



# Minutes

## 118th EDPB plenary meeting

15-16 April 2026 – in-person

Some points have been redacted from these minutes as their publication would undermine the protection of one or more of the following legitimate interests, in particular: the public interest as regards international relations; the privacy and integrity of the individual regarding the protection of personal data in accordance with Regulation 2018/1725; the commercial interests of a natural or legal person; ongoing or closed investigations; the decision-making process of the EDPB, in relation to matters upon which a decision has not yet been taken and/or the decision-making process of the EDPB, in relation to matters upon which a decision has been taken.

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

#### I.1. Introduction

The EDPB Chair informed the EDPB members of the mission to the USA for the IAPP summit, where she had the opportunity to meet with the US ODNI, Department of Justice and Department of Commerce to discuss the complaint mechanisms under the DPF for national security complaints. She also informed the EDPB members that a DPA day event had been organised, providing for opportunities of exchanges with the US administration and regulators. [REDACTED]

The Chair also informed the EDPB members about the Commission's specification proceedings regarding Alphabet's online search data sharing obligations related to Article 6(11) DMA. Once the draft measures are published, they will be open to public consultation for two weeks. [REDACTED]

The Chair then recalled the fact that the Cooperation Expert Subgroup does not currently have a coordinator, as its previous coordinator's term ended after the last meeting. The Chair made a last call to ask for volunteers for this function and informed the members that, if nobody applies, she will launch a written procedure to appoint two members of the EDPB Secretariat as interim coordinators.

The Chair reminded of the coming high-level meeting taking place in Dublin on 16–17 July 2026 and encouraged the EDPB members to share possible topics to discuss. [REDACTED]

Lastly, the Chair recalled that the application process for the 2026–2027 EDPB secondment programme enabling staff exchanges within the EDPB is currently ongoing and is open until 23 April. Interested SAs should indicate their willingness to host secondees, and colleagues willing to go on a secondment should express their interest before that deadline.

The HU SA then informed the EDPB members that, after the elections that took place in Hungary, there are ongoing investigations within the DPA.

## **I.2. Minutes of the 116th and 117th EDPB meeting**

The minutes of the 116th and of the 117th EDPB plenary meetings were adopted unanimously.

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

## **I.3. Draft agenda of the 118th EDPB meeting**

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

The discussions relating to agenda points B.1.3, B.1.4, B.1.6, B.2.1, D.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 five-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 Jacobs Douwe Egberts Group (International Transfers ESG); and
- A.2. Opinion on the draft decision of the NL SA regarding the Controller Binding Corporate Rules of SLB Group (International Transfers ESG); and
- A.3. Opinion on the draft decision of the BE SA regarding the Controller Binding Corporate Rules of Kuwait Petroleum Group (International Transfers ESG); and
- A.4. Opinion on the draft decision of the ES SA regarding the Controller Binding Corporate Rules of the Santander Group (International Transfers ESG); and
- A.5. Opinion on the draft decision of the Office of the Data Protection Ombudsman (FI SA) regarding the approval of the requirement for accreditation of a certification body pursuant to Article 43(3) GDPR (Compliance, E-Government & Health ESG).

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

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

#### **B.1.1 Guidelines on Scientific Research (Compliance, E-Government & Health ESG)**

The Chair introduced the topic and the background for the file, including the stakeholder event organised by the EDPB in April 2021 and the Joint Opinions on the European Health Data Space, Digital Omnibus and the Biotech Act. The Chair then passed the floor to the lead rapporteur who provided a general presentation of the guidelines and presented the work done.

During the discussion, one member underlined the importance of the consultation process for these guidelines.

The EDPB members adopted the guidelines unanimously. The guidelines will be submitted to public consultation for a period of 10 weeks.

#### **B.1.2. Internal Work Programme 2026–2027 (Coordinators & Strategic Advisory ESGs)**

The EDPB Chair introduced the topic and recalled the background of the file.

The EDPB Secretariat presented the Internal Work Programme 2026–2027 and the outcome of the discussion of the Commissioners' meeting. The EDPB members discussed the internal Work Programme 2026–2027 and agreed on certain modifications.

The EDPB members unanimously adopted the Internal Work Programme 2026–2027.

