

EDPS Representative	Interest representative	Date	Location
Wojciech Wiewiórowski, EDPS	Telefónica SA, 52431421-12	20/11/2025	Brussels, Belgium
<ul style="list-style-type: none"> ▪ Meeting topic(s) 	<ul style="list-style-type: none"> ▪ Telefónica raised some general points regarding their comprehensive privacy programme and their AI governance programme. ▪ Telefónica emphasized that an established governance model is equally essential for security — in the field of telecommunications security, such structures have long been in place. ▪ Telefónica voiced support for the omnibus legislation aimed at harmonizing reporting obligations. Regarding ePrivacy, Telefónica stressed that the need for reform extends far beyond the cookie rules. In particular, more flexibility is required in the processing of traffic and location data. For example, Article 6 of the ePrivacy Directive (governing traffic data) lacks an exemption for data processing for security purposes, unlike Recital 121 of Directive NIS 2.0. and Recital 49 of GDPR. ▪ Telefónica also noted the strategic importance of an adequacy decision for Brazil, pointing out that telecommunications inherently involves the cross-border transmission of data. ▪ Looking ahead, Telefónica plans to leverage AI to support privacy assessments, particularly in supplier selection, with the goal of identifying those partners that can ensure the highest standards of data protection. ▪ The EDPS referred to the ongoing work on a joint opinion with the EDPB and refrained from commenting on the digital omnibus. In closing, he expressed his appreciation for the Telefónica’s work on the Binding Corporate Rules. 		