

Paris, 30 September 2025

T-PD-BUR(2025)64RAPAbrEN

**BUREAU OF THE CONSULTATIVE COMMITTEE OF THE CONVENTION
FOR THE PROTECTION OF INDIVIDUALS WITH REGARD TO
AUTOMATIC PROCESSING OF PERSONAL DATA**

(Convention 108)

64th Bureau Meeting

Paris Office
29-30 September 2025

ABRIDGED REPORT

- Item 1 **Opening of the meeting / Statement by the Chair and the Secretariat**
- The Bureau took note of the information provided by the Chair and the secretariat. The Bureau congratulated Ms Beatriz de Anchorena for receiving the Giovanni Buttarelli award by the GPA.
- Item 2 **Adoption of the agenda**
- The Bureau adopted the agenda.
- Item 3 **Convention 108+ state of play**
- The Bureau took note of the information provided by the Secretariat on the signatures and ratifications of the Protocol amending Convention 108 (CETS No. 223, hereafter Convention 108+): 46 signatures out of which, 33 ratifications. Since the June 2025 plenary, neither ratifications nor signatures occurred to the Amending Protocol CETS No. 223.
- The Bureau took note of the information provided by the Secretariat and held an exchange of views with regard to the preparation for the entry into force of Convention 108+, encouraged all Parties to finalize their ratification procedures as soon as possible and invited the Secretariat to organize a tour de table on the state of play of the ratification at the next plenary meeting in November.
- As regards Costa Rica, the Bureau took note of the information provided by the Bureau members and the secretariat on the latest developments regarding the internal legislative process and invited the secretariat to engage with Costa Rican authorities to support the domestic processes where appropriate.
- Item 4 **Transborder data flows of personal data (MCCs, other possible tools)**
- The Bureau took note of the revised information note prepared by the Secretariat on possible further actions regarding the transborder flows of personal data, held an exchange of views and invited the Secretariat to organize a tour de table on the state of play of the approval of the CoE MCC at the next plenary meeting in November. The Bureau agreed to integrate the actions and outcomes of the revised information note on transborder flows of personal data in the draft Work Plan 2026-2029 of the Committee with the proposed amendments.
- Item 5 **Data protection in the context of Large Language Models**
- The Bureau took note of the presentation by Ms Anamarija Mladinić, rapporteur and the experts — Ms Isabel Barberá (independent expert) and Ms Murielle Popa-Fabre (Responsible AI) on the “Draft Guidelines on Privacy and Data Protection in the context of Large Language Models-based systems, held an exchange of views and invited delegations to send comments on the draft document by 14 October. The Bureau also invited the Secretariat to work with the rapporteur and the experts on an amended version of the draft Guidelines based on comments received in view of its discussion at the November plenary.
- Item 6 **Future Work Programme**
- The Bureau took note of the information provided by the Secretariat, held an exchange of views on the draft Work Programme (2026-2029) and agreed to submit the draft with the proposed amendments to the plenary in November for adoption.
- Item 7 **Draft Guidelines on Data Protection in the context of neurosciences**
- The Bureau took note of the information provided by the rapporteur, Ms Alessandra Pierucci, the expert Dr Marcello Ienca and the Secretariat on the updated version of the “Draft Guidelines on Data Protection in the context of neurosciences”, held an exchange of views, invited delegations to send comments on the draft document by 14 October. The Bureau also invited the Secretariat to work with the rapporteur and the experts on the finalization of the draft Guidelines based on comments received in view of its first full reading at the November plenary.
- Item 8 **Cooperation with other Council of Europe bodies and entities**
- The Bureau took note of the information provided by the Secretariat on the event on Access to Public Information and Data Protection which will be held on 4 November back-to-back to the plenary meeting and agreed on the proposed agenda. It also took note of the information provided by the Secretariat on

the ongoing work within CAI.

