



## Briefing | EC - One year of GDPR application: taking stock in the EU and beyond

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*On June 13, The European Commission organised an event to mark the first year of implementation of the EU General Data Protection Regulation (GDPR). The event was opened by Věra Jourová, Commissioner for Justice, Consumers and Gender equality. In [her speech](#), she underlined the importance of data protection for democratic societies and the respect for privacy. The Commissioner also addressed the global context and new legislation being adopted in other countries. She named her three priorities: uniform application and implementation of the rules in Member States; efficient and pragmatic enforcement by the European Data Protection Board and to help businesses, especially smaller firms, to comply with GDPR.*

*The event addressed three main topics: how effective is enforcement, data protection as a business opportunity and how do individuals use their new rights. Representatives of data protection authorities, European Data Protection Board, business and civil society assessed how the GDPR has been working so far and what the practical implications are for the businesses and society.*

*The discussion touched upon issues such as new tools for data protection authorities, efficiency of the new system, practical obstacles, need for additional resources and necessity for dialogue between the supervisory authorities and businesses. Moreover, the representatives of business sector presented their solutions and approaches towards privacy under the new framework and opportunities created on the market where data protection is a priority. Cases of big tech companies, specifically Google and Facebook were also debated, with regard to issues like location tracking, facial recognition or the way how the consent is given by the user. Finally, the speakers elaborated on future opportunities and challenges, such as data portability and use of data for artificial intelligence. Please find the summary of the debate below.*

### *Opening speech*

**Věra Jourová, Commissioner for Justice, Consumers and Gender equality**

Opened the conference saying that the main purpose is to help the Commission to assess how the GDPR has been working so far. She wanted to understand the consistent application and interpretation of the GDPR. She also wanted to assess what is the impact of the GDPR on innovation and entrepreneurship in Europe and to understand if and how the people are using their new rights. In her speech, she underlined the importance of data protection for democratic societies and the respect for privacy. The

Commissioner also addressed the global context and new legislation being adopted in other countries. She named her three priorities: uniform application and implementation of the rules in Member States; efficient and pragmatic enforcement by the European Data Protection Board and to help businesses, especially smaller firms, to comply with GDPR. Please find the full speech on [this link](#).

### ***PANEL 1 – How effective is enforcement?***

**Moderator, Bloomberg journalist**, presented the speakers and opened the discussions with asking the speakers about their opinion on what are some of the biggest changes GDPR brought.

**Mr Ventsislav Karadjov, Vice-Chair of the European Data Protection Board** replied that the biggest change was to bring fragmentation to consistency and one interpretation. It is not easy and there is a long process to pass but we are getting there, he added. The Board is an independent body, it is functioning well, and the Commission is part of it and it is moving forward because of the joint effort. He highlighted that more than 470 cases are being dealt with, and the Board needs to take a decision. It is a challenge because there is more than one data protection authority involved and they need to cooperate. They have to deliver results. He argued that after one year, they are delivering pretty well while there is a room for improvement, however, taking into consideration that it is new body the results are good.

**Ms Helen Dixon, Irish Data Protection Commissioner**, said that the biggest change is the complete overhaul in which they now operate and deliver on their functions. Another change relates to the positive impact of the GDPR, as they can see that there has been a huge increase of awareness about data protection and supervisory authorities' existence. There has been a huge increase in terms of volume of reported breaches. Finally, there has been a massive change in reorientation towards a greater enforcement of the data protection, range of corrective powers and high-profile administrative fines. The enforcement is already giving way to a different form of work.

**Mr Mathias Cellarius, Global Data Protection Officer and Head of Data Protection and Privacy of SAP** pointed out that the change had already there before the GDPR entered into force, as the preparation could not happen only after the law became applicable. They started with the preparations already in 2015, and they had certain head starts. Still, they had to go through all the processes in the company to assess what the implications would be. They talked a lot towards internal and external stakeholders as well. There was a lot of uncertainties about business and innovation, he added. Since the law has come into effect, another change came, and all the guidance needs to be reaffirmed by the data protection authorities. Practical questions are being raised every day. In overall summary, data protection gained more prominent position globally and it is a positive change.

