Activity Report 2023

The past year was a success for the INPLP, marked by robust collaboration and network growth. The annual conference in Dublin, hosted by Rob Corbet (Arthur Cox), was a key milestone. Our priorities included strengthening collaboration, facilitating knowledge transfer, and expanding the network.





Dr. Tobias Höllwarth President, INPLP The International Network of Privacy Law Professionals had another exceptionally successful year in 2023. We witnessed the addition of numerous law firms to our organization, published nearly 100 articles, hosted a conference in Dublin, and implemented various initiatives to enhance the development of our network.

Looking ahead to 2024, our primary objective is to maintain our robust growth. This involves fostering open dialogue, encouraging the exchange of ideas, and realizing the full potential of our network, ensuring that each member can extract maximum value.

Kind regards, Dr. Tobias Höllwarth

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 previous year marked a significant period for the INPLP, highlighting the positive progression arising from our joint efforts, steadfast dedication, and continuous expansion of our network. Additionally, the successful hosting of a physical conference in Dublin underscored our commitment to establishing strong international partnerships.

Growth

We are pleased to welcome 11 new partners to our network as we work towards expanding our reach. This advancement strengthens our ability to operate globally and offer insights into data privacy practices across diverse regions. Currently, our network has expanded to include 66 members, representing 52 law firms across 40 countries.



https://inplp.com

Conference

The 8th INPLP conference was a resounding success. For the first time since the network's founding, the conference was hosted in Dublin, departing from its traditional venue in Vienna. The main topics of discussion revolved around AI and biometric law. We were delighted to welcome representatives from Chile, Argentina, Ecuador, Mexico, the USA, Canada, and various European countries.

https://inplp.com/latest-news/article/the-8th-annual-conference/



INPLP International Network of Privacy Law Professionals

Publications

The INPLP's commitment to advancing knowledge on the legal aspects of data and technology has yielded positive results, with nearly 100 articles on privacy law published in 2023. This accomplishment strongly reflects our mission to offer concise and tailored guidance, provide comprehensive perspectives on multiple jurisdictions, and offer insights that address the constantly expanding and evolving landscape of data protection challenges.

https://inplp.com/latest-news



ACTIVITY OF THE PERSONAL DATA SUPERVISORY AUTHORITY OF MONACO IN 2021

The Personal Data Supervisory Authority (hereinafter "CCIN") has published its 13th Activity Report covering the year 2021. This...



RESPONSIBLE USE OF AI BASED TOOLS IN MEDICAL DIAGNOSIS AND TREATMENT - THE AI SANDBOX

In 2021, the Norwegian Data Processing Authority (DPA) established a regulatory test environment ("sandbox") for Artificial...



THE PANAMANIAN DATA PROTECTION LAW The Data Protection Law entered into force in March 2021, two years after its publication on March 29, 2019. This law -although...



DATA PROTECTION AND PRESS FREEDOM IN THE PANAMANIAN FRAMEWORK

In 2022, the Panamanian Data Protection Authority sanctioned the digital media for publishing a public document without the consent. ...



TRANSFERS OF PERSONAL DATA IN EARLY STAGES OF TECHNOLOGY TRANSACTIONS OR M&AS

As part of negotiations, due diligence, preliminary reviews and analysis, a party may request or need certain information containing...



UK ICO'S NEW APPROACH TO PUBLISHING DETAILS OF COMPLAINTS, BREACH REPORTS AND REPRIMANDS

The UK Information Commissioner's Office (ICO) has started routinely publishing information about complaints made against...



CANADA'S PROPOSED ARTIFICIAL INTELLIGENCE AND DATA ACT (AIDA)

This article summarizes the substantive highlights and legislative progress of the proposed Artificial Intelligence and Data Act...



BULGARIAN DPA ON THE ADMISSIBILITY OF ONGOING ACCESS TO MUNICIPALITY'S VIDEO SURVEILLANCE

Bulgarian DPA issued an opinion on the questions from a Bulgarian City Municipality regarding requested ongoing access from the...



