



EUROPEAN
DATA PROTECTION
SUPERVISOR



ANNUAL REPORT 2025

EXECUTIVE SUMMARY



Further details about the EDPS can be found on our website edps.europa.eu

The website also details a [subscription feature to our newsletter](#).

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FOREWORD

It is my privilege to present the EDPS Annual Report 2025 – a year defined by the transition from strategic preparation to robust operationalisation across our expanding mandate.

If 2024 was a year of taking stock and celebrating our history, 2025 has been about delivering concrete results in an increasingly complex digital landscape. Our work this year has been driven by a commitment to ensuring that the fundamental rights of individuals continue to be protected within the ambitious and evolving Digital Rulebook.

A defining feature of 2025 has been the rapid evolution of our role in Artificial Intelligence. Our newly established AI Unit has moved from foundational planning to active mapping and governance. We have mapped the AI ecosystem across EU institutions, bodies, offices and agencies (EUIs), identifying growing use of generative AI and increasing reliance on off-the-shelf tools, underscoring the vital need for institutional accountability in this area. To support innovation within safe boundaries, we launched an AI regulatory sandbox pilot project, providing a collaborative space for EUIs to test AI systems under the guidance of the regulator before they are deployed.

Our commitment to technological foresight remains a cornerstone of our mission. Through the Technology and Privacy Unit, we have analysed the risks and opportunities of emerging trends such as Agentic AI, AI companions and federated learning. Furthermore, 2025 marked a significant expansion of our responsibilities in the field of cybersecurity. As a permanent member of the Inter-Institutional Cybersecurity Board, the EDPS is now playing a central role in strengthening the digital defences of the EU administration.



In the realm of Policy and Legislative Consultation, we reached a record level of activity, responding to 145 legislative consultations. Our advice has spanned critical topics from digital identity to targeted modifications to the GDPR, always aiming to ensure that new laws are legally sound and aligned with EU values. We also fostered a high-level debate on competition and innovation to ensure that the Digital Rulebook is implemented coherently across different regulatory sectors.

Our Supervision and Enforcement Unit has doubled down on ensuring accountability, notably through our landmark investigation into the European Commission's use of Microsoft 365 and our scrutiny of international data transfers. Whether defending our decisions before the Court of Justice of the European Union or auditing large-scale IT systems like the Visa Information System and Eurodac, our focus remains on the practical application of data protection standards.

2025 was a foundational year for our upcoming role as a market surveillance authority (MSA) and notified body for EUIs under the AI Act. In anticipation of the August 2026 deadline for high-risk AI provisions, we prioritised a strict 'functional separation' between these new responsibilities and our core data protection mandate. By investing in specialised expertise and closely following the development of harmonised standards, we continued building operational readiness to supervise AI in sensitive sectors such as law enforcement and migration. Our objective is to replace regulatory uncertainty with a coherent framework that provides legal certainty for the EU administration while robustly safeguarding fundamental rights.

Finally, our achievements this year demonstrate the power of collaboration. Through the European Data Protection Board and international networks like the Global Privacy Assembly, the G7 DPAs roundtable, and the International Organisations Workshop on Data Protection, we continue to advocate for high privacy standards that transcend borders.

The digital future is here, and while we cannot eliminate every risk, the EDPS is fully equipped to guide the EU administration through this transformation with expertise, independence and unwavering focus on the rights of the citizen.

A handwritten signature in black ink, appearing to read 'W. Wiewiórowski', with a long horizontal line extending to the right.

Wojciech Wiewiórowski
European Data Protection Supervisor

CHAPTER ONE

ABOUT US



1.1. The EDPS

1.1.1. Who we are

The [European Data Protection Supervisor \(EDPS\)](#) is the European Union's independent data protection authority responsible for supervising the processing of personal data by the European institutions, bodies, offices and agencies (EUIs).

We advise EUIs on new legislative proposals and initiatives related to the protection of personal data.

We monitor the impact of new technologies on data protection and cooperate with supervisory authorities to ensure the consistent enforcement of EU data protection rules.

Additionally, since the entry into force of the AI Act, we ensure that the EU institutions use, develop, and deploy AI in line with its rules.



1.1.2. Our mission

Data protection is a fundamental right, protected by EU law. We promote a strong data protection culture within EUIs.

