

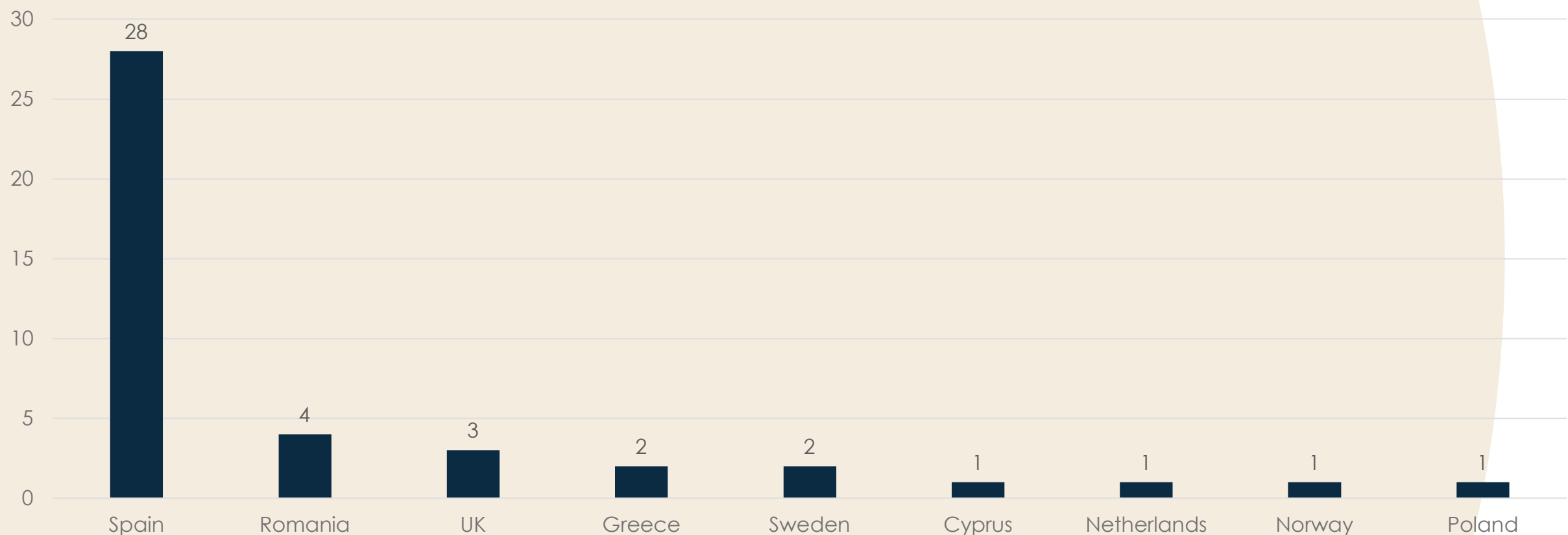
Steptoe

November UK/EU GDPR Enforcement Trends



Fines November 2023

Volume of Fines

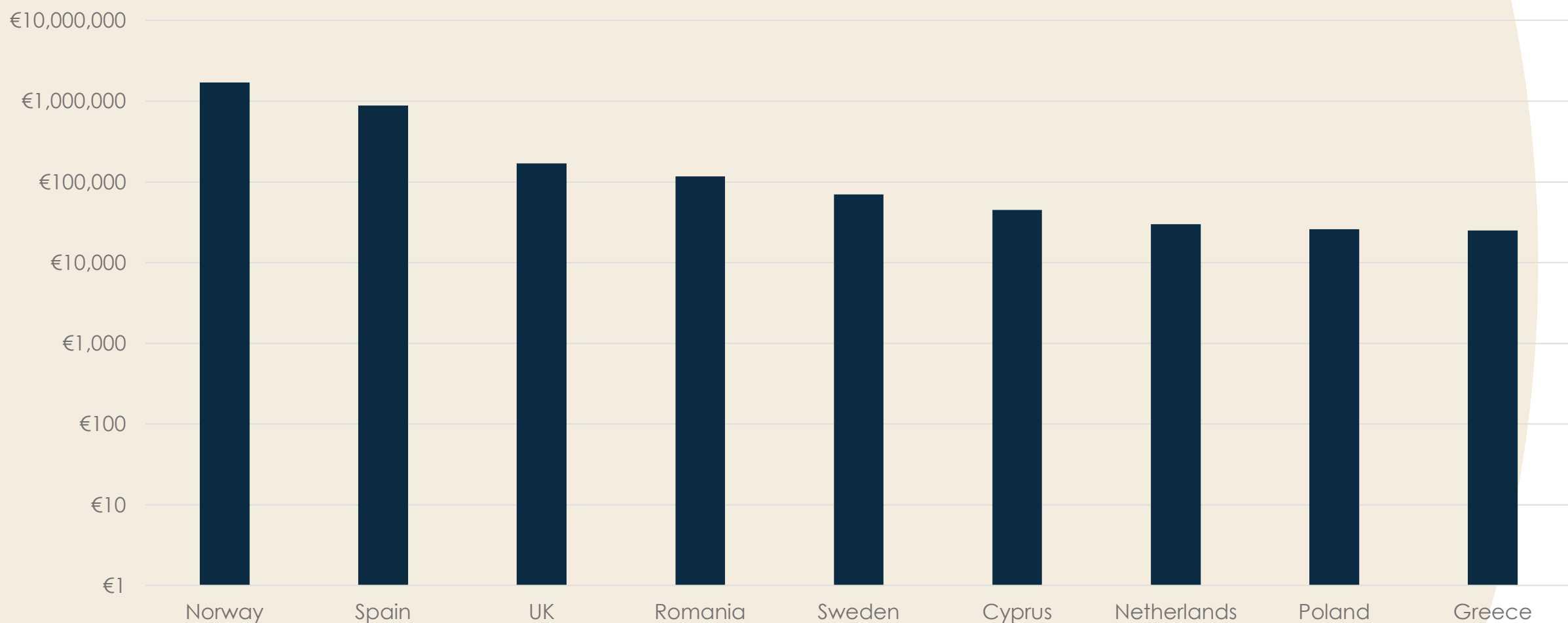


Top 3 Most Active Regulators by Volume of Fines

1. Agencia Española de Protección de Datos (**Spain**)
2. Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Persona (**Romania**)
3. The Information Commissioners Office (**UK**)

