



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.

EU Data Act explained: What it means for connected products, services, and IoT devices

The EU Data Act took effect on 12 September 2025, introducing major new requirements for manufacturers and service providers of connected devices and related services. The new law gives users stronger rights to access and share the data their products generate, requiring organisations to know where that data flows, how it's stored, and how it can be provided securely and in real time.

Our latest blog explains the Act's core obligations, how it differs from the GDPR, and provides practical steps to stay compliant.

Read the blog



UNITED KINGDOM

ICO warns that leaving the UK won't erase past GDPR breaches

The ICO has reminded organisations that withdrawing from the UK market does not remove liability for previous data protection violations.

In March 2025, the ICO launched an investigation into social media platforms' use of children's personal data. It later issued a notice of intent to fine online image sharing platform Imgur, after which the site restricted access for UK users. In an update on 30 September 2025, the regulator stated that 'exiting the UK does not allow an organisation to avoid responsibility for any prior infringement of data protection law.'

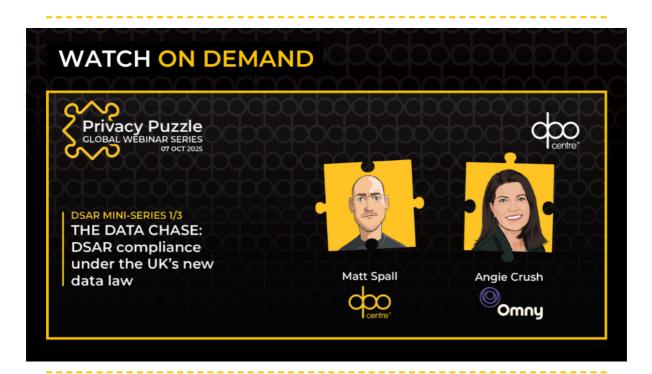
The message is clear for overseas businesses offering products or services to UK users: UK General Data Protection Regulation (GDPR) obligations continue to apply for the period you were in scope. For further guidance on the GDPR's extra-territorial scope, <u>readour blog</u>.

Car dealership fined £65K for unlawful marketing

Garage group Jacksons has been fined £65,000 by Guernsey's Office of the Data Protection Authority (ODPA) for sending marketing messages to customers who had opted out of receiving them.

Following a two-year investigation, the ODPA found that the records of 430 customers who had said 'no' to direct marketing were later changed to 'yes' — reportedly on the instruction of a senior employee. The authority concluded that this amounted to a serious and deliberate breach of individuals' marketing preferences.

Organisations are reminded to maintain clear consent records and ensure marketing lists are updated accurately and lawfully. Further information on best practices can be found in the ICO's direct marketing guidance.



EUROPEAN UNION

European Commission launches new tools to support Al Act implementation

On 8 October 2025, the European Commission launched three new initiatives designed to help organisations understand and apply the EU AI Act.

Apply Al Alliance

A single governance structure that brings together stakeholders and policymakers to coordinate EU AI policy. It serves as a central forum for dialogue, enabling members to access the latest AI developments, share insights, and connect with peers.

Al Act Service Desk

A team of experts working alongside the AI Office to provide practical guidance and respond to gueries on how the Act applies in practice.

Single Information Platform

An online hub offering interactive tools, tailored guidance, and resources to support organisations' compliance with the AI Act.

These initiatives are part of the EU's wider effort to ensure consistent and effective enforcement ahead of key compliance dates in 2026. For a closer look at what the AI Act means for your organisation, explore our AI Act blog series.

EDPB launches consultation on DSA-GDPR interplay guidelines

On 12 September 2025, the European Data Protection Board (EDPB) opened a public consultation for *Guidelines 3/2025*, examining how the General Data Protection Regulation (GDPR) should apply in the context of the Digital Services Act (DSA). These draft guidelines aim to clarify how intermediary service providers must interpret and comply with GDPR rules when fulfilling DSA obligations.

The guidelines address several key intersections, including:

- Deceptive or manipulative design
- Privacy and safety of minors, particularly restrictions on profile-based advertising toward children
- Transparency obligations in online advertising
- · Risk assessments mitigating systematic risk

These guidelines are meant to promote consistency across DSA and GDPR enforcement and help organisations avoid conflicts or uncertainty when both regimes apply.

Respond to the public consultation, which is open until 31 October 2025.

Dutch regulators call for stricter rules on Al chatbots

The Dutch data protection authority, Autoriteit Persoonsgegevens (AP), and the Authority for Consumers and Markets (ACM) have urged the European Commission to supplement existing transparency obligations with clearer rules governing the design of AI chatbots.

The authorities state that organisations must:

- Always offer users the option to speak to a human
- Clearly indicate when an interaction is automated
- Ensure chatbots do not provide incorrect, evasive, or misleading information

They also warned of additional privacy risks, noting that chatbots, particularly generative AI models, may be trained on or access sensitive internal data. This increases the likelihood of information exposure, inference attacks, or unintentional data leaks. Depending on the system's design and risk level, organisations may also need to complete an AI Impact Assessment (AIIA).



CANADA & UNITED STATES

CPPA issues record fine over privacy notice failures

On 26 September 2025, the California Privacy Protection Agency (CPPA) ordered Tractor Supply Company to pay \$1.35 million and change its business practices to resolve multiple California Consumer Privacy Act (CCPA) violation claims. This marks the largest fine in the CPPA's history and the first enforcement action highlighting the importance of privacy notices and the privacy rights of job applicants.

The CPPA found that the company violated consumer rights by failing to maintain a compliant privacy policy, neglecting to inform job applicants of their privacy rights, and not providing an effective mechanism for consumers to opt out of the sale or sharing of their personal information. It also disclosed data to other companies without the required contractual safeguards.

The case serves as a reminder that privacy notices must be clear, comprehensive, and accessible to all audiences and that contracts with third parties must include appropriate data protection terms.

For practical advice on meeting CCPA obligations, see the <u>CPPA's guidance for businesses</u>.

Interactive Advertising Bureau (IAB) Canada

releases Al Use Case Map for digital advertising
Published on 2 October 2025, the practical guide is designed to help organisations in the advertising industry explore how artificial intelligence (Al) can be responsibly integrated into their operations.

The interactive map allows businesses to assess AI opportunities within their internal structures and workflows. It categorises use cases into key areas, such as ad operations and trafficking, audience and identity, and privacy and governance, with each supported by real-world examples. Use cases are also tagged by maturity level: 'established' (widely in production) or 'emerging' (beyond pilot phase but not yet fully operationalised).

The tool aims to promote greater transparency and understanding of how AI is reshaping advertising practices while encouraging responsible adoption across the sector.

Explore the Al Use Case Map

INTERNATIONAL

India publishes market study on Al and competition

On 6 October 2025, the Competition Commission of India (CCI) released its *Market Study on Artificial Intelligence and Competition*, examining how AI is reshaping markets, ecosystems, and regulatory frameworks. The report seeks to identify emerging competition issues and assess whether existing rules remain fit for purpose in the age of AI.

The study:

- Highlights the competitive challenges created by AI development and deployment
- Proposes broad principles to help enterprises conduct self-audits of their Al systems
- Urges the adoption of transparency measures to reduce information asymmetry and promote fair competition

The CCI emphasises that proactive governance and responsible innovation will be key to maintaining trust and competition in India's rapidly evolving AI economy.

Read the report



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)
- Chief Revenue Officer (United Kingdom)
- Accounts Assistant (United Kingdom)
- Marketing Content Coordinator (United Kingdom)

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