

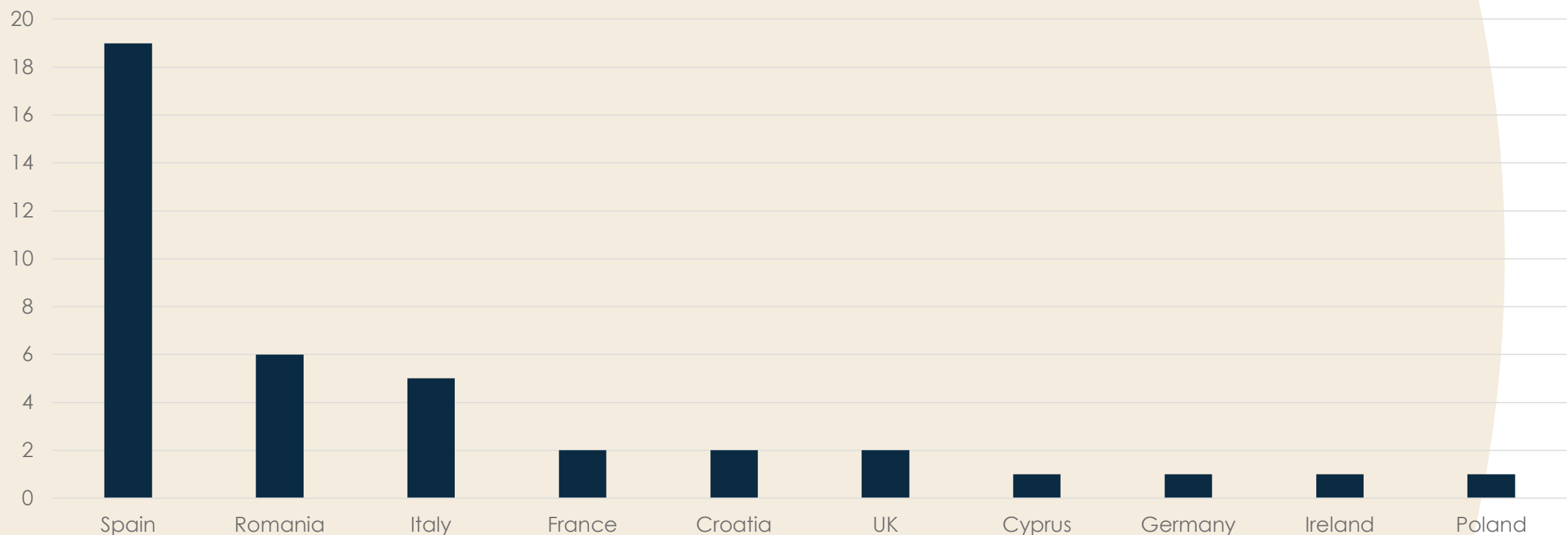
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May UK / EU GDPR Enforcement Trends