Fines November 2023

Value of Fines



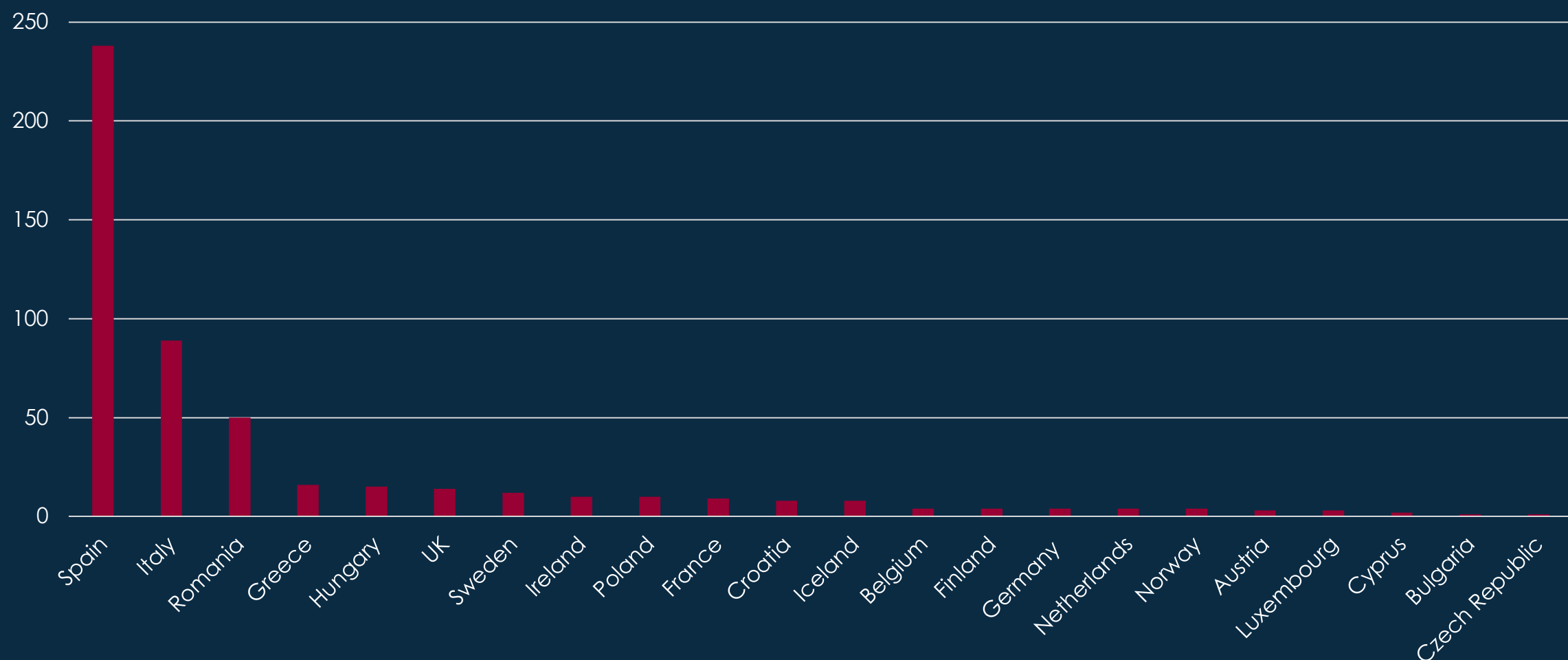
Top 3 Most Active Regulators by Value of Fines

1. Datatilsynet (**Norway**)
2. Agencia Española de Protección de Datos (**Spain**)
