

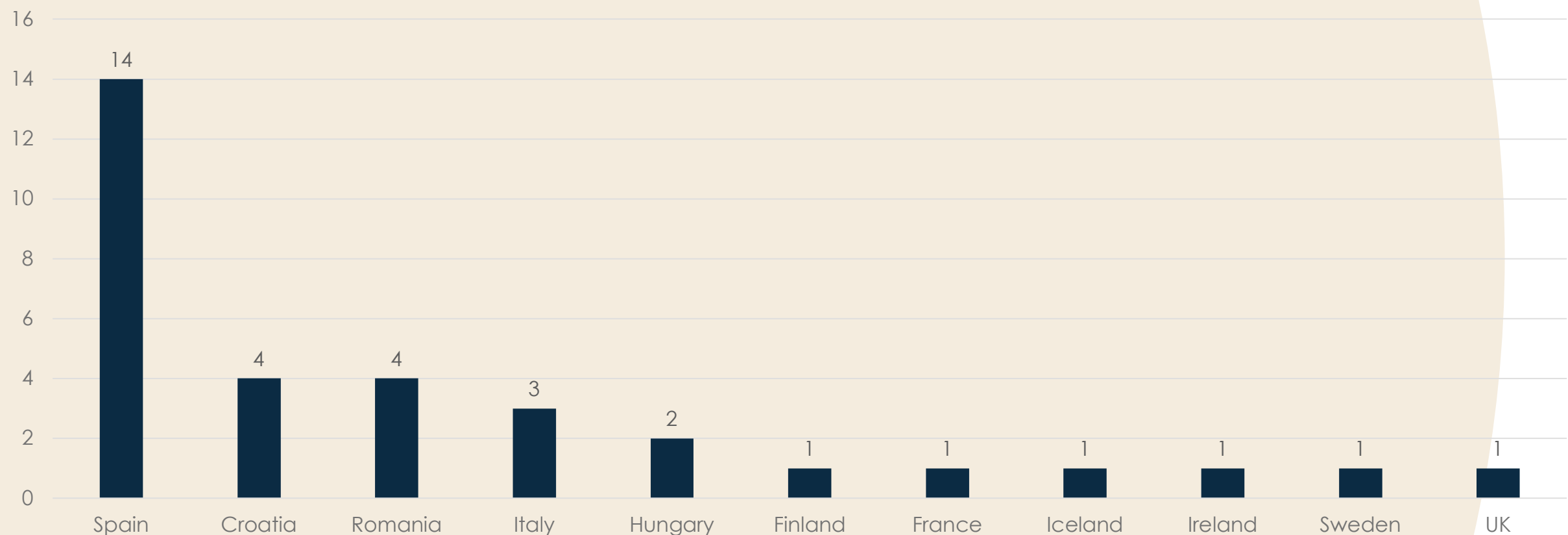
Steptoe

September  
UK/EU GDPR  
Enforcement  
Trends



## Fines September 2023

Volume of Fines

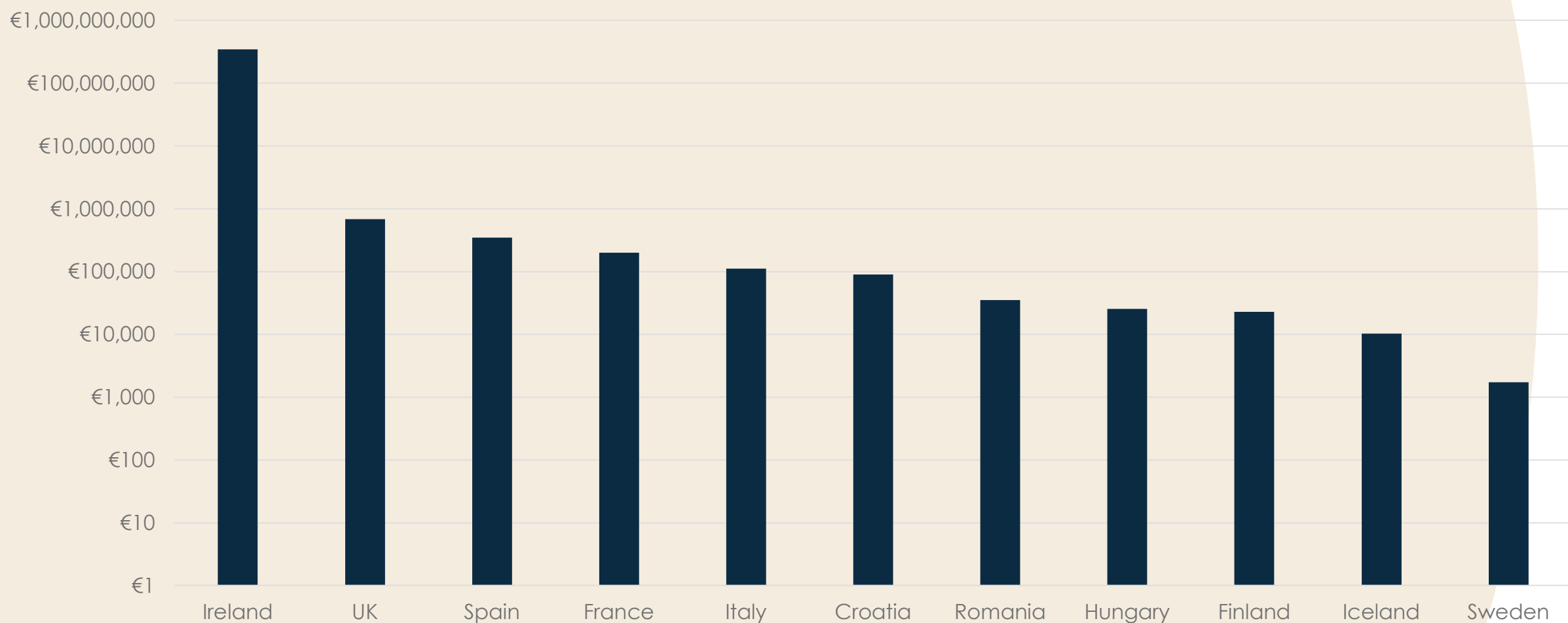


### Top 3 Most Active Regulators by Volume of Fines

1. Agencia Española de Protección de Datos (**Spain**)
