

EXECUTIVE SUMMARY 2024

PROTECTING PERSONAL DATA IN A CHANGING LANDSCAPE



HIGHLIGHTS 2024

Coordinated Enforcement report on the role of DPOs

JANUARY

FEBRUARY

- Launch Coordinated Enforcement action on the right of access
- Opinion 04/2024 on the notion of main establishment of a controller

- Opinion 08/2024 on 'consent or pay' models deployed by large online platforms
- Adoption 2024-2027 Strategy

APRIL

MAY

Opinion 11/2024 on the use of facial recognition technologies to streamline airport passengers' flow

Election of a new EDPB Deputy Chair
Zdravko Vukić

JUNE

OCTOBER

- Guidelines on Legitimate Interest and first meeting of EDPB with DPAs of countries with an adequacy decision
- Opinion 22/2024 on certain obligations following from the reliance on processor(s) and sub-processor(s)

Stakeholder events on AI models and "Consent or Pay"

NOVEMBER

DECEMBER

Opinion 28/2024 on AI models

INTRODUCTION

In 2024, the EDPB reaffirmed its commitment to safeguarding individuals' fundamental rights to privacy and data protection in a fast-changing digital landscape. A key milestone was the adoption of the EDPB's [new Strategy 2024–2027](#), which sets out the Board's priorities for strengthening enforcement, promoting compliance, and addressing emerging technological challenges. The strategy is built around four strategic pillars: enforcing data protection effectively, supporting compliance, enhancing cooperation, and promoting data protection in the digital age.

The [European Data Protection Board \(EDPB\)](#) continued to play a central role in providing guidance and legal advice to ensure the consistent application of the [General Data Protection Regulation \(GDPR\)](#) across the European Economic Area (EEA). In 2024, the number of consistency

opinions adopted under Art. 64(2) GDPR significantly increased, underlining the importance of this instrument in promoting early alignment on matters of general application.

To support understanding and implementation of data protection obligations, the EDPB further expanded its outreach activities. [The Data Protection Guide for Small Business](#), launched in 2023, was made available in 18 languages, and a new series of guideline summaries was developed to assist non-expert audiences in navigating key topics under the GDPR.

In parallel, the Board actively contributed to cross-regulatory cooperation by engaging with EU and international partners, including the European Union Artificial Intelligence Office and the High-Level Group on the Digital Markets Act. These efforts highlight the Board's growing role in shaping data protection within an increasingly interconnected regulatory environment.

1. THE EDPB SECRETARIAT

In 2024, the EDPB [Secretariat](#) significantly advanced its capacities to effectively respond to an increasingly dynamic regulatory landscape, reinforcing its pivotal role in upholding data protection right.

The Secretariat ensures comprehensive analytical, administrative and logistical support for all EDPB activities. It contributes specifically to drafting consistency opinions and guidance documents, and managing litigation ensuring robust support across all EDPB operations.

A noteworthy area of evolution was the Secretariat's digital transformation and enhancement of internal information systems. The Internal Market Information (IMI) system remained central, facilitating over 5.644 procedures throughout the year, a significant increase compared to previous years. To enhance the user experience, new centralised training resources and video tutorials were introduced, simplifying access to and improving the effective use of EDPB IT tools among Data Protection Authorities (DPAs).

The Secretariat supported the Board in its cross-regulatory work, cooperating closely with EU regulatory bodies such as the European Data Innovation Board and the High-Level Group on the Digital Markets Act (DMA). Moreover, the Secretariat's role in supporting the [Coordinated Supervision Committee \(CSC\)](#) increased as the tasks of CSC expanded, particularly in the preparation for supervising critical large-scale EU IT systems, including the Visa Information System (VIS) and the European Travel Information and Authorisation System (ETIAS).

Transparency and accountability continued to be essential priorities, with the Secretariat managing 38 public access requests for EDPB documents. Additionally, the Secretariat organised over 530 meetings during the year, significantly exceeding the previous year's activities.

By proactively adapting to evolving technological challenges and regulatory responsibilities, the EDPB Secretariat provided support for effective GDPR enforcement and strengthened the collaborative framework for protecting data privacy rights across Europe.

2. EUROPEAN DATA PROTECTION BOARD - ACTIVITIES IN 2024

In 2024, the EDPB significantly reinforced its pivotal role in ensuring the consistent interpretation and robust enforcement of data protection rules across Europe. In 2024, amid rapid technological advancements and increasing digital complexity, the EDPB addressed emerging data protection challenges through its guidance and consistency work. Throughout the year, the Board adopted key consistency opinions, comprehensive general guidelines and influential statements on significant legislative developments. These measures substantially contributed to ensuring a coherent regulatory framework, thereby shaping Europe's data protection landscape and reinforcing individuals' fundamental rights to privacy and data protection.