#### **B.1.3 Opinion on the Europrivacy criteria of certification regarding their approval by the Board as European Data Protection Seal pursuant to Article 42(5) GDPR (Compliance, E-Government & Health ESG) [Confidential discussion] [Not for observers]**

The Chair introduced the item and its background and passed the floor to the EDPB Secretariat as lead rapporteur. The lead rapporteur provided a general presentation of the draft Opinion and presented the work done.

The EDPB members welcomed the Opinion and adopted it unanimously.

#### **B.1.4. Opinion on the Europrivacy criteria of certification regarding their approval by the Board as European Data Protection Seal to be used as tool for transfers pursuant to Article 42 and 46 GDPR (Compliance, E-Government & Health ESG and International Transfers ESG) [Confidential discussion] [Not for observers]**

The Chair introduced the item and its background and passed the floor to the EDPB Secretariat as lead rapporteur. The lead rapporteur provided a general presentation of the draft Opinion and presented the work done.

The EDPB members welcomed the Opinion and adopted it unanimously.

#### **B.1.5. Promotion of GDPR compliance tools – Request for mandate (Compliance, E-Government & Health ESG)**

The Chair introduced the item and recalled that supporting the development and implementation of appropriate and effective compliance measures, such as certification and codes of conduct, is one of the key actions of the EDPB Strategy 2024–2027. The Chair then passed the floor to the lead rapporteur to present the request for mandate, who recalled that compliance and guidance are also foreseen in the Helsinki Statement.

The EDPB Secretariat also informed the members that they would propose a general approach for planning public consultations during an upcoming Plenary meeting.

The EDPB members took note of the information and adopted the mandate unanimously.

#### **B.1.6 EDPB Letter regarding INGO registration requirements**

The EDPB Chair introduced the subject, recalling previous discussions on the matter and the commitment to have a unified approach at EDPB level. Following this, the rapporteur presented the draft letter to the European Commission.

The European Commission confirmed they are aware of the issues highlighted in the draft letter and explained they have been in touch with several concerned NGOs.

After exchanging on the draft, the EDPB members adopted the letter, with 23 EU members voting in favour, 2 EU members voting against and 3 EU members abstaining. The EEA SAs expressed their position, with 3 EEA SAs in favour. The EDPB members also agreed to publish the letter on the EDPB website.

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

### **B.2.1. Guidelines on Anonymisation (Technology ESG) [Confidential discussion]**

The EDPB Chair introduced the item, underlining that these guidelines are a high priority for the Board. The EDPB Chair then stressed that the purpose of today's discussion is to give orientations to the TECH ESG on some strategic points, as well as to discuss the way forward on the guidelines.

After a presentation given by the lead rapporteur, the EDPB Chair invited comments on the first discussion point, [REDACTED]

[REDACTED] and recalled that many stakeholders have requested guidance on this point at the EDPB stakeholder event following the SRB ruling. [REDACTED]

[REDACTED] The lead rapporteur then introduced the second discussion point [REDACTED]

[REDACTED] The EDPB members then discussed the scope of the Guidelines. It was agreed that the current scope should be retained and that it respects the mandate received by the TECH ESG.

The Board then discussed the need for a dedicated "sprint team" to finalise the work by the summer. The EDPB members endorsed this proposal, noting the importance of these Guidelines and the need for the sprint team to have a clear mandate to ensure that the text meets the EDPB's Helsinki commitments. Two members discussed whether the concept of sprint teams could be used in other contexts. It was suggested that the EDPB could consider the experiences of and results from this sprint team in later discussions on this point.

Finally, the EDPB Chair stressed that the EDPB members should follow this file attentively and ensure coordination within their SAs.

### **B.2.2. EDPB Good practices when using LLM/Gen AI tools with information shared within the EDPB**

The EDPB Chair introduced the subject. The EDPB Secretariat presented some short draft Good practices to be followed by Members and their staff when using Gen AI tools in the context of the EDPB activities.

The EDPB members exchanged on the matter and approved the good practices.

## C. Organisational matters

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

#### C.1.1 Comparative analysis of existing cooperation agreements (Cross-Regulatory Interplay and Cooperation ESG)

The rapporteur presented an update of the work done on this matter in the context of the CIC ESG with a view to prepare a template.

The EDPB members took note of the information provided.

### C.2. General organisational matters

#### C.2.1 Representatives for the Joint Review of the EU-US Terrorist Finance Tracking Programme Agreement

The EDPB Chair introduced the subject and recalled the relevant background..

