



Report on the use of SPE external experts in 2025

Adopted on 15 April 2026

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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 supervisory authorities ("SAs") and enhances cooperation/solidarity by reinforcing and complementing the strengths of the individual SAs and addressing operational needs.

This report is the third report regarding the use of SPE. As such, it provides information on the work that has been carried out throughout 2025.

Five projects, which were launched in 2024, were finalised in 2025. Respectively, in 2025, eight new projects have been initiated, out of which three were completed before the end of the year.

Finally, the EDPB organised a third in-person bootcamp for SAs experts on the theme of AI and AI auditing.

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 SPE contact points

The group of SPE contact points met three times remotely in 2025. 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 to identify specific needs in enforcement cases that will require experts' support
- help 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 documentations/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)
- encourage the creation of new methodologies harmonising approaches on inspections and enforcement.

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.

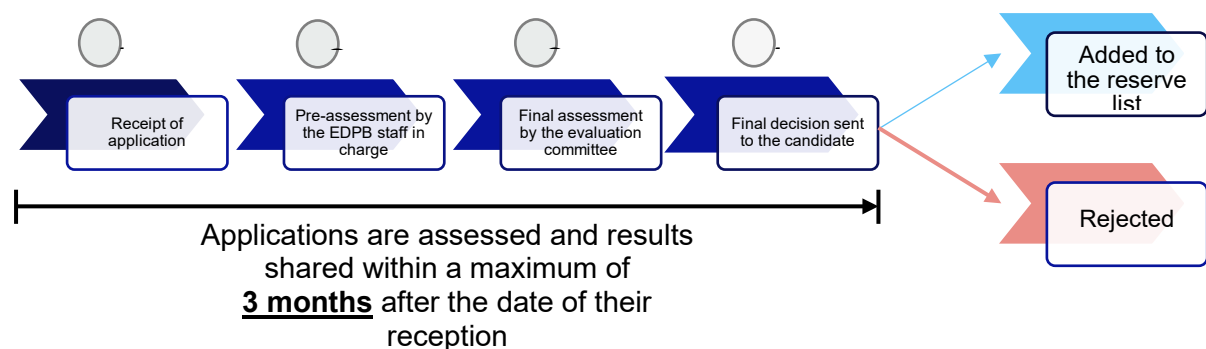
2 Reserve list for 2026-2030

A reserve list of external experts was set up following a first call for expressions of interest in February 2022^{2,3} (Call for expressions of interest D(2022) 0352), for which experts have been able to apply through an electronic procedure⁴. Following its extension, the reserve list was valid until 10 February 2026.

For this call, in 2025, the Secretariat received 109 additional applications from possible external experts⁵. Respectively, since 2022, the Secretariat has processed 897 applications. After evaluating all candidacies received until 10 November 2025, 635 experts were present on the reserve list.

Due to the expiration of this first reserve list, a second call of interest was launched on 28 November 2025 to establish a new reserve list of experts for the period 2025-2030⁶. This new call will be open until 28 August 2030, and the reserve list will expire on 28 November 2030.

The following selection procedure was followed for these applications:



The pool in figures	2025 ⁷	Since Feb 2022
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² https://edpb.europa.eu/system/files/2022-02/call_for_expressions_of_interest_support_pool_of_experts.pdf

³ The SPE consists of qualified experts in areas such as IT auditing, website security, mobile OS and apps, IoT, cloud-computing, behavioural advertising, anonymisation techniques, cryptology, AI, UX design, Fintech, Data science, digital law, etc.

⁴ https://edpb.europa.eu/system/files/2022-02/SPS_Support%20Pool%20of%20Experts_external_final_0.pdf

⁵ The number consists of applications received from both new applicants and update of initially refused applicants who wish to be re-assessed.

⁶ https://www.edps.europa.eu/system/files/2025-11/25_11_28_technical_descriptions_individual_experts_for_implementation_of_edpbs_support_pool_of_experts_en.pdf

⁷ These numbers were counted until the expiration date of the list which was set for 10 February 2026.

Applications received	109	897
Selection committee's meetings	5	18
Candidates currently on the reserve list	66	635 (70.8%)
Split of the reserve list by confirmed field(s) of expertise:		
Legal expertise	56	453 (71%)
Technical expertise	10	160 (25%)
Technical & legal expertise	0	21 (4%)

3 Transparency of SPE projects

Until the end of 2025, the **deliverables of sixteen projects** were published, following decisions of the EDPB Plenary. They are accessible through the EDPB's website in the section dedicated to SPE: https://www.edpb.europa.eu/support-pool-experts-spe-programme_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 where 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.

Finally, the 2024 report on the use of SPE external experts was also published on the EDPB website⁸.

