

EDPB Documents



Report on the use of SPE external experts in 2024

13 March 2025

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INTRODUCTION

The Support Pool of Experts (SPE) is a project under pillar 2 of the EDPB 2024-2027 strategy ('supporting effective enforcement and efficient cooperation between national supervisory authorities')¹. The SPE provides support in the form of expertise for investigations and enforcement activities of common interest to SAs and enhances cooperation/solidarity by reinforcing and complementing the strengths of the individual SAs and addressing operational needs.

A first report on the use of SPE external experts was published in 2024 to report on the activities of the SPE in 2023². This report focuses on the main initiatives continued or conducted in 2024 as part of the SPE. It also provides a recap of the activities of the SPE contact points and the applicable procedures for the call for expression of interest addressed to external experts and to launch a project.

Three projects which were launched in 2023 were continued and completed in 2024. In addition, nine new projects were launched in 2024, such as the One-Stop-Shop Case Digest on the right of access. Four out of these nine new projects were completed in 2024. Finally, the EDPB organised a second in-person bootcamp for SAs' experts on the theme of mobile app auditing, which included an internal training regarding the use of Pirogue Tool Suite organised through an SPE project.

This report does not cover other enforcement cooperation related initiatives, although some of them may fall in the scope of the SPE such as collaboration on strategic cases, CEF actions, investigation priorities, or the EDPB secondment programme.

1 CONTINUOUS EXCHANGES BETWEEN SPE CONTACT POINTS

The group of SPE contact points **met three times remotely in 2024**. It is coordinated by the EDPB Secretariat and includes participants from SAs.

- Among others, the SPE contact points:
- Follow all information on SPE activities,
- Discuss and propose ongoing and future SPE projects, in particular they identify specific needs in enforcement cases that will require experts' support,
- Identify an SA's operational needs for national investigations with respect to the SPE,
- Share enforcement experiences and good practices between SAs,
- Analyse provided enforcement documentation/solutions,
- Disseminate information within the respective SAs,
- Develop common methodologies: IT knowledge and more specific legal issues (e.g. BCR, data transfer to third countries, online platforms, IoT research), and

¹ Its Terms of Reference

https://edpb.europa.eu/sites/default/files/files/file1/edpb_document_supportpoolofexpertstor_en.pdf were adopted by the EDPB plenary in December 2020 and the project plan was adopted in December 2021.

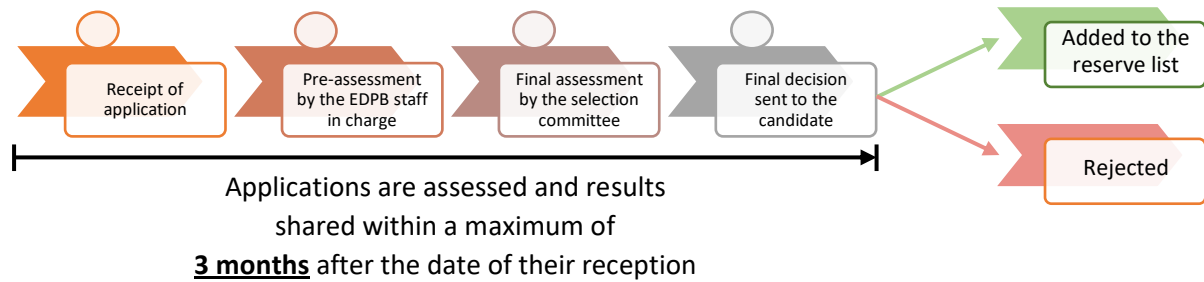
² Available at https://www.edpb.europa.eu/our-work-tools/our-documents/support-pool-experts-projects/report-use-spe-external-experts_en.

- Encourage the creation of new methodologies harmonising approaches on inspections and enforcement.

2 A GROWING POOL OF EXTERNAL EXPERTS

A reserve list of external experts was set up following a call for expressions of interest in February 2022³. Experts can apply through an electronic procedure^{5,6}.

