



GLOBAL PRIVACY NEWS  
FROM THE DPO CENTRE



**The DPOA** 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.

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## AI Officer vs DPO: Defining roles in AI governance

Artificial intelligence has become integral to business operations, but questions around accountability and oversight are taking centre stage. Many organisations are now formalising their approach by expanding their Data Protection Officer's (DPO) responsibilities or appointing a dedicated AI Officer — but which model offers the right balance of compliance and innovation?

Our latest blog unpacks how these roles intersect under the GDPR and EU AI Act, and why understanding the difference is now critical for compliance teams defining their AI governance model.

[Read our blog](#)

AI OFFICER VS DPO:  
DEFINING ROLES IN AI GOVERNANCE



UNITED KINGDOM

## ICO seeks views on updated enforcement process

The Information Commissioner's Office (ICO) has opened a consultation on new guidance outlining how it conducts investigations and uses its enforcement powers. The aim is to provide greater transparency for organisations about the regulator's decision-making process, including:

- How investigations are initiated
- Handling of representations
- Determination of penalty amounts

The proposed guidance also reflects the additional powers granted to the ICO under the Data Use and Access Act (DUAA), including extended enforcement capabilities under the Privacy and Electronic Communications Regulations (PECR).

[Respond to the consultation](#), which is open until 23 January 2026.

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## Human error leads to data breach at council

South Gloucestershire Council has reported a data breach after inadvertently publishing the personal details of 625 respondents to a public consultation. The document, uploaded to the consultation website, contained names, addresses, phone numbers, and email addresses that should have been removed before publication.

The council took prompt action to remove the document once the error was identified and has notified the Information Commissioner's Office (ICO) and affected individuals.

The incident serves as a reminder that human error remains one of the leading causes of data breaches, even in well-governed public bodies. Ensuring robust pre-publication review processes, data redaction checks, and staff training can significantly reduce the risk of accidental disclosures, particularly when publishing consultation or freedom of information responses.

[Read our blog](#) for effective tips on breach prevention.

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The graphic is a promotional poster for an online webinar. It has a black background with a pattern of small yellow circles. At the top left, the text 'ONLINE WEBINAR' is written in white and yellow. Below this, there is a yellow puzzle piece icon with the text 'Privacy Puzzle GLOBAL WEBINAR SERIES 27 NOV 2025'. To the right of this, the title 'DOUBLE BLIND: Secondary use of health data and AI in clinical trials' is written in white. On the far right, the 'dpo centre' logo is visible. Below the title, there are four yellow puzzle pieces, each containing a portrait of a speaker. Below each portrait is the speaker's name and the 'dpo centre' logo. The speakers are Ben Seretny, Lawrence Carter, Pippa Scotcher, and Michael McCagh.

**ONLINE WEBINAR**

**Privacy Puzzle**  
GLOBAL WEBINAR SERIES  
27 NOV 2025

**DOUBLE BLIND: Secondary use of health data and AI in clinical trials**

**Ben Seretny**  
dpo centre

**Lawrence Carter**  
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**Pippa Scotcher**  
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**Michael McCagh**  
dpo centre

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## EUROPEAN UNION

### CNIL investigates impact of AI on Data Protection Officers

The French data protection authority (CNIL) has launched a new study exploring how artificial intelligence is reshaping the role of Data Protection Officers (DPOs). Conducted in partnership with the Ministry of Labour and Solidarity, the French Association of Data Protection Correspondents, and the Afp, the research builds on a long-running project examining GDPR-related employment and skills.

The survey, which is open to all practising DPOs in France, aims to understand the impact of AI governance, the challenges DPOs face as technology and regulation evolve, and their needs for tools and training. The findings, due in the first half of 2026, will inform future CNIL initiatives to support DPOs navigating the growing intersection between data protection and AI compliance.

[Respond to the survey](#)

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## **French MP to appeal EU-US data transfer ruling**

On 31 October 2025, French MP Fabien Latombe announced his intention to appeal the recent EU General Court judgement upholding the EU–US Data Privacy Framework (DPF). The court had dismissed his earlier challenge, finding that the DPF provides adequate protection for EU personal data transferred to the United States.

Latombe plans to escalate the case to the Court of Justice of the European Union (CJEU), arguing that the ruling overlooks the risks associated with extensive US intelligence access and limited redress options for EU citizens.

