
MINUTES

Meeting of the Network of Data Protection Officers of national law enforcement authorities, JHA Agencies and EPPO

Brussels, Thursday 23rd January 2025

The 8th meeting of the network for Data Protection Officers of law enforcement authorities, Justice and Home Affairs Agencies and the European Public Prosecutor's Office (hereinafter the “LED DPO Network”) took place on Thursday 23rd June 2025 in Albert Borschette Congress Centre.

The Commission representatives welcoming the participants and informed them about the new transparency requirements entailing the creation of a webpage with information about the LED DPO Network.

The first part of the meeting started with a presentation by DG HOME on the closure of the High-Level Group on Access to Data by Law Enforcement, and the follow-up, including by the Commission. The DPOs were asked to actively participate in follow-up initiatives.

The next agenda point was dedicated to the preparation of the 2026 Commission report on the application of the LED. A Fundamental Rights Agency (FRA) representative gave an update on the field research FRA will carry out in this context. The involvement and support of the DPOs will be crucial to the success of this research, the results of which will feed into the Commission report.

The Legal Service of the European Commission then gave a presentation about subsequent processing of the personal data under the LED, focussing on Articles 4(2) and 9(1) and on recent CJEU case-law about those LED provisions.

Finally, JUST/C.3. gave an update on CJEU case-law, covering two recent LED related judgments adopted by the Court since the last meeting.

During the session held exclusively among DPOs, without the presence of the Commission representatives, DPOs discussed topics such as use of drones, risk assessment/data breaches and some AI use cases, national actions of DPAs and fines or other use of powers (data subject rights, unlawful data sharing). As regards the next meeting, the DPOs expressed the wish to discuss AI. Discussing the citizens’ perspective on the LED was also mentioned as a possible future topic.

It was agreed to save 12 June 2025 as a tentative date for the next meeting, subject to confirmation.

List of participants

1.DPO’s from national law enforcement authorities of:

Austria
Belgium
Cyprus
Croatia
Denmark
Finland
France
Germany
Greece
Hungary
Iceland
Ireland
Latvia
Lithuania
Luxemburg
Malta
Netherlands
Norway
Poland
Romania
Slovenia
Spain
Sweden
Switzerland;

2. DPOs of EUROJUST and the European Public Prosecutor's Office (EPPO);
3. European Commission: DG JUST/C.3, DG HOME/D.4, LS;
4. Representative of FRA.