



WERELDWIJD PRIVACYNIEUWS  
VAN DPO CENTRE



**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.

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## Clinical trials part 1: Data protection considerations for Clinical Trial Agreements

In the first part of our new clinical trials blog series, we break down the essential data protection provisions sponsors need to include in Clinical Trial Agreements (CTAs) to ensure GDPR compliance. Whether you're operating in the EU, EEA, or UK, this guide helps you understand key considerations, including sponsor and site roles, Data Sharing Agreements, engaging sub-processors, and international data transfers.

Learn how to strengthen your agreements and safeguard trial personal data from day one.

[Read now](#)

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### EUROPEAN UNION

## DPC to fine TikTok over €500M for unlawful EU data transfers

TikTok's parent company, ByteDance, faces further penalties as Ireland's Data Protection Commission (DPC) prepares to issue a fine exceeding €500 million for violating GDPR. According to reporting by Bloomberg, TikTok allowed engineers in China to access personal data of European users without sufficient safeguards. The DPC is also likely to order TikTok to suspend the data processing within a defined period.

TikTok previously received fines totalling €345 million from the DPC for violating children's privacy and GDPR requirements, making this new fine the largest to date against the platform. It's a clear warning to other big tech firms handling EU personal data to ensure full compliance with cross-border data transfer rules.

[Read our blog on EU and UK data transfer mechanisms](#)

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## Germany opens door to GDPR claims under competition law

On 27 March 2025, Germany's Federal Court of Justice, Bundesgerichtshof (BGH) published three landmark rulings confirming that GDPR violations can also trigger legal claims under competition law. Following ECJ guidance, the BGH held that both competitors and consumer protection associations can bring actions for GDPR breaches under the Unfair Competition Act (UWG). This expands enforcement beyond regulators and data subjects.

While a surge in warning letters is unlikely due to restrictions on claims by smaller firms, businesses should review privacy notices and data practices to mitigate risks.

[Read the rulings \(in German\)](#)

## Dutch DPA proposes sandbox to support EU AI Act compliance

The Dutch Data Protection Authority, Autoriteit Persoonsgegevens (AP) has proposed an AI regulatory sandbox in line with the EU AI Act, to launch by August 2025. The sandbox will support AI developers in building systems that comply with the Act, offering a central platform across all sectors, with input from relevant market authorities, allowing developers to submit questions throughout the development process.

This marks a positive step in aligning AI innovation with regulatory and data protection standards in the Netherlands.

[Read the proposal](#)

**WE'RE ATTENDING**

**GEAUX BEYOND**  
**at ACRP 2025**

→ **NEW ORLEANS • APRIL 24-27**

**24 - 27 APR 2025**  
NEW ORLEANS, LA

**doo**  
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The graphic features a yellow background with a repeating pattern of white circles. A black rectangular area contains the text 'WE'RE ATTENDING' in white, 'GEAUX BEYOND at ACRP 2025' in large white letters, and 'NEW ORLEANS • APRIL 24-27' with a yellow arrow pointing right. To the right of the text is a colorful graphic with a yellow square containing a black spiral, a red square with a black lightning bolt, and a blue square with a black crescent moon and stars. Below these squares is a black and white piano keyboard. At the bottom, a black bar contains a white calendar icon, the dates '24 - 27 APR 2025' and 'NEW ORLEANS, LA', and the 'doo centre' logo.

## UNITED KINGDOM

### Charities set to gain new direct marketing exemption

In an approved amendment to the proposed UK Data (Use and Access) Bill, charities will be allowed to send direct electronic marketing to new supporters without obtaining explicit consent, provided the messages align with the charity's mission and include clear opt-out options. This is similar to the current 'soft opt-in' rule that applies to commercial organisations under the Privacy and Electronic Communications Regulations (PECR).

With the bill looking set to pass as early as May 2025, charities should begin preparing by reviewing privacy notices and data systems, and crucially, conducting a Legitimate Interest Assessment (LIA). This is essential because the exemption could shift the lawful basis for processing data from Consent to Legitimate Interests. The Information Commissioner's Office has endorsed the change but urges careful and responsible implementation of the proposed changes.

[View the progression of the DUA Bill](#)

## WE'RE ATTENDING



 **29 - 30 APR 2025**  
LONDON, UK



## CANADA & UNITED STATES

### Unredacted JFK files cause significant data breach

A major data protection breach has occurred in the US following the release of largely unredacted JFK assassination files by the Trump administration. According to the Washington Post, the documents exposed the social security numbers, names, and addresses of over 400 individuals, including former congressional staffers, diplomats, military personnel, and investigators from the 1970s Church and House Select Committees.

The breach highlights the ongoing risks around handling historic records and the need for rigorous redaction practices to protect personal data, even decades later.

[Read our blog on applying GDPR to historic records](#)

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## **New US rule tightens restrictions on cross-border transfers**

On 8 April 2025, the US Department of Justice's (DOJ) new rule on cross-border transfers came into effect. The rule restricts the transfer of US sensitive personal and government-related data to countries of concern, including China, Russia, Iran, Cuba, and North Korea. It applies to data brokerage, vendor, employment, and investment agreements, and introduces new privacy, cybersecurity, and governance obligations.

US companies must now assess whether their data qualifies as 'sensitive' or 'government-related' and ensure compliance. The reporting requirements include an annual report for certain restricted transactions involving cloud-computing services. With civil and criminal penalties for violation, including fines and imprisonment, the rule marks a major shift in cross-border data compliance and enforcement.

[Read the DOJ statement](#)

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## **INTERNATIONAL**

### **Türkiye enacts new cybersecurity law**

On 19 March 2025, Türkiye's new Cybersecurity Law (no. 32846) came into effect, marking a significant step in integrating cybersecurity into national security. The law introduces strict obligations for public and private entities handling personal data or critical infrastructure, including mandatory reporting of incidents, use of certified cybersecurity providers, and regulatory oversight by the newly established Cybersecurity Presidency and Cybersecurity Board.

The Law defines key cybersecurity terms and requires compliance across all stages of digital operations. Various administrative and criminal penalties apply for non-compliance, including failure to maintain confidentiality, potentially leading to between 4 and 8 years in prison.

For organisations engaging with Turkish partners or data flows, this law raises the bar for cybersecurity standards and data governance.

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## 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!](#)

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