4 SPE projects

Since the launch of the SPE initiative, thirty projects have been launched, out of which twenty-five had been completed at the end of 2025.

Overall, nine SAs proposed new projects since 2022. Three out of these SAs proposed a new project in 2025 after a previous successful one. For the first time, in 2025, two drafting teams engaged with work on EDPB documents used SPE projects to answer specific technical questions which arose in the course of their work.

4.1 SPE projects launched in 2024 and completed in 2025

Five projects were launched in 2024 and were successfully completed over the course of 2025.

⁸ https://www.edpb.europa.eu/our-work-tools/our-documents/support-pool-experts-projects/report-use-spe-external-experts_en

4.1.1 LLM risk identification guide

by Isabel Barberà

• Available on the EDPB website at https://www.edpb.europa.eu/our-work-tools/our-documents/support-pool-experts-projects/ai-privacy-risks-mitigations-large_en

The rapid integration of AI technologies (including Large Language Models or LLMs) brings with it regulatory and compliance challenges, particularly regarding data protection regulation. The HR SA has witnessed a growing number of inquiries from data controllers eager to leverage the capabilities of LLMs. Despite this enthusiasm, many organisations remain either unaware or only vaguely aware of the critical importance of aligning their AI processing operations with the GDPR before deployment and over the course of the use of AI systems.

The objective of this project was to address these gaps by providing clear, actionable insights and tools to assist organisations in conducting effective risk assessments in the context of LLMs. By doing so, this project aimed to facilitate the responsible and legally compliant adoption of AI technologies and, thus, ease the enforcement duty of SAs. This project built upon completed SPE projects, in particular the 2023 project sponsored by EDPS on data protection risks of Optical Character Recognition (OCR) and Named Entity Recognition (NER)⁹ and the report of the work undertaken by the ChatGPT Taskforce¹⁰.

The AI Privacy Risks & Mitigations Large Language Models (LLMs) report puts forward a comprehensive risk management methodology for LLM systems with a number of practical mitigation measures for common privacy risks in LLM systems. In addition, the report provides use cases examples on the application of the risk management framework in real-world scenarios:

- first use case: a virtual assistant (chatbot) for customer queries,
- second use case: LLM system for monitoring and supporting student progress and,
- third use case: AI assistant for travel and schedule management.

This project was launched in September 2024 and was completed in April 2025.

4.1.2 Development of a statistics and monitoring web application, IMIView

⁹ https://www.edpb.europa.eu/our-work-tools/our-documents/support-pool-experts-projects/ai-risks-optical-character-recognition_en#:~:text=OCR%20is%20a%20technology%20used,classify%20them%20into%20predefined%20categories.

¹⁰ https://www.edpb.europa.eu/our-work-tools/our-documents/other/report-work-undertaken-chatgpt-taskforce_en

by Adrian Simion

- [Available to the EDPB Secretariat to produce statistics](#)

Under the GDPR, supervisory authorities have a duty to cooperate to ensure its consistent application.

A case with a cross-border component is registered in a central database via the IMI (Internal Market Information System). In 2025, 414 cross-border cases have been created in the EDPB's case register, and 572 final decisions have been adopted.

This project introduced a sophisticated statistical application, automating the generation of GDPR activity reports within the IMI, to replace a highly manual and time-consuming process to generate reports and statistics.

4.1.3 Website Auditing Tool (version 2.0.0)

by Dr. Jérôme Gorin

- Publicly available at <https://webgate.ec.europa.eu/edpb/spaces/HUB/pages/176489782/EDPB+Website+auditing+tool>
- <https://code.europa.eu/edpb/website-auditing-tool>
- <https://code.europa.eu/edpb/edpb-website-auditing-tool-backend>

This project, carried out by Dr. Jérôme Gorin, provided new features to the Website auditing tool and develop a server side to enhance collaborative work.

Version 1.3 of the tool was published in May 2025. It included a software available for Mac, Windows or GNU/Linux as well as a first limited SaaS version. The limited server version provided a subset of the features available on the local version and could only use knowledge databases or audits stored locally either within the software or in the browser storage.

This design limited the potential for collaborative work, as any work created within the tool needed to be manually exported and shared with colleagues.

Both versions of the tool (local software and SaaS) have been upgraded to enable sharing of information with a secure database on a server. This shift should promote smoother workflows in analysis, improve the transparency of contributions, and make collaboration more efficient.