3. The Information Commissioners Office (**UK**)

Steptoe

Fines YTD November 2023

Volume of Fines



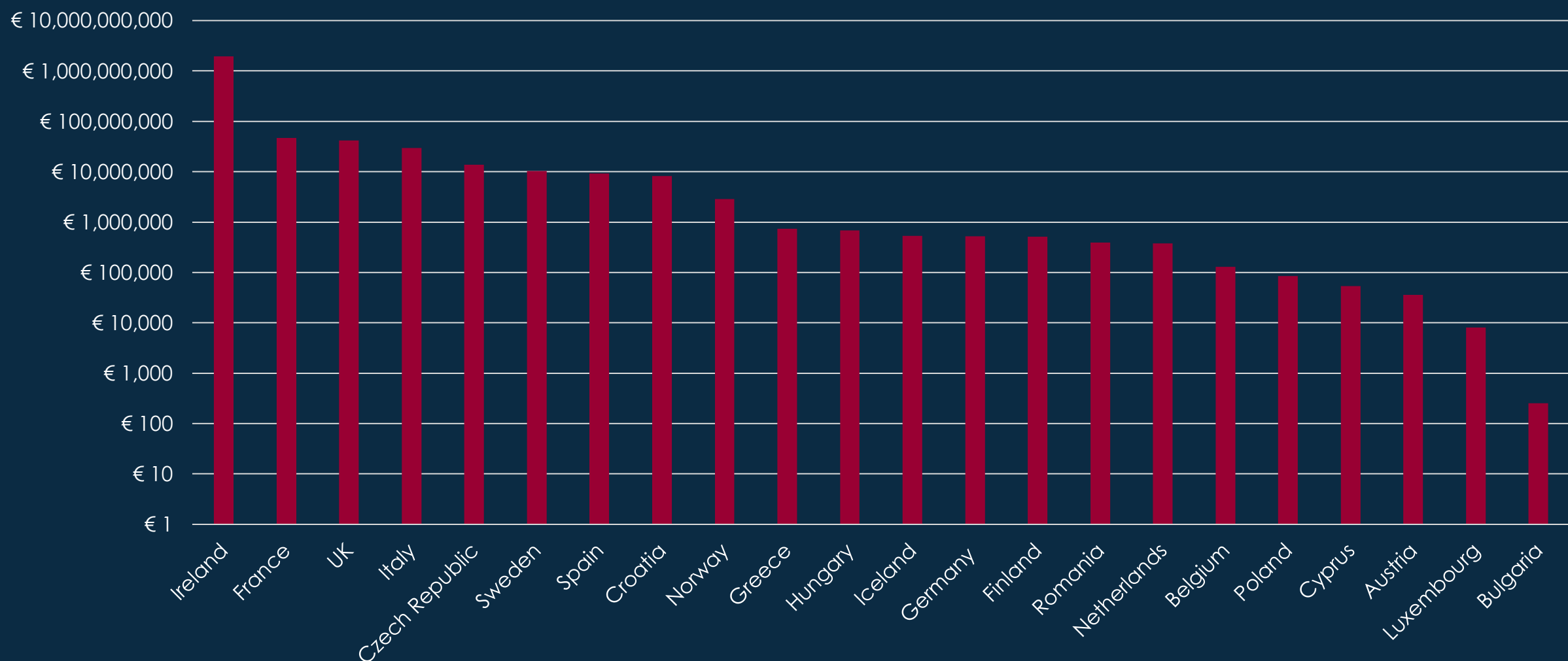
Top 3 Most Active Regulators by Volume of Fines

