

EUROPEAN
DATA PROTECTION
SUPERVISOR



ANNUAL REPORT

EXECUTIVE SUMMARY 2024



Further details about the EDPS can be found on our website edps.europa.eu

The website also details a [subscription feature](#) to our newsletter.

Brussels, Belgium: PWC EU Services EEIG

© Design and Photos: PWC EU Services EEIG, EDPS & European Union

© European Union, 2024

Reproduction is authorised provided the source is acknowledged.

For any use or reproduction of photos or other material that is not under the European Data Protection Supervisor copyright, permission must be sought directly from the copyright holders.

PDF ISBN 978-92-9242-906-5 ISSN 1977-8333 doi: 10.2804/7519189 QT-01-25-002-EN-N

Foreword

I have the pleasure of introducing you to the EDPS Annual Report 2024 - a special edition as it concludes the EDPS' Mandate 2020 - 2024 and our 20th Anniversary celebrations.

This year has therefore been an opportunity to take stock of the work completed during the mandate, guided by our three-pillar principles: Foresight - Action - Solidarity; to anticipate technologies' benefits and challenges that lie ahead, to provide the necessary tools and take efficient actions to data protection matters, and to ensure that people's privacy is protected according to EU values.

As was highlighted during the EDPS Summit: Rethinking data in a democratic society held in June 2024, the way personal data is processed and the digital landscape as a whole has considerably evolved, and its machinery in constant movement.

Understanding this continuous digital grind, composed of positive and more challenging aspects, the EDPS invested this year in its preparations for Artificial Intelligence's (AI) development and use in EU institutions, bodies, offices and agencies (EUIs).



Ahead of our newly acquired roles under the AI Act as competent market surveillance authority for the supervision of AI systems and notified body for assessing the conformity of certain high-risks AI systems, the EDPS launched its AI Strategy in May 2024. It is based on three key pillars: governance, risk management and supervision. The EDPS also created its very own AI Unit, composed of various experts. Now at the end of 2024, we have put this strategy into motion. We have set up a functioning AI Correspondents Network, including diverse specialists from across the EUIs to foster a collaborative and consistent approach to the use of AI, fostering AI literacy, public procurement and pilot programmes for sustainable and fair EU-centric AI tools, and published guidelines for EUIs on this topic.

Foresight, anticipating technologies and the digital landscape's waves, was also reflected in other areas of our work throughout the year.

With our Technology and Privacy Unit, we pursued our monitoring of technologies' evolution, notably neurodata, and different AI-led technologies, such as retrieval-augmented generation, on-device AI, machine unlearning and plenty others.

Our aim, in this line of work, is to always highlight the possibilities, limits and risks (some of which are unknown - inevitably) of technologies to individuals' personal data and privacy. On that basis, the way data protection by default and by design is embedded in their lifecycle, we steer, with our influence in international fora and platforms, like the Internet Privacy Engineering Network, or the International Working Group on Data Protection and Technology.

From a Policy and Consultation perspective - another of the EDPS' key areas, and Unit, in which it operates, we provided advice to the EU co-legislator on the Digital Rulebook, which encompasses the AI Act, the Digital Wallets draft Regulations, regulations on the use of health technology. These examples of topics we have worked on demonstrate the direct impact our work has on EU citizens' day-to-day life and their information security and privacy.

Building a safer digital future starts today. With the EDPS' Supervision and Enforcement Unit, we doubled-down on providing essential tools to EUIs, either in the form of Supervisory Opinions, verifying and authorising transfers of personal data to non-EU/EEA countries, training sessions, DPO networking, to ensure that they comply with EU data protection laws for now and the future.

We encourage them to build and share privacy habits - in other words to lead by example in data protection.

Collaboration is a loyal ally to consistent application of EU data protection rules, and their elevation to global standards. With this in mind, we steadily worked with the European Data Protection Board, of which we are a member and provider of its Secretariat, on EU-wide data protection and privacy preoccupations. We led multiple discussions advancing privacy with our participation in multilateral fora, such as the G7 roundtable of data protection and privacy authorities, and the International Organisations workshops we co-organise annually.

We can't predict the future, but we can use our resources, human intelligence and expertise, to prepare for the diverse possibilities and risks that the digital landscape presents.



Wojciech Wiewiórowski

European Data Protection Supervisor

CHAPTER ONE

Presenting the EDPS



1.1.

The EDPS

1.1.1.

