



GLOBAL PRIVACY NEWS
FROM THE DPO CENTRE



The DPIA is an assessment of the impact of the most significant and important-to-know data protection issues from around the globe. It's not the full story, just a quick 3-minute read, collated and condensed to keep you updated with the latest news in our ever-evolving industry.

How GDPR territorial scope impacts North American businesses

The General Data Protection Regulation (GDPR) has redefined global data privacy and impacted businesses far beyond the borders of the EU and UK. With the extra-territorial scope of the law, it means that even if your business is based outside these regions, you may still need to comply with the GDPR if you process the personal data of EU/UK individuals or monitor their behaviour. Determining whether your business acts as a data controller or processor is also key to understanding your obligations.

Our latest blog breaks down these requirements and provides practical guidance for North American organisations to navigate GDPR compliance effectively.

[Read our blog here](#)

CANADA & UNITED STATES

Bill C-27 paused following Parliament prorogation

Following nearly three years of review, Bill C-27 was halted when Prime Minister, Justin Trudeau, announced his resignation and Parliament was suspended on 6 January 2025. The Bill is a significant legislative proposal aimed at modernising Canada's privacy laws.

As a result of this pause, it is unlikely Canada's federal privacy regime will be updated in 2025.

Key elements of the Bill include:

- **Consumer Privacy Protection Act (CPPA)** to provide updated privacy protections for individuals
- **Artificial Intelligence and Data Act (AIDA)**, establishing a risk-based framework to regulate AI

[Read about the impact of halting Bill C-27](#)

New York enacts Senate Bill on AI

On 30 December 2024, New York enacted the Legislative Oversight of Automated Decision-Making in Government Act (LOADinG Act). The Act establishes a comprehensive framework for the use of AI, emphasising transparency, accountability, and the protection of individual rights.

Primarily, the Act aims to regulate the deployment of automated decision-making systems by state agencies. Under the legislation, state agencies must ensure continuous and meaningful human oversight of automated decision-making systems, conduct and publish impact assessments, and conduct tests to ensure the system performs accurately, fairly, and without bias.

[Read the LOADinG Act](#)

US DoJ issues rule to protect data from foreign adversaries

The US Department of Justice (DoJ) has issued a final rule that carries out Executive Order 14117. The rule prevents access to Americans' bulk sensitive personal data and US government-related data by countries of concern, such as China and Russia.

Key aspects include:

- Identifying countries of concern and covered persons to whom the rule applies
- Designating classes of prohibited, restricted, and exempt transactions
- Establishing bulk thresholds for certain sensitive personal data, including biometric identifiers and precise geolocation data
- Implementing processes to issue licenses authorising otherwise prohibited or restricted transactions

[Learn more about the DoJ's final rule](#)



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UNITED KINGDOM

ICO reprimands NHS Trust for DSAR failures

The Information Commissioner's Office (ICO) has reprimanded the United Lincolnshire Teaching Hospitals NHS Trust for failures relating to Data Subject Access Requests (DSARs). An investigation found that, between 1 March 2021 and 31 March 2022, the Trust failed to respond to 32% of DSARs during the statutory one-month timeframe and had deficiencies in its system for logging access requests.

Matt Spall, DPO and DSAR specialist, said, *'Organisations should create and maintain a log of all DSARs, which includes the date the request was made, the initial deadline to work towards, and progress notes to ensure each DSAR can be tracked from initial acknowledgement through to completion. If a DSAR is complex, or changes have been made to the scope by the data subject, this can be recorded in your log.'*

Read our blog, [ICO DSAR guidance: Preventing misunderstandings](#), to learn about the key considerations when responding to DSARs.

EUROPEAN UNION

BSI publishes white paper on XAI

On 6 January 2025, the German Federal Office for Information Security (BSI) published a white paper dealing with the explainability of artificial intelligence in an adversarial context. The paper highlights the need for explainable AI (XAI) methods to clarify how AI models make decisions, essential for detecting and mitigating adversarial attacks.

It also discusses key challenges, such as ensuring explanations remain reliable and trustworthy, and provides recommendations for improving the resilience and transparency of AI systems.

[Download BSI's white paper](#)

CJEU decision halts gender title collection by railways

On 9 January 2025, the Court of Justice of the European Union (CJEU) ruled that it is unlawful for railway companies to collect a customer's gender marker when purchasing a train ticket. The case involved the French railway company, SNCF, which had forced passengers to choose between the civil titles 'Mr' or 'Ms' when purchasing tickets, without offering a third option for transgender or non-binary individuals.

The CJEU relied on the General Data Protection Regulation (GDPR) principles of Data Minimisation and Accuracy, finding that collecting gender information is not necessary for the provision of railway services and could risk discrimination based on gender identity. Organisations across the EU will need to comply with this judgement, ensuring gender markers are only collected when strictly necessary for the purposes for which the data is processed.

[Read the CJEU decision](#)

WE'RE ATTENDING



3 - 6 FEB 2025
ORLANDO, FL



INTERNATIONAL

South Korea passes second comprehensive AI law in the world

On 26 December 2024, South Korea passed the Basic Act in the Development of Artificial Intelligence and the Establishment of Trust (AI Basic Act). It is the second comprehensive AI legislation to be passed globally, following the EU AI Act.

The Act aims to balance innovation with ethical AI development and is expected to take effect from January 2026.

Key aspects of the Act include:

- The Minister of Science, Technology, Information and Communication must establish a 3-year plan for the promotion of AI technology
- The formation of a National AI Committee to deliberate on AI policy, investment, infrastructure, and regulations
- Regulating the use of 'high impact' models, covering areas such as essential services, healthcare, and recruitment
- If AI-generated material is photorealistic, businesses must indicate that the outputs are AI-generated
- Foreign AI businesses without a Korean address must designate a domestic representative if they meet certain users or revenue thresholds

[Learn more about the AI Basic Act](#)

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- **Data Privacy Officers (Canada)**
- **Data Protection Officers (United Kingdom)**
- **Data Protection Officer - Life Sciences (United Kingdom/The Netherlands)**
- **Data Protection Officers (The Netherlands)**
- **Data Protection Support Officers (United Kingdom)**
- **Recruitment Coordinator (Maternity Cover) (United Kingdom)**

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