

Panel discussion

Data controllership and anonymisation

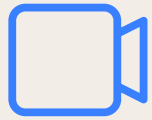
The logo for Data Europa Academy is located in the bottom left corner. It features the text "data.europa academy" in white, with "data" on the top line, "europa" in the middle, and "academy" on the bottom line. The text is set against a dark blue circular background. To the right of this circle is a white circle, and the entire graphic is partially enclosed by a larger light blue circle.

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europa
academy

12 July 2024

10.00 — 11.30 CEST

Rules of the game



The webinar will be recorded



For questions, please use the ClickMeeting chat.



Please reserve 3 min after the webinar to help us improve by filling in our feedback form



Introduction



Hans Graux
Lawyer IP, IT and data
protection law, Partner at
Timelex



Karen Cruyt
PhD researcher at HALL,
Vrije Universiteit Brussel



Charlotte Ducuing
PhD Fellow in law,
Katholieke Universiteit Leuven



Agenda

10.05 – 10.10	Opening and introduction – <i>Hans Graux</i>
10.10 – 10.40	Personal data and nonpersonal data, and the fluidity between them – <i>Karen Cruyt</i>
10.40 – 11.10	Data controllership and joint controllers – assessment criteria – <i>Charlotte Ducuing</i>
11.10 – 11.30	Q&A session
11.30	Closing remarks – <i>Hans Graux</i>



Personal data and nonpersonal data, and the fluidity between them
Panel discussion data.europe academy 12 July 2024

ANONYMITY IS IN THE EYE OF THE BEHOLDER

KAREN CRUYT – VRIJE UNIVERSITEIT BRUSSEL



HEALTH &
AGEING
LAW LAB

AGENDA

1 Introduction

2 Relevance – anonymous v.
pseudonymous

3 C-319/22 (9 November 2023) -
Gesamtverband Autoteile-Handel

4 T-557/20 (26 April 2023) - SRB v.
EDPS

5 Conclusions

INTRODUCTION

WHO AM I?

- Background: data protection consultant
- Currently: PhD researcher at HALL (VUB)
 - Data protection, health data, technology, and secondary use of (personal) data
 - Open (health) data and data altruism – voluntary data sharing
- Health and Ageing Law Lab
 - Interdisciplinary research group, part of the Law, Science, Technology and Society Research Group (LSTS) of the Vrije Universiteit Brussel
 - Privacy and data protection; use of advanced technologies in healthcare, pharmaceutical development and research; e-Health and m-Health; and healthy ageing
 - Involved in Horizon projects related to health, as legal and ethical partner of consortia
 - Yearly symposium “Health, Law and Technology” (HELT), next edition 24/04/2025
 - Summer School on Digital Health Technologies, in collaboration with TU Dresden
 - <https://hall.research.vub.be/>



