



WERELDWIJD PRIVACYNIEUWS  
VAN DPO CENTRE



**The DPIA** is een beoordeling van de impact van de belangrijkste en bekendste kwesties op het gebied van gegevensbescherming uit de hele wereld. Het is niet het volledige verhaal, maar slechts een snelle samenvatting van 3 minuten, verzameld en samengevat om u op de hoogte te houden van het laatste nieuws in onze steeds veranderende branche.

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## GDPR DPO requirements: What qualifies as large-scale processing?

If your organisation undertakes what is known as 'large-scale processing', you may be legally required under the General Data Protection Regulation (GDPR) to appoint a Data Protection Officer (DPO). But what qualifies as 'large-scale'?

In our latest blog, we explore what large-scale data processing means with clear, industry-specific examples to help you assess your obligations and stay compliant.

[Read our blog to find out if your business needs a DPO](#)

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## EUROPEAN UNION

### Privacy group files 6 complaints against Chinese corporations

On 16 January 2025, privacy group *noyb* (None of Your Business) filed six complaints against the Chinese corporations TikTok, SHEIN, Temu, AliExpress, WeChat, and Xiaomi for unlawfully transferring European users' personal data to China. The complaints argue that China is an 'authoritarian surveillance state' without adequate data protection measures and call on data protection authorities to immediately suspend these transfers.

This action underscores the necessity for organisations to ensure compliance with the General Data Protection Regulation (GDPR) when conducting data transfers outside the EU. To learn more about effectively managing the risks of international data transfers, read our blog, [Navigating international data transfers: TIAs vs TRAs](#).

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### EDPB publishes draft guidelines on pseudonymisation

On 16 January 2025, the European Data Protection Board (EDPB) adopted its Guidelines 01/2025 on Pseudonymisation, setting out the legal and technical requirements for effective pseudonymisation. The guidelines provide two important legal clarifications:

1. Pseudonymised data is still personal data and is therefore subject to the GDPR
2. Pseudonymisation can reduce risks and make it easier to use Legitimate Interests as a legal basis, as long as all other GDPR requirements are met

They also explain how pseudonymisation can help organisations comply with data protection principles and implement safeguards to prevent unauthorised identification of individuals.

The guidelines are open for consultation until 28 February 2025.

[Read the EDPB guidelines of pseudonymisation](#)

## AP requests input on prohibiting social scoring AI systems

On 18 December 2024, the Dutch data protection authority, Autoriteit Persoonsgegevens (AP), issued a call for input on prohibited social scoring artificial intelligence systems under the EU AI Act. This marks the third call for input by the AP, focusing on the specific criteria and implications of banning AI systems that assign social scores to individuals based on their behaviour, personal characteristics, or socio-economic status.

The feedback will be used to clarify enforcement guidelines, identify real-world risks and challenges, and shape national policy and compliance requirements. The consultation closes on 7 February 2025.

[Submit your input](#)

**Privacy Puzzle**  
GLOBAL WEBINAR SERIES  
18 MAR 2025

**SMART HIRING OR BACKFIRING:  
Employing AI in recruitment**

Helen Armstrong | Richard Bradshaw | Nicky Badenoch | David Smith

SILVER CLOUD | PeopleRe. | dpo centre

**18 MAR 2025** ⌚ 10:00 EDT | ⌚ 14:00 GMT | ⌚ 15:00 CET [REGISTER NOW](#)

**UNITED KINGDOM**

## ICO publishes guidance on ‘consent or pay’ models

On 23 January 2025, The Information Commissioner’s Office (ICO) published new cookie compliance guidance on ‘consent or pay’ models, which allow people to choose between agreeing to personalised adverts or paying to access an ad-free service. The guidance

states that organisations using ‘consent or pay’ models must be able to demonstrate that consent has been freely given and include an assessment of these models in their DPIA.

The guidance also sets out a framework of factors organisations should consider when conducting an assessment, including:

- Is there a clear power imbalance between you and the users of your product or service?
- Have you set an appropriate fee for accessing your service without personalised advertising?
- Does your core service offer comparable products or services to those who choose to consent or pay?
- Do you present choices equally to users, with clear and understandable information about what each choice means and involves?

[Read the ICO ‘consent or pay’ guidance](#)



The banner features a yellow background with a repeating pattern of white circles. At the top, a black box contains the text 'WE'RE ATTENDING' in white. Below this, a white box contains the event title 'BIO-EUROPE SPRING®' in teal, with the dates and location 'March 17-19, 2025 | Milan, Italy' underneath. A teal and orange geometric shape is on the left, and a faded image of a cathedral is on the right. At the bottom, a black box contains a calendar icon, the dates '17 - 19 MAR 2025', the location 'MILAN, ITALY', and the 'doo centre' logo.

## CANADA & UNITED STATES

### White House issues EO to bolster AI in US

On 23 January 2025, the White House issued an Executive Order (EO) titled ‘Removing barriers to American leadership in artificial intelligence’. The EO aims to enhance the nation’s dominance in AI to promote human flourishing, economic competitiveness, and national security. It mandates the development of an AI action plan within 180 days and rescinds previous policies perceived to hinder innovation.

The new order revokes EO 14110, signed by former President Joe Biden, which emphasised the safe and trustworthy development of AI. As the focus shifts from risk mitigation to rapid innovation, companies may face fewer regulatory hurdles when developing and deploying AI models.

[Read the Executive Order](#)

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## Washington State data privacy bill passes first reading

On 28 January 2025, House Bill 1671, concerning personal data privacy, passed its first reading in the Washington State House of Representatives. The Bill aims to enhance consumer rights, such as the ability to access their personal data, correct inaccuracies, request deletion, and opt out of processing for the purposes of targeted advertising.

The Bill outlines several requirements for data controllers, including:

- Responding to authenticated consumer requests within 45 days of receipt, free of charge
- Providing consumers with a secure and reliable means to exercise their rights
- Limiting the collection, processing, and transfer of personal data to what is strictly necessary to provide a specific product
- Conducting data protection impact assessments for high-risk processing

[Read House Bill 1671](#)

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## INTERNATIONAL

### Chinese-made DeepSeek banned in Italy

On 20 January 2025, Chinese-made DeepSeek released its latest open-source language model, R1, which quickly became the most downloaded app on Apple's Top Free Apps chart. The company claims that R1 was built at a fraction of the cost of industry-leading models, such as OpenAI, and can exceed their capabilities.

Italy's data protection authority, the Garante, has banned DeepSeek pending further investigations, with other EU authorities initiating similar concerns about its data processing practices.

Privacy experts warn that DeepSeek's data handling poses substantial risks, given China's differing privacy and security standards. David Smith, DPO and AI Sector Lead at The DPO Centre, stated, '*Like many services before it, DeepSeek appears to offer a free service in return for unfettered use of submitted data, with no true user control.*'

[Read our full story on DeepSeek](#)

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**OP ZOEK  
NAAR EEN  
FANTASTISCHE  
PLEK OM TE  
WERKEN?**

**KLIK HIER**



## We are recruiting!

To support our ongoing requirement to continuously grow our remarkable and extraordinary **#ONETEAM**, we are seeking candidates for the following positions:

- **Data Protection Officers (The Netherlands)**
- **Data Protection Officer - Life Sciences (United Kingdom/The Netherlands)**
- **Data Protection Officers (United Kingdom)**
- **Data Privacy Officers (Canada)**
- **Data Protection Support Officers (United Kingdom)**
- **Recruitment Coordinator (Maternity Cover) (United Kingdom)**

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