



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.

ICO's guidance on Consent or Pay: What you need to know

If you're planning to adopt a 'Consent or Pay' model for your online service, you need to ensure compliance with the UK General Data Protection Regulation (UK GDPR) and the Privacy and Electronic Communications Regulations (PECR).

In our latest blog, we explore the new Consent or Pay guidance from the Information Commissioner's Office (ICO) and share important compliance considerations. Find out how the ICO's latest guidance will affect your business and how you can effectively implement a compliant Consent or Pay model.

Read the blog

#### **EUROPEAN UNION**

## **EDPB** launch CEF action on right to erasure

On 5 March 2025, the European Data Protection Board (EDPB) launched its Coordinated Enforcement Framework (CEF) action for 2025 on the <u>right to erasure</u>. The action will see 32 Data Protection Authorities (DPAs) from across Europe investigate how data controllers respond to requests for erasure, particularly focusing on how they apply the exceptions to this right. This coordinated action aims to ensure consistent enforcement among DPAs. The results will be collectively analysed to produce further insights into the topic, facilitating targeted follow-ups at both national and EU level.

In preparation, controllers should:

- Review and update internal policies and procedures for handling erasure requests
- Train staff to recognise and process requests correctly
- Implement robust methods to verify the identity of the requestor
- Maintain detailed records of all erasure requests and the actions taken in response
- Regularly assess the necessity of retaining personal data, deleting any that is no longer needed

\_\_\_\_\_

## Third draft of General-Purpose Al Code of Practice published

On 11 March 2025, the European Commission published the third draft of the General-Purpose AI Code of Practice. The Code aims to streamline the commitments and measures for AI model providers, ensuring they align with the EU AI Act.

The Code includes transparency and copyright obligations for all providers of general-purpose AI models (with some exemptions for certain open-source models), alongside a Model Documentation Form that allows providers to easily document necessary information.

For models classified as systematic risks, the Code outlines risk assessment and mitigation measures, including model evaluations, incident reporting, and cybersecurity obligations.

The draft Code is open for feedback from stakeholders until 30 March 2025.

Read the third draft Code of Practice

\_\_\_\_\_

## Dutch citizens' medical data found on discarded hard drives

A number of hard drives containing the personal and medical data of Dutch citizens were discovered at a flea market in Belgium. The drives previously belonged to Nortade ICT Solutions, a now-closed IT company that developed software for healthcare organisations. The data included service numbers (BSN), dates of birth, addresses, prescriptions, and other medical information dating from 2011-2019.

It's unclear how the drives came to be at the flea market, but it highlights a serious concern regarding proper disposal of sensitive information. Under the General Data Protection Regulation (GDPR), companies are required to securely erase or destroy personal data once it is no longer needed. Learn more about data retention best practices in our <u>blog</u>.

\_\_\_\_\_\_



### **UNITED KINGDOM**

## UK's AI (Regulation) Bill passes first reading in House of Lords

On 4 March 2025, the Artificial Intelligence (Regulation) Bill was reintroduced to Parliament and passed its first reading in the House of Lords. The Bill previously failed to progress into law due to the dissolution of Parliament prior to the last general election.

Key features of the Bill include:

- Establishes an Al Authority to oversee the development and use of artificial intelligence
- Regulatory principles, including safety, transparency, fairness, accountability, and contestability
- Mandates businesses appoint designated Al officers to ensure safe, ethical, and unbiased Al usage
- Creates regulatory sandboxes, allowing companies to test Al innovations in controlled environments

Businesses utilising AI should adhere to transparency principles, conduct thorough testing, and ensure compliance with relevant data protection laws.

**Read the Bill** 



WORLD CONGRESS EUROPE

BIOTECH · HEALTHTECH · MEDTECH





## **CANADA & UNITED STATES**

# AG sues insurance firm for failing to protect consumers' data

On 10 March 2025, New York Attorney General Letitia James filed a lawsuit against National General and its parent company, Allstate Insurance, for failing to protect consumers' personal information from cyberattacks. The lawsuit alleges that the companies suffered two major data breaches in 2020 and 2021, exposing the driver's license numbers of over 165,000 New Yorkers.

According to AG James, National General failed to notify affected consumers after the first breach and neglected to investigate the extent of the compromise, leading to a second, larger breach months later. The lawsuit claims that both incidents resulted from the company's failure to implement proper cybersecurity measures.

Developing a robust plan for data security helps organisations stay ahead of threats and reduce the impact of data breaches. Our blog on <u>data breach management</u> explores best practices and provides 5 tips for an effective response.

#### **COPPA 2.0 reintroduced to US Senate**

On 4 March 2025, the bipartisan Children and Teens' Online Privacy Protection Act (COPPA 2.0) was reintroduced to the US Senate. The legislation aims to enhance the protection of minors' personal information online.

#### Key features include:

- Prohibits digital companies from collecting personal information from users under 16-years-old without consent
- · Bans targeted advertising to children and teens

- Introduces an 'eraser button' that allows parents and children to delete personal information online
- Establishes data minimisation rules to prohibit excessive collection of minors' data
- Revises COPPA 'actual knowledge' standard, requiring businesses to implement an age verification processes

**Read the Bill** 

#### **INTERNATIONAL**

# Uganda's PDPO launches toolkit for data protection compliance

On 25 February 2025, Uganda's Personal Data Protection Office (PDPO) launched a Data Protection and Privacy Compliance Toolkit to help organisations comply with the country's Data Protection and Privacy Act. It offers practical tools, templates, and detailed guidance that businesses can use to assess their data protection practices, identify gaps, and implement improvements.

The toolkit has been specifically tailored to FinTech organisations and aims to be a comprehensive resource for both small and large businesses. It marks a significant milestone in the country's efforts to strengthen data protection practices.

Access the toolkit



#### 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 Officers (United Kingdom)
- Data Protection Officer Life Sciences (United Kingdom/The Netherlands)
- Data Privacy Officers (Canada)
- Data Protection Support Officers (United Kingdom)

If you are looking for a new and exciting challenge, apply today!



Copyright © 2025 The DPO Centre, All rights reserved.

You have been sent this newsletter under legitimate interest, for more information please read our <u>Privacy Notice</u>
The DPO Centre is a limited company registered in England and Wales (Company Number: 10874595)

The DPO Centre Group, London, Amsterdam, New York, Toronto, Dublin

Manage preferences