the dpia

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 to explain AI-generated outputs in DSARs

Organisations generating AI-driven scores, labels, or predictions about individuals may need to disclose these outputs when responding to a Data Subject Access Request (DSAR). If an AI output relates to an identifiable person, it may qualify as personal data, but explaining it clearly and proportionately can be challenging in practice.

In our latest blog, we explore when AI outputs fall within scope of a DSAR and how organisations can provide meaningful explanations without disclosing proprietary systems or algorithms.

Read our blog

CANADA & UNITED STATES

Ten US states introduce or draft laws regulating neurotechnology

Advances in neurotechnology are increasing the collection of neural data, raising significant privacy risks. Several US states, including Colorado and Vermont, have responded with new legislation targeting these technologies. But differing approaches may create complex compliance obligations.

To stay ahead of emerging requirements, organisations should:

- Determine whether their products or services collect, process, or derive neural data
- Map how neural data is used, shared, and retained across the organisation
- Build safeguards into neural technologies from the earliest stages of development

- Review existing sensitive data policies to ensure neural data processing is addressed
- Maintain clear records of consent and limit how neural data is used

Learn more about which states have introduced legislation targeting neural data.

BC Court of Appeal upholds enforcement action against Clearview AI

In 2021, the Office of Information and Privacy Commissioner for British Columbia (OIPC) took enforcement action against Clearview AI under the province's Personal Information Protection Act (PIPA). The case arose from Clearview's practice of scraping publicly accessible facial images from the internet and offering facial recognition services to law enforcement without individuals' consent. Clearview argued that PIPA did not apply to its activities.

The Court rejected this position, clarifying that:

- PIPA applies where organisations collect the personal information of British Columbia residents
- Facial images scraped from the internet do not qualify as 'publicly available' data under the law
- Organisations must demonstrate a 'reasonable purpose' for processing biometric information, given its sensitivity

Read the judgement

Connecticut OAG to target prohibited 'dark patterns'

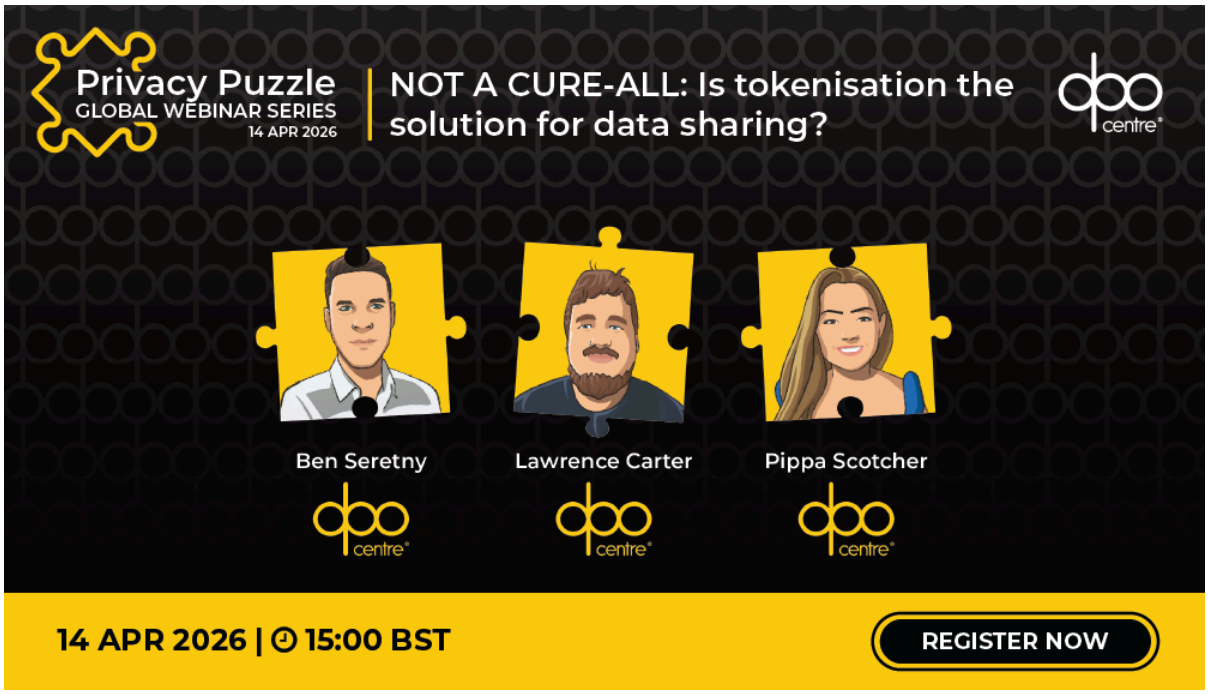
The Connecticut Office of the Attorney General (OAG) has signalled increased scrutiny of 'dark patterns' in its 2025 Enforcement Report. The OAG will pay particular attention to how user choices are presented through interfaces such as cookie banners and consent flows.