**Mr Ventsislav Karadjov**, pointed out that 16 guidelines already have been already discussed and he recalled the public consultation. The Board also successfully started with other task, which is to provide one stop shop consistent review of cases. He said that there are almost 500 cases filed, from which only 20 are finalised and 60-70 cases are out the draft procedure. On other cases discussions took place. It is a lot of work because when it comes to transborder cases, there is more than one authority involved and there are a lot of citizens concerned. The Board is delivering, in addition it does a lot for raising awareness. Citizens started to know their rights, there are more complaints coming since GDPR is in implementation.

**Ms Helen Dixon** said that they focus on better communication on the investigations and they want the decisions to be fair and of precedent value. There is a lot of comments on the ongoing processes, they need to keep the focus on their job. They have a big quantity of large-scale investigations. She pointed out that the complains that now land at the Irish DPS can originate in other countries.

To give a small example, if a Czech service user wants to make a complaint about a platform, the first thing is that the complaint needs to be translated in English, then transmitted in the shared IT platform – all this already takes time. If there is an issue with the mandate, the procedures are taking again more time. It is a good machinery, but it is new, and they need to learn about the processes to be faster. Another reason why things take long is that under a fair process both parties have the right to be heard at all stages of the process. She wanted to reassure everyone, that the big investigations are at their final

stage, and the files for final decision will start to come. She agreed with the Commissioner that the enforcement is on the way.

**Mr Ventsislav Karadjov** reiterated that the data protection is a complex topic and they are heading to more data-driven world. They have a panel of competent experts that sit together and consider situation in respective member states and industries. He recalled how many opinions were adopted and how much preparation it required. There is a dialogue with industry and he would always appreciate more of it.

**Moderator** asked about the one stop shop tool.

**Mr Ventsislav Karadjov**, said that from their point of view it is working, and they need to discuss this also with the industry. For the EDPB, it is a complex coordination procedure and it is a robust instrument that takes time, also for the enforcement decision by the lead authority. It can deliver results.

**Ms Helen Dixon** conceptually thought that it is the correct idea. Operationally, they have not put through yet draft decision with all the authorities involved on the bigger cases. She earlier referred to a number of minor logistical issues that could give rise to delays. They need to find better logistical solutions. The option of joint enforcement operation to authorise other authorities to cooperate under the leadership of another authority is yet to be explored. Some DPAs are reluctant of the concept, she pointed out.

**Mr Mathias Cellarius** said that their home regulator is the German one and the concept of the one stop shop has not been fully implemented in practice yet. He thought it is a good concept to have one regulator that they know, and they can follow their advice and they know that they are going to step in if there is an involvement from another authority from different member state.

**Mr Ventsislav Karadjov**, on the question of resources, he thought that this is the topic of the topics. Independency means that financial and human resources have to be available. The resources should come from local governments of the member states. The European Commission needs to control this process. New competencies of the DPA require a lot of awareness and investigation because citizens are expecting results, plus there are now one stop shop processes which mean that this is not only on the local level anymore. This has to be well estimated and recognised by the local governments when analysing the financial needs. This year's budget of the Board has to be increased. He underlined that importance of the Board and DPAs activities as they are followed by citizens and industry.

**Ms Helen Dixon** added that they have now new tasks and powers that require also labour and resources. There are meetings with other member states' authorities taking place, expert groups, emergency meetings, Brexit issues which all require travelling. The goal is to have harmonisation and level playing field, and it is crucial, but the resources were underestimated, she thought. They are seeking resources from the government and it is not only about the volume of staff, but also about new combinations of required skills. They focus a lot on certain types of lawyers or technologists. She also stressed the necessity of building the relationship with academics. They are finalising the bid for 2020 budget and they expect a big fight for it. They want to make their case.

**Question from a representative of SMEs association** highlighted that while SMEs are fully supporting the aim of the GDPR, the problems of SMEs and small-scale organisations are not being addressed. He regretted that they are not represented in the panels. He pointed out that the GDPR need a clear reality check as it is responding to problems created mainly by big enterprises but are affecting SMEs. He wanted the Commission to better adapt it to the reality of SMEs.

**Question from confederation of data protection officers** about the roles in the EDPB, certification standards for the national data protection officers and guidelines. Is EDPB considering publishing its own standards to set a benchmark for national DPAs?

**Mr Ventsislav Karadjov** replied that the Board needs to develop guidelines applicable for all member states, but they are doing an annual review to prepare updates for their work. Such recommendations should be assessed, and these guidelines have to aim to support the business. He will communicate it to

the board and secretariat. Data protection officers may have some specific competencies at local level in some countries and the authorities in the countries have to identify these.

