



**Welcome to our Life Sciences newsletter!**

**The latest data protection developments affecting Life Sciences, with expert insights and advice from our specialist DPOs.**

## **LIFE SCIENCES IN THE NEWS**

On 7 July 2026, the European Data Protection Board (EDPB) published draft [Guidelines 02/2026 on Anonymisation](#). Open for consultation until 30 October 2026, the guidance builds on recent case law to clarify when personal data can be considered anonymous under the General Data Protection Regulation (GDPR).

The proposals are particularly relevant where data is shared or reused for clinical research, analytics, or AI training.

## **What could this mean for Life Sciences organisations?**

**Julian Marku, Data Protection Officer at The DPO Centre, explains:**

'For organisations using anonymised data in research analytics or AI, the key takeaway from the EDPB's draft guidance is that anonymisation cannot be treated as a one-off technical exercise. It needs to be assessed in context, including who will receive the data, what other information they may have access to, and how the data could be used in future.'

'The proposals introduce three anonymisation tests: No Record Isolation, No Linkage, and No Inference. Importantly, data may be anonymous for one organisation but remain personal data for another, depending on the recipient's ability to re-identify individuals.'

'Organisations should therefore review whether their current approach goes far enough.'

'This includes:

- Documenting and regularly reviewing anonymisation methods
- Identifying, mitigating, and monitoring re-identification risks
- Embedding Privacy by Design principles into relevant processes
- Maintaining appropriate contractual safeguards when sharing data with third parties
- Ensuring Privacy Notices explain anonymisation activities and relevant recipient categories, even if the recipients only receive data which is anonymous in their hands

'Particular attention should be given to future or secondary uses of data, especially for research and AI training, where changes in context could affect whether data can still be considered anonymous.'



## ANONYMISATION PART 2: RISK REDUCTION FOR CROS, SPONSORS & PARTNERS CONDUCTING **CLINICAL TRIALS**

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