Who we are

The European Data Protection Supervisor (EDPS) is the [European Union's independent data protection authority](#) responsible for supervising the processing of personal data by the European institutions, bodies, offices and agencies (EUIs). We advise EUIs on new legislative proposals and initiatives related to the protection of personal data. We monitor the impact of new technologies on data protection and cooperate with supervisory authorities to ensure the consistent enforcement of EU data protection rules.



1.1.2.

Our mission

Data protection is a fundamental right, protected by EU law. We promote a strong data protection culture in the EUIs.

Our values and principles

We carry out our work according to the following four values.

- **Impartiality:** Working within the legislative and policy framework given to us, being independent and objective, finding the right balance between the interests at stake.
- **Integrity:** Upholding the highest standards of behaviour and to always do what is right.
- **Transparency:** Explaining what we are doing and why, in clear language that is accessible to all.
- **Pragmatism:** Understanding our stakeholders' needs and seeking solutions that work in a practical way.

1.1.3.

What we do

We have five main fields of work.

- **Supervision and Enforcement:** Monitoring the processing of personal data by EUIs to ensure that they comply with data protection rules.
- **Policy and Consultation:** Advising the European Commission, the European Parliament and the Council on legislative proposals, implementing and delegated acts, international agreements, and other initiatives with impact on data protection.
- **Technology and Privacy:** Monitoring and assessing technological developments impacting the protection of personal data. We oversee that the systems supporting the processing of personal data by EUIs implement adequate safeguards to ensure compliance with data protection rules. We implement the digital transformation of the EDPS.
- **AI Preparedness:** Under the AI Act we act as notified body and market surveillance authority to assess the conformity of high-risk AI systems that are developed, deployed and used by EUIs. We ensure that the use, development and deployment of AI by EUIs is coherent and consistent with the AI Act. Our responsibilities embody the principles of good governance, risk management and supervision.
- **Cooperation:** Working with data protection authorities to promote consistent data protection across the EU as well as high standards of data protection globally. Our main platform for cooperation with EU/EEA data protection authorities is the [European Data Protection Board](#), to whom we also provide a secretariat and have a [Memorandum of Understanding](#) defining how we work together.



Each area of expertise, enumerated above, is embodied by Units and Sectors that bring together a diverse group of legal and technical experts, as well as other specialists in their field from all across the European Union.

1.1.4.

Our Powers

The powers we have as the data protection authority of EUIs are laid out in [Regulation \(EU\) 2018/1725](#).

Under this Regulation, we can, for example, warn or reprimand an EUI that is unlawfully or unfairly processing personal data; order EUIs to comply with requests to exercise individuals' rights; impose a temporary or definitive ban on a particular data processing operation; impose administrative fines to EUIs; refer a case to the Court of Justice of the European Union.

We also have specific powers to supervise the way the following EU bodies, offices and agencies process personal data:

- Europol - the EU Agency for Law Enforcement Cooperation under [Regulation 2016/794](#).
- Eurojust - the EU Agency for Criminal Justice Cooperation under [Regulation 2018/1727](#).
- EPPO - the European Public Prosecutor's Office under [Regulation \(EU\) 2017/1939](#).
- Frontex - the European Border and Coast Guard under [Regulation \(EU\) 2019/1896](#).

Since 2024, the EDPS has acquired new powers and roles under the AI Act as notified body and market surveillance authority to assess the conformity of high-risk AI systems that are developed, deployed and used by EUIs.

1.2.

EDPS Strategy 2020 - 2024

In a connected world, where data flows across borders, solidarity within Europe, and internationally, will help to strengthen the right to data protection and make data work for people across the EU and beyond.

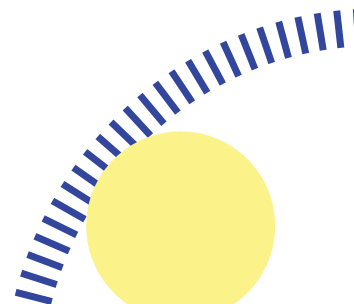
[The EDPS Strategy for 2020-2024](#) focuses on three pillars: Foresight, Action and Solidarity to shape a safer, fairer and more sustainable digital future.

- **Foresight:** Our commitment to being a smart institution that takes the long-term view of trends in data protection and the legal, societal and technological context.
- **Action:** Proactively develop tools for EUIs to be world leaders in data protection. To promote coherence in the activities of enforcement bodies in the EU with a stronger expression of genuine European solidarity, burden sharing and common approach.