Following its extension, the reserve list is **valid until 10 February 2026**. Interested parties can apply at any time prior to the last three months of validity of the list, until 10 November 2025.



At the end of 2024, **568 experts** are present on the reserve list. In 2024, the Secretariat received 87 additional applications from possible external experts. The following selection procedure was followed for these applications:

The pool in figures	2024	Since Feb 2022
Applications received	87	790
Selection committee's meetings	5	13
Candidates currently on the reserve list	65	568 ⁷ (72%)
Split of the reserve list by confirmed field(s) of expertise:		
Legal expertise	42	397 (70%)
Technical expertise	22	150 (26%)
Technical & legal expertise	1	21 (4%)

The reserve list can then be used to propose a specific project to a candidate, depending on the EDPB's needs and whether a specific profile matches these needs.

³ https://edpb.europa.eu/system/files/2022-02/call_for_expressions_of_interest_support_pool_of_experts.pdf

⁴ The SPE consists of qualified experts in areas such as IT auditing, website security, mobile OS and apps, IoT, cloud-computing, behavioural advertising, anonymization techniques, cryptology, AI, UX design, Fintech, Data science, digital law, etc.

⁵ <https://ec.europa.eu/eusurvey/runner/PoolOfExperts>

⁶ https://edpb.europa.eu/system/files/2022-02/SPS_Support%20Pool%20of%20Experts_external_final_0.pdf

⁷ One SPE expert withdrew from the list in 2024.

3 ENHANCED TRANSPARENCY OF SPE PROJECTS

3.1 Publication of deliverables and annual report

Until January 2025, the **deliverables of ten projects** were published, following decisions of the EDPB Plenary. They are all accessible on the EDPB's website at https://www.edpb.europa.eu/our-work-tools/our-documents/publication-type/support-pool-experts-projects_en.

It is important to note that while the above deliverables are made publicly available on the EDPB's website, the views expressed in these documents are only those of their authors (i.e. the SPE experts) and do not reflect the official position of the EDPB. The EDPB does not guarantee the accuracy of the information included in these documents. Neither the EDPB nor any person acting on the EDPB's behalf may be held responsible for any use which may be made of the information contained in these deliverables. Some excerpts may be redacted from these deliverables as their publication would undermine the protection of legitimate interests, including, inter alia, the privacy and integrity of an individual regarding the protection of personal data in accordance with Regulation (EU) 2018/1725 and/or the commercial interests of a natural or legal person.

A specific disclaimer is included in each of the deliverables made public.

Extracts of the One-Stop-Shop (OSS) case digests on the right to be forgotten and on security/data breaches were included in the EDPB annual report for 2022⁸ and 2023⁹. Finally, a **first report on the use of SPE external experts** was published in 2024¹⁰.

3.2 Improving the availability of deliverables

The SPE section available on the EDPB website at https://www.edpb.europa.eu/support-pool-experts-spe-programme_en has been updated and enhanced. It includes an updated and **consolidated list of the main published SPE projects**.

4 SPE PROJECTS

Since the launch of the SPE initiative, twenty-two projects have been launched, out of which seventeen had been completed at the end of 2024. Overall, seven SAs proposed new projects since 2022. Four out of these seven SAs proposed a project in 2024 after a previous successful one.

4.1 SPE projects launched in 2023 and completed in 2024

Three projects were launched in 2023 and were successfully completed over the course of 2024.

⁸ https://edpb.europa.eu/system/files/2023-04/edpb_annual_report_2022_en.pdf, pages 42-50.

⁹ https://www.edpb.europa.eu/system/files/2024-04/edpb_annual_report_2023_en.pdf, pages 34-35.

¹⁰ Available at https://www.edpb.europa.eu/our-work-tools/our-documents/support-pool-experts-projects/report-use-spe-external-experts_en.