2.1 CONSISTENCY OPINIONS

Art. 64(1) GDPR Opinions

In 2024, the EDPB issued 20 opinions under Art. 64(1) GDPR, primarily addressing the approval of Binding Corporate Rules (BCRs) to facilitate secure international data transfers within multinational companies. Additionally, the Board provided clarity through opinions on draft accreditation requirements for certification bodies and code of conduct monitoring entities. These opinions were instrumental in enhancing a uniform interpretation and application of GDPR standards across Member States.

Art. 64(2) GDPR Opinions

In 2024, the EDPB adopted eight consistency opinions under Art. 64(2) GDPR, below is a selection of the most relevant ones:

- [Opinion 04/2024 on the notion of main establishment of a controller in the Union under Article 4\(16\)\(a\) GDPR](#) clarified criteria for determining a controller's main establishment within the EU. This clarification was crucial for enabling Data Protection Authorities to determine jurisdiction accurately and consistently under Art. 4(16)(a) GDPR;

- [Opinion 08/2024 on Valid Consent in the Context of Consent or Pay Models Implemented by Large Online Platforms](#) emphasised essential requirements to ensure that consent provided by users remains truly voluntary and informed, thereby protecting individual autonomy and choice;
- [Opinion 11/2024 on the use of facial recognition to streamline airport passengers' flow \(compatibility with Articles 5\(1\)\(e\) and\(f\), 25 and 32 GDPR\)](#), highlighted critical compliance points such as transparency obligations, proportionality assessments, and strict safeguards required to protect sensitive biometric data and passengers' privacy rights;
- [Opinion 22/2024 on certain obligations following from the reliance on processor\(s\) and sub-processor\(s\)](#) provided clear guidance on contractual agreements, necessary oversight mechanisms, and measures ensuring accountability and GDPR compliance throughout the data processing chain;
- [Opinion 28/2024 on certain data protection aspects related to the processing of personal data in the context of AI models](#) underscored the necessity of transparency, robust explainability mechanisms and ongoing oversight to mitigate privacy risks and uphold data subjects' rights.

2.2 GENERAL GUIDANCE

In 2024, the EDPB adopted four guidelines, two of which were finalised following public consultation initiated in 2023, providing critical resources to support organisations in achieving and maintaining GDPR compliance. Notably, [Guidelines 01/2024 on processing of personal data based on Article 6\(1\)\(f\) GDPR](#) provided in-depth clarifications, including practical examples and assessment methodologies, and recommended procedural safeguards to ensure the legitimate interest balance against data subjects' rights and freedoms.

[Guidelines 02/2024 on Article 48 GDPR](#) comprehensively addressed cross-border data transfers under Art. 48 GDPR, detailing required safeguards, assessments, and mechanisms to ensure transfers align with GDPR standards, particularly focusing on international data transfers and judicial and administrative requests for data access. The guidelines offered organisations practical

strategies to navigate complex international data flows securely and compliantly.

Moreover, the EDPB adopted two additional guidelines after public consultation, reinforcing its commitment to transparency and stakeholder collaboration. This inclusive approach enhanced the applicability and practicality of guidance documents, facilitating easier compliance for businesses of all sizes.

2.3 STATEMENT ON LEGISLATIVE DEVELOPMENTS

Throughout 2024, the EDPB contributed to the law-making process by issuing six statements:

- [Statement 1/2024 on legislative developments regarding the Proposal for a Regulation laying down rules to prevent and combat child sexual abuse](#) addressed the European Commission's proposed regulation on this critical issue. While acknowledging the importance of combating such crimes, the Board emphasised the need for any measures to comply fully with fundamental rights, particularly the right to privacy and data protection. The Statement raised concerns over the potential for general and indiscriminate monitoring of private communications and called for proportionality and precision;
- [Statement 2/2024 on the financial data access and payments package](#), emphasised the critical need for comprehensive data protection mechanisms in the rapidly evolving financial technology sector, ensuring consumer trust and security;
- [Statement 3/2024 on data protection authorities' role in the Artificial Intelligence Act framework](#) advocated for clear delineation of duties, effective oversight powers, and adequate resources to ensure DPAs can robustly uphold data protection standards amidst increasing use of AI;
- [Statement 4/2024 on the recent legislative developments on the Draft Regulation laying down additional procedural rules for the enforcement of the GDPR](#) recommended streamlined procedures and clear guidance to facilitate swift, efficient, and

consistent actions by regulatory authorities in the handling of cross-border cases, thus ensuring stronger protection of individuals' rights;

- [Statement 5/2024 on the Recommendations of the High Level Group on Access to Data for Effective Law Enforcement](#) responded to recommendations from the High-Level Group on data access for effective law enforcement, stressing the necessity to balance enhanced data sharing capabilities with stringent safeguards to maintain fundamental privacy protections;
- [Statement 6/2024 on the Second Report on the Application of the General Data Protection Regulation - Fostering Cross Regulatory Consistency and Cooperation](#) replied to the second European Commission report on GDPR implementation, recognising positive advancements while highlighting areas requiring further improvement.

