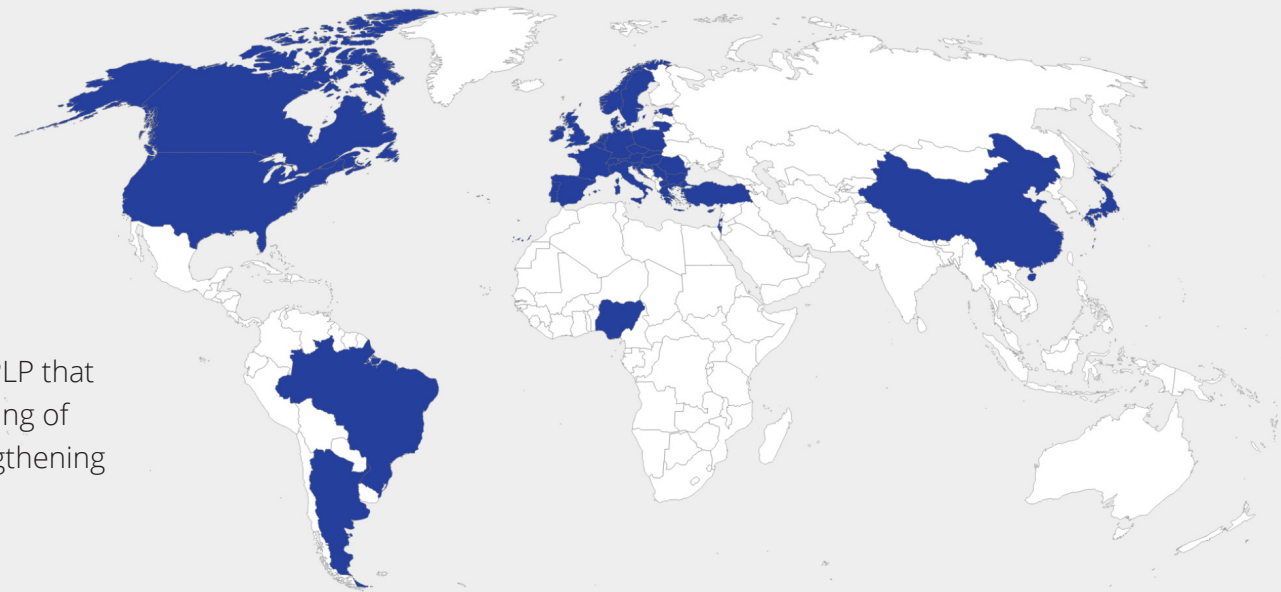


Activity Report

2020 - 2021

The elapsed period brought an immensely successful year for INPLP that was characterized by strong collaboration, hard work, and a growing of the network. Striving for an ambitious expansion goal while strengthening international relations has been our key objective.





Dr. Tobias Höllwarth
President, INPLP



Anne Robert
GIACCARDI & BREZZO AVOCATS



Thomas Giaccardi
GIACCARDI & BREZZO AVOCATS

Although 2020 held a lot of unusual and unanticipated challenges in store for us all, it turned out to be a very successful year for INPLP. Our network was able to welcome a host of law firms as new members, publish 75 specialist articles, bring the comprehensive GDPR Fines Database up to date, conduct a professional online conference, and send a strong signal to the European Data Protection Board with our letter of recommendation.

INPLP intends to continue this path of robust and professional growth in 2021 and has already launched two new specialist projects. Furthermore, the INPLP board expects that we will welcome our 100th member in 2022.

All this shows the excellent value of the INPLP network for its members as well as the value of the work performed by INPLP for its members' clients.

Kind regards,

Dr. Tobias Höllwarth

Anne Robert

Thomas Giaccardi

About INPLP

INPLP is a not-for-profit international network of qualified professionals providing expert counsel on legal and compliance issues relating to data privacy and associated matters.

INPLP provides targeted and concise guidance, multi-jurisdictional views and practical information to address the ever-increasing and intensifying field of data protection challenges.