HEALTH &
AGEING
LAW LAB



HELT

HEALTH, LAW, AND TECHNOLOGY SYMPOSIUM 2024



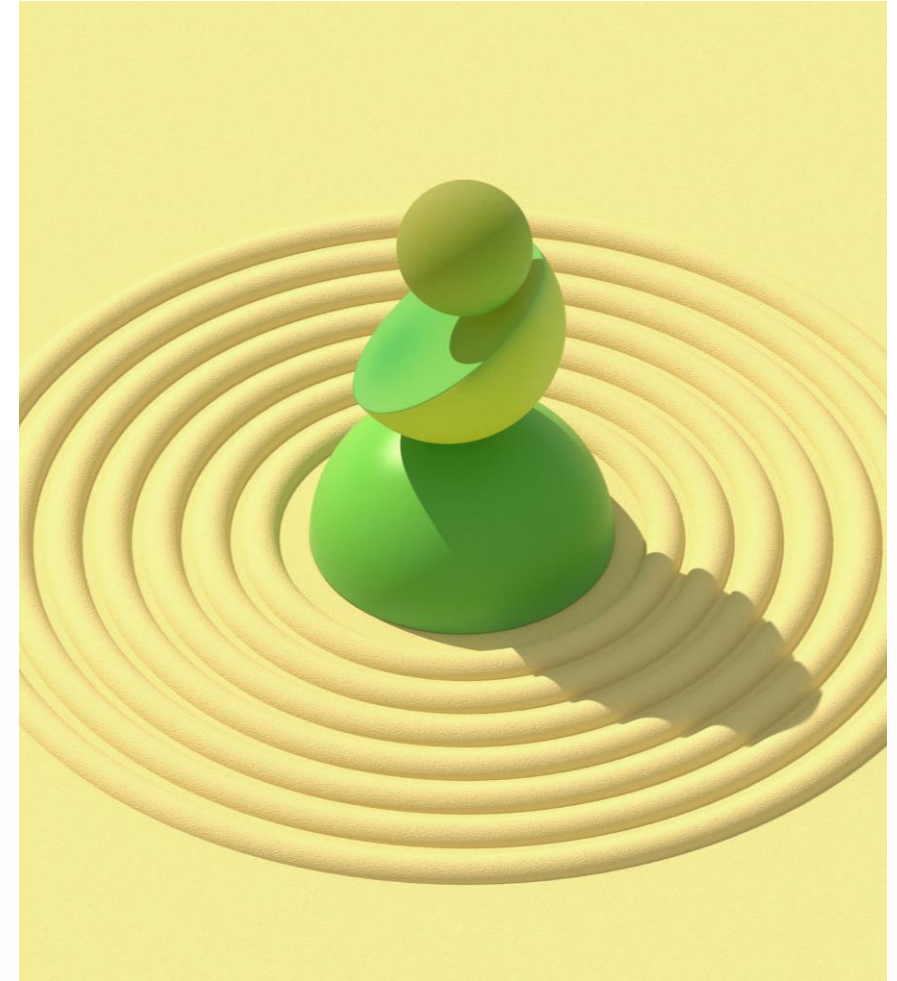
RELEVANCE

Art. 2 GDPR (material scope)

- ▶ 1. This Regulation applies **to the processing of personal data** wholly or partly by automated means and to the processing other than by automated means of personal data which form part of a filing system or are intended to form part of a filing system.

Art. 4 GDPR (definitions)

- ▶ (1) 'personal data' means any information **relating to an identified or identifiable natural person** ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;



RECITAL 26

GDPR

The principles of data protection should apply to any information concerning an identified or identifiable natural person. Personal data which have undergone pseudonymisation, which could be attributed to a natural person by the use of additional information should be considered to be information on an identifiable natural person. **To determine whether a natural person is identifiable, account should be taken of all the means reasonably likely to be used**, such as singling out, either by the controller or by another person to identify the natural person directly or indirectly. To ascertain whether means are reasonably likely to be used to identify the natural person, account should be taken of **all objective factors**, such as the costs of and the amount of time required for identification, taking into consideration the available technology at the time of the processing and technological developments. The principles of data protection should therefore **not apply to anonymous information**, namely information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable. This Regulation does not therefore concern the processing of such anonymous information, including for statistical or research purposes.

ANONYMOUS V. PSEUDONYMOUS

- ▶ Test in recital 26: risk-based approach
- ▶ Article 29 WP guidelines: very restrictive, don't accept risk
- ▶ Courts and authorities: on a scale from most risk-based (e.g. Irish DPA) to stricter (e.g. CNIL)
 - ▶ Half-way test: "motivated intruder" > ICO (see <https://ico.org.uk/media/about-the-ico/documents/4018606/chapter-2-anonymisation-draft.pdf>): reasonably competent, with access to appropriate resources, and uses investigative techniques
- ▶ Technological developments: is true anonymisation even possible?



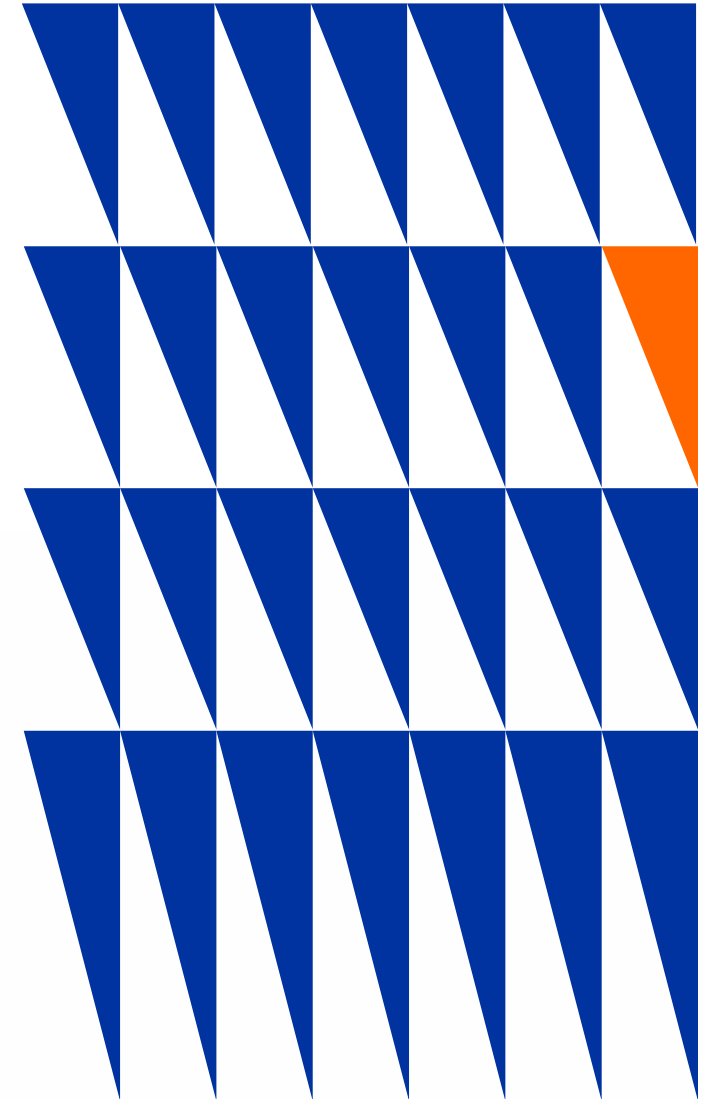


DISCUSSION RECENT CASE LAW

RECENT CASE LAW

- ▶ Recent(ish) case of the Court of Justice about the relativity of the notion of personal data
 - ▶ C-319/22 (9 November 2023) - Gesamtverband Autoteile-Handel
About the classification of Vehicle Identification Numbers (VINs)
- ▶ Two older cases about this, from the General Court
 - ▶ T-557/20 (26 April 2023) - SRB v. EDPS (! appeal by EDPS is pending)
About opinions of shareholders and creditors shared by the Single Resolution Board (SRB) to third parties
 - ▶ T-384/20 (4 May 2022) - OC v European Commission (! appealed by OC)
About a press release issued by the European Anti-Fraud Office (OLAF)