- **Solidarity:** Our belief is that justice requires privacy to be safeguarded for everyone, in all EU policies, whilst sustainability should be the driver for data processing in the public interest.

For more information about the EDPS, please consult our [Frequently Asked Questions](#) page on the EDPS website.

For more information about data protection in general, consult our [Glossary page](#) on the EDPS website.



CHAPTER TWO

Highlights of 2024



As the 2020 - 2024 mandate ends, we continued to deliver on our actions to shape a safer digital future, operating in our core areas of expertise: **Supervision & Enforcement, Policy & Consultation, Technology & Privacy** and more recently, **Artificial Intelligence**.

In the area of **Supervision & Enforcement**, we:

- **advised EUIs on planned data processing operations in the form of Supervisory Opinions** on transfers of personal data, individuals' privacy rights, data retention and the processing of special categories of data, for example;
- **investigated alleged breaches of data protection laws by EUIs**, such as the European Commission's use of Microsoft tools, or EUIs' use of profiling and automated-decision making;
- **audited EUIs to identify strengths and weaknesses in their data protection practices**, for example in the area of recruitment, the processing of health data and the processing of children's data for research purposes;
- **addressed complaints from individuals** who believe that an EUI has infringed their data protection rights, including in the context of remote recruitment testing, micro-targeting of social media campaigns;
- **defended privacy and the EDPS' institutional role and decisions before the Court of Justice of the European Union**;
- **collaborated with Data Protection Officers of EUIs to uphold consistent and coherent data protection standards** across EU public administration with the organisation of workshops, trainings, roundtables and various meetings;
- **completed supervisory work in three key areas: Artificial Intelligence, International transfers of personal data** and **collaborating with EU data protection authorities**.

In the area of **Policy & Consultation**, we:

- **issued 97 responses to legislative consultation requests from the European Commission in the form of Opinions, Formal and Informal Comments, providing advice on the data protection implications of draft EU laws and international agreements** on a range of topics, including Justice and Home Affairs, the Digital Rulebook, Artificial Intelligence, international law enforcement agreements, Large-scale IT systems, health, transport;
- **actively contributed to promoting and further developing consistent and coherent data protection rules and practices across the EU**, in particular through our membership in the European Data Protection Board;
- **fostered international cooperation to promote high global EU data protection standards**, for instance at the G7 of Data Protection and Privacy Authorities or at the Global Privacy Assembly.

In the area of **Technology & Privacy**, we:

- **forecasted and analysed digital and technological developments**, highlighting their opportunities and risks in our publications and podcasts of TechSonar and TechDispatch, with a focus on AI and pervasive trends, such as neurotechnologies;
- **organised our Internet Privacy Engineering Network (IPEN)** on automated decision making;
- **helped EUIs address, overcome and prevent data breaches**, and creating awareness campaigns and initiatives;
- **audited IT systems of EUIs**, from websites, to Large Scale Information Systems, such as the Schengen and Visa Information Systems;
- **pursued our actions for digital transformation**, such as updating the Website Evidence Collector and streamlining the organisation of our IT support;
- **prepared for the EDPS' evolving role in cybersecurity** with the Cybersecurity Regulation 2023/2841 and to **improve the preparedness of the EDPS in this area**.

Supporting **internal governance mechanisms and compliance** involved:

- **acquiring legally compliant electronic qualified signatures**, as a further building block the **digitisation** of our processes;
- **creating an ISO-based corporate template for drafting procedures**, ensuring consistency and robustness in EDPS processes;
- **handling 53 requests for access to documents**, the highest number so far and a sign of the growing interest in EDPS activities;
- **the DPO providing independent advice** to internal services, as delegated controllers, with a view to ensure the EDPS' accountability.

Concerning **AI preparedness**, we:

- **created the AI Unit** to take on the EDPS' new tasks under the AI Act;
- **designed and unveiled our AI Act Strategy** based on governance, risk management and Supervision;
- **brought together an AI Act correspondent network of EUIs.**

Communicating data protection involved:

- **communicating on the EDPS' 20th anniversary**;
- **diversifying our online presence** using different tools, mediums and campaigns;
- **leading events to increase visibility of our work** to raise global data protection standards;
- **building and maintaining relationships with journalists**, stakeholders and the public.

As a **working organisation**, we:

- **managed human and financial resources** in a sustainable way to deliver our mandate and tasks;
- **invested in employees, Units and Sectors** by offering trainings on AI;
- **supported the creation of the AI Unit.**

2.1.