Following a survey, the Chair decided to appoint [REDACTED] from the SE SA and [REDACTED] from the BE SA as EDPB representatives to the 8th joint review of the EU-U.S. Terrorist Finance Tracking Program Agreement. The EDPB members took note of the information.

## D. Items for information

### D.1. Updates by EDPB participants

#### D.1.1. Negotiations with the United States on an Enhanced Border Security Partnership

The EDPB Chair introduced the subject, recalling previous discussions on the topic.

The EDPB Chair then welcomed the European Commission's representative, who provided the EDPB members with an update about on the negotiations. The EDPB members asked questions to the European Commission's representative and exchanged on the matter.

#### D.1.2 Semestrial report of the Coordinated Supervision Committee

The EDPB Chair recalled the legal duties entrusted to the Coordinated Supervision Committee (CSC) to supervise a growing number of European large scale IT systems and the resources this requires from both SAs and the EDPB Secretariat.

The CSC coordinator provided an update on the Coordinated Supervision Committee's activities for the period October 2025 to March 2026. During this period, the CSC has focused on preparing the coordinated supervision of ETIAS and of EES, on the coordinated supervision of VIS and SIS, of Europol and Eurojust, as well as of the CIS JHA.

Following the need to obtain direct information from the European Commission in the context of the activities of the CSC in relation to EES, the CSC intends to take contact with the European Commission in order to agree on cooperation methods.

The EDPB members took note of the information provided.

#### D.1.3 Annual report of SPE activities for the year 2025

The EDPB Chair recalled the history of the Support Pool of Experts and gave the floor to the EDPB Secretariat, who presented the report on the use of SPE external experts which summarises the activities carried out in 2025.

The EDPB members took note of the information presented and agreed that the report will be published on the EDPB website.

#### **D.1.4 Update on Amazon case**

The LU SA provided an update concerning the Amazon case and a recent ruling of the Luxembourgish Court of Appeal. The LU SA also informed the members that a new draft decision will be submitted in IMI.

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

### **D.2.1 SPE Project: AI Tool for SAs**

The EDPB Chair informed the EDPB members that a project on an AI tool for SAs had been commissioned as part of the Support Pool of Experts at the request of the EL SA. The EL SA shared its appreciation for this work and provided information about the SPE project report.

The EDPB members took note of the information and decided to publish the document on the EDPB website.

### **D.2.2 Use of AI by DPAs**

The EDPB Chair introduced the subject and passed the floor to the speaker. The speaker informed the members that their SA is working on the implementation of an internal AI-based tool intended to reduce administrative burdens and that other SAs are planning or already testing similar tools. Following this, the EDPB members discussed the utility of further discussion on the matter, and agreed that there is a shared interest in intensifying the exchange of information and best practices on this topic. The EDPB members agreed to start by collecting information and takeaways from practical experience before discussing a more structured approach as part of the IT USERS ESG. The EDPB Chair highlighted that the matter is not purely technical and requires legal expertise and high-level involvement.

### **D.2.3 CSAM update**

The EDPB Chair referred to the recent European Parliament's decision not to prolong an interim derogation from e-Privacy rules allowing service providers to voluntarily detect child sexual abuse online in private communications.

The EDPB members acknowledged the current situation and agreed to come back to this topic at a later stage.

### **D.2.4 DE SA event on Digital Omnibus**

The DE Fed SA invited the EDPB members to an event which will take place on 8 June 2026 at the Bavarian representation office in Brussels. The event will be dedicated to the Digital Omnibus.

## **E. Written state of play**

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

## **E.2.1. European Accreditation – EDPB procedure for the evaluation of GDPR certification schemes and their criteria, candidate to be approved as European Data Protection Seals (Compliance, E-Government & Health ESG)**

The EDPB members took note of the written state of play concerning the EDPB procedure for the evaluation of GDPR certification schemes and their criteria, candidate to be approved as European Data Protection Seals.

### **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, RO SA, SE SA, SI SA, SK SA,

European Commission

EFTA Surveillance Authority

Observers:

- AL SA, BA SA, ME SA, MD SA, MK SA, RS SA. In line with Art. 8 of the EDPB RoP, the observers were present during the plenary meeting except for point B.1.3, B.1.4, B.1.6 and D.1.1 of the agenda.
- The CH SA was present for item D.1.2 of the agenda.

EDPB Secretariat