Fines May 2023

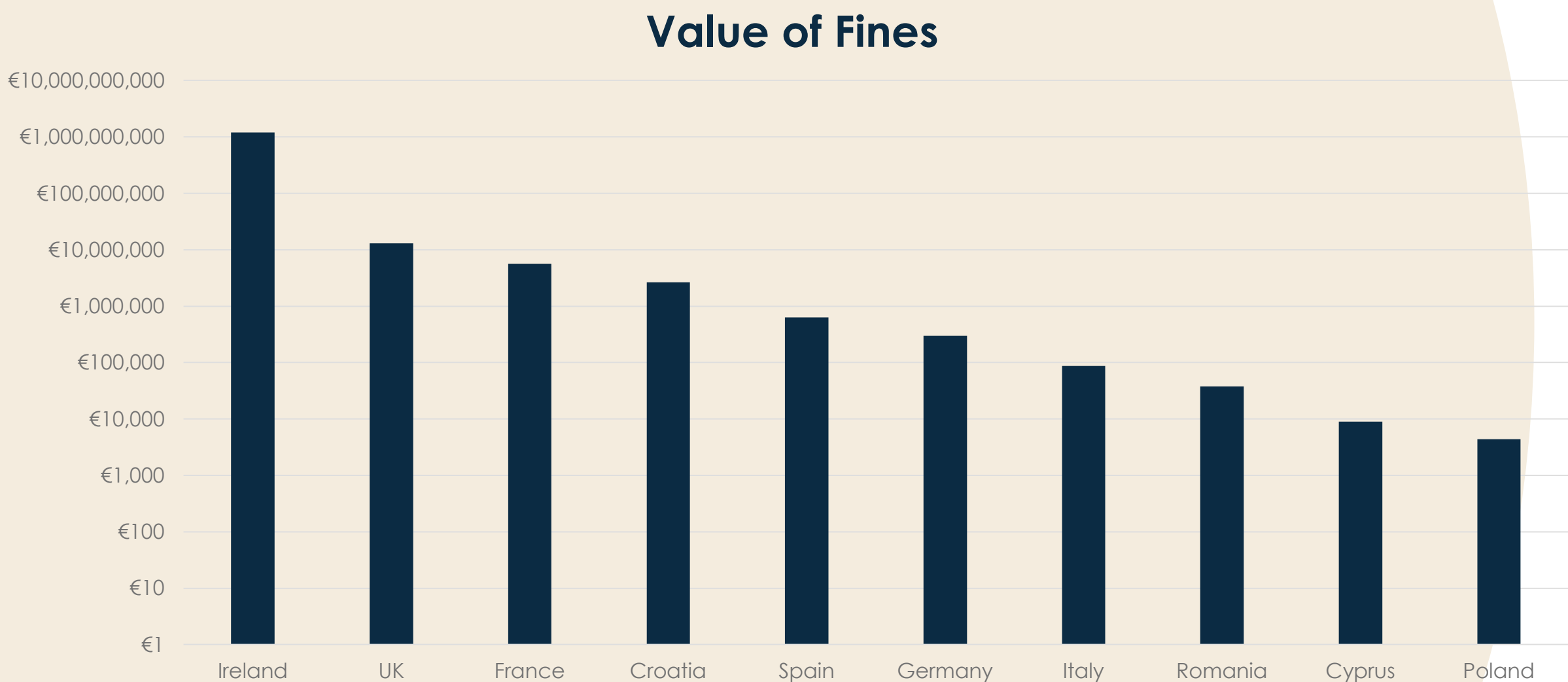
Volume of Fines



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 Personal
(**Romania**)
3. Garante per la protezione dei dati personali
(**Italy**)

