of a criminal nature (art. 33 Dutch GDPR Implementation Act)</td><td>65</td><td>264</td><td>324</td><td>200 (estimate)</td></tr><tr><td>Legislative advice (formal opinions on new legislation)</td><td>120</td><td>106</td><td>106</td><td>n/a</td></tr></table> The NL SA moreover publishes outcomes of exploratory studies and other types of guidance, such as — Study on manufacturers and suppliers of facial recognition cameras — Inventory on use of microtargeting in the run-up to the Dutch elections for the House of Representatives and a Privacy manual for election campaigns — Privacy risks in the educational sector — Algorithmic Risks Report (First Algorithmic Risks Report Netherlands calls for additional action to control algorithmic and AI risks Autoriteit Persoonsgegevens)		2020	2021	2022	2023 (until 30 September)	Codes of conduct	3	5	4	1	Prior consultations	8	10	4	2	Individual guidance requests from DPO’s	1214	1309	901	500 (estimate)	Certification	1	0	1	0	Compliance enhancing interventions	298	233	111	120 (estimate)	Permits for the processing of personal data of a criminal nature (art. 33 Dutch GDPR Implementation Act)	65	264	324	200 (estimate)	Legislative advice (formal opinions on new legislation)	120	106	106	n/a
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	— Guidance for taking care of personal data in case of bankruptcy — Several Covid19-related topics (e.g. recommendations on the Covid19-app and recommendations on sharing telecom data in the fight against Covid19. — Guidance on positioning Data Protection Officers and a DPO-day (congress for DPO's with guidance, information on all kinds of topics, 600 DPO's present) — Advice on the use of Google workspace in the educational sector Communication, publicity campaigns and public affairs — In addition to its annual reports, the NL SA issued over 300 press releases and news items, 8 yearly newsletters, and two animated films about data breaches and complaints; — The NL SA moreover launched its new website in 2023: www.autoriteitpersoonsgegevens.nl — Organised Open House in June 2023 for general public with info sessions on diverse topics, over 200 visitors — Organised 2 expert sessions with journalists for national news outlets, 1 on GDPR general and 1 on data breaches — The NL SA participates in 'round table discussions' in the Dutch parliament and the publishes position papers, which can be found on our website. Digital/Data Strategy The NL SA has been designated by a parliamentary mandate as the coordinating authority with regard to algorithm supervision in The Netherlands from 2023 onwards. This task was allocated to the NL SA in response to the desire to better protect public values and fundamental rights when developing and using algorithms in general, including Artificial Intelligence. The focus is on improving the protection of public values and fundamental rights. Such as preventing discrimination and arbitrariness and promoting transparency as well as looking at the fairness of algorithms and the prevention of deceptive or misleading information.
NO	We continuously publish guidance available on https://www.datatilsynet.no/ We also contribute to the guidance on https://www.dubestemmer.no/
PL	<u>The main activities of the Polish SA undertaken to promote awareness of personal data protection include:</u> — Developing and continuous updating of a website -both in Polish (https://uodo.gov.pl/pl) and in English (https://uodo.gov.pl/en) (more details below). — Media relations - preparing answers to journalists' questions, press releases, interviews, and articles. — Social media presence - maintaining the X (Twitter) profile: https://twitter.com/UODOgov_pl. — The Polish SA's Helpline (in Polish and English) is open from Monday to Friday, from 10:00 a.m. to 2:00 p.m. (approx. 12 800 calls per year).

- **Monthly Bulletin** for Data Protection Officers (the DPOs.), that currently has around 11500 subscribers. Archive publications are also published on the website: <https://uodo.gov.pl/pl/438/1183>.

