



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 everevolving industry.

ICO's guidance on Consent or Pay: What you need to know

If your organization operates in the UK and you're considering implementing a 'Consent or Pay' model, you will need to demonstrate compliance with the UK General Data Protection Regulation and the UK Privacy and Electronic Communications Regulations.

In our latest blog, we explore the new guidance on 'Consent or Pay' models from the UK's Information Commissioner's Office (ICO) and share important compliance considerations. Find out how the ICO's latest guidance will affect your business and how you can effectively implement a compliant Consent or Pay model.

Read the blog



Canadian Privacy Commissioner launches investigation into X

On 27 February 2025, the Privacy Commissioner of Canada opened an investigation into social media platform, X. The investigation will examine whether the platform is meeting its obligations under the Personal Information Protection and Electronic Documents Act (PIPEDA), focusing on the collection, use, and disclosure of Canadian's personal information to train artificial intelligence models.

Under PIPEDA, organisations must:

- Obtain meaningful consent from individuals before collecting, using, or disclosing their information
- Be transparent about their data practices, including how personal information is used to train AI models
- Implement appropriate safeguards to prevent unauthorised access, disclosure, or misuse of personal information
- Appoint an individual to be accountable for compliance with the Act

AG sues insurance firm for failing to protect consumers' data

On 10 March 2025, New York Attorney General Letitia James filed a lawsuit against National General and its parent company, Allstate Insurance, for failing to protect consumers' personal information from cyberattacks. The lawsuit alleges that the companies suffered two major data breaches in 2020 and 2021, exposing the driver's license numbers of over 165,000 New Yorkers.

According to AG James, National General failed to notify affected consumers after the first breach and neglected to investigate the extent of the compromise, leading to a second, larger breach months later. The lawsuit claims that both incidents resulted from the company's failure to implement proper cybersecurity measures.

Developing a robust plan for data security helps organisations stay ahead of threats and reduce the impact of data breaches. Our blog on <u>data breach management</u> explores best practices and provides 5 tips for an effective response.

COPPA 2.0 reintroduced to US Senate

On 4 March 2025, the bipartisan Children and Teens' Online Privacy Protection Act (COPPA 2.0) was reintroduced to the US Senate. The legislation aims to enhance the protection of minors' personal information online.

Key features include:

- Prohibits digital companies from collecting personal information from users under 16-years-old without consent
- Bans targeted advertising to children and teens
- Introduces an 'eraser button' that allows parents and children to delete personal information online
- Establishes data minimisation rules to prohibit excessive collection of minors' data
- Revises COPPA 'actual knowledge' standard, requiring businesses to implement an age verification processes



UNITED KINGDOM

UK's AI (Regulation) Bill passes first reading in House of Lords

On 4 March 2025, the Artificial Intelligence (Regulation) Bill was reintroduced to Parliament and passed its first reading in the House of Lords. The Bill previously failed to progress into law due to the dissolution of Parliament prior to the last general election.

Key features of the Bill include:

- Establishes an Al Authority to oversee the development and use of artificial intelligence
- **Regulatory principles**, including safety, transparency, fairness, accountability, and contestability
- Mandates businesses appoint designated Al officers to ensure safe, ethical, and unbiased Al usage
- Creates regulatory sandboxes, allowing companies to test AI innovations in controlled environments

Businesses utilising AI should adhere to transparency principles, conduct thorough testing, and ensure compliance with relevant data protection laws.

Read the Bill

EUROPEAN UNION

EDPB launch CEF action on right to erasure

On 5 March 2025, the European Data Protection Board (EDPB) launched its Coordinated Enforcement Framework (CEF) action for 2025 on the <u>right to erasure</u>. The action will

see 32 Data Protection Authorities (DPAs) from across Europe investigate how data controllers respond to requests for erasure, particularly focusing on how they apply the exceptions to this right. This coordinated action aims to ensure consistent enforcement among DPAs. The results will be collectively analysed to produce further insights into the topic, facilitating targeted follow-ups at both national and EU level.

In preparation, controllers should:

- Review and update internal policies and procedures for handling erasure requests
- Train staff to recognise and process requests correctly
- Implement robust methods to verify the identity of the requestor
- Maintain detailed records of all erasure requests and the actions taken in response
- Regularly assess the necessity of retaining personal data, deleting any that is no longer needed

Learn more about the Right to erasure

Third draft of General-Purpose Al Code of Practice published

On 11 March 2025, the European Commission published the third draft of the General-Purpose AI Code of Practice. The Code aims to streamline the commitments and measures for AI model providers, ensuring they align with the EU AI Act.

The Code includes transparency and copyright obligations for all providers of general-purpose AI models (with some exemptions for certain open-source models), alongside a Model Documentation Form that allows providers to easily document necessary information.

For models classified as systematic risks, the Code outlines risk assessment and mitigation measures, including model evaluations, incident reporting, and cybersecurity obligations.

The draft Code is open for feedback from stakeholders until 30 March 2025.

Read the third draft Code of Practice



Uganda's PDPO launches toolkit for data protection compliance

On 25 February 2025, Uganda's Personal Data Protection Office (PDPO) launched a Data Protection and Privacy Compliance Toolkit to help organisations comply with the country's Data Protection and Privacy Act. It offers practical tools, templates, and detailed guidance that businesses can use to assess their data protection practices, identify gaps, and implement improvements.

The toolkit has been specifically tailored to FinTech organisations and aims to be a comprehensive resource for both small and large businesses. It marks a significant milestone in the country's efforts to strengthen data protection practices.

Access the toolkit



We are recruiting!

To support our ongoing requirement to continuously grow our remarkable and extraordinary **#ONETEAM**, we are seeking candidates for the following positions:

- Data Privacy Officers (Canada)
- Data Protection Officers (United Kingdom/ The Netherlands)
- Data Protection Support Officers (United Kingdom)

If you are looking for a new and exciting challenge, apply today!



The DPO Centre Group, London, Amsterdam, New York, Toronto, Dublin

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