We carry out our work according to the following four values and principles.

- **Impartiality:** Working within the legislative and policy framework given to us, being independent and objective, finding the right balance between the interests at stake.
- **Integrity:** Upholding the highest standards of behaviour and to always do what is right.
- **Transparency:** Explaining what we are doing and why, in clear language that is accessible to all.
- **Pragmatism:** Understanding our stakeholders' needs and seeking solutions that work in a practical way.

1.1.3. What we do

We have five main fields of work.

- **Supervision and Enforcement:** Monitoring the processing of personal data by EUIs to ensure that they comply with data protection rules.
- **Policy and Legislative Consultation:** Advising the European Commission, the European Parliament and the Council of the European Union on legislative proposals and initiatives related to data protection.
- **Technology and Privacy:** Monitoring and assessing technological developments impacting the protection of personal data. We oversee that the systems supporting the processing of personal data by EUIs implement adequate safeguards to ensure compliance with data protection rules. We implement the digital transformation of the EDPS.

- **AI Preparedness:** Under the AI Act we act as notified body and market surveillance authority to assess the conformity of high-risk AI systems that are developed, deployed and used by EUIs. We ensure that the use, development and deployment of AI by EUIs is coherent and consistent with the AI Act. Our responsibilities embody the principles of good governance, risk management and supervision.
- **Cooperation:** Working with data protection authorities to promote consistent data protection across the EU and European Economic Area. Our main platform for cooperation with data protection authorities is the European Data Protection Board, to whom we provide a secretariat and have a Memorandum of Understanding defining how we work together.

Each area of expertise, enumerated above, is embodied by Units and Sectors that bring together a diverse group of legal and technical experts, as well as other specialists in their field from all across the European Union.

1.1.4. Our powers

The powers we have as the data protection authority of EUIs are laid out in [Regulation \(EU\) 2018/1725](#).

Under this regulation, we can, for example, warn or reprimand an EUI that is unlawfully or unfairly processing personal data, order EUIs to comply with requests to exercise individuals' rights, impose a temporary or definitive ban on a particular data processing operation, impose administrative fines to EUIs, or refer a case to the Court of Justice of the European Union.

We also have specific powers to supervise the way the following EUIs process personal data:

- Europol (the EU Agency for Law Enforcement Cooperation), under [Regulation 2016/794](#);

- Eurojust (the EU Agency for Criminal Justice Cooperation), under [Regulation 2018/1727](#);

- EPPO (the European Public Prosecutor's Office), under [Regulation 2017/1939](#);

- Frontex (the European Border and Coast Guard), under [Regulation 2019/1896](#).

Since 2024, the EDPS has acquired new powers and roles under the AI Act: notified body and market surveillance authority to assess the conformity of high-risk AI systems that are developed, deployed and used by EUIs.

1.2. EDPS Strategy 2020-2024

In a connected world, where data flows across borders, solidarity within Europe and internationally will help to strengthen the right to data protection and make data work for people across the EU and beyond.

Wojciech Wiewiórowski was appointed as Supervisor by a joint decision of the European Parliament and the Council to serve a five-year term, beginning on 6 December 2019. In 2025, the selection procedure for a new EDPS mandate for the next term of five years was still ongoing. Pending a renewed mandate the **EDPS Strategy for 2020-2024** continued to guide our work.

The strategy focuses on three pillars: Foresight, Action and Solidarity, to shape a safer, fairer and more sustainable digital future.

- **Foresight:** Our commitment to being a smart institution that takes the long-term view of trends in data protection and the legal, societal and technological context.

- **Action:** Proactively develop tools for EUIs to be world leaders in data protection. To promote coherence in the activities of enforcement bodies in the EU with a stronger expression of genuine European solidarity, burden sharing and common approach.

- **Solidarity:** Our belief is that justice requires privacy to be safeguarded for everyone, in all EU policies, whilst sustainability should be the driver for data processing in the public interest.

For more information about the EDPS, please consult our [Frequently Asked Questions](#) page on the EDPS website.

For more information about data protection in general, consult our [Glossary page](#) on the EDPS website.



CHAPTER TWO

HIGHLIGHTS OF 2025



During 2025, we continued to deliver on our actions to shape a safer digital future, operating in our core areas of expertise: Supervision

and Enforcement, Policy and Legislative Consultation, Technology and Privacy, and Artificial Intelligence.

