

## Final Minutes

### 121<sup>st</sup> meeting

8-9 June 2026 – In-person

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

##### I.1. Introduction

The Deputy Chair welcomed the EDPB members to the first day of the plenary meeting. The Deputy Chair encouraged the Supervisory Authorities to volunteer as rapporteurs for a work item concerning a draft joint controllership arrangement between the ECB and National Competent Authorities in the context of the Single Supervisory Mechanism.

On the second day of the plenary meeting, the Chair informed the members that this was the last in person plenary meeting for Aleid Wolfsen, President of the NL SA, and Anne Debet, Vice President of the FR SA, and thanked them for their meaningful contribution to the work of the EDPB, recalling that Aleid Wolfsen has also held the position of Deputy Chair of the EDPB.

##### I.2. Minutes of the 119th EDPB meeting

The minutes of the 119<sup>th</sup> EDPB plenary were unanimously adopted with the modifications proposed.

The members also agreed on the public version of the minutes.

##### I.3. Draft agenda of the 121st EDPB meeting

The draft agenda was adopted with the inclusion of three new items under AOB – one from the SE SA concerning the Meeting of the Nordic Countries in May, one from the IE SA concerning the outcome of some judicial proceedings in cross-border cases and one from the PT SA on the book for the PT SA's anniversary seminar.

The discussions relating to agenda points B.2.2 and C.1.1 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 point A agenda items and they were both adopted unanimously:

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

- A.2. Opinion on the draft decision of the NL SA regarding the Processor Binding Corporate Rules of the Rubrik Group (International Transfers ESG).

## B. Agenda items for discussion

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

#### B.1.1. Common Data Breach Notification Template (Technology ESG)

The Deputy Chair introduced the item and recalled that it stems from the Practical Implementation Plan of the Helsinki Statement. Following this, the lead rapporteur presented the template. As this template is intended to be used by the SAs for the creation of an IT interface, the lead rapporteur also presented a demo of an IT prototype implementing the template. The lead rapporteur recalled that the purpose of template could also be taken into account for the Single-Entry-Point mechanism proposed with the Digital Omnibus, once there is more clarity on this proposal.

The EDPB members decided to agree on the implementation of the template at national level on a later stage, considering the dynamic situation with regard to the Single-Entry-Point envisaged in the context of the Omnibus.

The EDPB members took a vote on the content of the template. 26 EU members of the EDPB voted for adoption, 1 EU member of the EDPB abstained. 2 of the EEA members of the EEA expressed their position in favour of the adoption.

The EDPB members adopted the Common Data Breach Notification template and agreed that it would be subject to a public consultation for a period of 8 weeks.

#### B.1.2. Joint letter of the Customs Information System Supervision Coordination Group and the Coordinated Supervision Committee to the European Commission (Coordinated Supervision Committee)

The CSC coordinator explained the intention with the letter to be addressed to the European Commission in order to improve the efficiency of data protection supervision in the Customs Information System. It calls on the European Commission to consider amendments to the Customs Information System (CIS) Regulation to enable coordinated supervision under Article 62 of the EUDPR with the CSC.

The EDPB members adopted the letter to be signed jointly by the CIS Supervision Coordination Group and the EDPB simultaneously.

#### B.1.3. Request for mandate regarding Joint EDPB-AMLA Guidelines on partnerships for information sharing under Article 75 AMLR and their data protection implications (Financial Matters ESG)

The Deputy Chair introduced the item and recalled that the Helsinki Statement mentions joint guidelines as a tool through which the EDPB can support the cross-regulatory cooperation and consistency. The rapporteur then recalled the context of the request and the work done so far by the Financial Matters Subgroup in line with the mandate received in June 2025. The rapporteur also explained that, under the requested mandate, the Financial Matters expert subgroup would work jointly with AMLA on the data protection implications of information-sharing partnerships introduced in the new Regulation on Anti-Money Laundering/Countering the Financing of Terrorism, and that the mandate still needed to be approved by the AMLA's Board.

The EDPB members unanimously granted the mandate to the FMESG to work as described in the request and the Annex to the request.

#### **B.1.4 Request for mandate on Data Act FAQ (Compliance, E-Government and Health ESG)**

The Deputy Chair introduced the item and the background of the file. Following this, the rapporteur presented the request of mandate. The format of the FAQs has been chosen in line with Helsinki Statement requirements to deliver practical and easy to understand tools, and to retain more flexibility in the event of legislative changes to the Data Act. The request for mandate foresees two phases of stakeholder consultation: a targeted written public consultation before the drafting starts and an open request for written feedback after the first version of the FAQs has been approved by the EDPB.