Fundamental question: what makes information **personal** data?



FACTS

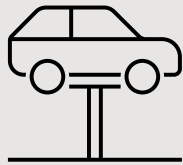
- ▶ Reg. 2018/858: information to be made available by vehicle manufacturers (such as Scania) and authorised dealers to repairers + independent operators (such as those represented by Gesamtverband Autoteile-Handel)
- ▶ Scania: website on which searches can be done based on the last 7 numbers of the VIN (vehicle identification number) or general vehicle information
 - ▶ No VINs provided by Scania to independent operators -> only repairers have access to them
- ▶ Gesamtverband believes Scania does not provide sufficient information
- ▶ Additional question asked by referring German court: does this regulation impose a legal obligation on vehicle manufacturers to process personal data?
 - ▶ "...while taking the view that, as a general rule, the VIN does not constitute personal data..." (par. 23)
 - ▶ Third question: *Does Article 61(1) of Regulation [2018/858] constitute, for vehicle manufacturers, a legal obligation within the meaning of Article 6(1)(c) of the GDPR which justifies the disclosure of VINs or information linked to VINs to independent operators as other controllers within the meaning of point 7 of Article 4 of the GDPR?*

C-319/22 (9 NOVEMBER 2023) - GESAMTVERBAND AUTOTEILE-HANDEL

FINDINGS OF THE AG & COURT

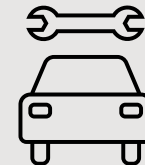
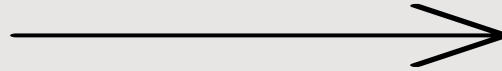
- ▶ AG refers to case C-175/20 (24 February 2022; “alsts ieņēmumu dienests (Traitement des données personnelles à des fins fiscales)”) in which was stated that VINs are personal data, but disagrees: vehicles are not always owned by natural persons
- ▶ Conclusion AG: yes, a VIN can be personal data, if supplemented by access to means which can reasonably allow to identify the owner of the vehicle
- ▶ Directive 1999/37: registration certificate (VIN + name + address of owner/user)
 - ▶ If natural person: VIN is personal data (for independent operators + for vehicle manufacturers)
 - ▶ Par. 49: “ ...where **independent operators** may reasonably have at their disposal the means enabling them to link a VIN to an identified or identifiable natural person, which it is for the referring court to determine, that VIN constitutes personal data for them, within the meaning of Article 4(1) of the GDPR, and, **indirectly**, for the **vehicle manufacturers** making it available, **even if the VIN is not, in itself, personal data for them**, and is not personal data for them in particular where the vehicle to which the VIN has been assigned does not belong to a natural person.
- ▶ 2nd part of the question: yes, this Regulation establishes a legal obligation to process personal data

IF INDEPENDENT OPERATOR HAS MEANS TO REASONABLY IDENTIFY THE OWNER OR LEGAL USER OF THE VEHICLE

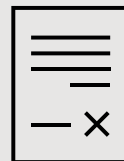


**Vehicle
manufacturer**

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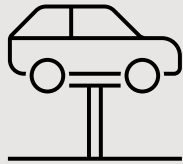


**Independent
operator**



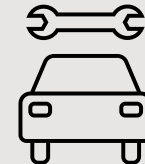
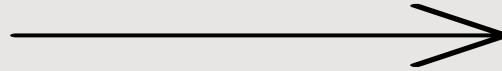
Personal data transfer
Legal basis = art. 6(c) GDPR

IF INDEPENDENT OPERATOR HAS NO MEANS TO REASONABLY IDENTIFY THE OWNER OR LEGAL USER OF THE VEHICLE

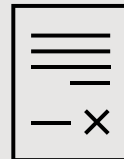


**Vehicle
manufacturer**

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**Independent
operator**



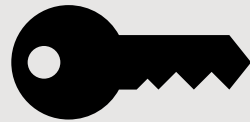
Anonymous data transfer
GDPR does not apply

It will be up to the referring court to decide which scenario applies.

KEY TAKEAWAYS



Confirms the test to determine the nature of data (personal vs. non-personal).



The personal nature of data can be relative.