- Item 9 **Developments and activities in the field of data protection**
The Bureau took note of the information provided by the participants and Secretariat, notably on the Global Privacy Assembly (Seoul, 15-19 September), the plans to create a Latin-American Observatory in the framework of the Iberoamerican Network, the meeting of the Berlin Group (Tbilisi, 2-3 July 2025), Conference on data protection and artificial intelligence (10 December 2025, Warsaw), Workshop on data governance (Dakar, 29-31 July 2025), EU Digital Alliance Week (Antigua, 22-25 September 2025) and the IAPP High level meeting (Boston, 24 June 2025).
- Item 10 **Cooperation**
The Bureau also took note of the various cooperation programmes relevant to data protection, in particular on the on-going institutional support to beneficiaries of the Southern Mediterranean region (South V Programme) and the renewal of the programme under South Programme VI, initiative to prepare a global cooperation programme by the Council of Europe on digital matters as well as on-going and possible future cooperation with data protection authorities under several Council of Europe Action Plans, notably in the Republic of Moldova, Armenia, Azerbaijan and Ukraine.
- Item 11 **Data Protection Commissioner**
The Bureau took note of the information provided by the Secretariat regarding the follow up actions after the elections of the new Data Protection Commissioner and her upcoming official visit to the Council of Europe as well as her participation at the next plenary meeting in November.
- Item 12 **Observers**
The Bureau took note of the information provided by the observers, notably by EDPS, Ecuador, Gabon. Those latter countries informed the Bureau on their national authorities' intention to accede Convention 108+. The Bureau once again underlined in this respect the need to a speedy entry into force of Convention 108+ to enable interested countries to join as a Party.
- Item 13 **Next meetings**
The Bureau took note of the dates of the next plenary meeting to be held on 3-5 November 2025 (49th) in Strasbourg, as well as of the next Bureau meetings in March 2025 (65th) in Paris.
- Item 14 **Stefano Rodotà Award**
The Bureau took note of the information provided by the Secretariat on the process for amending the internal competition rules and tasked the Secretariat to prepare a new version in view of its adoption by Bureau members and to prepare the launch of the next edition of the award.
- Item 15 **Any Other Business**

DRAFT ANNOTATED AGENDA

	1. Opening of the meeting
	Statement by the Chair Statement by the Secretariat
T-PD(2024)48RAPAbrEN <i>Pro memoria</i>	Abridged report of the 48 th Plenary meeting (17-19 June 2025)
T-PD-BUR(2024)63RAPAbr <i>Pro memoria</i>	Abridged report of the 63 rd Bureau meeting (19-20 March 2025)
T-PD(2021)WP2022-2025 <i>Pro memoria</i>	Work programme of the Committee 2022-2025
TPD43(2022)7 <i>Pro memoria</i>	Rules of procedure
	2. Adoption of the agenda
	3. Convention 108+ State of play
	Information provided by the Secretariat <u>Required action:</u> The Bureau will take note of the information provided by the Secretariat and have a discussion on the state of ratifications, have an exchange of views with regard to the preparation for the entry into force of Convention 108+, in particular the Rules of procedure, Terms of Reference, Methodology for the evaluation and follow up mechanisms.
<ul style="list-style-type: none"> • Consolidated text of the modernised Convention ETS No. 108 • Explanatory report • Amending protocol CETS No.223 • T-PD(2018)20rev11 • T-PD(2018)21rev11 • Methodology for the first round of evaluation under Convention 108+ 	
T-PD(2020)08Rev - Expert Report	Costa-Rica <u>Required action</u> Bureau will take note of the information provided by the Secretariat
	4. Transborder data flows of personal data (MCC, Interoperability, other possible tools)
NEW Note from the Secretariat (rev1) Compiled version of CoE MCC	Presentation by the Secretariat <u>Required action:</u> The Bureau will take note of the information provided by the Secretariat and will hold an exchange of views and decide on the necessary follow-up.
	5. Data protection in the context of Large Language Models
NEW Draft Guidelines on data protection in the context of Large Language Models Expert Report on “Privacy and Data Protection Risks in Large Language Models (LLMs)”	Presentation by the rapporteur Anamarija Mladinić, the experts Isabel Barberá (Rhte) and Murielle Popa Fabre (Responsible AI) and the Secretariat <u>Required action:</u> The Bureau will take note of the presentation by the experts, will hold an exchange of views and decide on the necessary follow-up.

	6. Work Programme 2026-2029
NEW Draft Work Programme 2026-2029	<p><u>Required action:</u></p> <p>The Bureau will hold an exchange of views on the state of play of the implementation of the current work programme and on draft Work Programme 2026 – 2029 and decide on the necessary follow up.</p>
	7. Draft Guidelines on Data Protection in the context of neurosciences
NEW Draft Guidelines on Data Protection in the context of neurosciences Expert report CDBIO report on Neurotechnologies and human rights framework: do we need new rights?	<p>Information and the presentation provided by the rapporteur, Alessandra Pierucci and the experts Dr Eduardo Bertoni (American University Washington College of Law) and Prof Marcello Ienca (Technical University of Munich) (TBC)</p> <p><u>Required action:</u> The Bureau will hold an exchange of views on the draft guidelines presented and decide on the necessary follow-up.</p>
	8. Cooperation with other Council of Europe bodies and entities
Concept paper (event on API and DP)	<u>Required action:</u> The Bureau will take note of the information provided by the Secretariat.
	9. Developments and activities in the field of data protection
	<u>Required action:</u> The Bureau will take note of the information provided by the participants and the secretariat and decide on the necessary follow-up.
	10. Cooperation
	<p>The Secretariat will provide information on on-going cooperation projects.</p> <p><u>Required action:</u> The Bureau will take note of the information provided by the Secretariat.</p>
	11. Data Protection Commissioner
<ul style="list-style-type: none"> Activity report 2022-2024 CM Resolution on the new Regulations on the Protection of Personal Data 	<u>Required action:</u> The Bureau will take note of the information provided by the Secretariat.
	12. Observers
<ul style="list-style-type: none"> List of Observers T-PD(2018)04Rev3 - State of play and admission criteria <i>Pro memoria</i> 	<p>The Bureau will take note of the information provided by the observers and the Secretariat on the observer status requests.</p> <p><u>Required action:</u> The Bureau will hold an exchange of views and decide on the observer status request in view of their adoption at the June plenary.</p>
	13. Next meetings
	<p><u>Plenary meetings:</u> 49th plenary: 3-5 November 2025 50th Plenary: (TBC), Strasbourg</p> <p><u>Bureau meetings:</u> 65th Bureau: (TBC) March 2026, Paris 66th Bureau: (TBC) September 2026, Paris</p>

