

## Final Minutes

### 122nd EDPB plenary meeting

7 July 2026 – Remote

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

##### I.1. Introduction

The EDPB Chair recalled the Helsinki Statement's commitment to increase consistency and provided some practical information on a new initiative to support this goal in the early stages of the drafting process of EDPB documents.

The EDPB Chair also provided an update to the EDPB members regarding the European Commission's specification decision under Article 6(11) of the Digital Markets Act and its coming publication.

##### I.2. Minutes of the 120th EDPB meeting

The minutes of the 120th EDPB plenary meeting were adopted unanimously. The members also agreed on the public version of the minutes.

##### I.3. Minutes of the 121st EDPB meeting

The minutes of the 121st EDPB plenary meeting were unanimously adopted with the modifications proposed. The members also agreed on the public version of the minutes.

##### I.4. Draft agenda of the 122nd EDPB meeting

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

The discussions relating to agenda point B.2.1 were declared confidential in accordance with Art. 33 EDPB(c) RoP.

##### I.5. US Supreme Court judgment in *Trump v. Slaughter*

The EDPB Chair provided information on the US Supreme Court ruling in *Trump v. Slaughter*, and passed the floor to the coordinator of the BTLE ESG, who provided further information to the EDPB members on the judgment.

The European Commission informed the EDPB members that it is assessing the impact of the judgment on the DPF and working closely with the U.S. administration.

The EDPB members exchanged on the matter and agreed on the need to address the European Commission with a letter which expresses concern over the possible implications of the decision and requests the continued sharing of information so that the EDPB and its members can continue to make informed decisions.

The EDPB members also agreed to refer the matter to the ITS ESG for further analysis and to keep each other updated about any developments.

## 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 all adopted unanimously.

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

## B. Agenda items for discussion

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

#### B.1.1 Guidelines on Anonymisation (Technology ESG)

The EDPB Chair introduced the item and its background, and passed the floor to the lead rapporteur, who presented the work done.

Regarding the first discussion point, the EDPB members discussed and approved wording for the applicable perspective to be used when assessing if data is personal in a controller-processor relationship. For the second discussion point, the EDPB discussed the text relating to the reasonably likely use of illegal means and confirmed the text with minor editorial adjustments. For the third discussion point, the EDPB members discussed the text relating to general GDPR compliance issues and the anonymisation process. The EDPB members confirmed that the inclusion of some content was helpful and agreed on the points to be included. The EDPB members also expressed different positions on the part relating to the legal grounds for anonymisation and agreed that this matter would receive particular further consideration on the basis of the public consultation. For the fourth discussion point, the lead rapporteur highlighted key passages in the Guidelines, where previous discussion had been had at the Plenary and SAESG level. The EDPB members confirmed the wording. Regarding the fifth discussion point, the EDPB members agreed to include a flowchart on the technical assessment as an annex to the Guidelines.

27 EU members voted in favour of adopting the guidelines, with 1 EU member being absent. The EEA SAs expressed their position, with 3 EEA SAs in favour of adopting the guidelines. The guidelines will be submitted to public consultation until 30 October 2026.

#### B.1.2 Guidelines on web scraping in the context of generative AI (Technology ESG)

The EDPB Chair introduced the item and passed the floor to the lead rapporteur, who presented the work done on the guidelines.

The EDPB members discussed and agreed on a minor clarification to the wording of the guidelines.

The EDPB Members adopted the guidelines with one EU member voting against. The guidelines will be submitted to public consultation until 30 October 2026.

### **B.1.3 Template for Cross-Regulatory Cooperation Agreements (Cross-Regulatory Interplay and Cooperation ESG)**

The EDPB Chair introduced the item and passed the floor to the lead rapporteur, who presented the work done on the file and provided an overview of the template.

The EDPB members adopted the template unanimously. The template will be submitted to a targeted consultation with the High-Level Group on the Digital Markets Act and with the national regulatory authorities, for a period of twelve weeks.

The EDPB Chair invited the EDPB members to share the template with their regulatory counterparts at national level for feedback, to be then conveyed to the EDPB Secretariat and to the drafting team at the end of the twelve weeks.

### **B.1.4 Guidelines on processing of personal data through blockchain technologies (Technology ESG)**

The EDPB Chair introduced the item and passed the floor to the lead rapporteur, who presented the work done on the guidelines after the public consultation. The EDPB Chair also explained that, since this is the first set of revised guidelines to be published after the Helsinki Statement, this is the first time that the EDPB will publish a report on the public consultation, as well as a track-changes version which compares the original and the revised versions of the Guidelines.

The EDPB Members adopted the guidelines unanimously.

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

### **B.2.1. EDPB coordinated information campaign to inform EEA individuals about updates to ESTA information requirements (Borders, Travel & Law Enforcement ESG)**

The EDPB Chair introduced the item and passed the floor to the lead rapporteur, who presented the work done so far.

The EDPB members exchanged on the matter. It was agreed that the information campaign should focus on raising awareness with a united voice, without being a full EDPB statement. The EDPB members agreed that the drafting team should continue the work by preparing a short, factual document which could then be updated once the updates to the ESTA information requirements have been finalised.

## **C. Organisational matters**

### **C.1. Updates by EDPB Expert Subgroups and Task Forces**

#### **C.1.1. Good Practices for Cross-Regulatory Cooperation and Exchange of Information between Regulators (Cross-Regulatory Interplay and Cooperation ESG)**

The EDPB Chair introduced the item and passed the floor to the rapporteur, who presented the results of the questionnaire sent to the DMA High-Level Group on cross-regulatory cooperation, the responses received and the envisaged follow-up actions.

The EDPB members took note of the information provided.

## D. Items for information

### D.2. Any other business

#### D.2.1. Update following the G7 DPAs Roundtable 2026 in Paris

The FR SA provided an update on the G7 DPAs Roundtable 2026 which took place in Paris and informed that the documents adopted were a statement for privacy preserving age assurance, a joint paper on connected home devices and children's privacy, and a joint communiqué.

The EDPB members took note of the information given.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

#### D.2.3. IE SA update on national court proceeding

The IE SA provided an update on a recent judgment of the Irish High Court in a case involving cross-border processing that have been subject to the cooperation mechanism under the GDPR and on the fact that some preliminary questions will be addressed to the European Court of Justice.

The EDPB members took note of the information given.

## E. Written state of play

### E.2. Other written state of play

#### E.2.1. Statement on the impacts on personal data protection of the creation of watchlists by private entities (Financial Matters ESG)

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, LV SA, MT SA, NL SA, NO SA, PL SA, PT SA, SE SA, SI SA, SK SA,

European Commission

Observers:

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