4.1.1 Complex Algorithms and effective Data Protection Supervision for AI systems

by Dr. Kris Shrishak

- Available at https://www.edpb.europa.eu/our-work-tools/our-documents/support-pool-experts-projects/ai-complex-algorithms-and-effective-data_en

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SAs are increasingly dealing with questions regarding the training and use of Artificial Intelligence during investigations. The DE SA (Federal) expressed the need to further strengthen enforcement capacity building in this area.

An SPE project was launched in November 2023 and was completed in March 2024 by the SPE expert Dr. Kris Shrishak.

The two reports produced tackle two topics, namely:

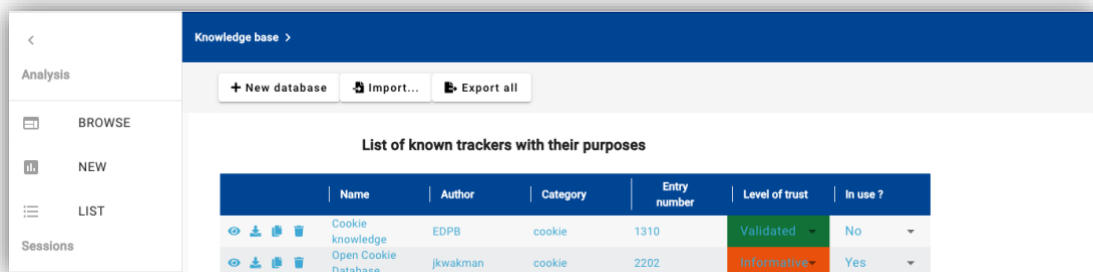
- **Tool-based evaluation of bias in AI applications and automated decision making systems.** This report looks into the different main types of bias and how to address them in a practical point of view (i.e. methods and tools). One important conclusion of the report is that these technical approaches and tools should be complemented with contextual and socio-cultural knowledge as AI systems are not purely technical, but socio-technical.
- **The effective implementation of data subjects' rights during the development and use of AI.** This report covers techniques and methods to implement the right to rectification and the right to erasure when AI systems process personal data. Implementing these rights is challenging but many technical approaches have been proposed.

4.1.2 Website auditing tool (version 2)

by Dr. Jérôme Gorin

- **Version 2** published as Free and Open Source Software under EUPL 1.2 Licence, available at <https://code.europa.eu/edpb/website-auditing-tool>

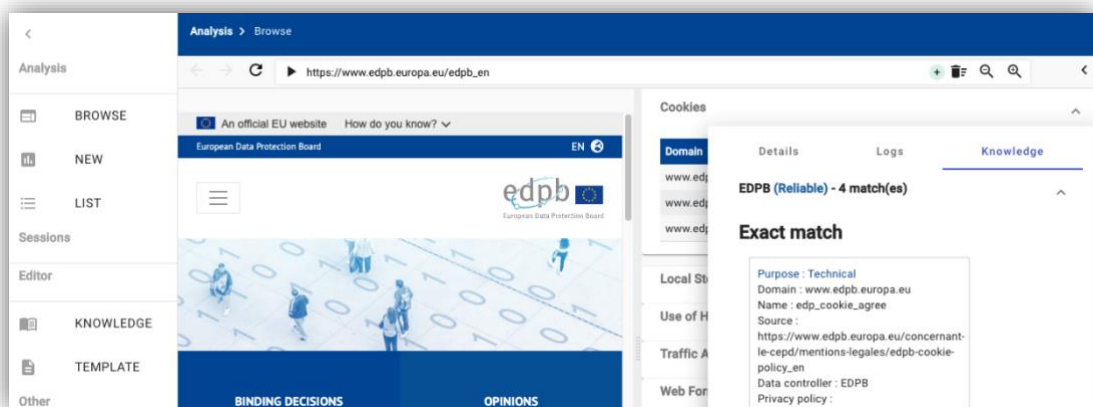
In 2022, a project developed a user-friendly and documented tool for website inspections, building on the Website Evidence Collector¹¹ (WEC). The expert for this project was Dr. Jérôme Gorin. The version 1, under EUPLv1.2+, was only available to Supervisory Authorities. The project being a success, the EDPB members requested to launch a public second version with multiple new features.



