






EDPS Newsletter



EUROPEAN DATA
PROTECTION SUPERVISOR

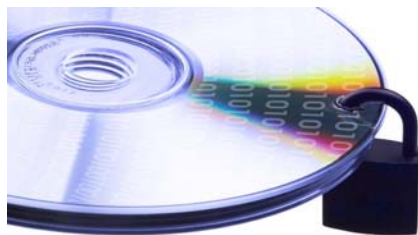
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CONSULTATION

> EDPS opinion on Anti-Counterfeiting Trade Agreement



The opinion, published on 22 February 2010, focuses on potential threats to privacy and data protection of a new multilateral agreement, currently under negotiations, to strengthen the enforcement of intellectual property rights and to combat counterfeiting and piracy (Anti-Counterfeiting Trade Agreement - ACTA).

The EDPS regrets that he was not consulted by the European Commission on the content of an agreement which raises significant issues as regards individuals' fundamental rights, and in particular their right to privacy and data protection. In this context, he views with concern the fact that little information is publicly made available about current negotiations.



From what has been reported about the content of ACTA, he is concerned as regards a potential incompatibility between envisaged measures and data protection requirements. This would apply in particular to the legal framework that would be put in place to fight piracy on the Internet and which could include large scale monitoring of Internet users and the imposition of obligations on Internet Services Providers to adopt "three strikes Internet disconnection policies" - also referred to as "graduated response" schemes.

“Whereas intellectual property is important to society and must be protected, it should not be placed above individuals' fundamental rights to privacy and data protection.” Peter Hustinx, EDPS.

The EDPS' main recommendations include the following:

- **to investigate less intrusive means to fight piracy on the Internet:** three strikes approach policies are not necessary to achieve the purpose of enforcing intellectual property rights. Alternatively, less intrusive solutions should be considered or, at least, envisaged policies should be performed at a more limited scope, notably through targeted ad hoc monitoring;
- **to apply appropriate safeguards to all data transfers in the context of ACTA:** as far as the agreement involves international exchanges of personal data between authorities and/or private organisations located in the signatory countries, appropriate safeguards should be implemented to all data transfers made in the context of ACTA. Such safeguards should take the form of binding agreements between EU senders and third country recipients;
- **to establish a public and transparent dialogue** on ACTA, possibly by means of a public consultation, which would also help ensuring that the measures to be adopted are compliant with EU privacy and data protection law requirements.

↪ EDPS opinion ([pdf](#))

> EDPS comments on international data exchange agreements

On 25 January 2010, the EDPS published some comments on different international agreements, notably the PNR (Passenger Name Record) agreements with the US and Australia, as well as the EU-US TFTP (Terrorist Financing Tracking Programme) agreement concerning the transfer of European financial transaction data.

With regard to the **US PNR agreement**, the EDPS reiterates some concerns, already expressed in his interventions before the Court of Justice and in opinions adopted with the Article 29 Working Party, which are not satisfactorily addressed in the definitive version of the agreement. In particular, the EDPS stresses that the agreement does not focus on persons presenting a risk, but rather allows for a bulk collection of personal data and risk assessment applied to all individuals. The PNR agreement with Australia, on the other hand, raises less privacy concerns.

With regard to the **EU-US TFTP agreement**, the EDPS considers that not enough evidence has been provided so far to justify the necessity and the proportionality of such a privacy-intrusive agreement, which in many ways overlaps with pre-existing EU and international instruments in this area. Furthermore,



some important data protection elements for the Europeans whose data are transferred to the US are not clearly defined in the agreement. While the agreement addresses some issues raised by European data protection authorities, it does not satisfactorily and systematically provide all the safeguards required by the EU data protection legal framework, leaving some dangerous lacunae that should be carefully addressed in the light of Article 16 TFEU and the new legal framework brought by the Lisbon Treaty.

From a broader perspective, the EDPS calls for a comprehensive and harmonised approach to international data-exchange agreements, which would enhance legal certainty and data protection with regard to trans-border exchange of information.

These comments were also presented to the European Parliament's Committee on Civil Liberties by the Assistant Supervisor Mr Giovanni Buttarelli, in the course of the debate that eventually led the Parliament to reject the TFTP agreement with the US.

