

**From:** [REDACTED]  
**To:** [REDACTED]  
**Sent at:** 20/05/22 15:25:59  
**Subject:** RE: [EXTERNAL] RE: Operational Personal Data Implementing rules - DPO Opinion

Dear [REDACTED]

I'm afraid we got confused with the file numbers. The correct numbers are: 1st opinion on OPD was registered under number DPO/NAPE/11364/2021 and was sent to the ED on 7/10/2021. The 2nd DPO opinion on OPD is filed under DPO/NAPE/11364a/2021 and was sent on 16/11/2021.

About the notes, nothing formal, is that literally when I've seen what it was produced, its certainly not minutes, there are plenty of gaps and incongruencies that I'm absolutely sure the EDPS did not say/ask, and I just want to make sure that the text is not totally ridiculous. BTW, once we have the minutes here finalised, would you like to see them for comments or we just send it to you FYI?

KR

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 May 2022 11:34  
**To:** [REDACTED]  
**Subject:** RE: [EXTERNAL] RE: Operational Personal Data Implementing rules DPO Opinion

**[EXTERNAL EMAIL]** CAUTION: Email originated from outside of Frontex. Do not click links or open attachments unless you recognize and trust the sender.

Dear [REDACTED]

Many thanks.

Then may I ask you also the reference of the second opinion as the one I intended to mention is "Warsaw, 16 November 2021, Reg No 11364a, ref: DPO/NAPE/11364a/2021".

An additional question: could you give me the date of the first opinion? Thanks a lot.

As regards notes, each of us took some notes during the presentations but we haven't compiled them (so far). I will check and come back to you.

Kind regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 May 2022 10:44  
**To:** [REDACTED]  
**Subject:** RE: [EXTERNAL] RE: Operational Personal Data Implementing rules DPO Opinion

Dear [REDACTED]

Good morning! Here it goes: 6828\_DPO\_Opinion\_Draft IR for the DPO

We are still working on the minutes. Do you happen to have any report on the meeting? My Office seem that couldn't take very detailed notes to produce a good quality minutes, and I had to send them back to redo, bc they made no sense. Maybe if you took some notes on the meeting (not on the things that probably you found weird) I could try to complement the very poor minutes I have right now.

KR

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 May 2022 10:21  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] RE: Operational Personal Data Implementing rules DPO Opinion

[EXTERNAL EMAIL] CAUTION: Email originated from outside of Frontex. Do not click links or open attachments unless you recognize and trust the sender.

Dear [REDACTED]

I hope everything is fine on your side.

May I ask you the reference of the second opinion of the DPO on the draft MB decision on OPD? We would like to refer to it in our opinion.

The version you sent us indicates "Warsaw 02.02.2012" with no specific reference while the second opinion contains the following date and reference: "Warsaw, 16 November 2021, Reg No 11364a, ref: DPO/NAPE/11364a/2021".

Thanks a lot in advance

Kind regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 08 February 2022 18:33  
**To:** [REDACTED]  
**Subject:** FW: Operational Personal Data Implementing rules DPO Opinion

Dear [REDACTED]

Following your request, please find attached the first DPO Opinion on OPD. The DPO had to issue a second one due to the fact that the consulted draft was still in process of redrafting by other business units, and it was uncertain what different draft would result after the input of other stakeholders. Please note below the communication to the Executive Director in that regard. Also note that, in point 1 and 2 of the Opinion, the procedural aspects of the involvement of the DPO were highlighted, including in relation to the evolution of the file thorough time, as well as deadlines.

KR



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**From:** [REDACTED]  
**Sent:** Thursday, October 7, 2021 9:10 PM  
**To:** [REDACTED]  
**Cc:** dataprotectionoffice <[dataprotectionoffice@frontex.europa.eu](mailto:dataprotectionoffice@frontex.europa.eu)>;  
HoCAB <[HoCAB@frontex.europa.eu](mailto:HoCAB@frontex.europa.eu)>; LEG.OPS  
<[LEG.OPS@frontex.europa.eu](mailto:LEG.OPS@frontex.europa.eu)>; [REDACTED]  
[REDACTED]  
**Subject:** Operational Personal Data Implementing rules DPO Opinion

Dear Sir,

Following your request to provide you with advice in relation to the drafting of data protection implementing rules, please find attached the DPO Opinion on the draft on Operational Personal Data Implementing rules distributed on 4 October to the Directors of Divisions for their comments. Unfortunately, the devised planning does not allow the DPO to provide its Opinion at a later stage, once the draft is final. Therefore I am only able to provide you with an opinion on a document that still may be subjected to changes after this consultation with the Directors, HoICO and FRO finalises. If needed or requested by you, I may submit an updated opinion, depending on the scale and depth of the changes introduced by the Directors of Divisions during this consultation phase.

I trust that this Opinion will help you take decisions on this draft, to be in compliance with the Data Protection acquis, which these rules aim at implementing. I would also like to be able to table this Opinion to the Management Board when this file is discussed, as I think that the DPO Opinion will aid the discussions with the Member States in relation to data protection obligations, roles, responsibilities and processes.

I am at your disposal for any clarification you deem necessary.

Kind regards



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