



Final Minutes

119th EDPB plenary meeting

11 May 2026 – Remote

Some points have been redacted from these minutes as their publication would undermine the protection of one or more of the following legitimate interests, in particular: the public interest as regards international relations; the privacy and integrity of the individual regarding the protection of personal data in accordance with Regulation 2018/1725; the commercial interests of a natural or legal person; ongoing or closed investigations; the decision-making process of the EDPB, in relation to matters upon which a decision has not yet been taken and/or the decision-making process of the EDPB, in relation to matters upon which a decision has been taken.

I. Adoption of the minutes and of the agenda, Information given by the Chair

I.1. Introduction

The EDPB Chair informed the EDPB members that Dr. Ian Deguara ended his term as Commissioner of the MT SA and welcomed Dr. Reno Borg as the new Commissioner of the MT SA. The new Commissioner introduced himself and expressed his readiness to work with the EDPB.

The EDPB Chair provided an update to the EDPB members on the latest developments regarding the legislative procedure of the Digital Omnibus. The EDPB Chair also highlighted that the EDPB could, if necessary, still react with a statement after a more-stable compromise text of the Digital Omnibus has been reached.

The EDPB Chair provided an update to the EDPB members on the upcoming high-level meeting of Commissioners, which will take place on 16 and 17 July 2026 in Dublin. The EDPB Chair introduced the topics for discussion during the high-level meeting in Dublin and invited the EDPB members to contact the Chair, the Chair's team or the EDPB Secretariat to suggest other possible topics for discussion.

Lastly, the EDPB Chair informed the EDPB members about the EDPB's application to become an observer to the AI Board's subgroup on sandboxes, in line with the EDPB-EDPS Joint Opinion on the Digital Omnibus on AI. The EDPB Chair provided further details on the application process and confirmed that the EDPB Secretariat will provide updates to the EDPB members on the matter.

I.2. Minutes of the 118th EDPB meeting

The minutes of the 118th EDPB plenary meeting were adopted unanimously.

The members agreed on the public version of the minutes.

I.3. Draft agenda of the 119th EDPB meeting

The draft agenda was adopted with the inclusion of two new items under AOB.

The discussions relating to agenda point D.1.1 were declared confidential in accordance with Art. 33(b) EDPB RoP.

The discussions relating to agenda points D.2.2 and D.2.4 were declared confidential in accordance with Art. 33(c) EDPB RoP.

A. Agenda items for adoption

There was no request to discuss the proposed A items. A single vote was organised for the two A agenda items and they were all adopted unanimously:

- A.1. Opinion on the draft decision of the NL SA regarding the Controller Binding Corporate Rules of the Infor Group (International Transfers ESG); and
- A.2. Opinion on the draft decision of the NL SA regarding the Processor Binding Corporate Rules of the Infor Group (International Transfers ESG).

B. Agenda items for discussion

B.1. Agenda items for discussion in view of adoption

B.1.1. Internal Best Practices for EDPB Expert Subgroups and Task Forces (Coordinators ESG)

The Chair introduced the item, underlining its links with the implementation of, and commitments in, the Helsinki Statement, and its aim to improve and streamline the functioning of the EDPB's subgroups and task forces. The EDPB Chair then passed the floor to the lead rapporteur, who presented the state of play of the file, provided an overview of the document and suggested one editorial correction to the text.

The EDPB members exchanged on the matter.

The EDPB members adopted the Internal Best Practices unanimously with the editorial correction suggested.

B.1.2. Request for mandate for an EDPB Statement regarding the Proposal for a Regulation on Digital Networks (Digital Networks Act) (Technology ESG)

The EDPB Chair introduced the item. The lead rapporteur presented the request for mandate.

The EDPB members exchanged on the matter and discussed the timeline of this workstream.

The EDPB members adopted the mandate unanimously, with an extension of the timeline so that the work will be done only after the Council's position on the matter.

B.1.3. Request for mandate on the elaboration of a Transfer Impact Assessment (TIA) template (International Transfers ESG)

The EDPB Chair introduced the item. The lead rapporteur presented the request for mandate.

The EDPB members adopted the mandate unanimously, underlying the need to collect existing transfer impact assessment templates made available by DPAs at national level.

C. Organisational matters

C.1. Updates by EDPB ESGs and TFs

C.1.1. Digital package mapping exercise – Updated questionnaire on the national implementation of the AI act (Cross-Regulatory Interplay and Cooperation ESG)

The EDPB Chair introduced the item and gave the floor to the lead rapporteur, who provided an update on the mapping exercise conducted by the Cross-Regulatory Interplay and Cooperation ESG in relation to the Digital Package, and in particular concerning the updated questionnaire related to the national implementations of the AI Act.