☞ EDPS comments ([pdf](#))

> EDPS opinion on accident investigation in civil aviation



The EDPS opinion, adopted on 4 February 2010, relates to the European Commission's proposal to update the current rules for civil aviation accident investigation. The opinion focuses on the aspects of the proposal which have an impact on the protection of personal data, including the processing of data from passengers lists, victims, families and witnesses, during the different stages of the investigation and in the context of an exchange of information between investigation authorities.

The EDPS welcomes the fact that data protection aspects are taken into account in the proposal. However, considering the specific context in which personal data are processed – investigation of accidents to improve aviation safety - further safeguards should be foreseen to ensure confidentiality of the data. This should include provisions requiring the deletion or anonymisation of personal data as soon as possible when they are no more needed for the investigation.

“ More stringent safeguards are needed to protect individuals who are directly or indirectly affected by a serious accident or the loss of relatives. ” Peter Hustinx, EDPS.

In order to improve the proposal from a data protection point of view, the EDPS recommends to:

- **keep the list of passengers confidential as a principle**, while providing the possibility to Member States to decide in specific cases and on legitimate grounds to make information available, after having informed all families and obtained their consent for the publication of the name of their relative;
- provide for a **limited period of storage** of personal data;
- ensure a **coordinated procedure for access, rectification and deletion** of personal data, especially in the context of their transmission to Member States through the proposed network allowing safety investigation authorities to exchange information;



- submit the **transmission** of personal data **to third countries** to the condition that they provide an **adequate level of protection**;
- **clarify the role and responsibilities** of the European Commission and of the European Aviation Safety Agency in the application of the Data Protection Regulation.

☞ EDPS opinion ([pdf](#))

> EDPS opinion on cooperation in the field of taxation

The opinion, which was published on 6 January 2010, concerns a European Commission's proposal to enhance administrative cooperation between Member States in the field of taxation. The proposal deals with indirect taxes, with the exception of VAT and excise duties which are dealt with in other legal instruments (see EDPS opinion of 30 October 2009 ([pdf](#))).

One of the main purposes of the proposal is to improve the exchange of information between Member States. In most cases it concerns information about natural persons. The data protection rules are therefore applicable.

In his opinion, the EDPS stated that the Commission proposal is a clear example of a lack of data protection awareness since the issue of data protection has almost completely been ignored. As a consequence, the proposal contains several elements which are incompliant with data protection requirements. In the opinion these shortcomings were highlighted and discussed.

Amongst other remarks, the EDPS called upon the legislator to define more clearly the responsibility of the Commission for the maintenance and security of the network which will be used to exchange information. He furthermore asked the legislator to specify the kind of personal information that can be exchanged, to better define the purposes for which personal data can be exchanged and assess the necessity of transfers, or at least assure that the necessity principle is respected.

☞ EDPS opinion ([pdf](#))

> EDPS opinion on restrictive measures in respect of specific countries



At the end of 2009, the EDPS adopted an opinion on various Commission proposals to impose restrictive measures in respect of certain specified countries (Somalia, Zimbabwe, the Democratic Republic of Korea and Guinea). The opinion highlighted that in this general context EU initiatives should respect fundamental rights and specifically the right to the protection of personal data.

The Commission proposals envisage fighting terrorism or human rights abuses by imposing restrictive measures - notably, asset-freezing and travel bans - on natural and legal persons suspected of being associated with



terrorist organisations and/or on certain governments. To this end, the European Commission publishes and publicises "blacklists" of the natural or legal persons concerned.

The EDPS opinion reaffirms that **fighting those who undermine the respect of fundamental rights must be done by respecting fundamental rights**. The EDPS therefore welcomes the intention of the Commission to improve the current legal framework by enhancing the listing procedure, and by taking the right to the protection of personal data explicitly into account. However, further improvements are needed in order to ensure that:

- listed individuals can access the personal data concerning them contained in classified documents, subject to any proportionate restrictions that may be necessary in certain circumstances. This is also essential to ensure the right of defence;
- effective mechanisms to delist natural persons, as well as to review EU lists at regular intervals, are implemented;
- judicial remedies and independent supervision by data protection authorities are fully applicable.