The Polish SA' website provides a range of information on data protection matters:

- **News and events:** Latest updates on administrative court decisions concerning the decisions of the Polish SA, information on current events (e.g. webinar "Personal data - do we know how to protect them?" <https://www.uodo.gov.pl/pl/138/2758>, or Children's Day within the Polish SA: <https://www.uodo.gov.pl/en/553/1508>). This section also includes reports on data protection and privacy (e.g. on the awareness of the security of personal data: <https://uodo.gov.pl/en/553/1520>, or on personal identification number (PESEL) <https://uodo.gov.pl/en/553/1510>), and the guidance provided by the Polish SA (e.g. Protection of personal data the election campaign <https://uodo.gov.pl/en/553/1550>). More information: <https://uodo.gov.pl/en/p/news-and-events>.
- **About us:** Information about the President and Deputy President of the Polish SA, predecessors, and the European Data Protection Board: <https://uodo.gov.pl/en/478>.
- **What we do:** Conferences and webinars, Michał Serzycki' Data Protection Award, Data Protection Day, "Your Data – Your Concern" programme, and the cooperation of the SA, including Memoranda of understandings concluded by the Polish SA: <https://uodo.gov.pl/en/p/what-we-do>.
- **Legislation:** information on legislation in force and on administrative decisions of the Polish SA. The Polish SA publishes each decision with a detailed categorisation according to the subject matter of the decision, including the type of infringement and the sector of activity of the controller: <https://uodo.gov.pl/en/480>.
- **Guidance:** Dedicated sections for citizens (<https://uodo.gov.pl/en/p/for-citizens>), controllers (<https://uodo.gov.pl/en/p/for-controllers>), and DPOs (<https://uodo.gov.pl/en/p/for-dpos>).

Key programmes and events:

- **Your Data -Your Concern** - an annual nationwide educational programme that has been running since 2009. Its aim is to increase awareness about data protection, online safety and new technologies among teachers and students nationwide: <https://www.uodo.gov.pl/en/641>. The programme includes an initiative "#ODOlekcje" which offers online lessons to students on data protection, particularly in the context of new technologies: <https://uodo.gov.pl/en/553/1335>.
- **GDPR Summer Leaders Academy** - a programme designed for students from certain faculties to provide them with practical knowledge about data protection rules (<https://www.uodo.gov.pl/en/553/1511>).
- **Personal Data Protection Law Institute** – established at the University of Economics and Human Sciences in Warsaw, under the auspices of and in partnership with the Polish SA: <https://www.uodo.gov.pl/en/553/1500>.
- **Data Protection Day** - an annual event to celebrate the European Data Protection Day, <https://www.uodo.gov.pl/en/553/1323>.

	— Michał Serzycki Award recognises individuals and organisations committed to advocating for the values of data protection and the right to privacy: https://www.uodo.gov.pl/en/p/michal-serzycki-data-protection-award. — The annual survey "Knowledge of personal data protection in Poland" - a research organised by the National Debt Register, and the Chroń PESEL service under the auspices of the Polish SA: https://www.uodo.gov.pl/en/553/1351. — New Technologies Forum – a two-day international conference dedicated to the topic of personal data protection in relation to the development of new technologies: https://www.uodo.gov.pl/en/553/1552.
PT	— There are some specific guidance issued by the PT DPA on issues considered more relevant at national level available at https://www.cnpd.pt/ — FAQs and brief thematic-oriented explanations for organisations available at https://www.cnpd.pt/ — Several ad-hoc guidance for data processing GDPR compliance in the context of COVID19 pandemic. — Edition of a semestrial Review by CNPD, called 'Data Protection Forum', containing scientific articles, opinions, commentary on case-law, DPO testimonies, — Echoing EDPB guidance and public consultations through dedicated news in the SA website. — Publication of CJEU case-law on privacy and data protection in the SA website Also, there have been an intense participation from representatives of the DPA in many conferences and seminars about data protection in general and very often on specific topics. The SA also participated in some initiatives addressed to SMEs and to DPOs.
RO	The guidelines issued by the National Supervisory Authority for Personal Data Processing — Guidelines regarding the owners' associations — Guidelines on the application of Law no. 363/2018 (https://www.dataprotection.ro/servlet/ViewDocument?id=2122) — Guidelines on the application of the General Data Protection Regulation, addressed to the controllers — Q&A Guidelines Regulation (EU) 679/2016 Other informative material for the application of the General Data Protection Regulation issued by the National Supervisory Authority for Personal Data Processing — Data Protection - Secondary education — Data protection - High school education — The rights of the data subjects - Excerpt from Regulation (EU) 679/2016 (https://www.dataprotection.ro/servlet/ViewDocument?id=1298) — The new Regulation (EU) 2016/679 applicable as of 25th of May 2018 - elements of novelty (leaflet) — The new Regulation (EU) 2016/679 applicable as of 25th of May 2018 - elements of novelty (brochure) — The Data Protection Officer - general information (https://www.dataprotection.ro/?page=Responsabilul_cu_protectia_datelor)