A NEW MEMBER HAS JOINED THE INPLP: BETÜL ÇOLAK AND CEREN CAKIR (TURKEY)

Tevetoglu Legal is an Istanbul-based international law firm that excels in offering exceptional legal counsel to pioneering...



CYBERATTACKS BASED ON THE VICTIM'S COMPLIANCE

Information security compliance has become now a new exploit that cybercriminals are taking advantage from, prompting a need for...



CYBER SECURITY BREACHES IN HONG KONG: A GROWING TREND AND A CALL TO ACTION

Hong Kong is grappling with a surge in cyber security breaches, prompting the authority to take proactive measures. This article...



HUNGARY IS PREPARED TO INTRODUCE A NEW ACT WHICH WOULD FURTHER DIGITIZE THE SERVICES PROVIDED BY THE STATE TO ITS CITIZENS

The new Hungarian Digital Citizenship Act would make communication with public administration, as well as management of official...



NEW CPRA REGS ARE HERE AGAIN!

California Privacy Protection Agency issues new amendments to the CPRA regs for discussion in its upcoming December 8 meeting. What...



A NEW MEMBER HAS JOINED THE INPLP: BORA YAZICIOĞLU (TURKEY)

YAZICIOGLU Legal is an Istanbul-based technology, media, telecommunications, data protection/cyber security and commercial law...



PRIVACY OF WAR CRIMES VICTIMS

The right for Privacy is a fundamental right according to Israeli law but it is a relative right. How should State interests to



THIS IS HOW COSTA RICA CLOSES 2023 IN TERMS OF PRIVACY AND DATA PROTECTION

2023 has been a year of growth and learning for Costa Rica in terms of privacy. Two takeaways on local supervisory authority...



UNDERSTANDING DATA TRANSFERS AND DATA TRANSMISSIONS UNDER MEXICAN DATA PROTECTION LAW

You may want to avoid getting lost in translation when preparing a data transfer to or from Mexico. We have different names to...



CHILE ON THE WAY TO GDPR STANDARDS Even though Chile was the first Latin

American country to have a data privacy regulation and has developed one of the most successful...



EXTRATERRITORIAL IMPLICATIONS OF TURKISH DATA PROTECTION LEGISLATION

This article explores the regulatory landscape for data controllers located outside Turkey and their obligations under the Turkish...



CALIFORNIAI: NEW EXECUTIVE ORDER TAKES ON GENERATIVE AI

California Governor, Gavin Newsom, issues Executive Order on Generative AI, which echoes some points in the recent Texas and...



WHO IS ACCOUNTABLE WHEN THE COMPANY SUFFERS A CYBERATTACK?

Managing cyber attacks has always been a complex task and, in almost every scenario, it implied the dismissal of the CISO of the...



GENERAL CAPETA PERSPECTIVE This case highlights the challenging balance between safeguarding data privacy and preserving the integrity of soort through...

DATA PROTECTION VS. ANTI-

DOPING MEASURES - ADVOCATE



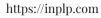
CONSTITUTIONAL COURT: THE CRITERIA FOR ACCESS TO TRAFFIC DATA TOO LOOSE

Slovenia's Constitutional Court found the provisions of the Criminal Procedure Act (CPA) enabling the prosecution (police) to access...



A THIN LINE BETWEEN A TYPO AND A DATA BREACH: A CASE STUDY IN ENHANCING DATA SECURITY PRACTICES

In a recent case, the Serbian Commissioner for Information of Public Importance and Personal Data Protection issued a cautionary...





FINDING THE BALANCE BETWEEN FIGHTING CRIME AND PRIVACY: AN UPDATE TO THE USE OF METADATA IN CRIMINAL PROSECUTION

On October 13, 2023, the Portuguese Parliament approved an updated version of Law No. 32/2008, which had been declared.



INSURANCE COMPANY FINED SEK 35 MILLION FOR SECURITY FAILURES AND PUTTING DATA SUBJECTS' DATA AT RISK.

The Swedish Authority for Privacy Protection issued an administrative fine of SEK 35 million (3MEUR+) against the insurance company...



AI ACT AND GDPR: MANAGING THE WORLD OF DATA IN THE WORLD OF PRIVACY.

