



GLOBAL PRIVACY NEWS
FROM THE DPO CENTRE



The DPIA is an assessment of the impact of the most significant and important-to-know data protection issues from around the globe. It's not the full story, just a quick 3-minute read, collated and condensed to keep you updated with the latest news in our ever-evolving industry.

Clinical trials part 3: GDPR considerations for Informed Consent Forms

In the final part of our clinical trials blog series, we explore how sponsors can meet their GDPR obligations when preparing and localising Informed Consent Forms (ICFs). Whether you're operating in the EU, EEA, or UK, ICFs play a vital role in ensuring transparency and protecting participants' data rights.

This guide covers key topics, including who should be involved in drafting, what transparency details to include, how to manage international transfers, and why one ICF is rarely enough. Avoid common pitfalls and ensure your clinical trial documentation supports compliance from the start.

[Read part 3](#)



**CLINICAL TRIALS PART 3:
GDPR CONSIDERATIONS FOR
INFORMED CONSENT FORMS**

UNITED KINGDOM

DUA Bill at risk over AI copyright dispute

The UK's Data (Use and Access) Bill remains in legislative limbo due to a persistent standoff between the House of Lords and the House of Commons over provisions related to artificial intelligence (AI) and copyright transparency.

On 4 June 2025, the House of Lords voted 221 to 116 in favour of an amendment requiring AI companies to disclose the copyrighted materials used to train their models. This vote marks the fifth time the Lords have insisted on this amendment, despite repeated rejections by the Commons.

The government has expressed concern that accepting the amendment could jeopardise the entire Bill, which includes other significant measures, such as combating deepfakes and improving data protection.

The Bill now faces the prospect of being shelved unless the Commons accepts the amendment or proposes an alternative. It is expected to return to the House of Commons for further consideration in the coming days.

[Learn more about the DUA Bill](#)

NHS England pauses AI project amid GP data concerns

On 3 June 2025, NHS England halted its 'Foresight' artificial intelligence (AI) initiative following concerns from the British Medical Association (BMA) and the Royal College of General Practitioners (RCGP) regarding the use of GP data.

The AI programme was trained on de-identified data from 57 million NHS patients, originally collected for Covid-19 research, and aimed to predict health outcomes. But GP leaders said it was unclear whether data was shared with the right safeguards in place, or in a way that patients would reasonably expect.

The BMA and RCGP called for a pause on data processing and asked NHS England to refer the matter to the Information Commissioner's Office (ICO) to ensure appropriate governance and oversight. NHS England agreed to pause the project while their Data Protection Officer conducts a review.

[Read RCGP's comments](#)

Privacy Puzzle
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EUROPEAN UNION

EU proposes to relax GDPR record-keeping for smaller businesses

The European Commission has proposed changes to the General Data Protection Regulation (GDPR) that would ease record-keeping obligations for small and mid-cap companies (SMCs).

Currently, Article 30(5) mandates that organisations with fewer than 250 employees are exempt from maintaining Records of Processing Activities (RoPA) if their data processing is occasional, low risk, and does not involve special category or criminal offence data.

The amendment would expand this exemption to cover organisations with fewer than 750 employees and simplify the criteria. Instead of assessing frequency or categories of data, organisations would only be required to maintain a RoPA for processing activities that are likely to result in a high risk to individuals' rights and freedoms, as defined under Article 35.

If adopted, the amendment would reduce the administrative burden for many growing businesses across the EU while preserving safeguards for high-risk processing. However, organisations would still need to evaluate whether their processing meets the high-risk threshold, placing renewed importance on accurate DPIAs.

[Read the proposed amendments](#)

German DPA fines Vodafone €45M for GDPR violations

On 3 June 2025, the German Data Protection Authority (BfDI) imposed two fines totalling €45 million on Vodafone GmbH for GDPR violations:

- A €15M fine was imposed due to Vodafone's failure to properly review and monitor partner agencies acting on its behalf, leading to fraudulent activities, including fictitious contracts and unauthorised contract changes
- An additional €30M fine was imposed for weaknesses in the authentication process of Vodafone's online portal 'MeinVodafone' and its hotline, allowing unauthorised third parties to access eSIM profiles

Vodafone has since taken corrective actions.

[Read the BfDI's statement](#)

Dutch Supreme Court clarifies limits of GDPR Right of Access

On 9 May 2025, the Dutch Supreme Court clarified the limitations of the right of access under the General Data Protection Regulation (GDPR) in closed civil proceedings. The Court ruled that individuals do not have an unlimited right to access personal data if doing so would conflict with other fundamental rights or procedural safeguards.

In the case 24/00541, the claimant had requested access to all personal data processed about them during a confidential legal process. However, the Court determined that

disclosing such information could infringe upon the rights of third parties or compromise the integrity of judicial proceedings.

The judgment reinforces the principle that the GDPR's right of access must be balanced against other legal obligations and rights, including confidentiality, legal privilege, and fair trial guarantees.

[Read the ruling](#)

ONLINE WEBINAR
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**EXPANDING TRIALS INTO EUROPE:
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CANADA & UNITED STATES

California Senate Bill proposes exemption for online tracking technologies under CIPA

California Senate Bill 690 (SB 690), introduced by Senator Caballero, seeks to amend the California Invasion of Privacy Act (CIPA) by introducing a 'commercial business purpose' exemption. This amendment would allow businesses to use online tracking tools, such as cookies, pixels, chatbots, and session replay software, without facing CIPA lawsuits, provided these tools are employed for legitimate commercial purposes.

The Bill aims to address the surge in litigation under CIPA, where businesses have faced lawsuits for using standard digital tools that capture user interactions. However, opponents to the Bill suggest it could weaken consumer privacy protection by allowing companies to monitor communications under the guise of commercial activity.

[Follow SB 690's progress](#)

ITA launches International Privacy Certification Programme

On 2 June 2025, the US International Trade Administration (ITA) launched the International Privacy Certification programme, aiming to enhance global trust in cross-border data flows. The programme supports two certifications - Global Cross-Border Privacy Rules (CBPR) and Global Privacy Recognition for Processors (PRP) - allowing organisations to validate specific data processing activities against internationally recognised privacy standards.

To obtain certification, an organisation must undergo assessments by approved Accountability Agents, who will evaluate whether its privacy policies and practices comply with the programme requirements.

The programme marks the first mechanism for international privacy certification in North America. In the EU, frameworks like Europrivacy™® offer GDPR-aligned certification through accredited assessments.

Find out more about the [CBPR and PRP](#) and [Europrivacy](#) certifications.

INTERNATIONAL

Brazil's new pilot lets citizens monetise personal data

Brazil has launched a groundbreaking programme, known as *dWallet*, that enables citizens to manage and profit from their personal data. The initiative allows users to store data from online activities in a digital wallet, which companies can bid on.

This pilot positions Brazil ahead of similar efforts in other countries, aiming to shift data ownership to individuals. However, experts have cautioned that this could increase the price of data, making it inaccessible to small entities with low budgets, or exacerbate inequalities.

Policy analysts and data rights advocates emphasise the importance of participants remaining informed about their rights, understanding the value of their data, and making conscious decisions regarding data sharing.

[Learn more about dWallet](#)



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

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