



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 everevolving industry.

Early overview of the Data (Use and Access) Act 2025 (DUAA)

The UK's Data (Use and Access) Act 2025 (DUAA) has finally received Royal Assent after a protracted journey with delays, debates, and months of parliamentary ping-pong. It introduces targeted reforms to the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018, and the Privacy and Electronic Communications Regulations (PECR).

In our latest blog, we take an early look at some of the key areas set for updates, including international data transfers, Data Subject Access Requests (DSARs), automated decision-making, and cookies. The changes are designed to streamline rather than disrupt, however, they may still have practical implications for businesses across sectors. We break down what's worth noting now and will continue to share updates as official guidance and implementation timelines are confirmed.

#### Read our blog



### **UNITED KINGDOM**

# Public wary of Al in recruitment, says new ICO report

A new report from the UK Information Commissioner's Office (ICO) reveals public concern around the use of automated decision-making (ADM) in recruitment. The research found that most people are uncomfortable with AI being used to make hiring decisions without human involvement. While respondents recognised the potential for increased efficiency,

many expressed fears about bias, lack of transparency, and the inability to challenge outcomes. The ICO noted that trust in ADM is particularly low when it comes to final hiring decisions, with a clear preference for human oversight throughout the recruitment process.

These findings carry important implications for organisations using, or planning to use, Al in their hiring practices. Employers must ensure transparency, fairness, and meaningful human involvement in automated decisions.

To learn how to implement AI responsibly without losing the essential human touch, watch our on-demand webinar, **Smart hiring or backfiring: Employing AI in recruitment.** 

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## ICO publishes information on UK's Data (Use and Access) Act 2025

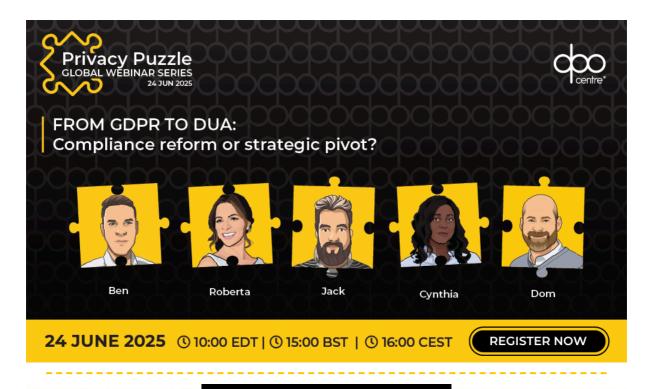
On 19 June 2025, the Information Commissioner's Office (ICO) published information on the Data (Use and Access) Act 2025 (DUAA), following Royal Assent. The guidance aims to support both organisations and the public by providing an overview of the Act's key provisions and the benefits it brings to the UK's data protection regime, including:

- Greater flexibility for scientific research
- Changes to cookie rules and automated decision-making
- Modernised approach to international data transfers

Implementation of the DUAA will be phased, with some provisions due to come into force within the next two months, while others may take up to 12 months, allowing organisations time to adapt to the new requirements. The ICO encourages organisations to familiarise themselves with the DUAA changes, review new obligations – particularly around online services for children – and consider opportunities to simplify or improve their data protection practices.

The draft guidance is open to public consultation for 12 weeks, closing on 7 September 2025.

Read the ICO's guidance		



### **EUROPEAN UNION**

### **European Commission opens consultation on high**risk Al systems

On 6 June 2025, the European Commission launched a 6-week consultation on implementing the EU AI Act rules for high-risk artificial intelligence systems. It aims to gather targeted stakeholder views on:

- Which AI system categories should be classified as high-risk
- Obligations these systems should meet, such as risk management, transparency, documentation and human oversight
- Lines of responsibility, clarifying the roles of developers, deployers, importers, and distributors in ensuring compliance

The consultation will help define which AI systems are considered high-risk and guide future Commission guidance on managing risks, ensuring human oversight, handling data, and keeping proper records.

The consultation remains open until 18 July 2025.

Take part in the consultation

### EDPB finalises guidance on data transfers to thirdcountry authorities

On 4 June 2025, the European Data Protection Board (EDPB) published its final *Guidelines 02/2024 on Article 48 GDPR*, clarifying when organisations can lawfully respond to data access requests from authorities outside the EU.

