

# [ Minutes ]

Final

## 20th meeting of the Coordinated Supervision Committee

17 September 2025, remote meeting

### Summary

The Coordinated Supervision Committee ('the Committee' or 'the CSC') met on 17 September 2025, remotely.

#### General part

- **Election of a new Deputy Coordinator**

Sebastian Hümmeler, one of two Deputy Coordinators, announced the upcoming end of his mandate in November 2025 and the election of the new Deputy Coordinator during this meeting to ensure business continuity.

Ms. Radostina Takova, from the Bulgarian DPA, was elected as new Deputy Coordinator of the CSC. Her mandate will take effect as of the expiry of the mandate of the current Deputy Coordinator.

- **AOB**

The evolution of the Committee's nature due to new systems of different types and natures falling under its supervision was reiterated. The CSC members were then informed about the Implementing Regulation (EU) 2025/1420 laying down rules for the application of Regulation (EU) 2024/903, as regards the establishment and the operation of the interoperability regulatory sandboxes, which makes reference to Article 62 of Reg. (EU) 2018/1725 and provides for the engagement of data protection authorities in the operation of the interoperability regulatory sandboxes.

#### AGORA

- **Presentation from the Commission**

The Commission presented the AGORA information-sharing system, which was established to implement Article 85 of the Digital Services Act (DSA) supporting communications and exchange of information between Digital Services Coordinators, the Commission and the Board for supervision, investigation, enforcement and monitoring under the DSA. The presentation focused on the structure of

the system, including data flows, the categories of personal data undergoing processing, the purposes of the processing, the data retention periods, the allocation of responsibilities between the different actors, the procedure to handle data subject requests for access, the risk assessment and the data protection by design and default. Questions were raised concerning the retention period, the existence of a shared repository, the elements envisaged with respect to assisting with the data subject requests, the allocation of responsibilities with respect to the joint investigation with the Digital Services Coordinators and the scope of the DPIA conducted by the Commission. The CSC Coordinators will now prepare a preliminary ranking of the most impactful new systems under the Committee's supervision and invite the Commission to provide details on them at the following meetings.

## EES

- **Reply from the Commission on the comments provided to the information campaign and data subject rights**

The CSC members were informed that the Commission had communicated its intention to incorporate most of the comments on the content of the EES information campaign and the information materials, which aimed to ensure that data subjects are properly and practically informed of the data processing taking place in the EES, in line with Article 51 EES Regulation. The CSC members will now review the updated information materials.

- **Activities of the CSC in view of the entry into force of EES (12/10/2025) - press release and/or standard information on DPAs websites**

It was announced that the entry into force of EES is scheduled on 12 October 2025. A press release will be published on the CSC website ahead of the entry into force of EES by Friday 10 October 2025. The CSC members were also encouraged to publish similar press releases and more information on the national supervisory authorities' websites.

- **Tour de table: activities at EU/national level**

Members exchanged on activities regarding the EES at European or national level, including presentations of the system to the SAs and the phases of entry into operation of EES in the respective Member States. The CSC members will liaise with the controllers at national level and gather information about the progressive start of operations of the EES to identify potential issues and conduct inspection activities in this regard.

- **AOB**

The CSC members were invited to share their position on the appropriate legal basis for queries by companies offering transportation services to verify whether third-country nationals exhausted their stay under Article 13 of the EES Regulation.

The CSC members were also informed by the EDPS about an ongoing consultation from the Commission concerning the practical guidance on the processing of personal data in the context of the progressive start of EES.

## ETIAS

- **Notion of recipients**

The ETIAS WG presented the note concerning the position on the interpretation of the public authority exemption in Article 4(9) GDPR, as formulated following the discussion and the feedback received during the previous CSC meetings. The CSC members shared their considerations with respect to the definition of disclosure and the role of the Central Access Point with respect to the request for consultation of ETIAS data and agreed to include a further question concerning the applicable legal framework under the LED or the GDPR. The CSC members will now comment on the note and the Key Provisions ESG will then be consulted.

- **Concept of controllership in ETIAS**

The ETIAS WG presented a note on the controllership for data processing operations related to ETIAS and explained the arguments towards the determination of joint, sequential or retroactive controllership. The CSC members agreed to work on this matter and share their considerations on the Committee's position on the controllership with the view to actively contribute to the work of Frontex regarding the DPIA and the handling of data subject rights.

## Cooperation mechanisms in cases of cross-border joint controllership: procedural aspects

The rapporteur provided the background of this topic and the example of the Joint Operation Analysis concept in Europol and explained the proposals for a cooperation option that could be implemented in the event of a prior consultation received in relation to a joint controllership operation. The CSC members agreed to develop and implement effective coordination mechanisms and cooperate within the forum of the Committee to manage joint controllership complexities. The drafting team will now prepare a first proposal, which will be sent to the CSC members for their input.

## SIS

- **Checking logs of Article 12 SIS Regulations: next steps**

In the meeting, it was agreed to communicate the opinion of the CSC regarding log checks to the Commission and to develop and provide guidance on checking logs of Article 12 SIS Regulation for the national competent authorities.

- **Presentation of ISO standard applicable to data protection audits**

A presentation of ISO 19011:2018 relevant for data protection audits pursuant to Article 55(2) Regulation (EU) 2018/1861 and Article 69(2) Regulation (EU) 2018/1862 took place. It was explained that this standard constitutes guidelines for auditing management systems. The CSC members exchanged their views on this and other standards, also relevant at national level, and underlined the need to ensure that all the vulnerabilities and the risks are covered during a specific audit.

- **SIS Audit Cycle**

The CSC members adopted the Recommendations on calculating the audit cycle in large-scale information systems and agreed that the document would be published on the CSC website and shared with the Commission.

- **AOB**

The CSC members discussed the upcoming assignment of Eurodac to the Committee's supervision, following the entry into force of [Eurodac Regulation recast](#).