	— The processing of personal data by the owners' associations (https://www.dataprotection.ro/?page=Prelucrarea_dator_personala_de_catre_a_sociatiile_de_proprietari) — The Schengen Section on www.dataprotection.ro - https://www.dataprotection.ro/?page=schengen — Legislation - https://www.dataprotection.ro/?page=Legislatie_schengen — The rights of the natural persons - https://www.dataprotection.ro/?page=drepturile_persoanelor_fizice_SIS_II — The data protection within SIS II - https://www.dataprotection.ro/?page=Protectia_dator_in_SIS_II — Additional information - https://www.dataprotection.ro/?page=Informatii_suplimentare_SIS_II — Schengen informative materials - https://www.dataprotection.ro/?page=Materiale_informative_SIS_II Schengen informative materials: — The Schengen II Information System (SIS II) — The Banner Schengen II Information System (SIS II) - https://www.dataprotection.ro/servlet/ViewDocument?id=808 — Schengen II Information System (SIS II - Video presentation) — The guidelines for the exercise of the right of access to the data introduced within SIS II - https://www.dataprotection.ro/servlet/ViewDocument?id=1171 — Europe without borders - European Commission information brochure — Schengen Information System. The most widely used IT system for security and border management in E https://www.dataprotection.ro/servlet/ViewDocument?id=2325 Press releases within the News Section on the website www.dataprotection.ro — Section "FAQ" - https://www.dataprotection.ro/?page=IntrebariFrecvente1 — Section releases "GDPR Sanctions" - https://www.dataprotection.ro/?page=Sanctiuni_RGPD — Section Annual Reports - https://www.dataprotection.ro/?page=Rapoarte%20anuale&lang=ro Information campaign within the educational units: https://www.dataprotection.ro/?page=Comunicat_Presa_08_09_2023&lang=ro Organisation of events: — The European Data Protection Day - 28th of January - conferences in person and on line and the "Open Doors Day" was organised at the premises of the Authority — on the Internet page www.dataprotection.ro there have been posted the information materials (brochures, leaflets) dedicated to the European Data Protection Day, as well as synthetic information on the activity from the previous years — on the national television broadcast channel TVR and within the transport means of the Bucharest Transport Society was broadcasted the informative video on the Regulation (EU) 2016/679 - public interest message, regarding the main aspects regulated under Regulation (EU) 2016/679, prepared by the Authority. The same message was broadcasted within the metro and the International Henri Coanda Airport
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	— Anniversary events/debates on the 25th of May - every year as of the date of application of Regulation (EU) 2016/679 — Drawing contest for children up to 14 years — Essay contest for students — Conferences, seminars, symposia, reunions, workshops dedicated to the promotion of the personal data protection rules — Inter-institutional working groups, meetings with public authorities and institutions
SE	IMY publishes on its website information about ongoing and closed investigations including decisions and possible appeals, opinions on legislative proposals and much more. In addition to this, please find below a selection of the specific guidance etc. that we have published: 1. Guidance to specific recipients: — Innovation stakeholders: Awareness raising initiatives to the innovation system on privacy and data protection matters: https://www.imy.se/publikationer/delredovisning-av-uppdrag-om-kunskapshojande-insatser-till-innovationssystemet-om-integritets--och-dataskyddsfragor/; https://www.imy.se/publikationer/kunskapshojande-insatser-till-innovationssystemet-om-integritets--och-dataskyddsfragor/ — Camera surveillance: Guidance regarding camera surveillance https://www.imy.se/publikationer/vagledning-vid-kamerabevakning/, including a webinar on 23 November 2023 to present the guidance. Legislator: Guidance for privacy analysis in legislative work https://www.imy.se/publikationer/vagledning-for-integritetsanalys-i-lagstiftningsarbete/ Guidance to political stake holders: https://www.imy.se/publikationer/vagledning-till-politiska-aktorer/ Children and young people's rights on digital platforms: https://www.imy.se/globalassets/dokument/rapporter/the-rights-of-children-and-young-people-on-digital-platforms_accessible.pdf A web portal for innovation matters: https://www.imy.se/verksamhet/dataskydd/innovationsportalen/ Data Protection Officers: A webinar for DPOs every year in December 2. Reports: Guidance by regulatory sandboxes: https://www.imy.se/publikationer/slutrapport-om-imys-pilotprojekt-med-regulatorisk-testverksamhet-om-dataskydd/