Contrary to some persisting beliefs that the AI Act and GDPR are inherently incompatible, GDPR may in fact be interpreted in a way ...



GENERATIVE AI AND THE PROTECTION OF PERSONAL INFORMATION UNDER THE JAPANESE LAW

While generative AI has been getting attention in business, there has been a concern on the protection of personal information when...



AUSTRIA: IS LEGAL ADVICE BY SOFTWARE SOLUTIONS AND/OR AI PERMITTED IN AUSTRIA?

In its judgment 4 Ob 77/23m from 27th June 2023 the Austrian Supreme Court, among other things, ruled that the provision of



THE 8TH ANNUAL CONFERENCE Successful event held in Dublin with representatives from 20 countries.



CROSS-BORDER DATA TRANSFER: NAVIGATING COMPLIANCE UNDER THE NIGERIAN DATA PROTECTION ACT 2023

The recently enacted Nigeria Data Protection Act ("the Act") 2023 is now the principal data privacy and protection legislation in...



BRAZIL'S INNOVATIVE APPROACHES TO DATA PROTECTION: THE MAIN DIFFERENCES BETWEEN GDPR AND LGPD.

The General Data Protection Regulation (GDPR) and the Brazilian General Data Protection Act (LGPD) are two comprehensive data...



CHAPTGPT: THE ITALIAN DATA PROTECTION AUTHORITY LEADS THE WAY AND IMPOSES GDPR COMPLIANCE.

The Italian Data Protection Authority recently gained international attention for being the first to address the privacy risks of...



CZECH DATA PROTECTION OFFICE RECORD BREAKING PENALTY FOR SPAM

The Czech Data Protection Office (Úřad pro ochranu osobních údajů or ÚOOÚ, further as "CZDPA") is the authority supervising ..



ADTECH UPDATE: CJEU LANDMARK DATA PROTECTION RULING FOR ONLINE AND BEHAVIORAL ADVERTISING

Online advertising is one of the largest online industries. However, it also has long faced issues with data protection regulators..



ROMANIAN WHISTLEBLOWING LAW, ABOUT PROTECTING DATA WHILE FOSTERING TRANSPARENCY

Romania transposed the EU Whistleblowing Directive on 22 December 2022, via Law No. 361/2022 on the protection of whistleblowers in...





Since the end of December 2021, the preliminary ruling of the European Court of Justice (CJEU) on the conditions under which an.



FEATURES OF NIGERIA'S NOVEL NIGERIA DATA PROTECTION ACT (NDPA) 2023. For a period, the Nigeria Data Protection

regulation (NDPR) 2019 was the reference point for data privacy and protection compliance..



LOUD AND CLEAR! CNIL SENDS STRONG PRIVACY WITH NEW €40 MILLION FINE OF CRITEO

French Data Protection Authority, the CNIL, has fined advertising company CRITEO €40 million for improper conduct in handling users' ...



DATA TRANSFERS ACROSS THE ATLANTIC... A STORM IN A **TEACUP?!**

The European Commission's new adequacy decision concerning the United States puts a stop to the European doctrine that was taking ...





THE POLISH SUPREME ADMINISTRATIVE COURT CONCLUDED "MORELE.NET SAGA"

In its judgement from February 2023, the Supreme Administrative Court of Poland announced a significant decision from 2019 of the ...



BARBADOS URGES BANKS TO BOLSTER CYBER RESILIENCE WITH NEW GUIDELINE

The Central Bank of Barbados recently published its Technology and Cyber Risk Management Guideline. Not only does the Guideline..



A NEW MEMBER HAS JOINED THE INPLP: IBRAHIM CAN CAYIRPARE (TURKEY)

CVG Law Firm is an Istanbul-based law firm offering legal consultancy and dispute resolution services to foreign and Turkish..



UPCOMING: THE 8TH ANNUAL CONFERENCE

November 17th - 18th (Dublin, Ireland)



NEW GUIDELINES WITH UPDATED OBLIGATIONS ON COOKIES IN SPAIN: COMPANIES HAVE JUST A FEW MONTHS TO ADAPT THEIR WEBSITES

The Spanish DPA (AEPD) published earlier this week new guidelines on cookies in order to update the existing ones to the ...