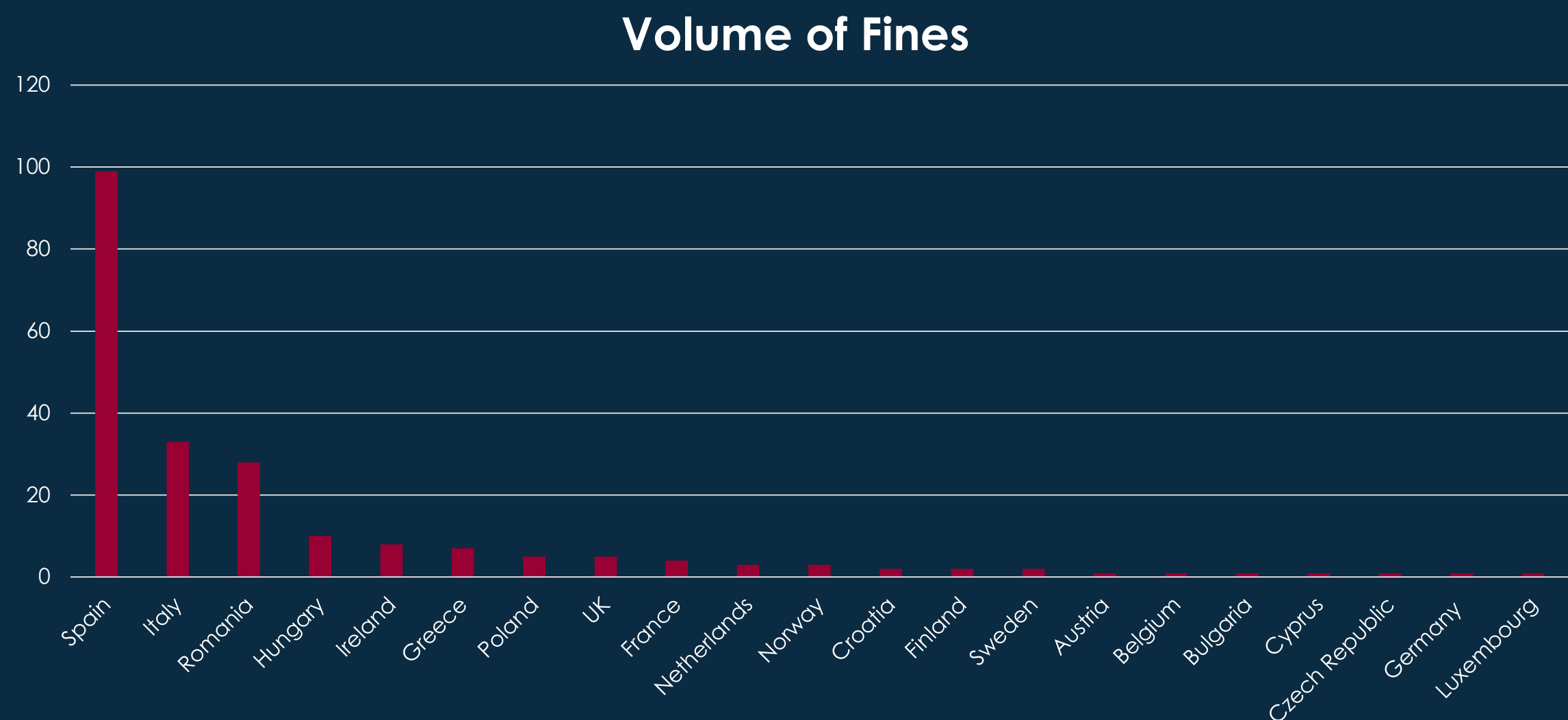
Fines May 2023



Top 3 Most Active Regulators by Value of Fines

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

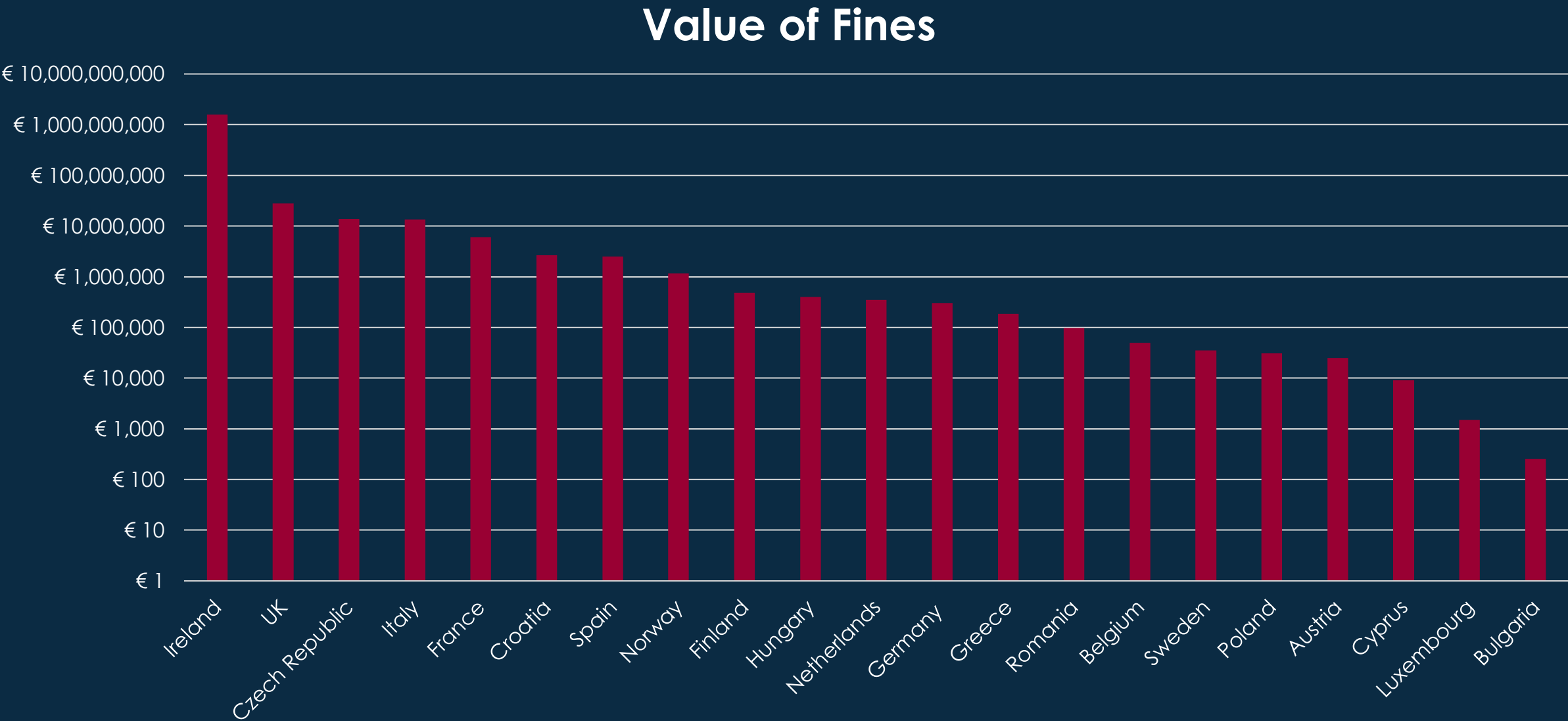
Fines YTD May 2023



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)

Fines YTD May 2023



Top 3 Most Active Regulators by Value of Fines

1. Data Protection Commission (**Ireland**)
2. The Information Commissioners Office (**UK**)
3. Úřad pro ochranu osobních údajů (**Czech Republic**)

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Top Fine

- The Irish Data Protection Authority (DPA) determined that personal data transferred to the US under the updated Standard Contractual Clauses (SCCs) nevertheless breached the GDPR.
- The European Data Protection Board required the Irish DPA to impose a record fine of €1.2 billion.
- The decision is being appealed but is a reminder that organizations should not rely on SCCs alone when transferring EEA data to the US.

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Key Takeaways

- When considering AI, ensure that it meets the 'privacy by design' principles. AI is the next large battleground for data privacy with Clearview AI and OpenAI / ChatGPT as high-profile examples.
- Regulators are active across almost all European jurisdictions demonstrating a need for broad compliance.
- While the largest fines are reserved for multi-nationals, the vast majority of GDPR fines are against comparatively small organizations and public authorities.

Steptoe



Leigh Mallon

lmallon@Steptoe.com

London



Anne-Gabrielle Haie

aghaie@Steptoe.com

Brussels

Key Contacts