In the area of Supervision and Enforcement, we:

- advised European institutions, bodies, offices and agencies (EUIs) on planned or existing processing operations in the form of supervisory opinions on joint controllership in banking supervision, transparency in internal investigations and the implementation of the European Travel Information and Authorisation System (ETIAS) watchlist;
- investigated alleged breaches of data protection laws by EUIs, such as the European Commission's use of Microsoft 365, international transfers under cloud service contracts, and the independence and dismissal of Data Protection Officers;
- audited EUIs to identify strengths and weaknesses in their data protection practices, for example in the processing of health data, epidemic intelligence and the use of mobile applications;
- addressed complaints from individuals who believe that an EUI has infringed their data protection rights, including in the context of staff data transmissions to Permanent Representations and access to selection board records;

- defended privacy and the EDPS' institutional role and decisions before the Court of Justice of the European Union, notably regarding the definition of personal data and the EDPS' legal standing;
- collaborated with Data Protection Officers of EUIs to uphold consistent and coherent data protection standards across EU public

administration with the organisation of bi-annual meetings and focused roundtables;

- completed supervisory work in three key areas: the EU interoperability framework, safeguards for international data transfers and the application of Data Protection Impact Assessments.



In the area of Policy and Legislative Consultation, we:

- issued 145 responses to legislative consultation requests from the European Commission in the form of opinions, formal and informal comments, providing advice on the data protection implications of draft EU laws and international agreements on a range of topics, including Justice and Home Affairs, digital ID and credentials, targeted modifications of the General Data Protection Regulation (GDPR), and international agreements on tax compliance;
- actively contributed to promoting and further developing consistent and coherent data protection rules and practices across

the EU, in particular through our membership in the European Data Protection Board (EDPB) and by fostering cooperation between competent digital regulators to ensure the effective implementation of the EU's Digital Rulebook;

- fostered international and institutional cooperation to promote high data protection standards, for instance by organising a high-level debate on competition, innovation and data protection to reflect on the impact of the EU's Digital Rulebook on the rights of citizens.

In the area of Technology and Privacy, we:

- forecasted and analysed digital and technological developments, highlighting their opportunities and risks in our publications and podcasts of TechSonar and TechDispatch, with a focus on AI-related technologies, federated learning and digital identity wallets;
- organised our Internet Privacy Engineering Network (IPEN) on secure multi-party computation;
- helped EUIs address, overcome and prevent data breaches through awareness campaigns and the PATRICIA II tabletop exercise, receiving international recognition for these initiatives at the Global Privacy Assembly Awards in the Accountability category;
- audited IT systems of EUIs, from websites through our awareness campaign pilot, to Large Scale IT Systems, such as the Visa Information System, Eurodac and the Customs Information System;
- pursued our actions for digital transformation, such as launching the Website Evidence Collector as an online service (WEC Online) and streamlining the institution's IT infrastructure and support;
- prepared for the EDPS's evolving role in cybersecurity as a permanent member of the Inter-Institutional Cybersecurity Board and by improving the institution's preparedness with new maturity and risk assessments;
- issued new AI risk management guidance to assist EUIs in identifying and mitigating technical risks associated with the development and deployment of AI systems.

Supporting internal governance mechanisms and compliance involved:

- adopting a decision on transparency measures at the EDPS, and having it referenced in the website of the interinstitutional Transparency Register;
- adopting a decision on records and archives management at EDPS;
- handling 72 requests for access to documents, the highest number so far, and a sign of the growing interest in the EDPS's activities;
- the DPO providing independent advice to internal services, as delegated controllers, with a view to ensure the EDPS's accountability;
- the AI Correspondent facilitating the EDPS's compliance with the AI Act.

In the area of Artificial Intelligence, we:

- reinforced the newly established AI Unit to prepare for the EDPS's tasks as market surveillance authority and notified body of EUIs' AI systems under the AI Act;
- mapped the current AI ecosystem in relation to prohibited practices and high-risk systems within EUIs, publishing a report that highlights the dominant areas of AI use and potential enforcement priorities for the EDPS;
- launched an AI regulatory sandbox pilot project to offer safe and collaborative environment for EUIs to develop and test innovative AI systems under regulatory oversight;
- strengthened the AI Act Correspondents Network (AIACN) via meetings and workshops to enable capacity-building and knowledge exchange between EUIs as they prepare to comply with the AI Act;
- enhanced cooperation with EU (national) market surveillance authorities and international organisations in the area of AI governance and supervision;
- actively contributed to the implementation and consistent and effective application of the AI Act by participating in interinstitutional fora and working groups, and submitting to public consultations.