DATA PRIVACY IN PERU: CONSIDERATIONS FOR FOREIGN PERSONAL DATA CONTROLLERS WITH NO PHYSICAL PRESENCE IN THE PERUVIAN TERRITORY.

As in the case of other Latin American and European jurisdictions, the scope of data protection rules in Peru has been designed to be ...



A NEW MEMBER HAS JOINED THE INPLP: MACARENA GATICA (CHILE)

Alessandri is one of the most prestigious law firms in Chile. Its services meet the entire range of legal requirements of local and..



ANOTHER NEW DIRECTION: UK REINTRODUCES THE DATA PROTECTION AND DIGITAL INFORMATION BILL, BUT WHAT'S CHANGED?

On 8 March 2023, the Department for Science, Innovation and Technology ("DSIT") introduced the Data Protection and Digital..



"ANOTHER BREACH IN THE WALL" - THE POLISH DPA'S VIEWS REGARDING DATA SECURITY AND NOTIFYING DATA BREACHES UNDER THE GDPR

In the ever-evolving landscape of data protection and privacy regulations, organizations must remain vigilant in upholding the ...



RECOMMENDATIONS FOR **RELIABLE ARTIFICIAL** INTELLIGENCE

Argentine Information Technology Subsecretariat approves a set of recommendations for trustworthy artificial intelligence ("AI"),...



THE COST OF NON-COMPLIANCE WITH THE GDPR - THE DATA PROTECTION COMMISSION ISSUES A RECORD FINE OF €1.2 **BILLION AGAINST META IRELAND**

On 22 May 2023, the Irish Data Protection Commission (DPC) announced the conclusion of its inquiry into Meta Platforms Ireland...



BULGARIAN DPA INTRODUCE DEEP AUDITS AS A STANDARD PRACTICE IN CASES OF DATA BREACHES

Bulgarian DPA is currently applying on a regular basis a new procedure in cases of data breach notifications which includes complex...



SERIOUS CRITICISM AND INJUNCTION ISSUED FOR USING FACEBOOK BUSINESS TOOLS

The Danish Data Protection Authority, Datatilsynet, has issued severe criticism of Boligportal, Denmark's largest online marketplace.



ACT CONTRARY TO EU LAW? On 8th June 2023 the ECJ's Advocate General, Maciei Szpunar, delivered his opinion in the Case C-376/22, concerning the conformity of ..



CURRICULA VITAE VS TRANSPARENCY EQUALS? DO POLITICAL APPOINTMENTS FALL UNDER DATA PRIVACY?

The type of information we need to know Publication of the CVs of persons holding public office serves the principle of...



DATA SUBJECT REQUESTS UNDER TURKISH DATA PROTECTION LAW

The Law on Protection of Personal Data w. no. 6698 ("DPL") contains data subject rights that are similar to those that can be found.



<u>a New Member has Joined The</u> INPLP: Daryl A. Palmer (Jamaica)

Palmer Legal provides best in class legal services with a human centered approached. They believe in listening to the client and...



BIOMETRIC DATA AND THEIR "SENSITIVITY" UNDER MEXICAN DATA PROTECTION LAWS

Mexico has not yet explicitly included biometric data as a special category of personal data (or sensitive data), but this has not...



NEW COOKIE REGULATIONS IN JAPAN – AMENDMENT OF TELECOMMUNICATIONS BUSINESS ACT

The Telecommunications Business Act ("TBA") is a law administered by the Ministry of Internal Affairs and Communications of Japan....



AUTHORITY IS PLANNING TO OVERHAUL THE DECADE OLD DATA PROTECTION REGIME IN HONG KONG – BUSINESS SHOULD PREPARE FOR CHANGES

The Hong Kong Privacy Commissioner for Personal Data has release signs of revamping the data protection regime in the region that...



CONVENTION 108+ Argentina becomes the 23rd state to ratify Convention 108+.