The screenshot shows the 'Knowledge base' section of the tool. It features a sidebar with navigation options: Analysis, BROWSE, NEW, LIST, Sessions, and Editor. The main content area displays a table titled 'List of known trackers with their purposes'. The table has columns for Name, Author, Category, Entry number, Level of trust, and In use?. Two entries are visible: 'Cookie knowledge' by EDPB and 'Open Cookie Database' by jkwakman.

Name	Author	Category	Entry number	Level of trust	In use ?
Cookie knowledge	EDPB	cookie	1310	Validated	No
Open Cookie Database	jkwakman	cookie	2202	Informative	Yes

Version 2 of the tool was made public in June 2024. It included multiple new features, such as different languages, the possibility to have multiple knowledge databases and a first basic SaaS version.



¹¹ Open source tool developed by EDPS: https://edps.europa.eu/node/5452_de

4.1.3 How to take enforcement action on the GDPR outside of the EU?

by Dr. Helena Kastlová

- Available at https://www.edpb.europa.eu/our-work-tools/our-documents/other/report-extraterritorial-enforcement-gdpr_nl

It is frequent that a company does not have an establishment within the EU and still processes personal data of data subjects in the EU. The GDPR stipulates that these companies must comply with the GDPR, even if they are not established within the EU (Art. 3(2) GDPR). In addition, they must also designate a representative within the EU who can serve as a point of contact for data subjects and SAs (based on Art. 27 GDPR). In practice, however, it sometimes happens that foreign companies do not adhere to this. Against this background, the NL SA has identified challenges in requesting companies outside the EU to pay fines.

The project was launched in November 2023 and completed in April 2024 by the SPE expert Dr. Helena Kastlová. The produced **legal report** includes the following:

- An analysis of the options for actions that US law would or would not provide the NL SA in a specific enforcement case to collect a fine or to take any form of enforcement action.
- A more strategic guidance on options that can be used for future cases that have a similar background.

4.2 SPE Projects launched in 2024

A total of **nine new projects** were launched in 2024, touching upon many diverse subject matters, both legal and technical. Four of them were completed over the course of 2024.

4.2.1 OSS Case Digest on the right of access

by Prof. Dr. Hanne Marie Motzfeldt

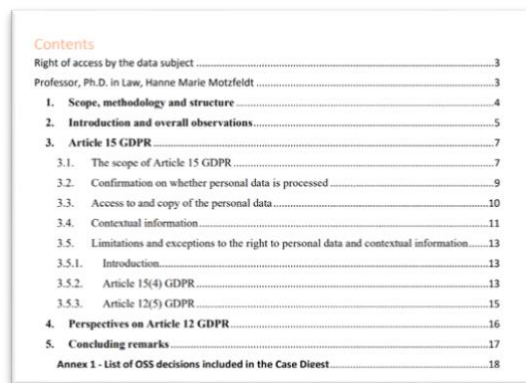
- Available at https://www.edpb.europa.eu/system/files/2025-01/oss-case-digest-right-of-access_en.pdf

The EDPB commissioned a third¹² thematic case digest. Case digests are overviews of decisions adopted under the one-stop-shop (OSS) procedure about a particular topic¹³. The purpose is to give

¹² Case digest on the right to object and the right to erasure, Alessandro Mantelero, 9 December 2022; Case digest on security of processing and data breach notification, Professor Eleni Kosta, 27 November 2023; available at https://www.edpb.europa.eu/about-edpb/publications/one-stop-shop-case-digests_en.

¹³ EDPB's public register with the one-stop-shop final decisions is available at https://edpb.europa.eu/our-work-tools/consistency-findings/register-for-article-60-final-decisions_en.

the SAs and the general public, including privacy professionals, insights into the decisions adopted by SAs following cross-border cooperation procedures.



