

Cooperation Subgroup meeting

5 September 2018, Brussels

1/ Adoption of the agenda

The coordinator welcomed the participants and presented the agenda. The agenda was adopted with the change of order of points 4, 5 and 6.

2/ Approval of the minutes of the last meeting

The minutes of the 15 May 2018 meeting were adopted.

3/ Follow-up to the Plenary meeting in July

The Coordinator informed the participants that the Cooperation subgroup was mandated on the following topics at the July EDPB Plenary:

- to coordinate the choice of knowledge tool in cooperation with the IT Users Subgroup;
- to further explore the possible options and opportunities on the network for SAs DPOs;



4/ Working program of the Cooperation subgroup, future role of the subgroup under the GDPR

The Coordinator informed the participants about the document on the “Analysis of the contribution on the organisation of the EDPB subgroups.” The subgroup has discussed the future of the group, and tried to identify the overlaps with other SGs.

Regarding the working program of the subgroup the following elements were identified:



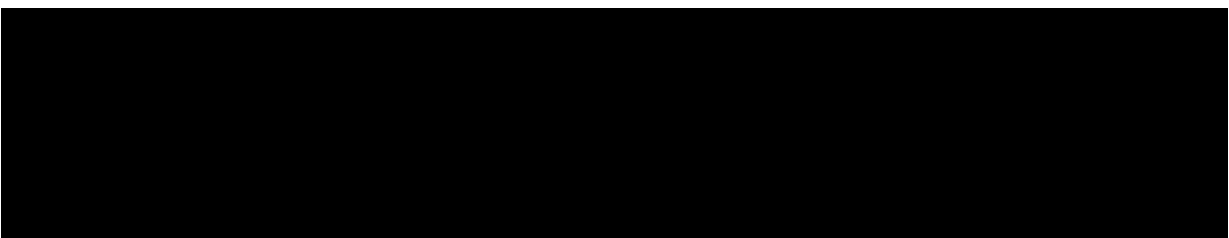
- Drafting guidelines on handling local cases;
- Revising guidelines on Article 60-61-62-66 in light of experiences with the use of IMI;
- Organization of a one-day mock case;

- Reflection paper on international mutual assistance and other cooperation tools to enforce the GDPR outside the EU (Art. 50);
- Exchange of views and experience among SAs on legal questions and practicalities regarding the application of the GDPR.

To Do:

- The coordinator of the subgroup will attend the next Coordinators Meeting scheduled for 10 September to express the state of play regarding the future of the Cooperation subgroup.
- According to Article 25.6 RoP an annual draft plan of the Cooperation subgroup should be prepared at the beginning of the year.

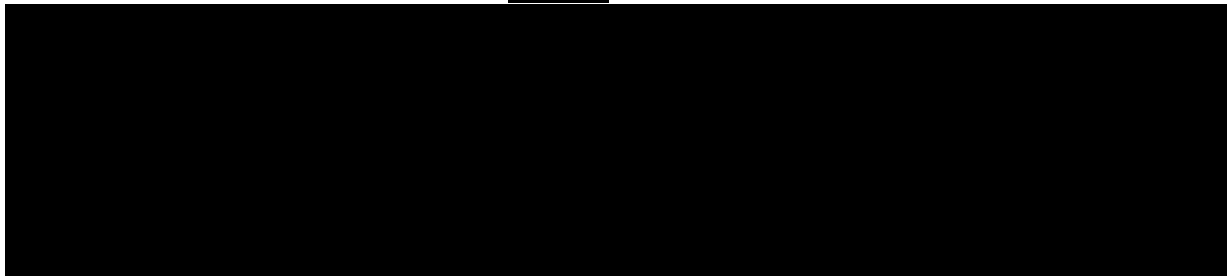
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To Do:

- An infonote will be submitted to the plenary with the state of play and for approval of the rapporteurs.

6/ Analysis of local cases, Art 56.2 –



To do:

- The rapporteurs continue their work and see if a dedicated paper to delisting cases is needed.
- Next subgroup meeting will be a two-day meeting, one day will be dedicated to analysis of local cases.

7/ Further steps related to the application of the GDPR / questions raised by delegations

A. How to better frame the ‘informal cooperation’ phase – exploring tools for gathering and sharing knowledge, experience and materials from the SAs

The EDPB Secretariat informed the members about its investigation on the technical possibilities. The Coop SG’s duty is to identify what they want to share among themselves, and the core discussion will be held within the IT User Subgroup, its next meeting is scheduled for 11 October.

██████████ is volunteered to be the rapporteur of this work.

To do:

- Members are invited to send suggestions to the rapporteur by the 19 September.
- The rapporteur collects the ideas and sends a summary to the EDPB Secretariat to feed the IT User Subgroup by 4 October.

B. Need/advisability of developing a network of SAs' DPOs

The subgroup agreed to set up a list with the contact details of the DPOs of the supervisory authorities to facilitate their communication.

To do:

- The Secretariat will set up the list and circulate within the subgroup to collect the relevant information. Once the document is ready, it will be circulated among the members.

C. Questions related to GDPR application

The members discussed how the SAs deal in practice with translation in the cooperation phase.

To answer the question raised, the EDPB Secretariat gave information that in the cooperation phase the initiating SA is responsible for the translation. Translation is only provided when the EDPB is involved in the procedures, and according to Art. 75 the Secretariat is taking care of this task. There is no legal basis to provide translation at EU level in the cooperation phase. The Secretariat also drew attention to the fact that this topic was already discussed at the FoP and the plenary level.

[8/ International cooperation for the protection of personal data, Art. 50 – ██████████](#)

The Rapporteur gave the summary of the ██████████

██████████ The rapporteur summarised the key recommendations in a document shared with the subgroup during the meeting and prepared a presentation on the main conclusions which will be shared with the heads of the supervisory authorities.

[9/ EDPB IT Platform, practical and procedural issues – feedback from the EDPB Secretariat](#)

The Secretariat informed the subgroup that the IT User Subgroup meets on 11 October where the possible enhancement of the IMI system and data structure for art. 70 will be discussed. The members were asked to send feedback as soon as possible. If a request touches a small modification, it can be done immediately, but if it is related to technical issues the secretariat has to liaise with DG Grow. The secretariat also gave information about the number of the different cases opened in the system.

[10/ Any other business](#)

The coordinator informed the members that the next Case Handling Workshop is taking place on 27-29 November 2018 in Budapest. The colleagues are invited to send topics for discussion. The following topics were already identified:

- Article 50 – cooperation between EU and non EU Supervisory Authorities;

- Article 56 and discussion on the parameters what a case shall meet prior to be inserted into the IMI system;
- Processing of personal data retrieved from public registries or acquired from the online environment.

[Annex: Attendance List](#)

SAs: AL, AT, BE, CZ, DE (Berlin), DE (Federal), De (Bayern), DK, EE, EL, ES, FI, FR, HU, IE, IT, LU, LV, NL, NO, PL, PT, RO, SE, SI, SK, UK

Further attendees:

- European Commission
- EDPB Secretariat