T-557/20 (26 APRIL 2023) - SRB V. EDPS

FACTS

- ▶ Regulation 2018/1725
- ▶ Banco Popular Espanol placed under resolution (Reg. 806/2014)
- ▶ SRB: valuation to check if creditors and shareholders would have received better treatment with normal insolvency procedures → sent to Deloitte for assessment
- ▶ Affected creditors and shareholders: right to be heard
 1. Registration phase: documentation to prove that they are affected
 2. Consultation phase: comments on valuation through online form
 - Processed by SRB employees ~ alphanumeric code
 - Comments on valuation passed to Deloitte
- ▶ **!** Complainants: no information about this data transfer
 - ▶ EDPS: reprimand to SRB
 - ▶ SRB: comments were not personal data, as Deloitte never had the key/means to reasonably identify

T-557/20 (26 APRIL 2023) - SRB V. EDPS

FINDINGS OF THE COURT

- ▶ Opinions and comments can be personal data (Nowak case)
 - ▶ But: EDPS had not examined the content of these comments
- ▶ Re-identification was impossible for Deloitte
 - ▶ Citing Breyer (IP addresses): not all information needs to be in the hands of one person
 - ▶ Possibility should be examined from the POV of the entity holding the data, in this case Deloitte
 - ▶ In this case: obtaining the information was prohibited by law or practically impossible
- ▶ The General Court annulled the EDPS' decision

"...since the EDPS did not investigate whether Deloitte had legal means available to it which could in practice enable it to access the additional information necessary to re-identify the authors of the comments, the EDPS could not conclude that the information transmitted to Deloitte constituted information relating to an 'identifiable natural person'..."

CONFLICTING VIEWS

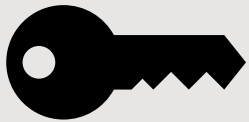


EDPS: if data is pseudonymous for one, it is pseudonymous for all



General Court: what is pseudonymous for one, can be anonymous for another

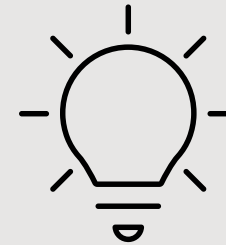
KEY TAKEAWAYS



Illegal means and bad actors are not to be taken into account when assessing the personal nature of data.



Data can be pseudonymous from the perspective of one party and anonymous from the perspective of another.



Decision was annulled because EDPS **did not investigate the possibility of re-identification** from the perspective of Deloitte, NOT because of the nature of the data.

TO BE CONTINUED?



Appeal by EDPS is pending, first ground:

“Incorrect interpretation of Article 3(1) and 3(6) of Regulation 2018/1725 as interpreted by the case-law of the Court of Justice for having required the EDPS to assess whether the information at stake in the case was personal data taking the perspective of the recipient and by omitting to give consideration to the notion of pseudonymisation.”

European Data Protection Board is intervening in the appeal case

CONCLUSIONS

- ▼ Pragmatic approach of the General Court and the Court of Justice of the EU
- ▼ Guidelines are needed (see Work Programme EDPB 23-24 and WP EDPB 21-22)
- ▼ CJEU seems to embrace that 0 risk is impossible & anonymisation can be reversible
- ▼ EDPS (and EDPB?) seems to take a more absolute stance



THANK YOU

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HEALTH &
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LAW LAB

<https://hall.research.vub.be/>

Data controllership and joint controllers – assessment criteria

Panel discussion 12 July 2024
data.europa academy
Charlotte Ducuing

Relevant roles for responsibility allocation

- (Data) controller(s) – alone or jointly (Art. 4(7) GDPR)
 - Main entity(ies) responsible for compliance with data protection obligations
- Data subject (Art. 4(1) GDPR)
 - Protected individuals and beneficiaries
- (Data) processor (Art. 4(8) GDPR)
 - Processes data on behalf of and following the instructions of data controller;
 - Specific obligations under the GDPR but mainly *not* the responsible actor
 - Becomes responsible (controller) upon acting *beyond* the instructions of data controller (Art. 28(10) GDPR)
- (Data) recipient (Art. 4(9) GDPR)
 - Person who receives personal data, e.g. from the controller
 - Can be a ‘third party’ (Art. 4(10) GDPR), for example an independent (i.e. other) controller

The central notion of ‘controller’

‘the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law’ (Art. 4(7) GDPR)

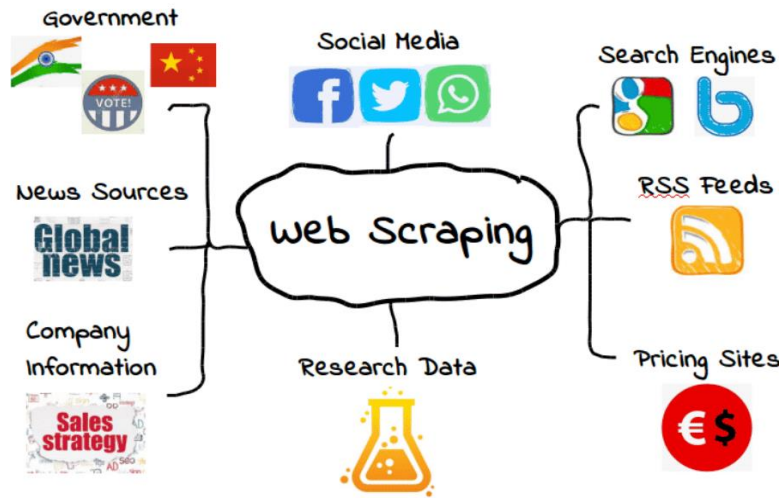
1. Can be anyone
2. ‘One or several controllers’ > array of types of responsibility allocation
 - legal recognition of joint controllership > requirement to determine respective responsibilities for compliance (Art. 26 GDPR)
3. Functional and **mainly** factual identification
 - Exception where controller is identified by law (explicitly or implicitly, see C-231/22)
4. Based on ‘purposes and means’ > controller deemed to have control over the ‘whys and hows’ (WP29, 2010) of data processing

The law in the books and the law in the street



Cloud computing: What happens when the alleged processor (has the power to) make(s) significant decisions on data processing?