INPLP fulfils its mission by sharing know-how, conducting joint research into data processing practices and engaging proactively in international cooperation in both the private and public sectors.

INPLP[®] International Network of
Privacy Law Professionals 



Introduction

The elapsed period brought an immensely successful year for INPLP that was characterized by strong collaboration, hard work, and a growing of the network.

Striving for an ambitious expansion goal while strengthening international relations has been our key objective.

Growth

In pursuit of our goal of rapid expansion, we were pleased to welcome 10 new members to our network. This further improves our ability to operate on a global scale and provide insights into data privacy activities around the globe. We have managed to expand to 48 members representing 37 partners in 35 countries.

New members joining the network last year:

Olumide Babalola / Nigeria

de la cruz beranek / Switzerland

Traple Konarski Podrecki & Partners / Poland

Molitor / Luxembourg

Matsuda & Partners / Japan

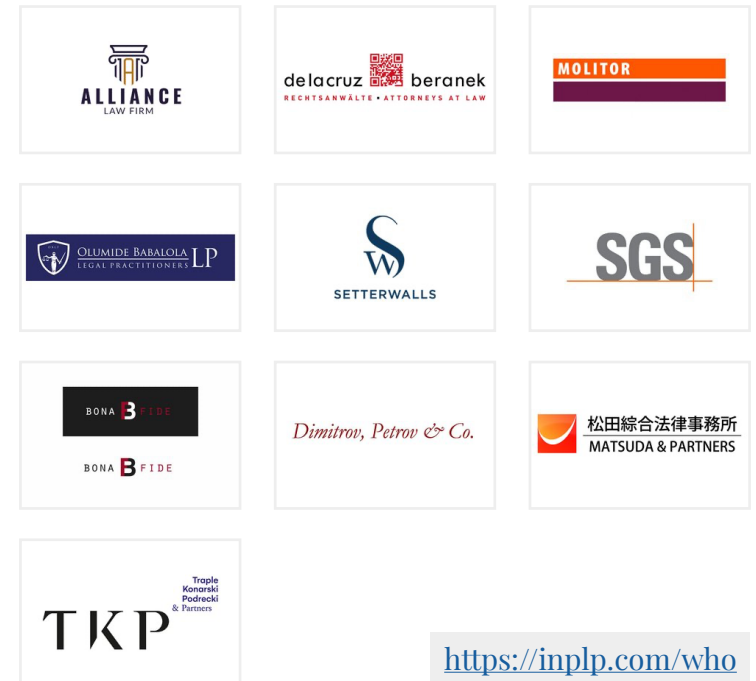
Dimitrov, Petrov & Co. / Bulgaria

SGS Hong Kong Limited / Hong Kong

Alliance Law Firm / Nigeria