2. Croatian Personal Data Protection Agency (**Croatia**)
3. Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Persona (**Romania**)

## Fines September 2023

### Value of Fines



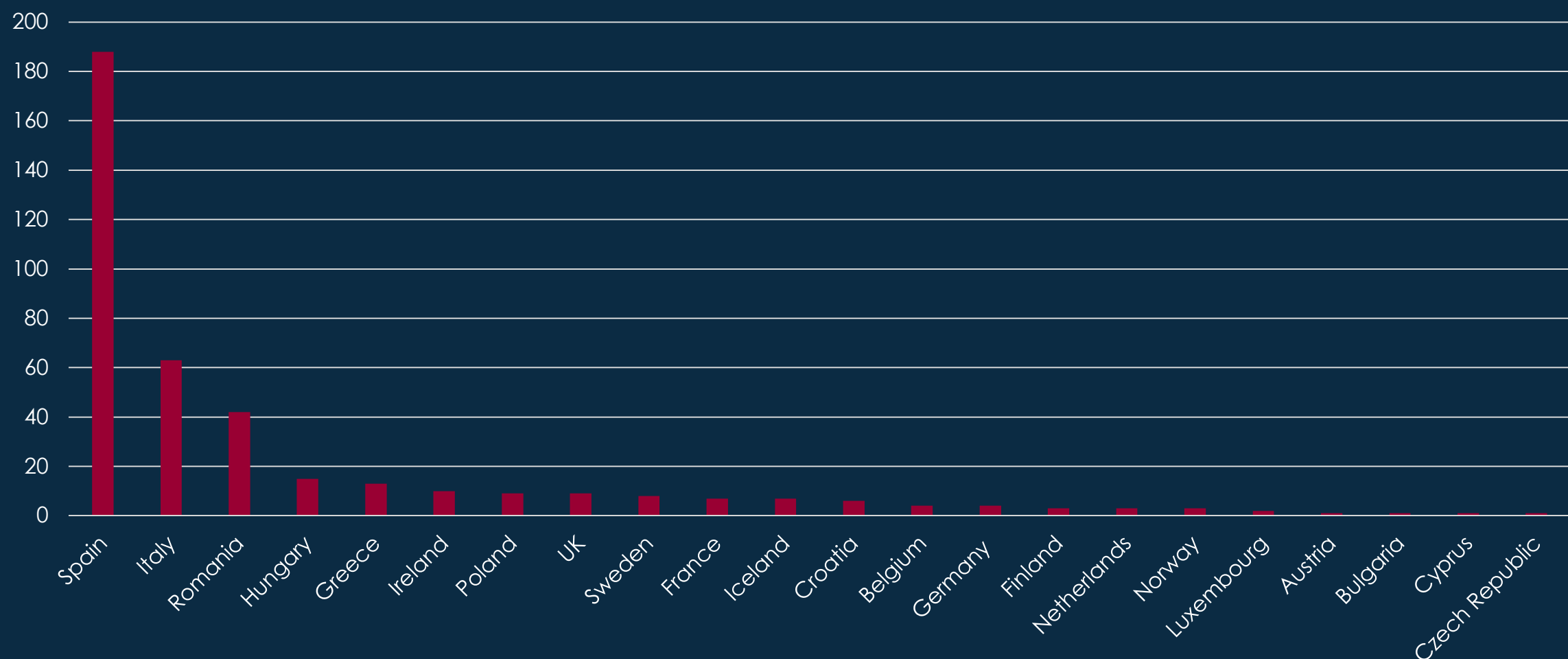
### Top 3 Most Active Regulators by Value of Fines