ARGENTINA: RATIFIES



SWEDEN: THE EU IMPLEMENTS THE TRAVEL RULE FOR TRANSFERS OF CRYPTO-ASSETS The so-called "Travel Rule" will soon be

The so-called "Travel Rule" will soon be extended to cover transfers of cryptoassets following the approval of the revised Transfer...



BRAZILIAN DPA CAN START TO APPLY FINES NOW

After two years of the law in force, and a countless actions to ensure compliance with the data protection regulation in Brazil, the...



THE DATA PROTECTION COMMISSION'S 2022 ANNUAL REPORT

On 7 March 2023, the Data Protection Commission ("DPC") released its 2022 Annual Report. We have summarized the key points from the...



NORWAY: THE NORWEGIAN DPA BANS THE GOVERNMENT'S COLLECTION OF SUPERMARKET DATA FOR STATISTICAL PURPOSES

Statistics Norway (SSB) is a Norwegian government agency that is responsible for development of official statistics for public...



SMILE, YOU'RE BEING RECORDED! Following the American and European trend, Portugal is now one of the countries that has determined the use of Bodycams by security...



2022 WAS A BUSY YEAR FOR ALL PRIVACY PRACTITIONERS. THIS ACTIVE SPIRIT DID NOT SKIP OVER ISRAEL AND ITS CITIZENS

Among the privacy changes some interesting Legislative amendments were proposed to the Israeli Privacy Protection Law (correction...



TRANSPARENCY IN THE SIGHTS OF THE LUXEMBOURG DATA PROTECTION AUTHORITY

As in the past, the Luxembourg data protection Authority (the "CNPD") launched in 2020 a thematic investigation on transparency...



AS THE LAST EU STATE, SLOVENIA PASSED PERSONAL DATA PROTECTION ACT

As of 2023 data privacy in Slovenia will be governed by the newly passed Personal Data Protection Act (ZVOP-2), which aims to bring...



EMPLOYERS TAKE WHEN PUBLISHING THE LABOR ACT ON THE NOTICE BOARD TO COMPLY WITH LABOR ACT PUBLICATION REGULATIONS IN SERBIA? According to the Labor Law of the

WHAT STEPS SHOULD

Republic of Serbia, if an employee refuses to accept at the premises of the employer a document...



I META TRACKING TOOLS ILLEGAL – AUSTRIAN DATA PROTECTION AUTHORITY HOLDS THAT THE USE DIRECTLY VIOLATES THE GOPR AND THE "SCHREMS II" DECISION

The Austrian Data Protection Authority (DPA) decided (6th of March 2023, D155.028, 2022-0.726.643) that the use of the Facebook...



FACEBOOK IS IN TROUBLE AGAIN

... And this time it's not Max Schrems who's behind it. On March 15, 2023, the Amsterdam District Court ruled that Facebook Ireland...





AM I MY BROTHER'S KEEPER?

Understanding the Importance of Data Protection Compliance Management in Processing Chains: Key Takeaways from the CJEU's "Proximus" ...



THE PRIVACY RISKS OF THE "VIRTUAL FRIEND": THE ITALIAN DPA CLAMPS DOWN REPLIKA

The Italian Data Protection Authority ("Garante Privacy") has ordered the limitation of the data processing activities carried out by ...



DO YOU THINK THAT A BLACK VAN SERVES ONLY TRANSPORTATION PURPOSES? WELL, MAYBE YOU WANT TO RECONSIDER YOUR OPINION!

How Cyprus found itself in the epicenter of the spy scandal in Greece



THE LISTS FOR FINANCIAL SUPPORT FOR VULNERABLE CATEGORIES OF CITIZENS MUST BE REMOVED FROM THE WEB SITES OF THE COMPETENT AUTHORITIES.

The lists for financial support for vulnerable categories of citizens may be available to the public only during the duration of the ...



THE 'CHAT GPT EFFECT' -PARSING PRIVACY AND AI REGULATION IN INDIA

The increasingly common use of AI in our daily lives raises multiple concerns. particularly around data privacy and regulatory..



