



Welcome to our Life Sciences newsletter!

A quick monthly read with useful information, articles, and views from our team of experienced DPOs on the latest data protection news specific to the Life Sciences.

LIFE SCIENCES IN THE NEWS

UNESCO adopts first global standard on the ethics of neurotechnology

On 5 November 2025, UNESCO adopted the Recommendation on the Ethics of Neurotechnology – the world’s first global framework on the responsible development of neurotech. The Recommendation, which entered into force on 12 November 2025, establishes essential safeguards to ensure innovation advances wellbeing without compromising fundamental human rights.

The framework covers both clinical and consumer neurotechnologies that directly interact with the nervous system. It identifies key risks — unauthorised data use, commercial exploitation, and infringements on mental privacy — and calls for stronger standards around consent, transparency, and governance.

To address these concerns, the Recommendation outlines core safeguards focused on:

- Protecting mental privacy and human autonomy
- Ensuring informed consent and transparency in neural data use
- Promoting equitable and accessible technologies

Life Sciences implications

The Recommendation reinforces the need for robust governance when handling neural or biometric data. Companies developing AI-enabled diagnostics, neuro-monitoring tools, or brain–computer interfaces should review:

- **Consent mechanisms** to ensure participants clearly understand how data will be used and shared
- **Cross-border transfer and security measures** to protect neural data against re-identification or misuse
- **Ethical review procedures** to balance innovation with privacy and autonomy

Although non-binding, UNESCO's framework is expected to influence national regulation and ethics reviews worldwide. Early alignment with its principles could help organisations strengthen public trust, accountability, and long-term readiness for future governance of neurotechnology.

[Read UNESCO's Recommendation](#)

What is the European Health Data Space and what does it mean for your organisation?



A DPO'S PERSPECTIVE

The EHDS and the GDPR: Striking the balance between innovation and rights

Pascal Bodang, DPO at The DPO Centre, outlines how organisations can prepare for the European Health Data Space (EHDS) by implementing key safeguards for the secondary use of health data.

'The EHDS aims to boost the healthcare sector by improving access to electronic health data through a shared, cross-border infrastructure. It will enable the use and exchange of health data across EU Member States for both primary and secondary purposes.'

'While the EHDS focuses on facilitating data sharing and the General Data Protection Regulation (GDPR) centres on protecting it, the two are not in conflict. Many of the EHDS's mandatory safeguards are already core principles under the GDPR, including purpose limitation, data minimisation, and secure processing.'

'The re-use of health data presents a unique opportunity to drive innovation and improve healthcare across Europe, but this must be done responsibly. To support both future compliance and stronger governance, organisations should begin reviewing and implementing the following safeguards:

- **Permitted and prohibited purposes:** Data must only be used for authorised purposes
- **Access control by Health Data Access Bodies (HDABs):** Applications are reviewed for compliance
- **Data minimisation:** Only the minimum necessary data should be accessed and processed

- **Anonymisation and pseudonymisation:** Privacy-preserving techniques should be applied
- **Restricted access:** Only authorised individuals or entities should have access
- **Secure processing environments:** Data must be processed in high-security, controlled settings'

GLOBAL WEBINAR EVENT

ONLINE WEBINAR

Privacy Puzzle
GLOBAL WEBINAR SERIES
27 NOV 2025

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

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