1. Agencia Española de Protección de Datos (**Spain**)
2. Garante per la protezione dei dati personali (**Italy**)
3. Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal (**Romania**)

Steptoe

Fines YTD November 2023

Value of Fines



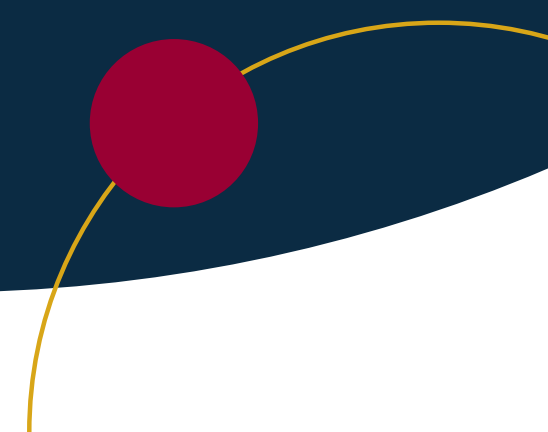
Top 3 Most Active Regulators by Value of Fines

1. Data Protection Commission (**Ireland**)
2. Commission Nationale de l'Informatique et des Libertés – CNIL (**France**)
3. The Information Commissioners Office (**UK**)

Steptoe



Top Fine

- The Norwegian DPA, Datatilsynet, issued a fine of approx. €1.7 million against the Norwegian Labour and Welfare Administration (NAV).
 - The main ground for this sanction relates to unsatisfactory “technical and organisational” measures implemented by NAV.
 - Datatilsynet is known to be a very stringent data protection authority and this case is a new demonstration that this data protection authority is not more lenient towards public authorities.
 - It must be noted that NAV was already sanctioned in 2022 for lack of legal basis, which may explain the high-level value of this new fine.
 - The NAV will have an opportunity to comment on the allegations and potentially have the proposed fine reduced.
- 

Steptoe

Key Takeaways

- Thus far, November has been the quietest month in 2023 in terms of GDPR enforcement, with a limited volume and value of fines imposed.
- Lack of legal basis for sending marketing communications remains a key concern for European regulators, as illustrated by the fines imposed by the UK's DPA to three companies.
- The Spanish DPA, AEPD, remains by far the most active regulator and continues to impose fines limited in value.

Step toe



Anne-Gabrielle Haie

aghaie@Step toe.com

Brussels



Leigh Mallon

lmallon@Step toe.com

London

**Key
Contacts**