The EDPB members discussed the request for mandate. It was agreed that the section relating to the respective roles and cooperation of supervisory authorities will only include elements relevant for the general public.

The EDPB members adopted the mandate unanimously.

### **B.2 Agenda items for discussion**

#### **B.2.1. Discussion on the protection of children online**

The Chair introduced the topic explaining that the aim of the discussion would be to exchange experiences before the meeting with the Co-Chairs of the Special Panel on Child Safety Online. This expert panel was set up by President Von der Leyen and included a discussion on age restrictions for the use of social media. The Chair recalled that the EDPB would be represented at the meeting by the DPAs of [REDACTED].

The EDPB members discussed the protections already provided by the GDPR and the DSA and exchanged on the questions raised, outlining the importance of privacy-compliant age verification systems. The members also shared information about ongoing national political debates on the protection of children, noting some national proposals to change the age at which children can provide consent for the use of online services under Article 8 GDPR, or to create for age restrictions for access to certain online services. Some members also raised the need for digital literacy and parental involvement was raised, while underlining that platforms have an important role to protect children and needed to be accountable. The members also raised the legal unclarity posed when Article 8 GDPR is combined with national rules on the age required to sign contracts.

The members underlined the importance of the EDPB statement on age assurance and the ongoing drafting of the EDPB Guidelines on Children's rights.

#### **B.2.2. Guidelines on Anonymisation (Technology ESG)**

The Chair introduced the topic recalling that, at the April Plenary meeting, the EDPB mandated a 'sprint team' to finalise the work on the draft anonymisation guidelines and set a target to adopt these guidelines by the Summer. The aim of the discussions at this Plenary meeting was to address some points on which strategic orientation was needed. She then passed the floor to the lead rapporteur to present the discussion points.

Regarding the first discussion point on the reasonably likely use of illegal means, the members agreed with the first option with the introduction of some practical examples of relevant factors. A new version of the text will be presented at the next plenary.

Regarding the second discussion point about the GDPR compliance of the anonymisation process, the members discussed the need to keep the Guidelines concise and whether points should be included on data breach notification or on the compatibility of anonymisation as a form of further processing. The Chair concluded that different options of the text will be presented at the next plenary meeting and that the members will then be called to decide on whether different parts of the sub-section should be maintained in the guidelines.

Regarding the third discussion point on the description of how effective (re-)identification techniques should be in order to break anonymisation, some members noted that if the incorrect reidentification still leads to actions against individuals' rights and interests, then this incorrect reidentification may still need to be considered as a reidentification. Several members supported the proposed wording but suggested that it is further clarified. The Chair concluded that, in light of the discussion, the paragraph should be clarified and presented for decision at the next plenary.

Regarding the last discussion point on the effect of encryption, several members noted that, while encryption is an important security measure, it should not be considered as anonymisation. After discussion, the Chair concluded that further technical discussion at the expert subgroup on this point is needed and the expert subgroup may propose either a new adapted wording or the previous wording for the plenary's decision.

## **C. Organisational matters**

### **C.1. Updates by EDPB ESGs and TFs**

#### **C.1.1. Outcomes from the ENF Workshop 2026 and follow-up actions (Enforcement ESG)**

The Deputy Chair introduced the item and recalled that the workshop for DPAs on complaint-handling had been organised by the Enforcement Expert Subgroup and hosted by the LU SA. The Deputy Chair also highlighted that this item stems from the Helsinki Statement and was organised as a follow-up action to the insights provided by Supervisory Authorities at the plenary meeting of February 2025.

Following this, the Coordinator of the Enforcement Expert Subgroup presented the outcomes of the workshop and the envisaged follow-up actions. Several members of the EDPB stressed on the usefulness of such workshops. The importance of identifying the most appropriate profile of participants for any future ones was also highlighted.

The EDPB members took note of the information given and the follow-up steps. The Coordinator of the Enforcement Expert Subgroup made a call for a co-coordinator, as the Subgroup continues functioning with only one coordinator.

#### **C.1.2 Joint EC-EDPB Guidelines on the interplay between the Digital Markets Act and the GDPR (Cross-Regulatory Interplay & Cooperation ESG)**

The Chair recalled that, following the adoption of the draft Guidelines last October, a joint public consultation took place for a period of 8 weeks. During this public consultation, the EDPB received a significant number of contributions which were analysed by the joint drafting team. The lead rapporteur then provided an overview of the contributions received and of the changes envisaged.