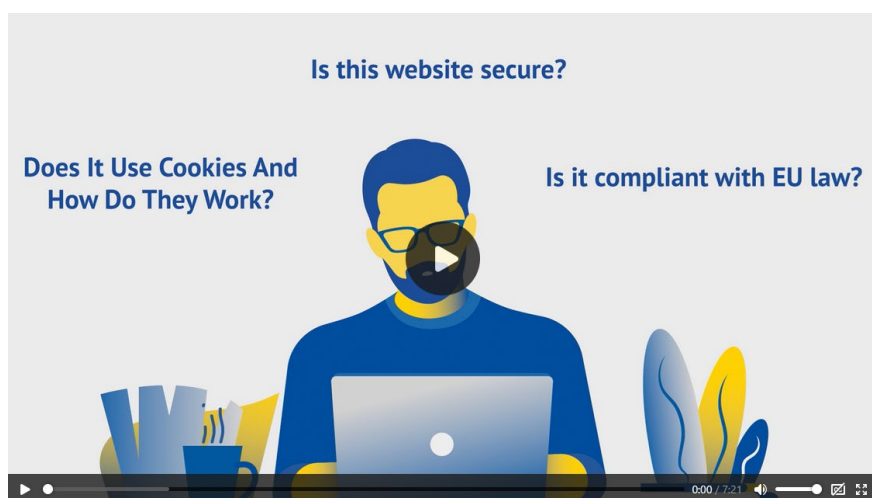
Both the updated client and the new backend were published on code.europa.eu.

4.1.4 Video tutorial on the Website Auditing tool

by Mirko Camia

- Available on the EDPB website at https://www.edpb.europa.eu/our-work-tools/our-documents/support-pool-experts-projects/edpb-website-auditing-tool_en

This project focused on creating a comprehensive animated video tutorial of 7:21 minutes for the EDPB Website Auditing Tool (WAT). The video aims to become an essential resource for enabling users to benefit from the EDPB WAT to its full potential.



4.1.5 Data brokers market study

by Ruben d'Hauwers

- Available on the EDPB website at https://www.edpb.europa.eu/our-work-tools/our-documents/support-pool-experts-projects/data-brokers-market-study_en

The BE SA commissioned a study to gain greater insights into the ecosystem of personal data providers and data brokers operating with a (presumed) main establishment in Belgium. The study aims to provide an overview for EDPB members and the BE SA to identify data providers and data brokers, while also offering a framework that other authorities can reuse to detect likely high-risk data providers and brokers.

The report is structured in three main parts.

First, it outlines the methodology used to identify data brokers, including working definitions and a description of the data sources. The study designed a search strategy to identify relevant companies in Belgium, using a set of key terms for online searches. The methodology developed and applied by the SPE expert in the report is designed to be re-useable and may serve as a valuable reference for other SAs across the EEA wishing to conduct a similar exercise.

Second, it presents a typology of data brokers identified, together with an analysis of their business models and an initial risk assessment. Only a small number of companies were found to fully meet the criteria of “data brokers”. To address this, the study introduced a typology capturing companies that partially meet the criteria, ultimately identifying eight different types of data providers and data brokers.

Third, the report provides an in-depth overview of more than 40 data brokers and providers identified in Belgium, ranked by type and size. Possible data brokers were assessed against the criteria outlined in the report. Overall, the study shows that the data broker and provider market in Belgium is highly diverse, with varying levels of risk related to personal data usage.

This project was launched in November 2024 and was finalised in September 2025.

4.2 SPE Projects launched in 2025

A total of eight new projects were launched in 2025 and four of them were completed over the course of 2025. The projects that have been published at the date of publication of this report are described below.

4.2.1 Report on international data protection enforcement cooperation

by Dr. Helena Kastlova

• Available on the EDPB website at https://www.edpb.europa.eu/our-work-tools/our-documents/support-pool-experts-projects/report-international-data-protection_en

This report examines the current state of international enforcement cooperation in the field of data protection, in particular regarding the cooperation between EEA data protection authorities (DPAs) and DPAs in countries with an EU adequacy decision, while also exploring how insights from other regulatory fields may inspire improvements to strengthen cross-border enforcement cooperation. The central question analysed in this report is the current state of international enforcement cooperation in data protection, whether there is room for improvement and to what extent useful lessons can be drawn from the related cooperation frameworks in consumer protection and competition law.

The findings are primarily based on desk research and analysis of questionnaire responses received from 18 DPAs across the EEA countries and countries with an EU adequacy decision. The report outlines that upon cooperation, DPAs encounter both legal and practical challenges, such as barriers to sharing personal data or confidential information, the exercise investigatory powers on behalf of foreign DPAs, the existence of reciprocity requirements, the absence of mechanisms for enforcing DPA decisions in third countries, as well as resource and operational constraints.

The report then recommends a combination of legal, technical and operational measures, drawing insights from successful practices in consumer and competition law, while addressing the specific obstacles, faced by DPAs.