The EDPS also recommends that, in light of the tools offered by the Lisbon Treaty and the long term vision put forward by the Stockholm Programme, the Commission abandons the current piecemeal approach - whereby specific, and sometimes different, rules on the processing of personal data are adopted for each country or organisation - and proposes a general and consistent framework for all targeted sanctions implemented by the EU against natural or legal persons, entities or bodies. This general framework should ensure the respect of the fundamental rights of the individuals concerned, and in particular the respect of the right to the protection of personal data. Necessary restrictions to these rights should be clearly laid down in law, be proportionate and respect the essence of these rights.

☞ EDPS opinion ([pdf](#))

> German Constitutional Court rules against German data retention law



On 2 March 2010, the German Constitutional Court (the Bundesverfassungsgericht) ruled against the German law which implements the Data Retention Directive 2006/24/EC. The Directive obliges Member States to adopt legislation which regulates the storage of telecommunication data, with a minimum retention period of six months and a maximum of two years. The German legislator had chosen the minimum which, according to the German Constitutional Court, was not as such contrary to fundamental rights contained in the German Constitution. Since the Directive was not therefore subject to legal doubts, the German Court had not sought a preliminary ruling of the European Court of Justice during the procedure.

However, the Court considered that the usage of the stored data should have been subject to stricter requirements than foreseen by the German legislator. In its judgment the Court subsequently formulated criteria for a more restrictive access to and use of the data. These criteria must be included in national legislation in order to ensure that the data retention obligation is implemented without breaching the fundamental rights contained in the German Constitution.



In a press statement, the EDPS underlined that the German Constitutional Court does not criticise the European Data Retention Directive as such. According to the EDPS, the judgment should be seen as a useful reference for the implementation of the Directive in other Member States. The EDPS also believes that the judgment of the German Court will be a valuable input to the evaluation of the Data Retention Directive later in 2010, particularly in light of the new legal framework established by the Treaty of Lisbon.

> EDPS welcomes Court of Justice's ruling strengthening independent position of data protection authorities

The Court of Justice decided on 9 March 2010 that data protection authorities in the German Länder which supervise the processing of personal data in the private sector, are not acting with "complete independence" as required by the Data Protection Directive 95/46/EC.

The case was brought by the Commission which argued that since these data protection authorities are part of the regional administration and subject to State scrutiny, they were not acting in complete independence. The German government stated that sufficient independence was ensured by making these authorities independent from the parties they supervise. The EDPS intervened in the case in support of the arguments of the Commission.

The Court confirmed the position of the Commission. It considered that "complete independence" means that the supervisory authority should be able to make decisions independently from any direct or indirect external influence. An authority must not only be independent from the parties it supervises, but must also not be part of government since the government itself may be an interested party. The German government argued that the State scrutiny in Germany sought only to guarantee the legality of the acts of the data protection authorities and not to exert any political influence. However, the Court considered that the existence of such State scrutiny means that the possibility remains that the authorities are not able to act objectively.

In its judgment the Court stated clearly that supervisory authorities are "an essential component of the protection of individuals with regard to the processing of personal data".

☞ The judgment can be found on the [Court website](#)

> EDPS publishes updated Inventory for legislative consultations

On 5 March 2010, an updated version of the EDPS Inventory for legislative consultations was published on the website.

This update was needed ahead of a more fundamental revision that will take place in the coming months, on the basis of the new Commission's Legislative and Work Programme for 2010 and the Action Plan of the Stockholm Programme that will both be available soon.

☞ EDPS Inventory - March 2010 ([pdf](#)).



SUPERVISION

> News on EDPS prior checking of personal data processing

Processing of personal data by the EU administration that is likely to result in specific risks for the people concerned is subject to a prior check by the EDPS. This procedure serves to establish whether the processing is in compliance with the Data Protection Regulation (EC) No 45/2001, which lays down the data protection obligations of Community institutions and bodies.

