

# GDPR After GDPR Day: Which Rating Does it Deserve?

Selected Developments & Perspective

ACCIS Data Protection Forum

Charles-Albert Helleputte

*Partner*

Co-chair of IAPP Brussels KN Chapter

+32 255 159 82

[chelleputte@mayerbrown.com](mailto:chelleputte@mayerbrown.com) [mwb.com](http://mwb.com)



Diletta De Cicco

*Associate*

Young Professional Privacy Leader

IAPP Brussels KN Chapter

+32 255 159 74

[ddecicco@mayerbrown.com](mailto:ddecicco@mayerbrown.com) [mwb.com](http://mwb.com)

13 March 2019



# Topics

- 1 GDPR = 28 Enforcement Strategies
- Data Breaches: 5 lessons learnt
- Data Subject Access Requests
- Perspective

# 1 GDPR = 28 Enforcement Strategies



France

- Employment data
- Housing and rentals
- Meters for public parking



The Netherlands

- Appointment of DPOs
- Government data
- Healthcare
- Data traders
- Data breaches



Belgium

- No strategic priorities adopted
- Focus on complaint-handling

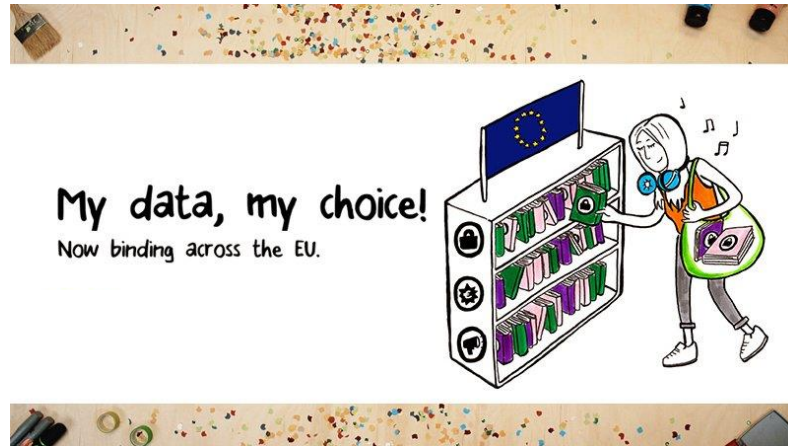


Ireland

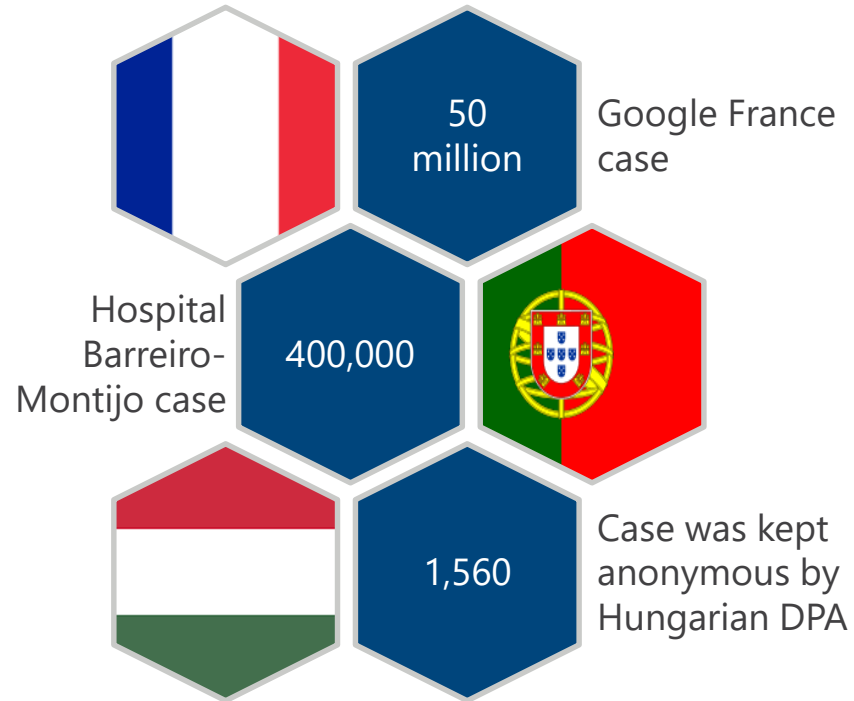
- Internal adaptation to GDPR
- Focus on complaint-handling
- Harmonize enforcement across EU

# 1 GDPR = 28 Enforcement Strategies

- “One-Stop-Shop” as a solution for consistency?
  - CNIL (Google case)
  - The EDPB was not consulted either to appoint Lead DPA