**Ms Helen Dixon** agreed with the previous speaker about the burden placed on the SMEs. She pointed out that SMEs are extremely important and in Ireland, they tried to focus on the SMEs and microenterprises. There is a lot that needs to be done and it is difficult. She recalled that they tried to issue practical guidance for companies to implement GDPR properly.

**Question from the audience:** While consistency and harmonisation of enforcement is an important goal, she pointed out to the lack of harmonisation and consistency in implementation of the regulation by member states.

**Mr Ventsislav Karadjov** reiterated that the consistency is key for the EDPB, the DPAs are not so different while they are oriented to the specificities of each country. From their perspective, there is a consistent approach. Previously each country was deciding on its own. They are developing guidelines addressing the controllers, they have certifications or opinions on the territorial scope of GDPR. If a sector develops code of conduct, SMEs and micro companies can apply this without putting resources to it on its own, he pointed out.

**Mr Mathias Cellarius** said that this is also where the question of resources comes into play. In Germany, there has been a practice developed where the DPAs work with the companies to reach a common understanding on how the rules can be best implemented in practice. There is a lot of investment in providing advice and helping businesses, he added. It will take still couple of years to have more uniform guidance, he concluded.

**Ms Helen Dixon** said that the implementation by member states is going to be a challenge. They are conscious of it, and as the DPA, they need to be transparent and publish as much guidance as they can, so they keep the dialogue going.

#### *Video-message from Giovanni Buttarelli, European Data Protection Supervisor*

Mr Buttarelli thanked for the opportunity to address the conference. He then spoke about the enforcement effectiveness, data protection as a business opportunity and effective use of individual rights.

He said that GDPR has brought world-wide effect, a possibility to increase the level of fundamental rights even outside EU and a key ingredient of sustainable technological development.

For the enforcement to be effective is critical for the success. They need major boost in terms of resources to better meet the expectations. DPS should start to exercise better the full range of its powers, which will be more effective than simple fines. For certain tech giants, that could be only a budget line.

GDPR, even if fully applied in its spirit, is not going to significantly impact on the current digital ecosystem based on imbalance. This current ecosystem is based on serving, profiling and centralising information. In addition, it is necessary to make consumer protection and data protection interoperable. Also, a new federal law in the US is needed. He then pointed out that they have 34 countries equipped with GDPR-like system.

He decided to release a visionary manifesto thinking to what we need, to align it with better governance and to speak better with one voice. For long-term future a conception of an advanced legal system needs to be prepared. He pointed out that July 9 will be an excellent opportunity for high-level debate. He hoped to go public with the manifesto before the event as a contribution for discussions.

#### *PANEL 2 – Data protection as a business opportunity?*

**Laurens Cerulus, Moderator** , presented the speakers and opened the panel on the business impact of the GDPR.

**Mr Eric Léandri, founder and CEO of Qwant** admitted that they are competing with Google, but they are a bit on a different market in terms of privacy and data protection. Before GDPR, they were trying to explain to the companies and people to keep their data to themselves as there are many opportunities for abuse. In his company, they followed Article 12 on the human rights, which is a right to privacy. This was the idea of their business. Since GDPR started to be developed, it started to be explained to the public to how the data are used. The difference with GDPR is that GDPR talks about citizens, not customers as it is the case in the US. A lot of information cannot be collected about citizens and put in the same database. It is about the citizen rights' protection.

**Ms Caroline Louveaux, Chief Privacy Officer of Mastercard** underlined that they always took privacy and data protection very seriously. GDPR had been only a natural continuation of the process. It is now easier for people to engage with them, so they can help their customers to handle access to data requests. She presented their solution "Truata". She underlined that a company cannot hold the data set. They have to keep database with transaction data and they have explored what is the best option for them. She believed it is possible to enable both data privacy and innovation.

**Ms Alisa Bergman, Vice President and Chief Privacy Officer of Adobe** noted that GDPR regulation is still "young", but it has had a positive impact on consumer's side who now make choices based on privacy. Also, on the employee side, they see also a lot of movement in that area, and the privacy becomes a part of the CSR. Finally, they also see that there is a big issue on the market place where people want to have trusted service providers. She spoke about making privacy positive part of the experience and building tools and technologies.