In communicating data protection, we:

- expanded and diversified our online presence by using a broader range of tools, formats and targeted campaigns to reach key audiences more effectively;
- reinforced our social media mix by reactivating our presence on Mastodon, a decentralised and privacy-oriented platform aligned with our values;
- organised and contributed to events to increase the visibility of our work and promote high data protection standards at global level;
- maintained and further developed relationships with journalists, stakeholders and the public;
- strengthened the EDPS's visibility as an employer, enhancing its attractiveness through targeted employer branding initiatives.

As a working organisation, we:

- managed human and financial resources in a sustainable way to deliver our mandate and tasks;
- invested in employees, Units and Sectors by offering trainings and development opportunities.

2.1. Key performance indicators 2025

We use a number of key performance indicators (KPIs) to help us monitor our performance in light of the main objectives set out in the EDPS Strategy. This ensures that we are able to adjust our activities, if required, to increase the impact of our work and the effective use of resources.










The KPI scoreboard contains a brief description of each KPI and the results on 31 December 2025. These results are measured against initial targets, or against the results of the previous year, used as an indicator.

In 2025, we met or surpassed the targets set in all KPIs, except one, confirming the positive trend in implementing our strategic objectives

throughout the year. KPI 7, on followers on EDPS social media, did not fully meet the set target, as our social media platforms have reached a stage of maturity and audience saturation, where growth has naturally stabilised and is no longer as dynamic as in previous years. On the other hand, in 2025, we reactivated the EDPS Mastodon account, previously operating as EU Voice, which had been closed in May 2024 following the conclusion of its pilot phase. This initiative aimed to reintroduce an alternative communications tool in support of a more democratic, decentralised and privacy-friendly model of social media and allowed us to reconnect with the 6,200 followers already gathered under the former EU Voice account.



Table 1
Key performance indicators

	KEY PERFORMANCE INDICATORS	RESULTS 31.12	TARGET 2025
	<p>KPI 1 Internal Indicator</p> <p>Number of cases, incl. publications, on technology monitoring and on promoting technologies to enhance privacy and data protection organised or co-organised by the EDPS.</p>	7 cases	5 cases
	<p>KPI 2 Internal & External Indicator</p> <p>Number of activities focused on cross-disciplinary policy solutions (internal & external).</p>	8 activities	8 activities
	<p>KPI 3 Internal Indicator</p> <p>Number of cases dealt with in the context of international cooperation (GPA, CoE, OECD, GPEN, IWGDPT, Spring Conference, international organisations) for which the EDPS has provided a substantial written contribution.</p>	34 cases	10 cases
	<p>KPI 4 External Indicator</p> <p>Number of files for which the EDPS acted as a lead rapporteur, rapporteur, or a member of the drafting team in the context of the EDPB.</p>	22 files	10 files
	<p>KPI 5 External Indicator</p> <p>Number of Article 42 Opinions and Joint EDPS-EDPB Opinions issued in response to the European Commission's legislative consultation requests.</p>	31 opinions	25 opinions
	<p>KPI 6 External Indicator</p> <p>Number of audits/visits carried out physically or remotely.</p>	6 audits	5 audits
	<p>KPI 7 External Indicator</p> <p>Number of followers on the EDPS social media accounts.</p>	<p>LinkedIn: 90,838 X: 28,102 Youtube: 3,681 Instagram: 731 Total: 123,352 Mastodon: 6,211</p>	<p>2024 figures (+10%) LinkedIn: 82,881 (91,169) X: 28,860 (31,746) YouTube: 3,409 (3,750) Instagram: 314 (345) Total: 115,464 (127,010)</p>
	<p>KPI 8 Internal Indicator</p> <p>Occupancy rate of establishment plan.</p>	92.50%	90%
	<p>KPI 9 Internal Indicator</p> <p>Budget implementation.</p>	92.50%	90%



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