# 1 GDPR = 28 Enforcement Strategies



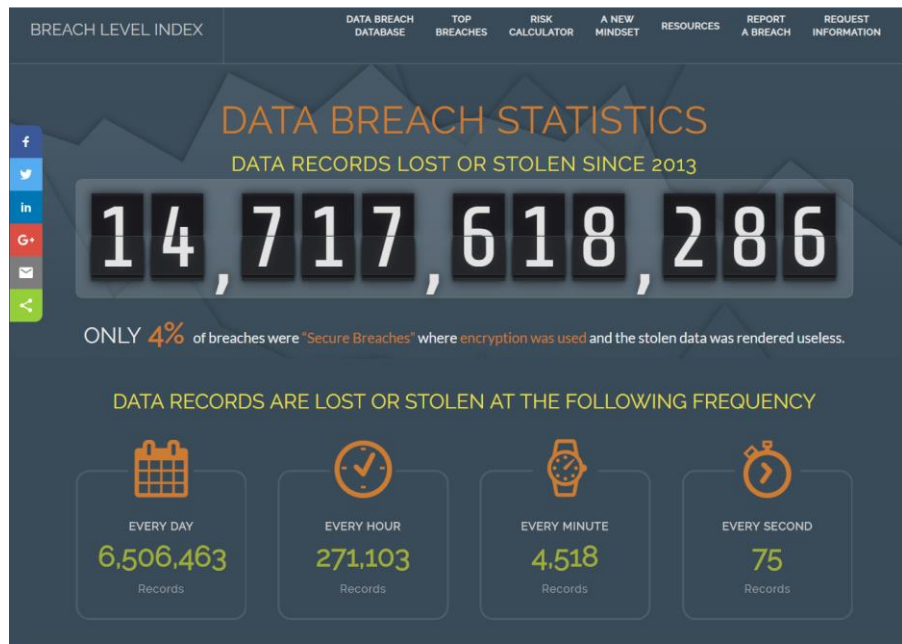
# Data Breaches: 5 lessons learnt



# Data Breaches: 5 lessons learnt

- What did we learn in this area?
  1. The GDPR is important but ... there is more than the GDPR
  2. Interaction with DPAs requires caution
  3. Data breach notification is a test for the LSA' choice
  4. Notifying DPAs might be (un)easy
  5. When, How and Why do we communicate with data subjects?

# Data Breaches: 5 lessons learnt





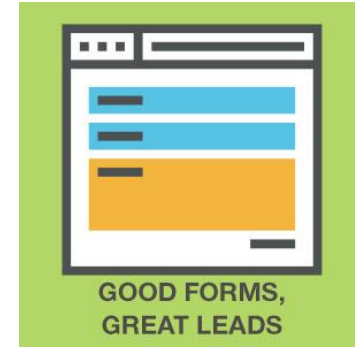
# Lesson 1: GDPR is not all what matters

**It's not only GDPR we should  
consider**

## Lesson 2: Interact with DPAs with caution

TALK TO US

OFF  
THE **RECORD**



# Lesson 3: Data Breach is a test for LSA choice



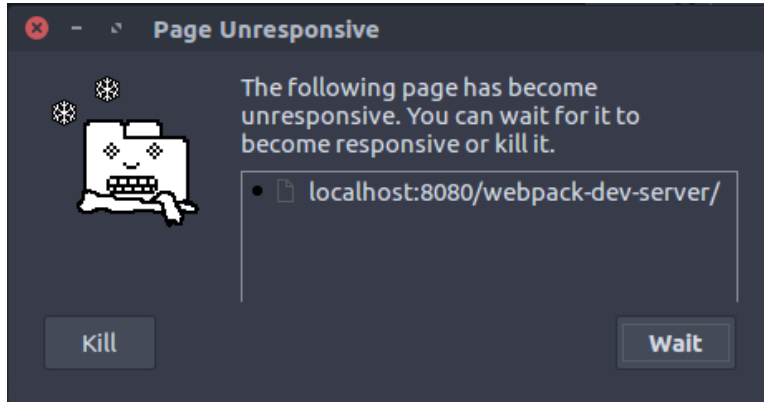
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"I've got the worst headache!"

# Lesson 4: Notify DPAs is (un)easy



# Lesson 5: Communicate to data subjects

## Communication



## Data Breaches: Bonus

**Happy  
AWESOME  
Friday!**



# Data Subject Access Requests

Piling up?



Fake DSARs?



# Perspective

- 25 May .... 2020 is fast approaching
- Watch out for relevant developments from the CJEU
- EDPB wants to “focus more on specific items or technologies”
  - Examples: Connected Vehicles, Social Media Data, blockchain, AI
- An EU-wide code of conduct for the credit reporting sector?



A red, rectangular stamp with a distressed, ink-like texture. The text "ANY QUESTIONS?" is written in a bold, white, sans-serif font, centered within the stamp. The stamp is tilted slightly to the right.

**ANY  
QUESTIONS?**

**You don't need consent!**





## Charles-Albert Helleputte

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[ddecicco@mayerbrown.com](mailto:ddecicco@mayerbrown.com) [mb.com](http://mb.com)

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