The EDPB members took note of the information given.

C.2. General organisational matters

C.2.1. Cooperation ESG coordinators

Following the end of the mandate of the two coordinators of the Cooperation ESG, the EDPB members unanimously designated [REDACTED] (DE SA) and [REDACTED] (DE SA) as coordinators of the Cooperation ESG, for a renewable term of two years.

One EDPB member recalled the need to have a second coordinator for the Enforcement ESG.

D. Items for information

D.1. Updates by EDPB participants

D.1.1. Possible Article 64(2) request on the concept of Article 10 data (Key Provisions ESG)

The EDPB Chair introduced the item and passed the floor to the SE SA.

The SE SA provided information to the EDPB members on a possible request for an EDPB opinion under Article 64(2) GDPR on the scope of Article 10 GDPR. The SE SA provided the background to the possible request, provided concrete examples of the situation and highlighted the reasons why requesting an EDPB opinion under Article 64(2) GDPR would be an appropriate solution.

The EDPB members took note of the information given and provided their views on the matter. The EDPB Chair also highlighted the differences between EDPB guidelines and EDPB opinions under Article 64(2) GDPR. The SE SA thanked the EDPB members for their comments.

D.2. Any other business

D.2.1. EDPB Plenary Meetings' Efficiency

The BG SA provided information to the EDPB members on the efficiency of the EDPB Plenary meetings.

The EDPB members took note of the information given.

D.2.2. Bilateral meetings between [REDACTED] and DPAs

The AT SA provided information to the EDPB members about a bilateral meeting that took place with [REDACTED] noting that they received detailed questions which were mainly about ongoing work at EDPB

level. The AT SA explained that, in the meeting, they had confirmed that they did not have a mandate to speak on behalf of the EDPB and that they wished to raise awareness with the other members. Another EDPB member confirmed that they had had similar experiences and that it had given similar responses.

The EDPB members took note of the information given and exchanged on the matter.

The EDPB Chair underlined the importance of speaking with one voice and of not disclosing information about ongoing work at EDPB level when liaising with external stakeholders.

D.2.3. Spring Conference 2026

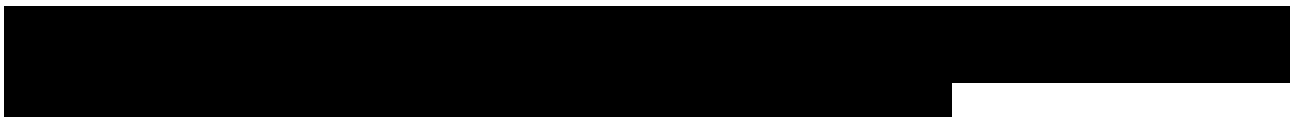
The CY SA formally informed the EDPB members of its serious concerns regarding the lack of communication, documentation, and registration confirmation from the organisers of the Spring Conference 2026 in Antalya, despite repeated efforts to engage.

The CY SA also highlighted that, although a member of the Steering Group, it had not been invited to participate in recent Steering Group online meetings, raising concerns regarding transparency, inclusiveness, equal treatment of members, and the proper functioning of the established governance arrangements.

The EDPB members exchanged views on the matter, expressed clear support for the concerns raised by the CY SA, and agreed to continue discussions with a view to considering appropriate next steps.

D.2.4. Framework agreement between the EU and the US

The EDPB Chair recalled the update on the negotiations provided by the European Commission's representative at the April plenary meeting.



The EU COM shared that it is currently considering further involving the EDPB on the matter.

The EDPB members took note of the information given.

E. Written state of play

E.1. Outcome of written procedures or urgent decisions

E.1.1. Outcome of written procedure - Text to be included on the website on the page of the public consultation regarding the DPIA template

The Chair introduced this written state of play and reminded the members of the written procedure.

The EDPB members took note of this information.

E.1.2. Outcome of written procedure - EDPB reply to EC public consultation on Art. 6.11 DMA specification

The Chair introduced this written state of play and reminded the members of the written procedure.

The EDPB members took note of this information.

Annex: Attendance List

AT SA, BE SA, BG SA, CY SA, CZ SA, DE SA, DK SA, EDPS, EE SA, EL SA, ES SA, FI SA, FR SA, HR SA, HU SA, IE SA, IS SA, IT SA, LI SA, LT SA, LU SA, MT SA, NL SA, NO SA, PL SA, PT SA, RO SA, SE SA, SI SA, SK SA

European Commission

Observers:

- AL SA, BA SA, ME SA, MK SA, In line with Art. 8 of the EDPB RoP, the observers were present during the plenary meeting except for points D.1.1 and D.2.4 of the agenda.

EDPB Secretariat