The report warned that deceptive design practices can undermine consumers' ability to make informed decisions about their data and may violate both the Connecticut Data Privacy Act (CTDPA) and the Connecticut Unfair Trade Practices Act.

Organisations are expected to:

- Provide transparent, balanced privacy choices that are clear and conspicuous to users
- Configure targeted advertising or data sales cookies to be 'off' by default
- Ensure options to accept and reject cookies are presented equally, with opt-out links that are prominent and easy to find

Learn more about dark patterns and good practices for presenting privacy choices.



UNITED KINGDOM

ICO fines Reddit £14.47M for children's privacy failures

The Information Commissioner's Office (ICO) found that Reddit relied on self-declaration for age verification and did not implement robust age assurance mechanisms. This meant it could not demonstrate a lawful basis for processing the personal data of children under 13. The investigation also found that Reddit failed to carry out a Data Protection Impact Assessment (DPIA) to assess and mitigate risks to children before January 2025.

The ICO warned that self-declaration can be easily bypassed and said organisations should match their age assurance methods to the level of risk on their platform.

Read the ICO's Code of Practice for guidance on age-appropriate designs.

EUROPEAN UNION

Spanish DPA fines FC Barcelona €500K over inadequate DPIA for biometric processing

The case relates to the club's use of facial recognition and voice recording as part of a digital census of its members.

Spain's Data Protection Authority (AEPD) found that the Data Processing Impact Assessment (DPIA) did not meet GDPR requirements. It lacked a clear description of the biometric data being processed, failed to properly assess whether less intrusive alternatives could achieve the same purpose, and did not adequately evaluate the risks to individuals.

Read our blog for practical steps on conducting a GDPR-compliant DPIA.

CNIL publishes guidance on AI development in Healthcare

On 5 March 2026, the French data protection authority (CNIL) published a practical fact sheet to support the development and evaluation of artificial intelligence systems in Healthcare.

The guidance outlines four stages in the AI lifecycle: building a database, creating datasets for AI development, deploying the system, and evaluating its real-world impact. For each stage, the CNIL provides practical questions, recommended actions, and supporting resources to help organisations assess compliance risks.

The publication reflects increasing regulatory attention on governance and accountability in AI projects, particularly those involving sensitive personal data.

Read the fact sheet

INTERNATIONAL

Mozambique approves draft Personal Data Protection Law

The proposed legislation establishes rules for the processing of personal data by both public and private entities.

Key aspects include:

- Application to processing carried out within Mozambican territory or by entities subject to its jurisdiction
- Core principles such as lawfulness, fairness, transparency, and purpose limitation
- A general requirement for free, specific, and informed consent from data subjects

- Individual rights including access, rectification, erasure, objection, and restriction of processing
- Obligations for controllers to implement appropriate technical and organisational security measures and notify authorities of data breaches
- Restrictions on international data transfers unless adequate protection is ensured

Learn more about the proposed law

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 (United Kingdom)**
- **Data Protection Officers (The Netherlands)**
- **Data Protection Officers (EU)**
- **Data Protection Officers - Life Sciences (United Kingdom)**
- **Data Protection Coordinator - Life Sciences (Poland)**
- **Data Protection Support Officers (United Kingdom)**
- **Senior Commercial Executive (United Kingdom)**
- **Senior HR Advisor - maternity cover (United Kingdom)**

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

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