4.2.2. OSS digest on the legal basis of "legitimate interest"

by Dr. TJ McIntyre

- Available on the EDPB website at https://www.edpb.europa.eu/system/files/2026-03/spe-oss-case-digest-legitimate-interest_en.pdf

The EDPB commissioned a fourth thematic case digest, this time on the legal basis of legitimate interest under Article 6(1)(f) GDPR.

The case digest is based on 62 decisions adopted under the OSS mechanism regarding legitimate interest that are available in the EDPB register and adopted between December 2018 and June 2025. A number of national SA decisions and court judgments were also mentioned to illustrate particular issues. The OSS decisions analysed presented a wide range of factual contexts, from hairdressers requiring customers to provide a phone number for a walk-in haircut to behavioural advertising affecting substantially all the population of Europe. Overall, the case digest provides useful examples on how SAs analysed the reliance of controllers on the legal basis of "legitimate interest" in specific context, providing both positive and negative compliance examples.

The external expert explained and summarised how SAs applied the three-step test to assess whether a controller could lawfully rely on the legal basis of legitimate interest.

Lastly, the external expert covered specific and recurring themes, focusing for example on consumer finance issues (such as credit checks, reporting to credit default registries and identifying debtors publicly), anti-fraud measures, rental vehicle monitoring and the interplay with the ePrivacy Directive.

The case digest also refers to EDPB Guidelines 1/2024 on Processing of Personal Data Based on Article 6(1)(f) GDPR, Version 1.0, 8 October 2024 and illustrates in practice parts of these Guidelines and the three-step test explained therein. Relevant cases before the Court of Justice of the EU (CJEU) are also mentioned.

This project was launched in July 2025 and completed in December 2025.

4.2.3. The Digital Euro and its token-based offline modality

by Prof. Tibor Jager

• Available on the EDPB website at: https://www.edpb.europa.eu/our-work-tools/our-documents/support-pool-experts-projects/digital-euro-and-its-token-based-offline_en

The EDPB has been working to ensure the highest standards of data protection in the context of the establishment of the digital euro. For example, the EDPB has adopted a joint opinion¹¹ with the European Data Protection Supervisor (EDPS) on the Proposal for a Regulation on the establishment of the digital euro¹².

Decisions regarding the design of the digital euro have significant implications for the rights and freedoms of European individuals as well as for their ability to use data protection-friendly and digital payment methods in the future.

This report explores the technical feasibility, inherent limitations, possible approaches and security considerations surrounding the development of a cash-like, anonymous and double-spending-resistant offline modality for the Digital Euro.

The author underlines that the vision of an offline digital currency that fully replicates the anonymity, security and usability of physical cash is conceptually appealing but the absence of physical constraints, as well as the need for robust double-spending resistance and the tension between anonymity and traceability pose a significant technical challenge.

The report highlights that an offline, secure and privacy-preserving digital currency requires navigating a complex landscape of technical trade-offs. It is specified that a large variety of cryptographic tools can be used to achieve unforgeability and anonymity in a very strong way. These must be combined with suitable techniques for double-spending prevention, e.g., via secure hardware elements or by carefully weakening the offline requirement. The author underlines that the design must be guided by clear requirements, realistic threat models and close collaboration across disciplines, including cryptography, systems security, hardware engineering, legal frameworks and policy. The author states that public transparency in both the design and implementation of all system components is essential because scrutiny by independent experts helps uncover vulnerabilities early and is critical to fostering public confidence, broad adoption and long-term legitimacy of the system.

The report concludes that an anonymous modality of the Digital Euro appears feasible, provided that the system is designed based on a suitable combination of techniques and trade-offs. More specifically, the currently available cryptographic techniques provide a credible path forward for the design of a privacy-preserving and secure offline modality of the Digital Euro. This ensures the expected level of privacy, security and usability properties.

This project was launched in June 2025 and completed in September 2025.

¹¹ www.edpb.europa.eu/our-work-tools/our-documents/edpb-edps-joint-opinion/edpb-edps-joint-opinion-022023-proposal_en

¹² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52023PC0369>

5 SPE event - Bootcamp on AI & AI auditing

The Secretariat organised a third in-person bootcamp in Brussels to allow SAs' experts to exchange knowledge and best practices for AI & AI auditing.

Around 50 experts from 24 SAs met in Brussels on 1-2 October 2025 to participate in this bootcamp. Of these experts, at least thirty participated in an EDPB meeting or event in Brussels for the first time. In addition, at least sixteen of them already took part in the first bootcamp.

6 Conclusion

This report provides a brief overview of the SPE projects continued or launched in 2025 with the reserve list of external experts. Many projects have been launched in 2025, including the growing trend of projects on AI systems, which continues to showcase the eagerness of SAs to benefit from the use of external expertise, whether legal or technical - or both.

Additional projects will be launched in 2026 and the Secretariat also plans to organise a fourth bootcamp.