Setterwalls / Sweden

Bona Fide / North Macedonia

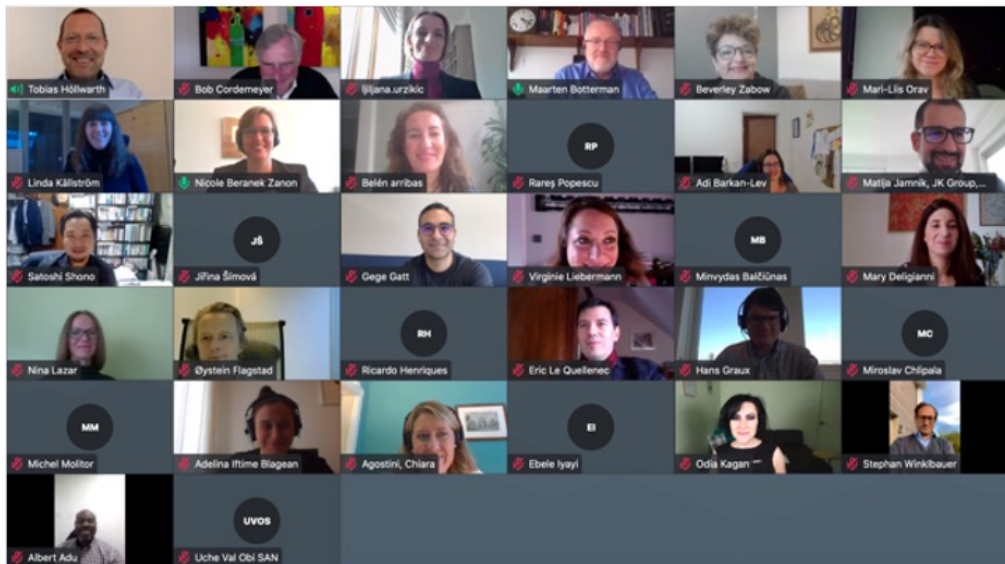


<https://inplp.com/who>

Conference

The COVID-19 pandemic upset our original plans of a physical conference in the Netherlands. In order to pursue our goal of strengthening international relations, a plan to host the 2020 conference online was conceived, and the conference was held successfully in November. Our INPLP Conference Committee helped to compile a comprehensive agenda ranging from keynote speakers addressing topics such as “Internet Governance in the Coming Years” or “Surveying the New Cyber Threat Landscape” to discussions dealing with issues such as Schrems II.

<https://inplp.com/latest-news/article/5th-annual-inplp-conference>



Letter to the European Data Protection Board

INPLP drafted a statement letter to the European Data Protection Board in response to the proposed Recommendations 01/2020 on measures supplementing transfer tools to ensure compliance with the EU level of personal data protection.

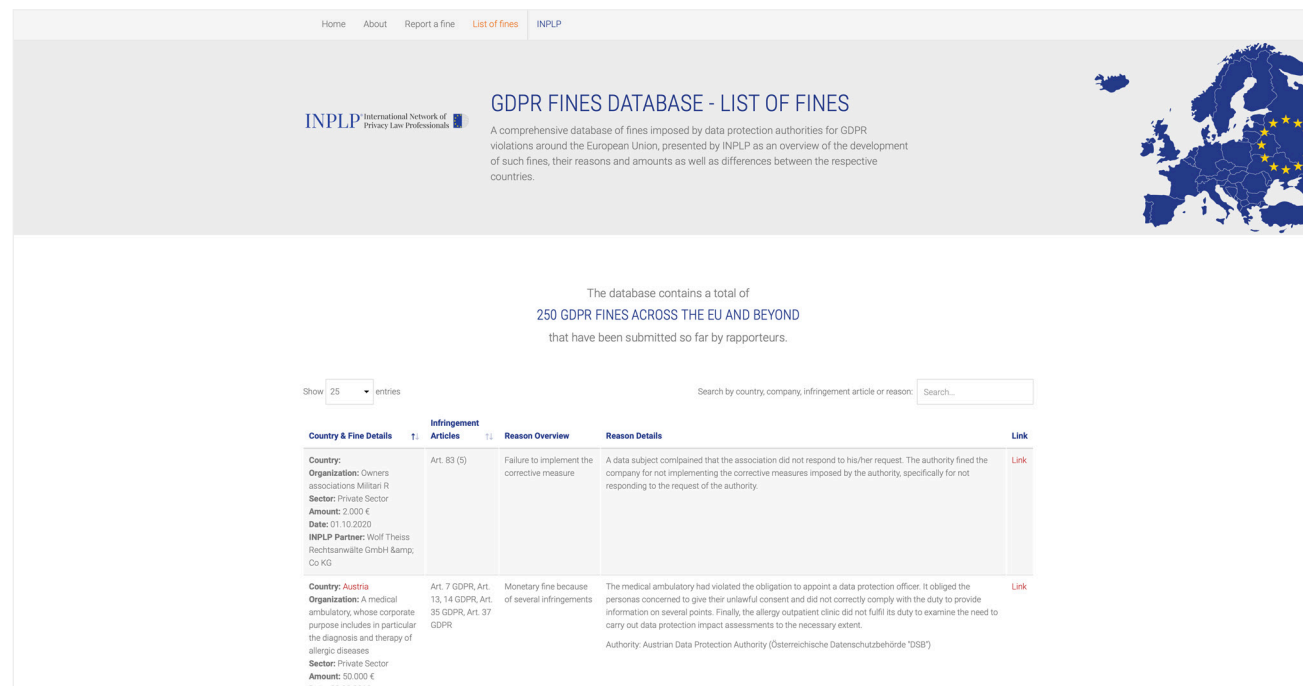
https://edpb.europa.eu/our-work-tools/public-consultations-art-704/2020/recommendations-012020-measures-supplement-transfer_en