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The SPE expert Professor Dr. Hanne Marie Motzfeldt drafted a case digest on the right of access. This is a topic on which SAs cooperate a lot, as shown by the large volume of decisions available. The OSS case digest summarises how SAs interpret the different components of the right of access in various contexts. In addition, the case digest analyses previous cases where exceptions and limitations to the right of access were raised by controllers. Overall, the case digest provides useful examples on the exercise of the right of access, for instance in the event of fake profiles or accounts which impersonate data subjects. This work complements the CEF 2024 on the right of access¹⁴. The case digest also refers to the available guidance at EU level, and in particular, EDPB Guidelines 01/2022 on the right of access.

This project was launched in May 2024 and completed in November 2024.

4.2.2 Internal training regarding the use of Pirogue Tool Suite

by Esther Onfroy

- Presented during the bootcamp

The capacity of SAs to audit smartphones consistently and efficiently is crucial for ensuring compliance and protecting user privacy. Effective auditing allows authorities to detect and address potential breaches of privacy and data protection laws. The PiRogue Tool Suite (PTS) is one of the tools used by pioneer SAs on the subject and, in the spirit of facilitating the coordination and cooperation on mobile applications auditing, the expert Estelle Onfroy provided a training on PTS to all interested SAs. The training session took place during a bootcamp on mobile app auditing which was addressed to SAs' staff working in inspection departments in September 2024 (see section 5 below).

PTS is composed of the PiRogue, an open hardware device (based on a Raspberry Pi) which operates as a network router analysing network traffic in real time, and of Colander, an incident response and

¹⁴ https://www.edpb.europa.eu/news/news/2025/cef-2024-edpb-identifies-challenges-full-implementation-right-access_en

knowledge management platform that helps transforming the collected information into browsable knowledge, and generating reports and detection rules.

The hands-on training session covered various aspects of the tool and provided the skills and knowledge necessary to effectively use it. Best practices for conducting audits using the tool were also explained. Small groups of auditors were able to perform a mobile audit during the session. The SPE expert provided the necessary equipment as well as a detailed slide deck.

Lastly, the seven other projects that were launched over the course of 2024 are either ongoing at the date of this report or were completed but not yet made public. More details relating to these projects may follow.

5 SPE EVENTS - BOOTCAMP ON MOBILE APP AUDITING

The Secretariat organised a **second in-person bootcamp in Brussels to allow SA' experts to exchange knowledge, best practices and test tools for mobile apps auditing.**

Around **50 experts from 27 SAs** met in Brussels on 18-19 September 2024 to participate in this bootcamp. Of these experts, at least twenty participated in an EDPB meeting or event in Brussels for the first time. In addition, at least thirteen of them already took part in the first bootcamp.

The two-day bootcamp consisted in a mix of presentations and hands-on training, which included:

- Presentation by the EDPB Secretariat on the SPE and relevant projects on auditing.
- Presentation on the privacy and security of mobile apps and their supply chain.
- Hands-on training on PiRogue Tool Suite by SPE expert Esther Onfroy (see Section 4.2.2).
- Networking social event among the participant.
- Presentation of two projects developed by PERÉN, followed by a brief discussion of each project.
- Presentation with preliminary findings, challenges and lessons learned in mobile app auditing.
- Participants were invited to share ideas and experiences from mobile app auditing as part of an open floor discussion.

In the survey distributed after the event, most participants repeatedly expressed interest in having further bootcamps.

6 CONCLUSION

This report provides a brief overview of the SPE projects continued or launched in 2024 with the reserve list of external experts. Many diverse projects have been launched in 2024, including a growing trend of projects on AI systems, which shows the eagerness of SAs to benefit from the use of external expertise, whether legal or technical - or both.

Additional projects will be launched in 2025 and the Secretariat also plans to organise a third bootcamp. Finally, the Secretariat will have to address the end of the validity of the reserve list of SPE experts in early 2025.