The law in the books and the law in the street

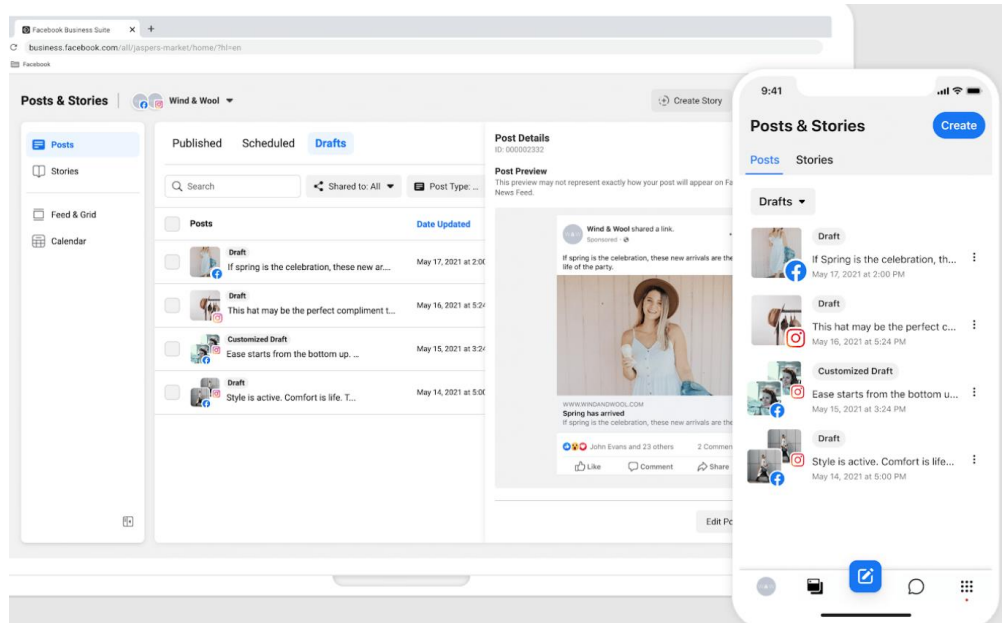


Where does responsibility of one for compliance start and end when data processing is highly fragmented and interconnected?



3.6.2022	EN	Official Journal of the European Union	L 152/21
CHAPTER II			
<i>Re-use of certain categories of protected data held by public sector bodies</i>			

The law in the books and the law in the street



Data subjects as data controllers (for the processing of data relating to themselves)?



The traditional view: Controller & purpose

- Purpose
 - The ‘anticipated outcome that is intended or that guides one’s planned actions’
 - Answers the ‘to what end’ or ‘what for’ questions of data processing (WP29 2010)
 - A cornerstone of data protection: Purpose limitation principle; yardstick for legal bases and for most obligations
- Purpose serves to identify and delineate relevant data processing obligations under the responsibility of (one or several) controller(s)
 - WP29 2010: controller determines the purpose(s) and the *essential* means
 - Essential means: those ‘closely linked to the purpose(s) and the scope of processing (type of data, processing duration, categories of recipients and data subjects)’
- Compliance analysis starts from the purpose for personal data processing to allocate responsibility and tailor obligations

The traditional view: *Google Spain* (C-131/12; 2014)