**Mr Eric Léandri** noted that the business is growing. He pointed out that BNP Paribas and several other banks, or certain French regions are switching their administration to use their search engine because of the respect for the privacy standards. He argued that following the rules can give you an advantage on the market. He explained that first, they started with the people, then private organisations and now they expanded to the cities and regions. He underlined that their start was with people who cared about their privacy. They focused on creating quality product that respects customers and European standards.

**Ms Caroline Louveaux** said that all customers are talking about privacy, it is a critical point. GDPR becomes a selling point that is difficult to be measured.

**Ms Alisa Bergman** agreed that the topic comes up in the customers relations and it is crucial to be a trusted provider. She thought that regulation had a lot to promise in terms of market harmonisation and she was optimistic about it. As a global company, they seek for more simplification and harmonisation.

**Ms Caroline Louveaux** added that it is important to keep the benefit of harmonisation not only for global companies, but also SMEs. For them, it is even more important to keep the harmonisation in the guidelines as well as they often do not have the resources to look into local specificities.

**Mr Eric Léandri** agreed that the harmonisation is important, and he hoped that the harmonisation will happen also among the EU member states. Talking about France, there were in a process to follow the strictest compliance to the GDPR statement and it was very complicated. The Commission did a fantastic job and a lot of work has been made. He pointed out that in some countries, the wording of the implementation should be examined.

**Ms Caroline Louveaux** said that there are a lot of new laws all around the globe, inspired by the GDPR, and they believed that individuals should have the privacy rights wherever they live so they extended their privacy standards. They use this as a competitive differentiator. Furthermore, they realised that often the GDPR is not well understood outside of Europe, talking about always requiring consent or about obligatory localisation of data.

**Ms Alisa Bergman** noted that GDPR is a contributing factor in the debate about US privacy law. The impact the GDPR has, is very positive. She added that the transatlantic dialogue is useful, and the individual should be always in the centre of attention when it comes to data protection.

**Question from the audience:** What is the policy of speakers' companies when extending GDPR standards on the global scope?

**Ms Caroline Louveaux** said that Mastercard extended the individual privacy rights to all customers without any exceptions.

**Ms Alisa Bergman** replied that the GDPR principles are considered globally but there are different legal framework and cultural differences they need to take into consideration. They want to do right by the user.

**Mr Eric Léandri** underlined that they go above the GDPR and have no exception. He informed about the introduction of their new payment services. He said that he only uses Visa as Mastercard is selling data to Google according to the press, and he asked Ms Louveaux about it.

**Ms Caroline Louveaux** denied that they would sell individual data. She said that they anonymise the data and they sell the aggregated data as an insight and only under certain conditions. She added that GDPR does not exist in a vacuum and there is also a legal framework around, which includes financial regulation, banking, cybercrime etc. They need to consider all these regulations; therefore, it is critical to have a consistent approach and to have other legislation to be in line with GDPR.

**Ms Alisa Bergman** recalled the notion that you always need user consent. She said that the user needs to be put in the centre, but the contextual relevant notices are necessary to make sure that consent is reserved to those instances where it makes most sense.

**Moderator** asked about the e-privacy legislation and interaction with GDPR.

**Mr Eric Léandri** said that there is no crystal ball to tell how the future interaction will look like. What they want as a company following privacy, is an e-privacy at maximum of capability to protect European data.

**Ms Alisa Bergman** thought that interplay between the two is critical for digital economy.

**Ms Caroline Louveaux** said there is also a lot of interaction with financial regulations where there are obliged to retain certain data for fraud notification purposes for instance.

**Mr Eric Léandri** pointed out that also cybersecurity is an everyday issue and there are a lot of things to be done to protect business, data or even countries. However, he wanted to go deeper in the problem and find clear exceptions for the cybersecurity data. He did not want to have this as universal excuse for collecting the data that would be then used for something else or sold. On the AI, he said that still this can work not on personal data. He gave an example of their cooperation with Nvidia. He stressed that AI can be done, as well as cybersecurity, without collecting the personal data and with the regulation that make the business grow. Mr Léandri argued that the market changed in Europe, and it is changing globally – it is not enough to apologise for data breaches and continue with dubious practices.

**Ms Alisa Bergman** added that regarding the IA, striking the right balance between innovation and privacy responsible way how to use data for technology is key.

**Ms Caroline Louveaux** pointed out that there is a conversation at European level about ethic and AI and more clarity will come on this in the future.