The guidelines confirm that such transfers require both a valid legal basis under Article 6 of the GDPR and a permitted transfer mechanism, such as an adequacy decision or Standard Contractual Clauses (SCCs). Foreign requests alone are not sufficient unless backed by an international agreement or specific exemption.

The EDPB also provides guidance for more complex scenarios, including indirect transfers via parent companies or processors. The final version updates the draft following public consultation.

#### **Read the Guidelines**

### Dutch DPA reduces AS Watson cookie fine from €600K to €50K

On 12 June 2025, the Dutch data protection authority, Autoriteit Persoonsgegevens (AP), confirmed it had significantly reduced a €600,000 fine imposed on AS Watson to just €50,000, following a successful objection by the retailer.

The original fine was issued in 2024 after an investigation into kruidvat.nl (one of AS Watson's subsidiaries) found that tracking and advertising cookies were placed on user devices without valid consent. The website:

- Assigned unique identifiers to users for personalisation and future tracking
- Collected personal data such as email and IP addresses
- Passed analytical data to third parties
- Made it difficult for users to adjust their cookie preferences, with tracking and advertising cookies checked by default

The AP found these practices to be in breach of the GDPR's requirements for lawful cookie use and user consent. However, after reviewing AS Watson's objection, the AP acknowledged inconsistencies in past enforcement and ruled that a lower fine would be more proportionate, referencing a comparable case where a smaller penalty had been imposed.

The decision reinforces the importance of transparent cookie consent mechanisms and consistency in regulatory enforcement.

Learn more about compliant cookie placement from our blog: <u>Website cookies – past,</u> <u>present and future</u>.

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### **CANADA & UNITED STATES**

## 27 US States sue 23andMe over sale of genetic data without consent

On 9 June 2025, 27 US states and the District of Columbia filed a lawsuit to block 23andMe's attempts to sell personal genetic data without customers' explicit consent. The action argues that DNA profiles, health traits, and medical records are too sensitive to be sold like ordinary assets and that each individual's permission is required before any transfer.

23andMe filed for Chapter 11 bankruptcy in March 2025 and has since received two major bids during the auction process: \$256 million from Regeneron Pharmaceuticals and \$305 million from former CEO and co-founder, Anne Wojcicki. 23andMe maintains that its privacy policy permits the sale, provided any buyer agrees to uphold existing protections.

The court will now decide whether the company can transfer customer data under bankruptcy rules or if it must first obtain valid consent. Consumer advocates warn the ruling could set a critical precedent for genetic privacy in the US.

**Read the lawsuit** 

#### NY State Senate passes RAISE Act

On 12 June 2025, the New York State Senate passed the Responsible Al Safety and Education (RAISE) Act. The Act aims to prevent frontier Al models from contributing to catastrophic risks or harmful misuse by introducing new obligations for the largest Al companies – those that have trained Al models using more than \$100M worth of computational resources.

The Act requires in-scope organisations to:

• Develop and publish a safety plan, security protocols, and risk assessments

• Report serious incidents, such as model theft or dangerous behaviour

The legislation also grants the New York Attorney General authority to impose civil penalties of up to \$10 million for a first violation and up to \$30 million for subsequent non-compliance. If enacted, the RAISE Act would establish one of the first state-level AI safety frameworks in the United States.

Read the RAISE Act

### **INTERNATIONAL**

### South Korea's PIPC issues new CCTV guidance

On 12 June 2025, South Korea's Personal Information Protection Commission (PIPC) released guidance for the use of CCTV in both public and private settings. The guidance follows hundreds of complaints related to the lack of signage indicating CCTV use and requests to view footage.

The PIPC highlighted three key rules for CCTV use:

- CCTV is prohibited in private spaces where there is a risk of invasion of privacy, such as bathrooms and changing rooms
- Clear signage must be displayed, alerting individuals to surveillance
- Data controllers must respond to data subject requests to view CCTV footage within 10 days

These rules aim to balance legitimate safety and security needs with strong privacy protections, ensuring compliance with the Personal Information Protection Act (PIPA).

Organisations using surveillance systems in South Korea should review their CCTV setups, update policies, and conduct privacy impact assessments where required.

Read the PIPC's CCTV guidance



#### 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)

If you are looking for a new and exciting challenge, and the opportunity to work for a **Great Place to Work-Certified™** company, **ranked in the top 50 of the UK's Best Workplaces™ for medium-sized businesses**, <u>apply today!</u>











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