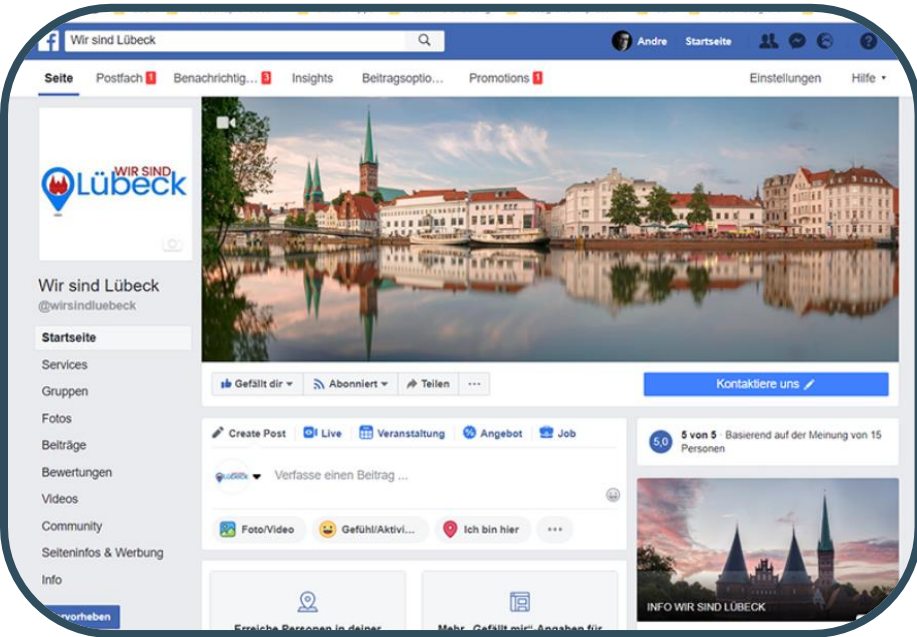
Website publishers



Google search engine

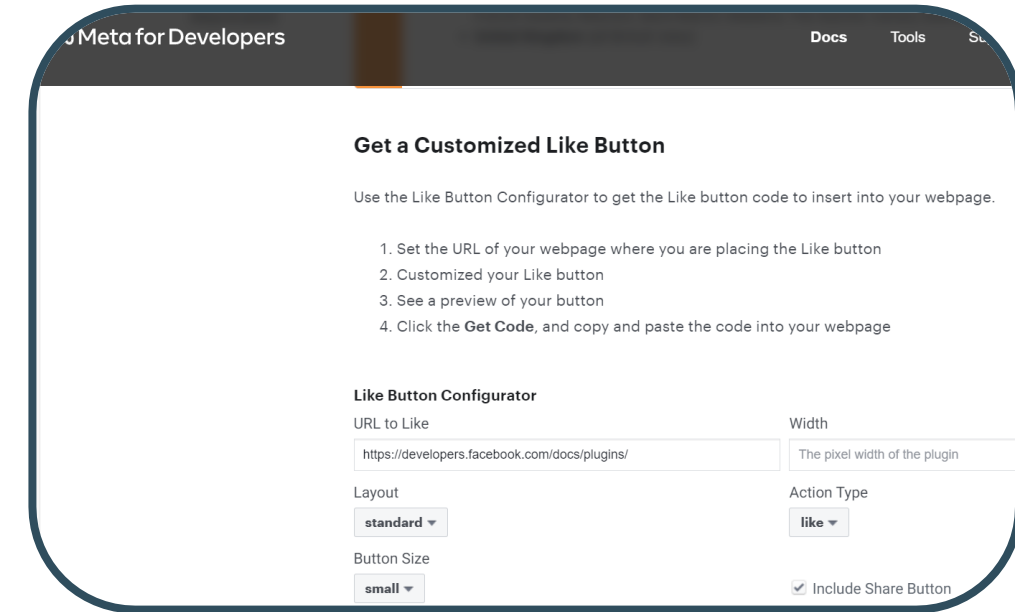
- Google has own and different purposes (and means) compared to website publishers
- Results in fundamental rights of individuals being affected additionally
- Applied then in *Inspektor v Inspektorata kam Visshia sadeben savet* (C-180/21; 2022)