The lead rapporteur explained that, in principle, the final version of the guidelines should be submitted to the plenary for adoption towards the end of 2026. Following this, the European Commission will translate the text into all official languages of the EU, and the final adoption of the

joint guidelines will be sought by both the EDPB Plenary and the College of Commissioners of the European Commission. The guidelines will finally be published.

The EDPB members took note of the information given.

## **C.2. General organisational matters**

### **C.2.1. Appointment of EDPB Representative(s) to the DMA HLG Subgroup on Artificial Intelligence (Cross-Regulatory Interplay & Cooperation ESG)**

The Chair introduced the topic and recalled that in May 2025, five EDPB representatives were appointed for the Artificial Intelligence subgroup of the DMA High-Level Group until 13 May 2027. As one main representative and one alternate indicated their unavailability to fulfil this role for the remaining part of the term, the EDPB members needed to appoint one new representative and one new alternate representative.

On the basis of a prior consultation of the members, [REDACTED], from the Spanish SA, was proposed as EDPB representative. [REDACTED], from the German SA (Baden-Württemberg), was proposed to be the alternate representative.

The EDPB members expressed their approval and the Chair appointed the nominees for the remainder of the current mandate.

### **C.2.2. EDPB Events Planning and Scheduling**

The EDPB Secretariat presented the Events planning and scheduling prepared in order to identify the maximum number of events per year possible considering the resources available and also the time needed to organise them.

The EDPB Secretariat will consult the members twice a year to identify the stakeholder events to organise.

## **D. Items for information**

### **D.1. Updates by EDPB participants**

#### **D.1.1. SPE – Update of the OSS Case Digest on the right to object and the right to erasure**

The Deputy Chair informed the members that the One-Stop-Shop “Case Digests” on the right to erasure and the right to object, which were available on the EDPB website, had been updated by an SPE expert. The EDPB members took note of the update.

One EDPB member noted that sometimes stakeholders are still unclear on the fact that these reports are prepared by external experts and not by the EDPB itself.

#### **D.1.2. Discussion with Commr. McGrath, Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection**

The Chair welcomed the Commissioner to the EDPB’s plenary meeting underlying the importance of the good cooperation between the EDPB and the European Commission. She left the floor to the Commissioner.

The Commissioner recalled that cooperation is essential and ensures the protection of fundamental rights. He addressed four main topics.

Firstly, about simplification, the Commissioner recalled that the Commission proposed targeted amendments to the GDPR mainly for clarifying the rules and simplifying when there was unnecessary burden. The Commission took note of the Joint opinion on the Digital Omnibus and will work with the co-legislators. The Helsinki Statement was a good example in the direction of making an effort to ensure a coherent application of the GDPR. The Commissioner also underlined the importance of the work of the EDPB and the Commission on different Joint Guidelines, such as on the interplay between the GDPR and the DMA/AIA.

Secondly, as of the international dimension of data protection, the Commissioner stressed the importance of international data flows. The Commission meets regularly with international partners. In the past year, the Commission adopted adequacy decisions in relation to Brazil and the European Patent Office and also renewed the two adequacy decisions for the UK. The Commission is also considering a possible extension of the scope of the Japan adequacy decision and is working closely with Kenya for a possible future mutual adequacy arrangement. This shows that the EU model has an impact. The Commission has adopted 18 adequacy decisions and other tools are also available, such as standard contractual clauses. As of the EU-US data protection framework, the first review of the framework happened in 2024 and involved also the EDPB. The Commission defended the legality of the framework in justice and continues to monitor the matter.

Thirdly, concerning the forthcoming Digital Fairness Act, the Commissioner stated that children's protection represents a political priority for the Commission. President Von der Leyen launched a panel of experts to ensure children protection online. The EDPB age assurance statement was very welcomed. There are still certain gaps in the area of consumer protection. The forthcoming Digital Fairness Act will seek to increase legal certainty and the EDPB's expertise on privacy will be indispensable.

Finally, concerning transparency political advertisement, the relevant EU Regulation is now fully applicable, and citizens have a right to get more transparency on this matter. The Commission actively supports the application of this regulation and adopted implementing acts even if enforcement is primarily for Member States. The EDPB has planned guidelines expected by the end of this year and the Commission thanks it for taking this work forward.

The Chair then addressed some questions to the Commissioner of relevance for the work of the EDPB.

She spoke about the negotiations on the Digital Omnibus. For the EDPB, it is crucial not to adopt the proposed amendments to the definition of personal data, as they risk significantly weakening individual data protection.