GDPR-Fines Database

In 2020, INPLP launched its GDPR Fines Database representing a comprehensive listing of fines imposed by data protection authorities across the European Union for GDPR violations. The database provides an overview of the development of these fines along with their reasons and amounts, as well as revealing differences between the respective countries. This further promotes transparency and know-how concerning topics relating to privacy law.

<https://gdpr-fines.inplp.com>



The screenshot shows the INPLP GDPR Fines Database website. At the top, there is a navigation menu with links for Home, About, Report a fine, List of fines, and INPLP. The main heading is "GDPR FINES DATABASE - LIST OF FINES". Below this, a sub-heading states "A comprehensive database of fines imposed by data protection authorities for GDPR violations around the European Union, presented by INPLP as an overview of the development of such fines, their reasons and amounts as well as differences between the respective countries." A map of Europe with the EU flag is visible on the right side.

The database contains a total of **250 GDPR FINES ACROSS THE EU AND BEYOND** that have been submitted so far by rapporteurs.

























Search options include "Show 25 entries" and a search box for "Search by country, company, infringement article or reason: Search...".

Country & Fine Details	Infringement Articles	Reason Overview	Reason Details	Link
Country: Owners associations Militari R Sector: Private Sector Amount: 2.000 € Date: 01.10.2020 INPLP Partner: Wolf Theiss Rechtsanwälte GmbH & Co KG	Art. 83 (5)	Failure to implement the corrective measure	A data subject complained that the association did not respond to his/her request. The authority fined the company for not implementing the corrective measures imposed by the authority, specifically for not responding to the request of the authority.	Link
Country: Austria Organization: A medical ambulatory, whose corporate purpose includes in particular the diagnosis and therapy of allergic diseases Sector: Private Sector Amount: 50.000 € Date: 30.08.2019	Art. 7 GDPR, Art. 13, 14 GDPR, Art. 35 GDPR, Art. 37 GDPR	Monetary fine because of several infringements	The medical ambulatory had violated the obligation to appoint a data protection officer. It obliged the persons concerned to give their unlawful consent and did not correctly comply with the duty to provide information on several points. Finally, the allergy outpatient clinic did not fulfil its duty to examine the need to carry out data protection impact assessments to the necessary extent. Authority: Austrian Data Protection Authority (Österreichische Datenschutzbehörde "DSB")	Link

Publications

Thanks to our dedication to improving the understanding of legal and practical aspects of data, technology, and the relation between them, INPLP published 75 articles relating to privacy law in 2020. This fully aligns with our mission to provide targeted and concise guidance, multi-jurisdictional views, and practical information to address the continually expanding and shifting field of data protection challenges.