**Mr Eric Léandri**, talking about AI, he pointed out that according to a statement by Microsoft, they want to have ethical AI and they are not waiting for the Commission to come up with rules. He recalled UN discussion about geospatial images, protection of personal data and what data are really needed for the development of defence systems. Personal data in the AI conversation is often very misplaced, he concluded.

**Question from the audience:** As consumer organisation we need to have GDPR that is enforced, she started. How do the consumers experience GDPR when they exercise their rights? According to the preliminary assessment, it not easy at all and it takes much too long to receive responses from companies. She asked the panellists about their experience.

**Ms Caroline Louveaux** replied they usually do not receive that many requests, and often customers ask for data actually held by bank. As soon as they have access request, they set up internal processes to address all the requests.

**Ms Alisa Bergman** said that on the business to business side, they build tools and technologies to help customers. On the directly consumer side, they follow closely the feedback and they review all the requests and always work on better processes.

**Question from the public:** The speaker said that data is the new oil of the economy. People have access to a lot of application and websites that are actually paid by their data.

**Ms Alisa Bergman** would rather see trust as the new currency and they are looking at data as an important assess.

**Ms Caroline Louveaux** agreed and said that transparency is required to gain more trust. Many consumers still do not have understanding what is happening with their data. They need to explain better as industry what they are doing so the consumers make more informed choice.

**Mr Eric Léandri** agreed that trust and transparency are crucial. If data is new oil, we have to take care of the risk that goes with it. They have not talked about when you lose the data, if there is an "accident", it is a good thing with GDPR that the companies are forced to inform public about this.

### ***PANEL 3 – How do individuals use their new rights?***

**Oliver Grimm, Die Presse, Moderator** opened the panel.

**Mr Finn Myrstad, Director of digital policy of the Norwegian Consumer Council, EU co-chair of Information Society Policy Committee at Transatlantic Consumer Dialog** talked about the case opened against Google and the data collection. He was annoyed by the way how the consumer consent was exercised with long messages with no choice to refuse. They looked at Google and Facebook, and they both had hidden defaults. They focused on how Google collects consent to access to the location data, which are one of the most sensitive data. Google is in a particular position as most consumers have Android system on their phones and there is a constant tracking possibility, even if the GDP location is turned off. They teamed up with the European Consumer organisation and there were other consumer organisations that piled complaints. This is a breach of consent and breach of GDPR spirit and legitimate interest principle, he argued. These practices cannot continue. He hoped to see some enforcement on this as it is crucial. He added that there should be a penalty for this as this concerns many consumers with huge impact on consumer privacy.

**Mr Olivier Dion, CEO of Onecub & P3C** said that the data portability should be the game changer under GDPR. It is a complex matter and companies right now do not offer useable portability. Complementary services cannot be built around this, they do it to be compliant, but the produced Excel sheets cannot serve further. Also, people do not understand the benefits of data portability, which is a problem for education. Both parties do not understand the impact of portability, he underlined. He continued that standards are needed, GDPR offers a good basis, there are many initiatives, but they might recreate cycles where projects work isolated from each other. They are now gathering people working on this on a global scale. The community wants to start a discussion about one standard that would work well with GDPR. This is also the best solution for reducing the costs.

**Mr Matthias Mohn, Judge, Labour Court, State Baden-Württemberg** wanted to talk about not only about consumers, but also about the employees. He wanted to emphasise that when looking at standard employer-employee relationship, a lot of personal data is produced every day. It is always difficult to

balance the legitimate interest of both parties to protect the personal data. Before GDPR, under German labour national law, there were already certain assurances for data protection. With GDPR coming into force, a lot of employees realised that they have the access rights. Looking at the specific case he worked on, the question was whether a company can withhold information because they had legitimate interest to keep certain information secret because it derived from whistleblower system. The employee argued that he has the right to know whether these allegations made by the whistleblower system used personal data stored by the company. The company has lost the case as the legitimate interest to keep the information secret was not demonstrated in a convincing manner for the court. The case is now pending in the federal court, so they all look forward to the decision which should come in the following month or the next year.

**Moderator** noted that there are going to be many unexpected implications of the GDPR in the labour law, for example in the cases of pre-screening by the companies of the job applicants.

**Mr Matthias Mohn** answered that every company has to think about in process of hiring people on which information they want to select a candidate. From the sent CV, it is obvious that the employer has this information. However, it is not clear for the background check executed by employer. There are few cases that actually are decided by court because a lot of labour law trials were settled, so there is no judgement in the end.