Key Performance Indicators 2024








We use a number of **key performance indicators (KPIs)** to help us monitor our performance in light of the main objectives set out in the EDPS Strategy. This ensures that we adjust our activities, if required, to increase the impact of our work and the effective use of resources.

The KPI scoreboard contains a brief description of each KPI and the results on 31 December 2024. These results are measured against initial targets, or against the results of the previous year that are used as an indicator.

In 2024, we met or surpassed the targets set in all KPIs, except one, confirming the positive trend of achieving our strategic objectives throughout the year.

One KPI did not fully meet the set target, KPI7, concerning followers EDPS social media account. In particular, in 2024 we continued observing a drop in the number of followers on our X account (ex-Twitter), likely resulting from a general decline in the number of people active on this social media platform.

KEY PERFORMANCE INDICATORS		RESULTS 31.12.2024	TARGET 2024
KPI 1  Internal Indicator	Cases, incl. publications, on technology monitoring and promoting technologies to enhance privacy and data protection organised or co-organised by the EDPS	10 cases	5 cases
KPI 2  Internal & External Indicator	Activities focused on cross disciplinary policy solutions (internal & external)	8 activities	8 activities

KEY PERFORMANCE INDICATORS		RESULTS 31.12.2024	TARGET 2024
KPI 3  Internal Indicator	Cases dealt with in the context of international cooperation (GPA, CoE, OECD, GPEN, IWGDPT, Spring Conference, international organisations) on which the EDPS has provided a substantial written contribution	39 cases	10 cases
KPI 4  External Indicator	Files on which the EDPS acted as a lead rapporteur, rapporteur, or a member of the drafting team in the context of the EDPB	17 files	10 files
KPI 5  External Indicator	Article 42 Opinions and Joint EDPS-EDPB Opinions issued in response to the European Commission's legislative consultation requests	25 opinions	25 opinions
KPI 6  External Indicator	Number of audits/visits carried out physically or remotely	10 audits/visits	5 audit/visits
KPI 7  External Indicator	Number of followers on EDPS social media accounts	X: 28,860 LinkedIn: 82,881 YouTube: 3409 Instagram: 314	Previous year's figures + 10%
KPI 8  Internal Indicator	Occupancy rate of establishment plan	98,8%	90%
KPI 9  Internal Indicator	Budget implementation	96%	90%

CHAPTER THREE

Celebrating the EDPS' 20th Anniversary

In 2024, we celebrated our 20th anniversary, a milestone reflecting two decades of commitment to protecting privacy and shaping the future of data protection in the EU and beyond. This celebration was not just a moment to look back at past achievements, but also an opportunity to reaffirm the EDPS' role in addressing evolving digital challenges.

Established on 17 January 2004, the EDPS has played a crucial role in guiding EU institutions, bodies, offices and agencies (EUIs) through an ever-changing digital landscape, ensuring that privacy remains a fundamental right in an increasingly data-driven world. From our early days of establishing a robust supervisory framework to its more recent contributions in AI governance and cybersecurity, we have continuously adapted to emerging technologies and regulatory challenges.

The 20th anniversary was structured around four key pillar activities: a book and timeline, 20 talks, 20 initiatives, leading up to a Summit. Each designed to highlight the impact of the EDPS and its vision for the future.

The first pillar consists of a [book](#) and a [timeline](#) analysing key data protection milestones and the EDPS' influence over the past two decades, alongside an in-depth exploration of future challenges.

The [second pillar features 20 talks](#) with leading voices from around the world, offering unique perspectives on how data protection and privacy shape various fields, such as cybersecurity, tech, AI space and ethics.

The [third pillar introduces 20 initiatives to reinforce individuals' fundamental rights](#) and modernise the EDPS' approach to anticipate and address future challenges.

The [fourth pillar is our European Data Protection Summit: Rethinking Data in a Democratic Society](#), that took place on 20 June 2024 in Brussels. This event was designed to foster open and dynamic discussions on the role of privacy and data protection in modern democracies, particularly in the context of increasing data collection by states, by private or public entities.

With these four pillars, we set the goal of anticipating future challenges and opportunities, equipping actors in the digital and privacy spheres with the regulatory tools needed to protect individuals' personal data. This anniversary was not just a reflection on the past but a commitment to the future.

By reinforcing our mission and adapting to evolving challenges, we reaffirm our dedication to safeguarding individuals' rights while shaping the policies and frameworks that will define data protection in the years ahead.



