



EDPS
EUROPEAN DATA PROTECTION SUPERVISOR

DECISION OF THE EUROPEAN DATA PROTECTION SUPERVISOR

of 24.04.2025

On Transparency Measures in accordance with the Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register

THE EUROPEAN DATA PROTECTION SUPERVISOR,

Having regard to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data,

Having regard to Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act),

Having regard to the Decision of the European Data Protection Supervisor of 15 May 2020 adopting the Rules of Procedure of the EDPS, as amended by the Decision of the European Data Protection Supervisor (EDPS) of 14 October 2022 and by the Decision of the European Data Protection Supervisor of 18 July 2024,

Having regard to the Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register¹ (“the ‘Interinstitutional Agreement’”), and in particular Article 11 thereof,

Whereas:

- (1) The European Data Protection Supervisor is committed to ensure the transparency of its decisions to the greatest extent possible.
- (2) The European Data Protection Supervisor considers appropriate that he or she, the Head of the EDPS Secretariat, and staff holding management functions should meet in their official capacities only with interest representatives that are registered in the Transparency Register established by the Interinstitutional Agreement.

¹ [OJ L 207, 11.6.2021, p. 1.](#)

- (3) To further enhance transparency, it is appropriate to make public information on meetings held between the European Data Protection Supervisor, the Head of EDPS Secretariat and staff holding management functions with said interest representatives.
- (4) By adopting these measures, the European Data Protection Supervisor aims to lay down the foundations for an improved transparency policy for the EDPS as European Union (EU) entity.

HAS ADOPTED THIS DECISION:

Article 1

This Decision applies to the person holding the office of European Data Protection Supervisor ('the Supervisor'), to the Head of the EDPS Secretariat, and to staff holding management functions.

This Decision establishes measures concerning the transparency of meetings that the Supervisor, the Head of EDPS Secretariat and staff holding management functions hold with interest representatives.

Article 2

For the purpose of this decision, the following definitions shall apply:

(a) 'Meeting' means a scheduled bilateral encounter organised at the initiative of an interest representative or the Supervisor, the Head of EDPS Secretariat or staff holding management functions to discuss an issue related to the formulation or implementation of policy or legislation falling within the EDPS competencies.

(b) 'Interest representative' means any natural or legal person, or formal or informal group, association or network that engages in activities carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of the Union institutions, bodies, agencies and offices.

(c) 'Staff holding management functions' means an EDPS staff member holding a post corresponding to the type of post of Head of Unit

Article 3

1. The Supervisor, the Head of the EDPS Secretariat and staff holding management functions shall ensure that they participate in their official capacities in meetings only held with interest representatives that are registered in the Transparency Register.

2. The Supervisor, the Head of the EDPS Secretariat and staff holding management functions shall make public information on meetings held between them and interest representatives.

3. The information, published in the Agenda on the EDPS website, shall consist of the date of the activity, the location, the name and function of the Supervisor, the Head of the EDPS Secretariat or the staff holding management functions; the name of the interest representative, their Transparency Register Identification Number and the subject of the meeting. The interest representatives shall be informed beforehand of the fact that the information will be made public.

Article 4

This decision shall not cover those meetings that are outside the scope of the Interinstitutional Agreement, in accordance with its Article 4.

Article 5

1. Minutes shall be taken of all meetings that the Supervisor, the Head of the EDPS Secretariat and staff holding management functions hold with interest representatives.
2. The Supervisor, the Head of the EDPS Secretariat and staff holding management functions shall make public the minutes of meetings, in accordance with the provisions of this Decision.
3. The minutes of a meeting shall be drawn up as a single document including:
 - (a) the information set out in Article 3(3);
 - (b) main points raised and positions expressed at the meeting;
 - (c) conclusions from the meeting, where applicable.

Article 6

Without prejudice to Article 7, the information set out in Article 3(3) and the document drawn up in accordance with Article 5(3) shall be published in a standardised format in the website of the EDPS within a period of 2 weeks following the meeting.

Article 7

The personal data of individuals (acting on behalf of interest representatives) or EDPS staff (other than staff holding management functions) attending meetings shall not be made public.

Article 8

The present decision shall be notified to the Management Board of the Transparency register in accordance with Article 11(1) of the IIA.

Article 9

The Head of the EDPS Secretariat shall be responsible for implementing this decision.

Article 10

1. This Decision shall enter into force on 05.05.2025
2. This Decision shall be published on the EDPS website.

(e-signed)

Wojciech Rafał WIEWIÓROWSKI

European Data Protection Supervisor