**Moderator** recalled the results of the current Eurobarometer survey and the behaviour of users.

**Mr Finn Myrstad** pointed out that the maximum data protection and privacy should be the default option in the social networks setting, but this is not happening in the services. People very often do not change the settings as they assume the protection is guaranteed by the law. He also addressed the issue of facial recognition on Facebook, which was framed as the detection of personal fraud. However, they did not say anything about further usage of the data. He referred to the systems of network analyses, emotional analyses, or background analyses. He claimed that in the settings, the privacy-friendly option was hidden and not put clearly. Similar case is Google, when opting out from location tracking. He said that the companies are using different techniques to discourage the users to select the privacy-friendly options. Mr Myrstad underlined that consumers assume that when there is a law to protect them, it is automatically applied. He also pointed out that the companies are making conclusions based on the set of data, which are not available for download when requesting the access to the data stored.

**Mr Olivier Dion** said that GDPR is becoming a standard at the legal level, proposing framework coming from society to give certain walls to technology. Talking about technology, they have to translate GDPR values into the products used every day in the banks, cities, jobs and implement this to the everyday live. They need one standard which would be also shared globally. He gave an example of cooperation with Japan who wants to work on the same baseline. There are certain ambiguities with the GDPR, also in the portability lines, however, they can implement new governance and apply the already tested standards to provide legislators with a constructive and specific feedback.

With many other players of the ecosystems, they sorted and identified the challenges and they need to know the next directions. The key for transformation is concrete examples and successful experiments. They work on smart cities and banks and they need to build on these experiences to provide the standards. They cannot build theoretical standards as they would not work in practice.

**Question from the audience:** Have you seen an abuse of the rights in the area of data portability?

**Mr Finn Myrstad** referred to the consent procedure with real time bidding, there are pop-ups constructed in a wrong way to turn out the third-party tracking, he pointed out. A lot of companies have their consent model wrong and the discussion should be whether this is on purpose or not. They work a lot with US counterparts (TACD for instance) and they are sharing the best practices. Sometimes, the US law can be used as a source of good practices. He was interested in a statement by Microsoft on the data access requests from US and EU.

**Moderator** asked about the right to know and automated decision made about people that affects them.

**Mr Olivier Dion** said that it is not so well-known, but it will become more useful in the future. The AI is consuming a lot of personal data and data in general. Unlike US and China, it will be more complex to collect the data in Europe. They are saying that the data can circulate freely but with strong safeguards. GDPR rights are the key aspect of the individual rights in the artificial intelligence era.

**Moderator** asked about the automated job searches and about the job platforms.

**Mr Matthias Mohn** replied that since there is no labour law applicable between the candidate and the platform, there are no cases like that before the labour courts. When it comes to the global corporations who would be using the similar systems, it is more of a speculation as well. He agreed that this poses a lot of challenging questions in terms of GDPR application. He pointed out that he is not aware of such a case. When it comes to a court between an employer and employee, the situation is rather complicated already.

**Question from the audience:** asked about smart cities and banks that are in lead for the data portability.

**Mr Olivier Dion** replied that all the major banks in France are involved. There is a strategy level and prototypes. The common reflection about this topic is that all the big players have been on the general data field before, now they are coming to payments. Helsinki is participating, and Finland is involved in their project. There are also other French cities (La Rochelle and other bigger cities). Subject number one for the cities is the mobility data (Uber, public transport). It is related to another topic, which is mobility for the environment to orient people to a greener mobility.

**Question from a Facebook representative:** Noted that Facebook attempted to have automated decision article implemented in practice, which is one of the new features. In addition, there are controls to change the image that the algorithm performs. This is the first attempt of such implementation. On the other topic, she pointed out that there could be abuse of the rights from the employees as well. Moreover, it can result from bad understanding of the legislation. The right for access is not a discovery exercise. On artificial intelligence, she said that it is as biased as the human programming it and as good as the data that are fed in it.

**Mr Finn Myrstad** appreciated that Facebook is participating the event like that as it usually refuses to publicly comment on these issues. He encouraged Facebook to be more transparent on their practices and there is still a lot of work to be done. He wanted to have more transparency with the big tech companies in general, not only Facebook.

**Mr Matthias Mohn** on the abuse of rights, he said that they have to look at each individual case. First of all, it is the use of right and the abuse of right is an exception to that.

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