>> Procedure to access to private drive and e-mail - Court of Auditors

A procedure to access private drive and e-mails has been developed by the Court of Auditors (CoA) in order to deal with various situations which may occur at the Institution (where staff pass away, leave the institution, or are absent and the information is necessary for the functioning of the institution). It was sent to the EDPS as a consultation, who decided that a notification for prior-checking was necessary.

The proposed **procedure** requires the person requesting the information to fill in a standard form. The request should contain a detailed description of the reason(s) justifying the access, the file name(s) or e-mail account, and/or the subject of the information. The form should be sent to the Information Security Officer or in his absence to the Physical Security Officer.

As this procedure potentially involves access to confidential data, the EDPS considered that the processing operation presented specific risks.

In his opinion issued on 10 January 2010, the EDPS **recommended**, among other matters, that the CoA

- adopt a specific legal basis for the use and storage of private e-mail, and establish clear user guidance on the use of network resources and e-mail;
- require those requesting access to special categories of data to demonstrate a substantial public interest on a case by case basis;
- ensure that the procedure cannot be used to circumvent the rules established by a disciplinary procedure;
- establish a timeframe for the conservation of the data retrieved that does not exceed the normal retention period;
- ensure that any logs on the log file server are only accessible to a third party such as the Data protection officer - in addition to the Information Security Officer and system administrators.

☞ EDPS opinion (FR) ([pdf](#))

>> Affiliated members' complaints - Joint Sickness Insurance Management Committee



The Joint Sickness Insurance Management Committee (JSIMC) is responsible for the operation of the Joint Sickness Insurance Scheme. The JSIMC is comprised of staff representatives appointed by the Staff Committees in each institution and representatives of the administrations. It deals with all amendments to the rules, complaints by members, and issues opinions, recommendations and proposals concerning the operation of the Scheme.

The EDPS met the JSIMC in November 2008 in order to discuss data protection issues in relation to the files managed by the JSIMC. Since the affiliated members' complaints dealt with often contain sensitive data, it was decided that the Committee would send a notification to the EDPS.

This notification led to an opinion, issued on 18 January 2010, in which the EDPS made the following recommendations:

- with regard to data quality, the EDPS was concerned by the fact that the JSIMC receives identification data and suggested that it should only be transmitted to the Committee where absolutely necessary. The EDPS also recommended that data are managed in accordance with the principles of necessity and proportionality, and that the files are kept up to date;
- the EDPS strongly advised that a data retention period should be determined for the data stored on CIRCA (a web-based application for workgroups using shared data) and that complaint files should be anonymised - or made subject to more restricted access;
- JSIMC should set up rights of access and rectification procedures for both paper and CIRCA files, and provide these to the data subjects;
- JSIMC should draft a privacy statement and provide it to data subjects;
- as for security measures; the EDPS strongly recommended that a risk analysis be undertaken and that an appropriate security policy be drafted within six months of his opinion. If this was not done, the EDPS would consider the processing operation to be in breach of Regulation (EC) No 45/2001.

☞ EDPS opinion (FR) ([pdf](#)).



EVENTS

> Forthcoming events

>> European Conference of Data Protection Commissioners (Prague, 29-30 April 2010)

The yearly European privacy and data protection commissioners' conference ("Spring conference") will be held in Prague on 29 and 30 April 2010, hosted by the Czech Office for Personal Data Protection.

The programme will deal with a number of current issues in data protection, such as the "Internet of things: ubiquitous monitoring in space and time", "Children in cobweb on networks", "Personal data protection at the crossroads", "Public sector: respected partner or privileged processor?" and "Ethnic profiling".



An important general theme will be the future of data protection, in relation to the possible revision of the general framework for data protection.

As usual, the EDPS and the Assistant Supervisor will actively participate in the conference.

>> Biannual Conference on data protection and law enforcement (Trier, 31 May - 1 June 2010)

On 31 May and 1 June 2010, the EDPS and the European Law Academy (ERA) will jointly organise a second biannual conference in Trier on Data Exchange and Data Protection in the Area of Freedom, Security and Justice, following the big success of the first conference in spring 2008.