3.1.

Book and Timeline

To mark its 20th anniversary, the **EDPS published in June 2024 a book titled "Two Decades of Personal Data Protection. What Next?"** This publication retraces the EDPS's journey, highlighting its role in shaping the digital landscape and safeguarding privacy. More than just a historical record, the book reflects on key lessons learned and anticipates future challenges in data protection.

The book embodies the philosophy that looking back is essential to preparing for the future. It examines how we have evolved alongside European data protection laws, emphasising the institution's unique position at the intersection of legal, technological, and societal developments. The reflections included illustrate how data protection has become a pillar of the EU, influencing policies beyond its original scope and shaping debates on democracy, digital sovereignty, and fundamental rights.

The publication is not only a retrospective but also have a vision for the years ahead. It delves into regulatory milestones, the growing complexity of privacy in an interconnected world, and the EDPS' role in addressing emerging risks. With digital transformation accelerating, this publication underscores the importance of maintaining strong, independent oversight to uphold privacy rights in the face of challenges such as artificial intelligence, cross-border data flows, and evolving security concerns.

A key strength of this book lies in its contributors. The book features 20 chapters authored by a diverse group of experts, including current and former EDPS officials, legal scholars, policymakers, and professionals specialising in data protection.

These perspectives provide a comprehensive analysis of the EDPS' impact over the years and its ongoing commitment to ensuring that privacy remains a core European value.

3.2.

20 Talks

To celebrate our 20th anniversary, the [EDPS launched the "20 Talks" series](#). This initiative explores the role of privacy and data protection across different sectors, bringing together experts from technology, policy, academia, and activism. The goal is to foster discussions on current challenges, ethical considerations, and the future of digital governance. By inviting diverse perspectives, the series aims to bridge the gap between Regulation, technological innovation, and fundamental rights.

The Talks cover a wide range of topics. Discussions include the risks of online fraud and identity theft, the importance of robust data protection laws in emerging digital societies, and the evolving regulatory landscape for artificial intelligence. Other sessions focus on the intersection of privacy and human rights, highlighting how data protection safeguards dignity and freedom. Speakers also discuss the responsibilities of policymakers, industry leaders, and civil society in ensuring that privacy remains a fundamental right in an increasingly digital world. The challenges of enforcing privacy laws, particularly with large technology companies, are also examined. Experts share insights on legal frameworks, compliance strategies, and the role of independent oversight bodies in holding organisations accountable.

The Series also addresses the broader implications of technological advancements. Conversations explore the ethical use of AI, the impact of data governance on international cooperation, and the role of encryption in protecting online communications. Additionally, the Talks highlight case studies and real-world examples of how privacy challenges have been addressed in different regions. The Talks emphasise the importance of integrating privacy considerations into technological development from the outset.

3.3.

20 initiatives

Turning wishes into actions and commitments, as part of our 20th anniversary, we worked on 20 initiatives to keep up with an evolving digital landscape, to thrive and lead as a modern data protection authority.

Each month, we published initiatives tackling different aspects of data protection law.

Topics worked on include, initiatives to ameliorate data protection officers' role, analysis of AI tools, enhancing cross-regulatory cooperation.



3.4.

European Data Protection Summit: Rethinking Data in a Democratic Society

On 20 June 2024, the **EDPS hosted a major conference in Brussels to celebrate its 20th anniversary. The event gathered data protection specialists, policymakers, and technology experts to reflect on the role of data protection in modern democracies.** In an era where digital information is a key asset, the Summit aimed to rethink how data can be managed while upholding fundamental rights and ensuring democratic oversight.

Throughout the day, discussions focused on the intersection between data protection, democracy, and technological change. One key topic was the relationship between democracy and the rule of law, exploring how national security policies affect privacy rights.

While state surveillance is not fully regulated under EU law, experts debated the need for greater democratic accountability to ensure both security and privacy. Another central discussion revolved around Artificial Intelligence and Data Protection, addressing the implications of the AI Act and the Digital Markets Act (DMA). Participants examined how innovation could be encouraged while safeguarding individuals' rights.



The role of public authorities in data protection was another major focus. Speakers questioned whether current legal frameworks adequately regulate how authorities handle personal data, particularly in law enforcement and governance. The debate extended to the issue of disinformation, with experts highlighting the challenges posed by social media in shaping public opinion. The Digital Services Act (DSA) was discussed as a crucial tool in addressing data misuse and online manipulation.





Publications Office
of the European Union

