



The DPIA is een beoordeling van de impact van de belangrijkste en bekendste kwesties op het gebied van gegevensbescherming uit de hele wereld. Het is niet het volledige verhaal, maar slechts een snelle samenvatting van 3 minuten, verzameld en samengevat om u op de hoogte te houden van het laatste nieuws in onze steeds veranderende branche.

GDPR DPO requirements: What qualifies as largescale processing?

If your organisation undertakes what is known as 'large-scale processing', you may be legally required under the General Data Protection Regulation (GDPR) to appoint a Data Protection Officer (DPO). But what qualifies as 'large-scale'?

In our latest blog, we explore what large-scale data processing means with clear, industry specific examples to help you assess your obligations and stay compliant.

Read our blog to find out if your business needs a DPO

·<u>----</u>-----

EUROPEAN UNION

EC proposes extension to UK adequacy decision

On 18 March 2025, the European Commission proposed a six-month extension to the UK adequacy decision, ensuring stable data transfers while the UK finalises its Data (Use and Access) Bill. Originally set to expire on 27 June 2025, the decision could be extended until 27 December 2025 if approved by the European Data Protection Board (EDPB). This avoids potential disruptions for businesses relying on free data flow between the European Union and the United Kingdom.

Once the UK's legislative process concludes, the Commission will assess whether the UK continues to provide an adequate level of protection for personal data.

Learn more about the DUA Bill

noyb files second privacy complaint against OpenAl

On 20 March 2025, Austrian privacy group, *noyb* (None of Your Business), filed a second complaint against OpenAl over GDPR violations. The case involves ChatGPT falsely

identifying a Norwegian man, Arve Hjalmar Holmen, as a child murderer, while also including accurate personal details.

It is not the first time the site has produced factually inaccurate stories, known as hallucinations. Following *noyb's* first complaint in 2024, OpenAl added a disclaimer to the site but claimed it could only block - not correct - misinformation. *noyb* argues this breaches the GDPR principle of Accuracy, posing a serious risk to individuals.

Learn more about noyb's complaint

AP annual report highlights 5 focus areas for 2025

On 20 March 2024, the Dutch data protection authority, Autoriteit Persoonsgegevens (AP), published its annual report for 2024, highlighting the authority's focus areas for the coming year.

- Algorithms & Al: Monitoring how personal data is processed in automated decision-making systems to prevent biases and discrimination
- **Big tech:** Examining the data collection practices, user consent mechanisms, and personal data handling of large technology companies to ensure compliance with data protection regulations
- Freedom & security: Overseeing government and private sector initiatives that involve surveillance and data collection to ensure security measures do not infringe on individuals' privacy rights
- **Data trading:** Ensuring data trading practices between organisations are transparent and that individuals' data is not misused or sold without their consent
- **Digital government:** Evaluating the security and privacy measures of government e-services to ensure citizens' data is handled responsibly

To remain compliant with data protection regulations, organisations should regularly audit processes and implement transparent data protection practices that carefully balance security with privacy.

Read the AP annual report		



UNITED KINGDOM

NCSC publishes guidance on privileged access workstations

On 25 March 2025, the National Cyber Security Centre (NCSC) published guidance for privileged access workstations (PAWs). Used to perform sensitive administrative tasks, PAWs are highly restricted devices designed to protect high-risk systems from cyber threats.

The guidance provides organisations with a structured approach to implementing PAWs, outlining practical considerations. It includes eight principles:

- Establishing a PAW strategy
- Designing a PAW solution to be usable and secure
- Establishing a foundation of trust
- · Scaling the solution
- · Reducing the attack surface
- Isolating high-risk activity from PAWs
- Implementing protective monitoring
- · Controlling data through the PAW solution

Read the NCSC's guidance on PAWs



CANADA & UNITED STATES

US Senators introduce Genomic Data Protection Act

On 5 March 2025, US Senators introduced the federal Genomic Data Protection Act (GDPA), aiming to regulate the collection, use, and sharing of genomic data by direct-to-consumer genetic testing companies.

Key provisions include:

- Consumer rights, allowing consumers to access and delete their data
- Notice requirements, mandating companies inform consumers if the organisation is acquired, or if their data is sold
- Excludes health care professionals who use genomic data for diagnosis or treatment
- Violations will be deemed as deceptive or unfair trade practices under the Federal Trade Commission Act

Unlike similar state laws, the GDPA will also apply to companies that purchase data from direct-to-consumer genomic testing companies for secondary use.

Read the Bill

Privacy experts warn 23andMe users to delete data

Data protection experts have raised privacy concerns after the genetic testing company, 23andMe, recently filed for Chapter 11 bankruptcy in the US. The company, which suffered a major data breach in October 2023 affecting 6.9 million users, insists it will continue operations while seeking a buyer.

However, privacy advocates warn that users' genetic and biological data could be sold to third parties without prior consent. Experts urge customers to delete their data, request the

destruction of DNA samples, and revoke all research permissions. The situation highlights ongoing risks in the genetic testing industry, where sensitive data security remains a critical issue.

Lawrence Carter, Life Sciences Sector Lead and Data Protection Officer at The DPO Centre, said, 'Genetic data is considered special category data under the GDPR and can only be processed if there is a valid condition under Article 9. If an organisation uses explicit consent to process genetic data and the consent is withdrawn, they must check if another Article 9 condition applies. If not, they must delete the data. Some jurisdictions have specific laws about how long genetic data and biological samples must be retained.'

Read more on 23andMe

INTERNATIONAL

CAC unveils mandatory Labelling Rules for Algenerated content

On 14 March 2025, the Cyberspace Administration of China (CAC) published mandatory Labelling Rules for Al-generated content. Set to take effect from 1 September 2025, the new rules impose labelling obligations on internet service providers and online content platforms.

The Rules introduce two primary label types:

- **Explicit Labels:** Visible indicators, such as text, audio, or graphics, that clearly inform users that content is Al-generated
- **Implicit labels:** Metadata embedded within Al-generated content, containing the service provider's name and a unique content ID for traceability

The Rules also mandate detection mechanisms that classify Al-generated content into three categories: confirmed, possible, or suspected Al-generated material. The regulation aims to reduce misinformation, increase accountability, and ensure that Al-generated content can be accurately traced to its source.

Learn more about the Labelling Rules



We are recruiting!

To support our ongoing requirement to continuously grow our remarkable and extraordinary **#ONETEAM**, we are seeking candidates for the following positions:

- Data Protection Officers (The Netherlands)
- Data Protection Officers (United Kingdom)
- Data Protection Officers Life Sciences (United Kingdom/Europe/Canada)
- Data Privacy Officers (Canada)
- Data Protection Support Officers (United Kingdom)

If you are looking for a new and exciting challenge, apply today!



Copyright © 2025 The DPO Centre, All rights reserved.

You have been sent this newsletter under legitimate interest, for more information please read our Privacy Notice
The DPO Centre is a limited company registered in England and Wales (Company Number: 10874595)

The DPO Centre Group, London, Amsterdam, New York, Toronto, Dublin

Manage preferences