<https://inplp.com/latest-news>

 <p>GDPR FINES: RAMPING UP AND DPAs SETTING STANDARDS</p> <p>European Supervisory Authorities imposed more than €1.68m in fines under the GDPR during 2020, close to a 40% increase on the previous...</p>	 <p>WHEN IS THE RIGHT TO PRIVACY MORE IMPORTANT THAN THE RIGHT TO LIFE ITSELF?</p> <p>In Israel, as in many other countries, the coronavirus is rampant. There are various strategies available to contend with this...</p>	 <p>ROMANIAN PUBLIC AUTHORITIES SANCTIONED FOR GDPR BREACHES</p> <p>Towards the end of 2020, the Romanian Data Protection Authority (ANSROPC) disclosed on its website information regarding the...</p>	 <p>WHEN CAN INFORMATION ON CRIMINAL RECORDS BE REQUESTED BY EMPLOYERS?</p> <p>A recent Opinion of the Bulgarian data protection authority and certain legislative changes lead to the conclusion that in Bulgaria...</p>	 <p>DRAMATIC CHANGES ARE COMING TO THE PRIVACY LANDSCAPE IN CANADA</p> <p>This article discusses how the proposed legislation seeks to strike a balance between protecting consumer's personal information, and...</p>	 <p>BRAZIL'S DATA PROTECTION LAW: A BRIEF OVERVIEW</p> <p>Despite being no stranger to data privacy regulation, only recently has Brazil enacted a comprehensive set of rules to regulate the...</p>
 <p>DATA BREACHES IN HEALTHCARE DUE TO HUMAN ERRORS: TWO HOSPITALS AND A LOCAL HEALTH ADMINISTRATION UNIT SANCTIONED BY THE ITALIAN DATA PROTECTION AUTHORITY</p> <p>Data breaches are violations of database security that may result not only from cyber attacks, as it is usually assumed, but also...</p>	 <p>HONG KONG'S STALE DATA PROTECTION LAWS</p> <p>When it was introduced twenty years ago, Hong Kong's data protection law was one of the leading regimes of its type in Asia. But time...</p>	 <p>A NEW MEMBER HAS JOINED THE INPLP: KIRSTEN WOLGAST (GERMANY)</p> <p>Pinsent Masons is a full-service international law firm. They respond to the pressures and opportunities facing businesses globally...</p>	 <p>DENMARK'S FIRST GDPR FINE TO DATE</p> <p>On February 12th 2021 the city Court in Aarhus handed down the first verdict in Denmark that has led to a fine based on GDPR. The...</p>	 <p>CYPRUS DATA PROTECTION WATCHDOG IMPOSES FINE ON MAJOR BANKING INSTITUTION FOR INTEGRITY AND CONFIDENTIALITY VIOLATIONS.</p> <p>On 19 October 2020, The Office of the Commissioner for Personal Data Protection (the Commissioner) announced its decision to fine...</p>	 <p>NO GDPR FINES FOR PUBLIC SECTOR BODIES AT ALL: NO DISCRIMINATION, AND NO PROBLEM!</p> <p>The GDPR explicitly allows Member States to determine whether and to what extent administrative fines can be imposed on public...</p>
 <p>A NEW MEMBER HAS JOINED THE INPLP: JUSTYNA MATUZAK-LESNIAK (POLAND)</p> <p>elbi Adwokaci i Radcowie Prawni (elbi Legal) is a boutique law firm with an international atmosphere and scale of activity, located...</p>	 <p>DOES THE DRAFT DATA GOVERNANCE ACT SIGNAL A MORE ECONOMIC APPROACH OF PERSONAL DATA IN THE EU?</p> <p>The draft Data Governance Act, which was published by the European Commission last November, aims to foster the availability of both...</p>	 <p>RIGHT TO ACCESS OF ORIGIN OF THE INFORMATION BASED ON SWISS FEDERAL ACT ON DATA PROTECTION (FADP)</p> <p>The Swiss Federal Supreme Court has made an interesting decision on the scope of the right to information under Swiss Federal Act on...</p>	 <p>SCHREMS II: AN OPPORTUNITY FOR THE SOVEREIGN CLOUD</p> <p>As personal data crossborder flows cannot benefit from the "EU-US privacy shield" anymore, as a consequence of the Schrems II...</p>	 <p>A NEW MEMBER HAS JOINED THE INPLP: WENDY WAGNER (CANADA)</p> <p>Gowling WIG provides its clients with in-depth expertise in key global sectors and a suite of legal services at home and abroad...</p>	 <p>A PRIVACY LAW FOR 25% OF THE WORLD'S POPULATION: CHINA'S PERSONAL INFORMATION PROTECTION LAW</p> <p>China published the Personal Information Protection Law (Draft) ("PIPL") for public consultation on 21 October 2020. This is the...</p>
 <p>SWISS FEDERAL SUPREME COURT RULES: SMART METERING INFRINGES INFORMATIONAL SELF-DETERMINATION RIGHT</p> <p>In one of its most recent decisions, the Swiss Federal Supreme Court ruled on smart metering. It decided that the prominent...</p>	 <p>A NEW MEMBER HAS JOINED THE INPLP: ANA POPOVIĆ (REPUBLIC OF SERBIA)</p> <p>Živković Samardžić is one of the Serbia's leading full-service independent law firms. Their 10 partners / 23 lawyers strong team...</p>	 <p>WHEN PRIVACY BECAME AN INVESTMENT RISK: SHALL COMPANIES REPORT IT'S SECURITY INCIDENTS TO THE MARKET?</p> <p>Potential investors are being warned of the negative impact that the GDPR sanctions may have on the expected profitability of the...</p>	 <p>NO SURPRISE HERE - THE EU COURT CONFIRMS AGAIN THAT PUBLIC AUTHORITIES' ACCESS TO TELECOM DATA IS STRICTLY LIMITED</p> <p>Public authorities' access to electronic communications data has always been and continues to be a hot topic, even (or especially)...</p>	 <p>A NEW MEMBER HAS JOINED THE INPLP: PAUL HASWELL (HONG KONG)</p> <p>Pinsent Masons is a full-service international law firm. We respond to the pressures and opportunities facing businesses globally...</p>	 <p>CAN DATA PROTECTION RULES AFFECT THE ASSIGNMENT OF RECEIVABLES IN BULGARIA?</p> <p>For many years, a common practice in Bulgaria is debtors to submit complaints to the Bulgarian OPA for unlawful processing of their...</p>