2022 AND 2023 IN BALTIC DATA PROTECTION

At the end of January, we celebrated Data Protection Day. To mark that annual occasion, TGS Baltic's Data Protection Team compiled an...



PERSONAL DATA PROTECTION ACT: ECUADOR'S CURRENT CHALLENGES

A highly advanced Personal Data Protection Law to become into force on May 31st 2023, brings some challenges to Ecuador's economy..



THE YEAR OF "GOOGLE FONTS" WARNING LETTERS

Last year, there were some positive developments in related to data protection law. Unfortunately there were also bad ones in which ...



CHINA FIRST ATTEMPT TO REGULATE DEEPFAKE-LIKE RISKS.

administration regulation on the use of deep synthesis technologies and their use on the internet. The..



China recently released an



ONLINE IDENTIFIERS ARE NOT ALWAYS PERSONAL DATA The Voivodeship Administrative Court in Warsaw recognizes online identifiers, including cookies, should not be

automatically..



IS THERE ANY LEGAL PROTECTION FOR THE PERSONAL DATA OF A TOURIST IN NIGERIA?

Article 1.2 of the Nigeria Data Protection Regulation (NDPR) 2019 provides the extent and limit of the territorial application of the.



THE FRENCH DOCTRINE ON THE USE OF THE CLOUD TESTED AGAINST FREE AMERICAN SOLUTIONS FOR EDUCATION

After a member of the French Parliament warned about the potential unlawfulness of using Office 365 and Google Workspace for free in...



CYBER INSURANCE: THE FRENCH LEGAL FRAMEWORK IS CHANGING

France makes the payment by insurers in case of cyber attacks conditional upon the prior filing of a criminal complaint within 72...



The Guidelines on Use of Cookies (the "Guidelines") was published by the Personal Data Protection Authority (the "Authority") on June...



FACIAL RECOGNITION TECHNOLOGY AND DATA PROTECTION: HOW TO COMPLY?

The development of facial recognition technology has introduced many possibilities to increase cybersecurity, productivity, and ...



'MERE UPSET' NOT SUFFICIENT FOR GDPR COMPENSATION CLAIMS

On 6 October 2022, Advocate General Manuel Campos Sánchez-Bordona issued an opinion concerning the right to compensation for...

Conclusions

We express our gratitude to all our partners and their members for their strong support and dedication throughout the year. Together, we expanded our network, welcomed many new members, published numerous articles, successfully organized a fantastic conference in Dublin, and set new plans for 2024. We look forward to the new year with excitement and appreciate our partners for their active involvement.

List of current partners

Marval O'Farrell Mairal aringer herbst winklbauer rechtsanwälte MGLP Rechtsanwälte Chancery Advocates Timelex Dimitrov, Petrov & Co. Andrade, Lacaz & Vasconcelos Advogados Peck Advogados Gowling WLG LLP Alessandri Abogados Aguilar Castillo Love tassos papadopoulos & associates **KARAMANOLIS & KARAMANOLIS** Barta.Legal pitc legal - Eckhardt Rechtsanwälte Spirit Legal Advokater & Rechtsanwälte HEKA I AW FIRM

Belén Arribas, Abogada Ecix Group OYAT Gerrish Legal Pinsent Masons Arthur Cox William Fry Hayes solicitors BTG Advaya RPLegal&Tax Palmer Legal Matsuda and Partners Molitor Avocats 99 AVOCATS Malta IT Law Association **BONA FIDE** BELLO, GALLARDO, BONEOUI Y GARCÍA Alliance Law Firm

Cordemeyer & Slager **Gjessing Reimers** Legal IT Abogad@s Traple Konarski Podrecki Abreu Advogados Wolf Theiss Setterwalls JK Group BCH Advokáti Chlipala Gün + Partners Ozdagistanli Ekici Zeynep Aga Tevetoğlu YAZICIOGLU Legal CVG Law Firm Stephenson Harwood Fox Rothschild



Current partners

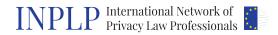




Current members



Activity Report 2023





An initiative under the auspices of EuroCloud Europe®

Powered by Sourcing International[®]