1. Data Protection Commission (**Ireland**)
2. The Information Commissioners Office (**UK**)
3. Agencia Española de Protección de Datos (**Spain**)

# Steptoe

## Fines YTD September 2023

### Volume of Fines



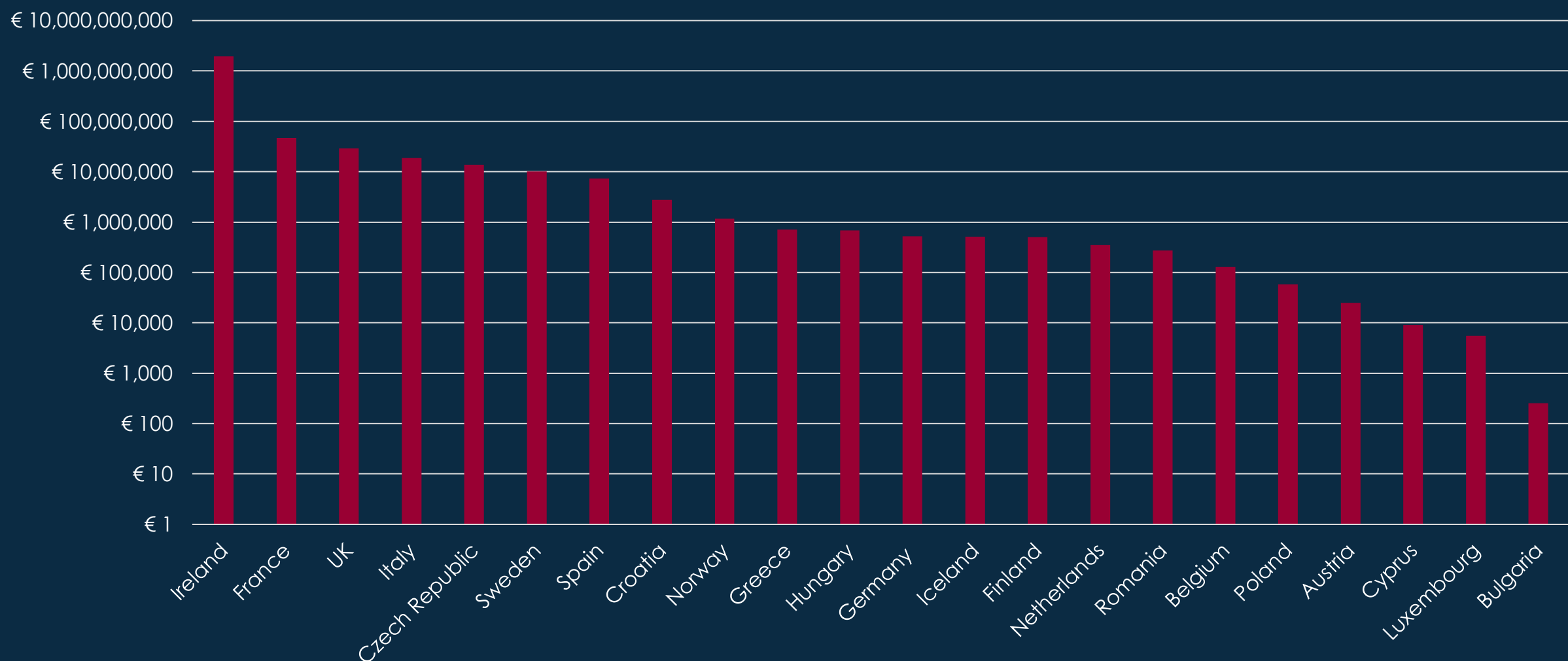
### Top 3 Most Active Regulators by Volume of Fines

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 September 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 Irish Data Protection Commissioner (“DPC”) sanctioned a social media platform for insufficient protection of child users.
- In particular, the DPC found that the social platform’s privacy settings, age verification process and transparency measures relating to child users were not aligned with GDPR.
- The DPC thus issued:
  - A reprimand;
  - An order requiring to bring the processing into compliance within three months; and
  - An administrative fine of €345 million.



# Steptoe

## Key Takeaways

- European Data Protection Authorities remain very stringent regarding failure to implement technical and organizational measures and resulting personal data breaches.
- Despite the existence of GDPR violations, the Belgian Data Protection Authority dismissed a complaint on the grounds that the breaches did not result in a major social and/or personal impact; hence the resources required to investigate the complaint would be disproportionate.

# Step toe



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