Conclusions

Thank you to all our members and partners for the strong support and hard work throughout the year. We have managed to sustainably grow our network and welcome many new partners, provide numerous publications on data privacy law, host an immensely successful online conference, send a statement letter to the EDPB, launch our GDPR Fines Database, and establish new plans and goals for the coming year. We look forward to 2021 and to hopefully meeting all members in person at our 2021 conference in Vienna. Thank you for your support and stay safe!

List of current members

- Götzl Thiele EUROLAWYER® Rechtsanwälte
- aringer herbst winklbauer rechtsanwälte
- Marval O'Farrell Mairal
- Time.lex
- Dimitrov, Petrov & Co.
- Andrade, Lacaz & Vasconcelos Advogados (ALV)
- Gowling WLG LLP
- de la cruz beranek Rechtsanwälte AG
- Nielsen Legal, advokátní kancelář, s. r. o.
- tassos papadopoulos & associates LLC
- Derra, Meyer & Partner
- Pinsent Masons Germany
- Spirit Legal
- NJORD Advokatpartnerselskab
- Belén Arribas, Abogada
- ECIX Group
- Alain Bensoussan Avocats Lexing
- Zepos & Yannopoulos
- Boris Guljaš I Ranko Lamza
- SGS Hong Kong Limited
- Pinsent Masons Hong Kong
- SimpLEGAL
- William Fry
- R&P legal
- BL&Z Law Offices & Notaries
- MATSUDA & PARTNERS
- TGS Baltic
- Molitor Avocats a La Coer
- GIACCARDI & BREZZO AVOCATS
- Malta IT Law Association
- BONA FIDE Law Firm
- Olumide Babalola LP
- Alliance Law Firm
- Cordemeyer & Slager
- Gjessing Reimers
- Traple Konarski poderecki & Wspólnicy
- e|s|b Adwokaci i Radcowie Prawni
- Abreu Advogados
- Wolf Theiss
- Živković Samardžić
- Setterwalls
- JK Group d.o.o. / JK Group Ltd
- Bukovinsky & Chlipala, s.r.o.
- Gün + Partners
- Pinsent Masons UK
- Fox Rothschild LLP