	Report on privacy protection 2020: https://www.imy.se/publikationer/integritetsskyddsrapport-2020/ Report on data breach notifications: https://www.imy.se/publikationer/anmalda-personuppgiftsincidenter-2022/ Report on complaints to IMY: https://www.imy.se/publikationer/klagomal-till-imy-2021/ Report on the study of data protection in organisations required to have a DPO, Data Protection in Practice, IMY report 2023:1: https://www.imy.se/globalassets/dokument/rapporter/data-protection-in-practice.pdf 3. Legal positions: Since 2021, IMY adopts and publishes legal positions in specific matters. They contain an account of our position in legal matters that have not been subject to guidance from courts or the EDPB. They form the basis for assessment in our activity and serve as guidance for the public. They may be repealed or revised subject to new case law or guidance from the EDPB. So far, four legal positions have been adopted and published in our series IMYRS (IMY's Legal Positions). These include the definition of special categories of data in a certain situation, the exemption for journalistic purposes, delisting of data in search results and the definition of data referred to in article 10 of the GDPR. IMYRS 2021:1, IMYRS 2022:1-3 https://www.imy.se/publikationer/?query=&selectedPublicationTypes=Legalposition&page=1
SI	The Information Commissioner is using a variety of tools and approaches in order to reach the relevant audiences with the goal of raising awareness, improving the understanding of data protection legislation and foster greater compliance. From 2018 to 2023, the SI SA: — issued 28 guidelines on various topics and /or aimed at particular subjects, e.g. biometrics, video surveillance, GPS systems, etc. (available at https://www.ip-rs.si/publikacije/priro%C4%8Dniki-in-smernice/). — developed forms, templates and standard contractual forms to assist particularly SMEs and small public sector organizations; — issued 18 infographics on important data protection mechanisms, obligations, terms or instruments, e.g. on the concept of personal data, performing data protection impact assessments, on certification/accreditation, etc. (available at: https://www.ip-rs.si/publikacije/infografike) — given 413 pro bono lectures to dedicated audiences, such as ministries, local administration, associations in different sectors and at various conferences, workshops and seminars); — issued 8039 written opinions to subjects from private and public sector as well as to individuals; — telephone advice in 12057 cases, which is available during business hours to everyone inquiring about data protection; — issued 427 opinions on legislative proposals (available at https://www.ip-rs.si/zakonodaja/priporo%C4%8Dke-na-predlog-predpisov/).