The Commissioner answered that the proposed amendments to the definition of personal data codify established case-law of the European Court of Justice, and the two omnibuses concerning the GDPR are now in the hand of the co-legislators.

The Chair then addressed the forthcoming Digital Fairness Act and asked for information about upcoming initiatives on cross-regulatory exchange of information, noting that the EDPB took some steps to have an effective cross-regulatory cooperation.

The Commissioner encouraged cooperation between national data protection and consumer protection authorities. He further noted that the forthcoming Digital Fairness Act will be coupled with the revision of the Consumer Protection Cooperation Regulation and that cooperation between consumer protection and other relevant authorities is particularly crucial.



One member referred to the EDPB letter sent to the European Commission on Israel's registration requirements imposed on NGOs. The Commissioner confirmed that the European Commission is monitoring the subject matter.

The Chair concluded the meeting by thanking the Commissioner for the fruitful discussion and wishing that the collaboration between the EDPB and the Commission continues along the same path.

### **D.1.3. Report on stakeholder event on processing of personal data to target or deliver political advertisements (Social Media ESG)**

The Chair recalled that the EDPB organised a remote stakeholder event on 27 March 2026 to engage in a timely manner with stakeholders and gather input for the draft EDPB Guidelines on the processing of personal data to target or deliver political advertisements. A report of the event was prepared and discussed at subgroup level and the EDPB members agreed to publish it on the EDPB website.

## **D.2. Any other business**

### **D.2.1. Possible data protection risks arising from the integration of third-party trackers in generative AI services**

The ES SA presented the findings of a report on the possible data protection risks arising from the integration of third-party trackers in generative AI services. The ES SA informed that they have not received complaints yet but they expect complaints in the future. The relevant report and all the links have been shared with the EDPB members.

The EDPB members took note of the information given.

### **D.2.2. Privacy challenges posed by smart glasses**

The Chair introduced the topic, explaining that smart glasses are becoming an increasingly important topic and raise significant privacy concerns. Several EDPB Members have already addressed these issues through awareness campaigns, guidance, engagement with stakeholders and enforcement actions. The Chair also recalled that this topic was discussed at the plenary meeting in March, following media reports on alleged data protection violations by Meta's smart glasses, and the EDPB launched an SPE project on the social acceptability of smart glasses.

The Chair proposed that short public-facing document be prepared by the Autumn to address the key privacy and data protection challenges, to highlight best practices and to provide recommendations. This would fall under the Helsinki Statement high-priority work items, for which a small drafting team would be appointed. The DPAs who volunteered to work on this were the [REDACTED].

The EDPB members agreed on the proposal.

### **D.2. 3. Update on the Nordic DPA meeting**

The SE SA provided an update on the meeting held between the Nordic countries' DPAs in Stockholm, on 21–22 May 2026 and the joint declaration that had been made at the end of that meeting. The declaration has been published on the website of the SE SA.

### **D.2.4. IE SA update on national court proceedings**

The IE SA provided an update on recent judgments of the Irish High Court in cases involving cross-border processing that have been subject to the cooperation mechanism under the GDPR.

The EDPB members took note of the information shared.

#### **D.2.5. HR SA point on the Meeting of the Central and Eastern European DPAs**

The HR Commissioner invited the EDPB members to the annual meeting of the Central and Eastern European Data Protection Authorities, organised by the HR and PL SAs. The meeting will take place in Zadar, Croatia, from 24 to 26 September. Two workshops will be organised within the framework of the meeting – one on the European Health Data Space and another on Data protection risks in AI systems.

The official invitation will be circulated by the EDPB Secretariat.

#### **D.2.6. PT SA point on the anniversary seminar titled: "Personal Data Protection: Building the Future"**

The Chair, on behalf of the PT SA, drew attention to the publication of the book on the PT SA's 30<sup>th</sup> anniversary seminar titled: "Personal Data Protection: Building the Future" with the interventions and photos from the Conference held at the Portuguese Parliament, in Lisbon in 2024, and had the pleasure to offer a hard copy of this publication to each Member of the EDPB and to the representatives of the European Commission participating on this Meeting, thanking the EDPB's Secretariat for the essential support.

### **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, LT SA, LU SA, LV SA, MT SA, NL SA, NO SA, PL SA, PT SA, RO SA, SE SA, SI SA, SK SA

LV SA delegated their voting right to the LT SA.

European Commission

Observers:

AL SA, MK SA, RS SA, XK SA

In line with Art. 8 of the EDPB RoP, the observers were present during the plenary meeting.

EDPB Secretariat