This seminar aims to give an overview of the relevant EU legislation and of the evolving legal framework for data protection, as a result of the Lisbon Treaty, the Stockholm Programme and the intentions of the Commission. The conference will address new threats to privacy caused by biometrics, RFID and other technological developments. It will also deal with the exchange of data within the European Union and in the transatlantic context.

☞ Registration will be possible on www.era.int where a preliminary programme is also available.

>> Case handling Workshop (Brussels, 18-19 March 2010)

The 21st Case Handling Workshop will take place in Brussels on 18 and 19 March 2010; it will be hosted by the Belgian Data Protection Authority.

Case handling workshops are organised twice a year to bring together officials of EU data protection authorities to share experiences and good practice on relevant topics. Among others, the issues for discussion during the next workshop include scientific research (archives and medical data), electronic ticketing in public transport, road tolls & pay-as-you-drive, as well as issues related to direct marketing and behavioural advertising.

☞ Agenda and programme are available on <http://www.chw2010brussels.be/agenda-programme>.

> Outcome of past events

>> First meeting of CIS Supervision Coordination Group (Brussels, 8 March 2010)

The EDPS convened the first meeting of the CIS Supervision Coordination Group which took place on 8 March 2010 in Brussels.



The theme of the meeting was the supervision of the Customs Information System (CIS) under Regulation (EC) No 766/2008 amending Council Regulation (EC) No 515/97.

Under this new legal framework, the EDPS is entrusted with the task of supervising compliance of the central part of the (ex) First Pillar CIS with the Regulation, while the national supervisory authorities are in charge of the data protection supervision of the national parts of the system. In this context, the EDPS shall convene at least once a year a meeting with all national data protection supervisory authorities competent for CIS-related supervisory issues.

The main objectives of this coordinated supervision are to examine implementation problems related to the operation of the CIS as well as possible difficulties during checks by the national supervisory authorities. Moreover, the Group might draw up recommendations for common solution to the existing problems.

The meetings also provide a good platform for closer cooperation with the Customs Joint Supervisory Authority responsible for supervision of the (ex) Third Pillar of the Customs Information System.

>> "Trust in the Information Society" conference (León, Spain, 10-11 February 2010)

On 10 and 11 February 2010 in Leon, Spain, Peter Hustinx participated in the conference "Trust in the Information Society" organised by the Spanish Presidency and the European Commission. At the end of this conference, the participants adopted the "Conclusions of León" in order to highlight their findings and concerns to those European institutions and Member States involved in the development of the European Digital Agenda.

☞ [Conclusions of León](#)

☞ [Video](#) of Peter Hustinx's contribution (see panel 6)

>> Safer Internet Day (Strasbourg, 9 February 2010)

Safer Internet Day is organised each year in February to promote safer and more responsible use of online technology and mobile phones across the world, especially amongst children and young people.

On European Safer Internet Day, the Commission organised a round-table discussion "Think before you post!" and presented the results of an assessment of the implementation of the Safer Social Networking Principles signed by 20 lead providers. The European Data Protection Supervisor contributed to the round-table with a presentation on "Protecting children on line: the role of data protection".

☞ [More information](#)

>> Fourth European Data Protection Day (28 January 2010)



The Member States of the Council of Europe and the European institutions celebrated the European Data Protection Day for the fourth time on 28 January 2010. This date marks the anniversary of the adoption of the Council of Europe's Convention on the protection of personal data (Convention 108), the first legally binding international instrument in the field of data protection.

On this occasion, the EDPS once again highlighted the increasing relevance of privacy and data protection. In a press statement, he underlined that while data protection as a fundamental right is increasingly relevant, it is also a key challenge to ensure an effective protection of personal data in practice.

“The growing use of personal data affects us all, and the privacy consequences of this development are now becoming more visible. It is therefore essential that everyone's fundamental rights to privacy and data protection are effectively protected in practice.” Peter Hustinx, EDPS.

The EDPS used the opportunity of this event to raise awareness about data protection rights and obligations, in particular among the EU staff. To that end, a one-day information stand was set up on three consecutive days in the Council, the European Commission and the European Parliament. A video message from Peter Hustinx, EDPS, and Giovanni Buttarelli, Assistant Supervisor, was also uploaded on the website to present the role of the office of the EDPS and to outline the challenges ahead in the field.