	— Requested the Constitutional court to assess constitutionality of 3 legal acts — conducted 14 privacy sweeps, in order to efficiently address noted systematic deficiencies or data protection breaches in particular sectors/topics. — issued 65 opinions on DPIAs and — conducted research and published a report on DPOs (available at: https://www.ip-rs.si/fileadmin/user_upload/Pdf/Porocila_IP/Dan%20varstva%20OP%202020%20-%20rezultati%20DPO%20ankete.pdf) The Information Commissioner also maintains a LinkedIn (1839 followers) and Facebook profile (2231 followers) to reach their respective target groups and regularly send a monthly newsletter to their subscribers (37 sent as of September 2020). The Information Commissioner has also successfully completed two EU funded awareness raising projects, namely RAPID.SI 2019-2021 («Raising Awareness on Data Protection and the GDPR in Slovenia — RAPiD.si) and iDECIDE 2020-2023 («Individuals decide – Raising awareness about data protection rights). Several brochures for target audiences were developed and distributed, a dedicated SME helpline was maintained and seminars were carried out; furthermore, separate websites for SMEs and for raising awareness on data protection were developed (www.upravljavec.si and www.tidolocas.si respectively). 11 video lectures on different topics were prepared and are available for use and further distribution at our website https://www.ip-rs.si/varstvo-osebni-podatkov/projekti/idecide. Every year, the Information Commissioner also hosts an event on the Data Protection Day in January. It holds a panel discussion on the pressing issues identified in the given year, and an award “Ambassador of data protection” is issued to an entity that has shown to promote the values of data protection through their activities, projects etc. The Information Commissioner is also a member of the Advisory board of the national safer internet project which foremost addresses children and schools.
SK	SK SA promotes awareness mainly through its website. On regular basis SK SA informs about different topics. Examples of our press releases: Annual reports of SK SA — 2018 Správa o stave ochrany osobných údajov za obdobie 25.5.2018 až 24.5.2019 — 2019 Správa o stave ochrany osobných údajov za obdobie 25.5.2019 až 31.12.2019 — 2021 Správa o stave ochrany osobných údajov za rok 2021 New guidance of SK SA — 2018 Usmernenie k zabezpečeniu priebehu volieb a metodické usmernenie k zákonnosti spracúvania — 2019 Zoznam spracovateľských operácií, ktoré podliehajú požiadavke na posúdenie vplyvu — 2020 Stanovisko ÚOOÚ SR k meraniu teploty zamestnancov a prípadných návštevníkov na pracoviskách — 2022 Vyjadrenie ÚOOÚ SR k bezpečnostným odporúčaniam od NBU pre slovenskú výpravu OH 2022