2.4 STAKEHOLDER CONSULTATION

In 2024, the EDPB maintained its proactive engagement with stakeholders to enhance the transparency, clarity, and effectiveness of its guidelines. Committed to ensuring that guidance remains both relevant and practically applicable, the EDPB conducted targeted consultation activities throughout the year.

For the seventh consecutive year, the EDPB carried out its annual stakeholder survey under Article 71(2) GDPR, gathering critical feedback on the practical implementation of its guidelines. Key stakeholders, including data protection and privacy experts from academia, industry professionals, and representatives of non-governmental organisations, actively contributed with insights regarding the guidelines' effectiveness and usability. Respondents particularly valued the clarity and practical applicability of the guidelines, highlighting their importance in simplifying compliance tasks.

Additionally, in 2024, the EDPB organised several dedicated stakeholder events designed to foster open dialogue and mutual understanding between regulators, industry representatives, civil society organisations, and academic institutions. These interactive sessions provided stakeholders with opportunities to share experiences, discuss challenges, and propose enhancements to the regulatory framework.

Feedback from stakeholders consistently indicated the need for additional practical resources, such as visual aids, interactive materials, and explanatory content, to better clarify complex technical concepts.

To address this need, the EDPB launched a new initiative to provide concise factsheets accompanying its guidelines, aimed at meeting stakeholders' needs by simplifying and clarifying key concepts.

Overall, stakeholder consultations continued to significantly shape EDPB's initiatives, reinforcing the Board's transparency, accountability, and responsiveness.

2.5 REPRESENTING THE EDPB WORLDWIDE

In 2024, the EDPB participated in key international fora, fostering strategic collaborations, and addressing critical issues in data protection and privacy. The EDPB Chairmanship contributed to 34 high-profile speaking engagements throughout the year.

3. ENFORCEMENT COOPERATION AND ENFORCEMENT BY DPAs

Throughout 2024, national Data Protection Authorities (DPAs) continued to play a crucial role in safeguarding the data protection rights of individuals, ensuring consistent and effective enforcement of the GDPR across Europe. The EDPB facilitated coordinated actions and provided targeted support to enforcement cooperation.

3.1 EDPB ACTIVITIES TO SUPPORT GDPR ENFORCEMENT

The EDPB intensified its efforts to enhance cooperation among DPAs through targeted initiatives, launching its third coordinated enforcement action focused on the right of access, a key compliance area identified collaboratively by DPAs. Additionally, the Support Pool of Experts (SPE) reinforced DPAs' enforcement capacities, providing specialised knowledge and facilitating collaborative projects, particularly regarding intricate and emerging topics such as Artificial Intelligence, consent mechanisms in digital platforms, and facial recognition technologies.

In 2024, the EDPB signed a Memorandum of Cooperation with PEReN, an interdepartmental office operating under

the joint authority of the French Ministers of Economy, Culture, and Digital Technology. This agreement represents a significant milestone in enhancing technical collaboration to address emerging data protection challenges across Europe. Moreover, the ChatGPT taskforce was established. The taskforce emerged as a collaborative effort to bridge gaps, ensure consistent application of the GDPR, and tackle the unique risks associated with ChatGPT's processing activities.

3.2 COOPERATION UNDER THE GDPR

DPA's continued effective cooperation through the IMI system, in total, 982 procedures related to the one-stop-shop (Art. 60 GDPR) have been triggered in 2024, out of which 485 final decisions. This collaborative approach streamlined the resolution of complex cases, promoted regulatory coherence, and ensured robust protection of individual rights throughout Europe.

3.3 BINDING DECISIONS

Reflecting improved cooperation and enhanced consensus-building among DPAs, the EDPB did not adopt any binding decisions under Art. 65 GDPR and Art. 66 GDPR in 2024. The absence of such decisions underscores the effectiveness of cross-border cooperation at national level.

3.4 CASE DIGEST

In 2024, the EDPB commissioned its third thematic case digest on the right of access as part of its SPE initiative. Case digests are overviews of decisions adopted under the one-stop-shop procedure about a particular topic. The purpose of these digests is to give the DPAs and the general public, including privacy professionals, insight into decisions adopted by DPAs following cross-border cooperation procedures.

3.5 NATIONAL CASES

Throughout the year, DPAs actively exercised their corrective powers to ensure GDPR compliance across various sectors within Member States. DPAs implemented investigative measures, processing restrictions, prohibitions, and imposed substantial monetary penalties addressing significant GDPR infringements. These national enforcement actions, detailed comprehensively in the Annual Report, highlight DPAs' steadfast commitment to protecting fundamental data protection rights and promoting compliance across Europe.

In 2024, DPAs jointly issued over €1.2 billion in fines. A detailed breakdown of fines issued in 2024 can be found in Chapter 3 of the Annual Report, as well as a non-exhaustive list of national enforcement actions.

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