☞ [More information](#) on EDPS activities for Data Protection Day.

☞ [Video message](#) from Peter Hustinx, EDPS, and Giovanni Buttarelli, Assistant Supervisor.



SPEECHES AND PUBLICATIONS

- "Recent developments in the European Union", speech ([pdf](#)) delivered by Peter Hustinx at the Joint ICCP-WPISP Roundtable "30 years after: the impact of the OECD Privacy Guidelines" (Paris, 10 March 2010)
- "Making data protection more effective: challenges and opportunities", speech ([pdf](#)) delivered by Peter Hustinx at the Breakfast Roundtable of the ICT Committee of the British Chamber of Commerce in Belgium on "Data Loss Prevention - Is sensitive information leaving your organisation?" (Brussels, 9 March 2010)
- Hustinx, P., "A question of trust", article ([pdf](#)) published in "The Parliament Magazine", Brussels, 8 March 2010, p. 40
- "Ensuring the right balance of IP rights and data protection", speech ([pdf](#)) delivered by Peter Hustinx at the ERA Conference "Intellectual Property and the Information Society in the EU" (Barcelona, 26 February 2010)
- "Challenges and opportunities: the stakes are rising", speech ([pdf](#)) delivered by Peter Hustinx at the conference "Trust in the Information Society" organised by the Spanish Presidency and the European Commission (León, 11 February 2010)
- "Protecting children on line: the role of data protection", speech ([pdf](#)) delivered by Peter Hustinx at the Safer Internet Day: "Think before you post!" (Strasbourg, 9 February 2010)



- "Data protection and international agreements in the area of law enforcement", speech ([pdf](#)) delivered by Hielke Hijmans at the Conference on the Area of Freedom, Security and Justice in a wider world (The Hague, 5 February 2010)
- "Data protection: an essential condition for trust in digital policing" speech ([pdf](#)) delivered by Peter Hustinx at the 13th European Police Congress (Berlin, 2 February 2010)
- Speaking notes ([pdf](#)) on body scanners delivered by Giovanni Buttarelli at the meeting of LIBE Committee on recent developments in Counter-terrorism policies (body scanners, "Detroit flight"...) (Brussels, 27 January 2010)
- Speech ([pdf](#)) delivered by Giovanni Buttarelli on the occasion of the Data Protection Day event at the European Medicines Agency (Videoconference, 27 January 2010)
- "The Surveillance Policy in Europe, today and tomorrow ", speech ([pdf](#)) delivered by Giovanni Buttarelli at the Conference for the 30th anniversary of the CRID (Namur, 22 January 2010)
- Hustinx, P., "Opportunities and challenges", article ([pdf](#)) published in "The European Data Protection Day", P. de Hert e.a., VUB Brussels, 2010, p. 6
- "Stockholm Programme and EU Information Management Strategy", speech ([pdf](#)) delivered by Giovanni Buttarelli at the Conference on European Index of Convicted Third Country Nationals (Brussels, 19 January 2010).



NEW DATA PROTECTION OFFICERS

Each Community institution and body has to appoint at least one person as Data Protection Officer (DPO). These officers have the task of ensuring in an independent manner the application of the data protection obligations laid down in Regulation (EC) No 45/2001 in the concerned institution or body.

Recent appointments:

- **Nicolas BRAHY**, Fuel Cells & Hydrogen Joint Undertaking

☞ See full list of [DPOs](#).



About this newsletter

This newsletter is issued by the European Data Protection Supervisor – an independent EU authority established in 2004 to:

- monitor the EU administration's processing of personal data;
- give advice on data protection legislation;
- co-operate with similar authorities to ensure consistent data protection.

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CONTACTS

www.edps.europa.eu

Tel: +32 (0)2 34234234234

Fax: +32 (0)2 34234234234

e-mail: see our contacts page

POSTAL ADDRESS

EDPS – CEDP
Rue Wiertz 60 – MO 63
B-1047 Brussels
BELGIUM

OFFICE

Rue Montoyer 63
Brussels
BELGIUM

EDPS – The European guardian of personal data protection