Towards the data processing operations-based approach



Wirtschaftsakademie (C-210/16; 2018)
Facebook fan page

Jehovan (C-25/17; 2018)
Door-to-door preaching

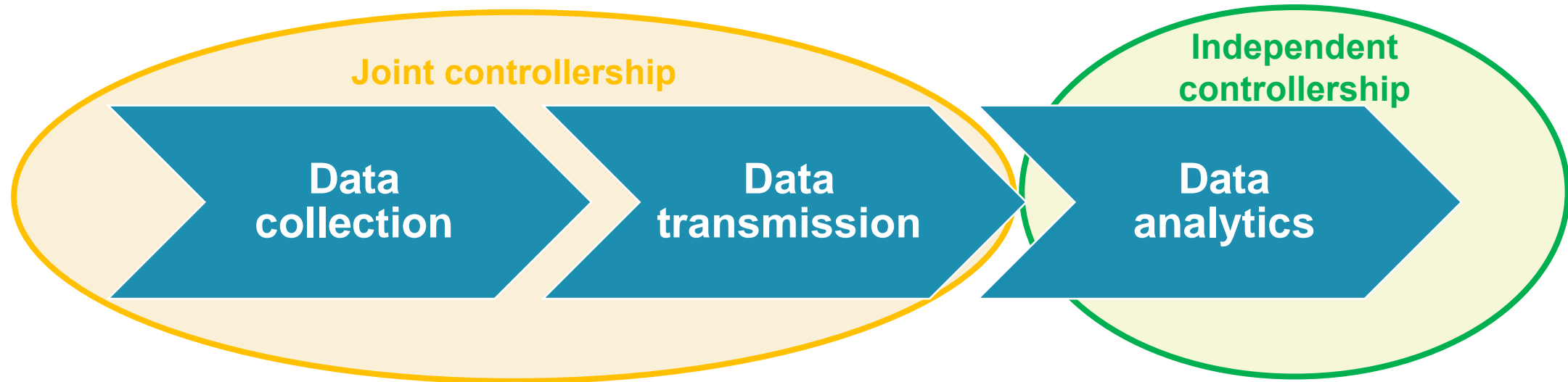


Fashion ID (C-40/17; 2019)
Social plugin embedded into a
website

Towards the data processing operations-based approach

- Commonalities between the three cases
 - Extensive interpretation of (joint) controllership to ensure high, effective and complete protection of fundamental rights
 - Creation of a Facebook fanpage is sufficient to be a (joint) controller; organization of door-to-door preaching that involve personal data processing is sufficient; embedding a social plugin on one's website is sufficient
 - The Court found joint controllership
 - Wirtschaftsakademie and Facebook; Jehovah's Witnesses community and its members; Fashion ID and Facebook to some extent
 - In case of joint controllership, that every and each controller has access to personal data is irrelevant
 - Joint control does not mean 'joint responsibility' (?)

The data processing operations-based approach to (joint?) controllership: Fashion ID



1. Identification of the relevant data processing operations
 - Chronological - but could be otherwise
2. Identification of the actors who exercise influence – purposes and means – for and on every relevant operation
3. In case of joint controllership, allocation of responsibilities for compliance
 - E.g. transparency requirements, obtainment of consent, etc.

The data processing operations-based approach to (joint?) controllership: After Fashion ID

- Data processing operations-based approach upheld by the Court outside of the specific context of the determination of controllership
 - Digi (C-77/21; 2022)
 - See also Opinion of AG Bobek on ‘SS’ SIA (C-175/20)
- Upheld by the Court in the context of the determination of controllership
 - *Etat belge v Autorité de Protection des données* (C-231/22)
 - Para 42: unclear; seeming demise of purpose
 - Court seemingly – and contradictorily - avoids answering (para 49-52)
 - *IAB Europe* (C-604/22; 2024)
 - Reference to the DP operations-based approach of the Court... but without legal effects

(Joint) controllership: The working synthesis of the EDPB (Opinion 07/20)

1. Joint participation

- Common decision – implying common intention or converging decisions, i.e. that complement each other and are necessary for the processing to take place as it does
- Access to personal data by every actor is irrelevant

2. In the 'determination'

- Influence over processing
- Scope: specific data processing operations in question – EITHER 'micro' OR 'macro' level

3. Of the purposes

- 'jointly determined purposes': either common purpose or different purposes 'closely connected or complementary' to each other
 - Condition: each actor shall have a purpose
 - 'merely being paid for services rendered' does not qualify as a purpose

4. And of the means

- 'jointly determined means': not necessarily the same level of influence; not necessary that each determines all the means
- Controllers shall determine at least the essential means

Where do we stand now?

- The case law is complicated
- The case law is not consistent
- The EDPB has provided useful expertise

Where do we stand now?

(Joint) controllership: The working synthesis of the EDPB (Opinion 07/20)

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Joint participation as either common or converging decisions

- Then **partly endorsed** by the Court (*IAB Europe*, para 59; see C-683/21): 'tangible' (not necessary?) impact on the determination of purposes and means

Where do we stand now?

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- Optional - rational than mandatory – DP operation-based approach**
- **Attempt to restore the function of purpose**
 - **but remaining issues with purpose**
 - **No guidance!**
 - **In line with the case law?**

Where do we stand now?

(Joint) controllership: The working synthesis of the EDPB (Opinion 07/20)

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Joint 'determination' rather than joint purpose

- Preserves the function of purpose by avoiding overly extensive ones (e.g. 'economic interest' of both Facebook and Fashion ID)
- In line with the (problematic) case law? E.g. broadly-phrased purpose of *IAB Europe* (para 63-64)
- Bans the interpretation that controllership should first be determined independently and only shall one identify what is joint (however: *IAB Europe*, C-604/22; 2024, para 58)

Where do we stand now?

(Joint) controllership: The working synthesis of the EDPB (Opinion 07/20)

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Distinction between the determination of the purposes and this of the means

- E.g. the use of the Facebook platform by Wirtschaftsakademie > speaks to the means (only)
 - **Limits (a little) the extension of joint controllership scenarios**

Where do we stand now?

(Joint) controllership: The working synthesis of the EDPB (Opinion 07/20)

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 - Controllers shall determine at least the essential means

Each controller shall have a purpose

- Bans an indirect benefit-based approach and thus an over-inclusiveness of joint controllership
 - In line with the case law?

Where do we stand now?

(Joint) controllership: The working synthesis of the EDPB (Opinion 07/20)