	— Initiatives of SK SA — 2021 Slovenský preklad Príručky o európskych právnych predpisoch v oblasti ochrany údajov dostupný na objednanie — 2022 Úrad na ochranu osobných údajov SR sa zapája do prvej koordinovanej akcie EDPB — 2023 Zriaďujeme emailovú schránku na ochranu osobných údajov detí a mládeže Data Protection Day — 2019 Deň ochrany osobných údajov 2019, workshop úradu — 2020 Deň ochrany osobných údajov — 2021 Deň ochrany osobných údajov, 28. január 2021 — 2022 Deň ochrany osobných údajov, 28. január 2022 — 2023 Deň ochrany osobných údajov, 28. január 2023 GDPR “birthday” — 2021 3. výročie uplatňovania všeobecného nariadenia o ochrane údajov (GDPR) a zákona č. 18/2018 Z. z. o ochrane osobných údajov v praxi (25.05.2018 až 25.05.2021) — 2022 4. výročie uplatňovania všeobecného nariadenia o ochrane údajov (GDPR) — 2023 5 rokov uplatňovania všeobecného nariadenia o ochrane údajov News about the rules in the area of Data Protection — 2018 Korigendum k nariadeniu GDPR — 2019 Slovenská republika pristúpila k dodatkovému protokolu k Dohovoru 108 — 2021 Druhé korigendum všeobecného nariadenia o ochrane údajov — 2023 Do prevádzky vstupujú obnovené Schengenské informačné systémy Judgement of CJEU — 2019 Rozsudok o ukladaní cookies používateľov internetu — 2020 Rozhodnutie SD EÚ vo veci Orange România SA — 2021 Rozhodnutie SD EÚ vo veci Latvijas Republikas Saeima (Pokutové body) — 2022 Rozhodnutie SD EÚ vo veci Valsts ieņēmumu dienests — 2023 Rozhodnutie SD EÚ vo veci X-FAB Dresden a vo veci KISA Implementing decision of Commission — 2019 Rozhodnutie o primeranosti pre Japonsko — 2021 Štandardné zmluvné doložky pre prenos osobných údajov do tretích krajín — 2022 Rozhodnutie o primeranosti pre Kórejskú republiku na účely prenosu osobných údajov — 2023 Rozhodnutie o primeranosti pre Spojené štáty americké Safe Internet Day — 2021 Druhý februárový utorok je Medzinárodný deň bezpečnejšieho internetu — 2022 Deň bezpečného internetu New initiatives of other SAs or EDPB
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	— 2019 Pozvánka na stretnutie zainteresovaných strán v oblasti práv dotknutých osôb (EDPB) — 2020 Štandardné zmluvné doložky pre sprostredkovateľov (DK SA) — 2021 Súťaž – návrh ikon na plnenie informačnej povinnosti prevádzkovateľa (IT SA) — 2022 Výzva na zapojenie sa do EDPB Support Pool of Experts (EDPB) — 2023 Sprievodca ochranou údajov pre malé podniky (EDPB) Adopted final guidelines/recommendation of EDPB — 2018 Usmernenia k nariadeniu v slovenskom jazyku — 2019 Usmernenia k územnej pôsobnosti — 2020 Usmernenia o spracúvaní osobných údajov prostredníctvom kamerových zariadení — 2021 Odporúčania k referenčnému kritériu primeranosti podľa smernice o presadzovaní práva — 2022 Usmernenia ku kódexom správania ako nástrojom na prenos — 2023 Usmernenia o certifikácii ako nástroji na prenosy Public consultation of EDPB — 2019 Verejná konzultácia EDPB k usmerneniam o spracúvaní osobných údajov prostredníctvom kamerových zariadení — 2020 Verejná konzultácia EDPB k usmerneniam k výkladu článkov 46 ods. 2 písm. a) a 46 ods. 3 písm. b) všeobecného nariadenia o ochrane údajov — 2021 Verejná konzultácia EDPB k Usmerneniam o príkladoch oznámení porušenia ochrany údajov — 2022 Verejná konzultácia EDPB k Usmerneniam k právam dotknutých osôb - právo na prístup — 2023 Verejná konzultácia EDPB k Usmerneniam k článku 37 smernice o presadzovaní práva All national guidance are available on our website https://dataprotection.gov.sk/uouu/sk/main-content/metodiky-uradu. SK SA covered topic such as – Surveillance by camera devices of natural persons at the family home; Obligations of the e-shop operator; Lawfulness of processing personal data; Status of legal entities and natural persons - entrepreneurs from the point of view of personal data protection; 30 steps of compliance with the new legal regulation of personal data protection, etc. You can find on our website also these sections: — Frequently asked questions https://dataprotection.gov.sk/uouu/sk/content/casto-kladene-otazky-k-nariadeniu-zakonu-c-182018-z-z-2 — Data subjects rights https://dataprotection.gov.sk/uouu/sk/content/prava-dotknutych-osob (you can find here templates of requests to exercise rights, this section is available also in EN language) — Transfer of personal data https://dataprotection.gov.sk/uouu/sk/content/prenos-osobnych-udajov (this section is available also in EN language)
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Employees of SK SA regularly take part in different conferences organized by third parties. For example Annual EPI conference on GDPR and Act on Data Protection is held under the auspices of the SK SA. Employees of SK SA provide trainings to different stakeholders on request (if it is in our human and time capacity).

We also provide consultation in written and oral form for different stakeholders – data subjects, controller, public authorities etc. Please find attached table with information about this below:

Relevant period	Consultations provided
25/5/ 2018 – 24/ 5/ 2019	2181
25/5/ 2019 – 31/ 12/ 2019	719
2020	1095
2021	799
2022	836
9/2023	596