If accepted, the appeal could once again put the long-term stability of the DPF in question, creating uncertainty for organisations relying on it for cross-border data transfers. Businesses are therefore advised to continue maintaining supplementary safeguards, such as Transfer Risk Assessments (TRAs) and Standard Contractual Clauses (SCCs), to ensure resilience should the DPF's validity be challenged.

[Read our blog](#) for advice on conducting TRAs.

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## **Dutch DPA reinforces data minimisation in consumer lending**

The Dutch data protection authority, Autoriteit Persoonsgegevens (AP), has advised the Minister of Finance that lenders are not permitted to request complete bank statements from individuals applying for a loan.

According to the AP, asking for full bank statements represents a significant and disproportionate intrusion into privacy, as payment records can reveal sensitive insights into an individual's identity, preferences, and lifestyle.

The advice follows the AP's review of the draft Implementation Act for the revised Consumer Credit Directive, which proposes stricter rules for small loans. The AP stressed that the draft legislation must be refined to ensure consumers understand what personal information lenders may legitimately request.

The AP also reiterated the importance of data minimisation, noting that lenders can assess creditworthiness using far less data. It encouraged the sector to develop a GDPR Code of Conduct and submit it to the AP for approval.

[Find out more about a GDPR Code of Conduct](#)

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## ONLINE **WEBINAR**

### GDPR - WHAT'S NEXT FOR DATA PROTECTION & COMPLIANCE?



**vinciworks**

GDPR - What's next for  
data protection and compliance

Wednesday 12 November, 12PM GMT

**12 NOV 25  
ONLINE**

## CANADA & UNITED STATES

### Phishing risks rise after Toys “R” Us Canada data breach

Toys “R” Us Canada has confirmed a data breach after an unauthorised party accessed and copied customer information from its database in July 2025. Although the breach was detected quickly and cybersecurity experts were engaged, privacy professionals have warned that the stolen data could be exploited for phishing or social engineering attacks.

The compromised data includes names, addresses, email addresses, and phone numbers, but does not appear to include account credentials or payment details. The company began notifying affected customers in late October and urge customers to remain vigilant for suspicious messages.

Businesses can help mitigate these risks by training employees to recognise and respond to phishing attempts. [Read our blog](#) for tips on safeguarding your organisation.

### Texas AG finalises \$1.375B privacy settlement with Google

The historic settlement follows a long-running investigation into alleged violations of Texas’ Deceptive Trade Practices Act (DTPA) and Capture or Use of Biometric Identifier Act. The lawsuit, first filed by the Attorney General in 2022, accused Google of:

- Continuing to track users’ locations even after location features were disabled
- Misleading consumers by collecting personal location data without consent
- Capturing biometric identifiers, including voiceprints and facial geometry, without consent

The settlement is one of the largest privacy-related fines in US history. It highlights the increasing scrutiny of major technology companies’ data collection practices at state



level and underscores the need for clear, informed consent and transparent data practices across all jurisdictions.

### [Guidance on the DTPA](#)

## INTERNATIONAL

### India's MeitY publish country's first AI Governance Guidelines

The guidance, produced by Ministry of Electronics and Information Technology (MeitY), outlines a comprehensive framework for the safe, inclusive, and responsible use of artificial intelligence across sectors.

The framework introduces:

- 7 guiding principles for ethical and responsible AI
- Recommendations across 6 key pillars of AI governance
- An action plan mapped to short-, medium-, and long-term goals
- Practical guidance for industry, developers, and regulators to promote transparency and accountability

The guidelines also call for organisations to implement grievance redressal mechanisms and recommend reviewing the Information Technology Act and Digital Personal Data Protection Act to address AI-related liabilities and emerging legal gaps.

### [Read the AI Governance Guidelines](#)



### 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 Protection Officers (The Netherlands)**
- **Data Protection Officers (EU)**
- **Data Protection Officers - Life Sciences (United Kingdom)**
- **Data Protection Coordinator - Life Sciences (Poland)**

- **Chief Revenue Officer (United Kingdom)**
- **Marketing Content Coordinator (United Kingdom)**

If you are looking for a new and exciting challenge, and the opportunity to work for a **Great Place to Work-Certified™** company, **ranked in the top 50 of the UK's Best Workplaces™ for medium-sized businesses**, [apply today!](#)



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