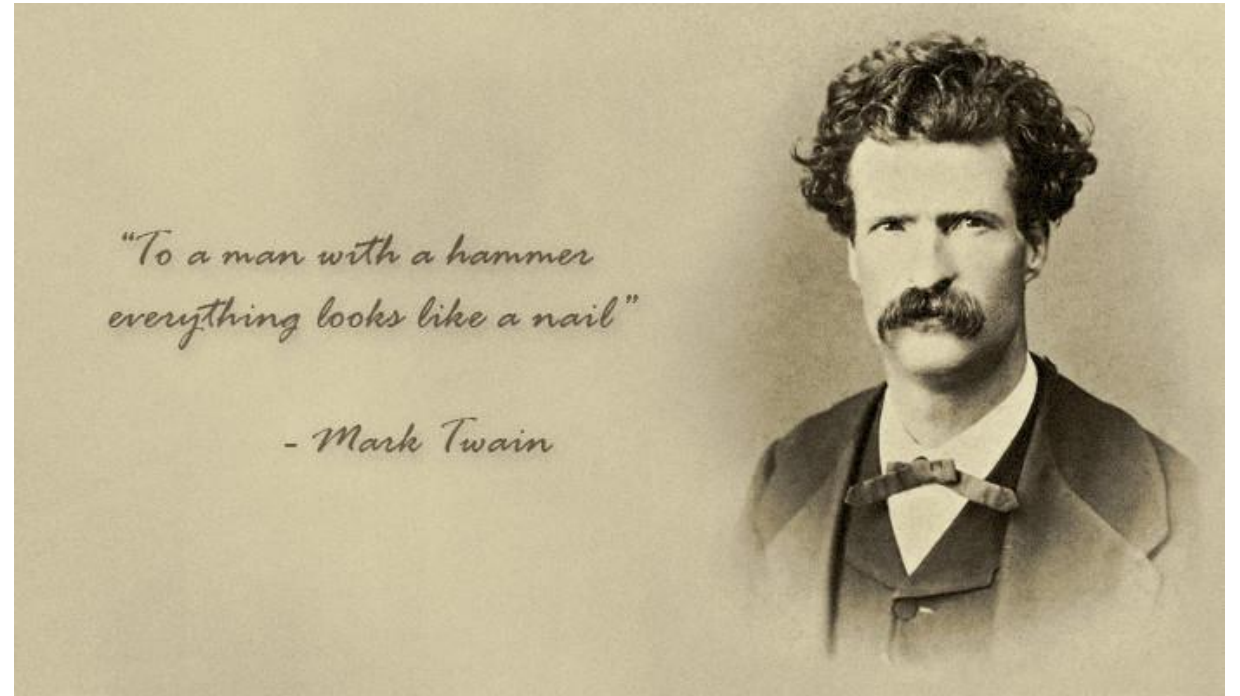
1. **Joint participation**
 - Common decision – implying common intention or **converging** decisions, i.e. that complement each other and are necessary for the processing to take place as it does
 - Access to personal data by every actor is irrelevant
2. **In the 'determination'**
 - Influence over processing
 - Scope: specific data processing operations in question – EITHER 'micro' OR 'macro' level
3. **Of the purposes**
 - **'jointly determined purposes'**: either common purpose or different purposes 'closely connected or complementary' to each other
 - Condition: each actor **shall have a purpose**
 - 'merely being paid for services rendered' does not qualify as a purpose
4. **And of the means**
 - **'jointly determined means'**: not necessarily the same level of influence; not necessary that each determines all the means
 - Controllers shall determine at least the essential means

Irrelevance of whether all joint controllers have access to personal data

- Explicitly and steadily stated by the Court
 - **Aims to avoid the circumvention of data protection law (maybe?)**
- **Risk of over-inclusiveness of joint controllership**
- **Inconsistent with the independent determination of controllership of each actor**
- **Could easily give rise to an indirect benefit-based approach (IAB Europe?)**

Where do we stand now?

- Some of the questions that we try to answer may not (entirely) be controllership ones, e.g.
 - Lack of rules on controller-to-controller data transfers? E.g. Should we have due diligence obligations upon data transfer? (see Wendehorst, 2020)
 - Should there be an obligation (rather than an option) for States to nominate public sector controllers and to grant them the competence to act as one?
 - How to square controllership with corporate law and the law of associations?



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Q&A session



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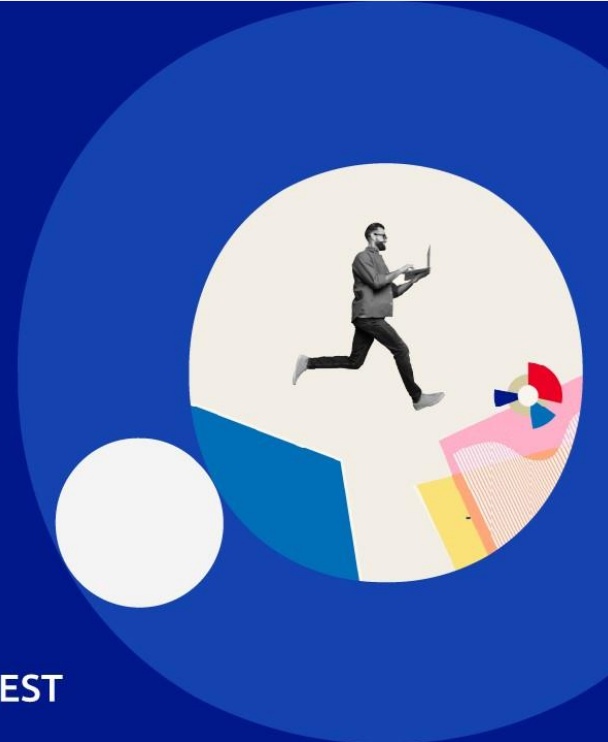
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