	Required action: The Committee will take note of the dates of the forthcoming meetings.
	14. Stefano Rodotà Award
Stefano Rodotà Award	<p>The Secretariat will provide information on on-going preparation for the 2025 edition of the award.</p> <p>Required action: The Bureau will take note of the information provided by the secretariat and decide on the necessary follow-up.</p>
	15. Any Other Business

LIST OF PARTICIPANTS / LISTE DES PARTICIPANTS

MEMBERS OF THE BUREAU / MEMBRES DU BUREAU

- **Beatriz DE ANCHORENA**, Chair/Présidente
- **Caroline GLOOR SCHEIDEGGER**, first Vice-Chair / première Vice-présidente
- **Anamarija MLADINIC**, second Vice-Chair / seconde Vice-présidente
- **Virpi KOIVU**, Bureau member / membre du Bureau
- **Alessandra PIERUCCI**, Bureau member / membre du Bureau
- **Ousmane THIONGANE**, Bureau member / membre du Bureau
- **Gonzalo SOSA BARRETO**, Bureau member / membre du Bureau
- **Elsa MEIN**, Former T-PD Chair / Ancienne Présidente du T-PD (excused/excuse)

COMMITTEE MEMBERS AND DELEGATIONS / MEMBRES DU COMITÉ ET DÉLÉGATIONS

GERMANY / ALLEMAGNE

Stefan Niederer – Adviser/conseiller, Office of the Federal Commissioner for Data Protection and Freedom of Information

REPUBLIC OF MOLDOVA / RÉPUBLIQUE DE MOLDOVA

Mrs. Victoria MUNTEAN – Representative/représentante
Director, National Center for the Protection of Personal Data

Mrs. Zoia COJOCARI – Adviser/conseillère
Head, External Relations and European Integration Department

UNITED KINGDOM / ROYAUME UNI

- **Thiona PHILIPS** – Deputy/suppléante, International Data Free Flows and Trade, International Data Unit, Department for Digital, Culture, Media and Sports

OBSERVERS AND PARTICIPANTS / OBSERVATEURS ET PARTICIPANTS

GABON/GABON

Mr Steve Singault Ndinga - Commissaire Permanent, APDPVP

EUROPEAN DATA PROTECTION SUPERVISOR (EDPS) / CONTRÔLEUR EUROPÉEN DE LA PROTECTION DES DONNÉES (CEPD)

Mrs. Michèle DUBROCARD – Representative/répresentante

ECUADOR/EQUATEUR

Mr Manuel Jacho
Mr Israel Castro

EXPERTS

- **Isabel BARBERA**, Independent researcher specializing in Responsible AI and Privacy Engineering / chercheuse indépendante spécialisée en IA responsable et en ingénierie de la vie privée.
- **Marcello IENCA**, professor at the School of Medicine and Health, Technical University of Munich (TUM) / professeur à la Faculté de médecine et de santé, Université technique de Munich (TUM).
- **Murielle POPA-FABRE**, consultant specializing in the impact, policies and governance of Generative AI / consultante spécialisée dans l'impact, les politiques et la gouvernance de l'IA générative.

COUNCIL OF EUROPE BODIES AND SECRETARIAT / ORGANES ET SECRETARIAT DU CONSEIL DE L'EUROPE

DGI Direction générale droits humains et Etat de droit / DGI Directorate General Human Rights and Rule of Law

Digital Governance and Sport Department / Service de la Gouvernance numérique et sport

- **Matthias KLOTH**, Head of Digital Governance and Sport Department / Chef du Service de la Gouvernance numérique et sport

Data Protection Unit / Unité de la protection des données

- **Kristian BARTHOLIN**, Head of the Data Protection Unit / Chef de l'Unité de Protection des Données
- **Peter KIMPIAN**, Secretary of the Committee / Secrétaire du Comité
- **Ana TOKHADZE**, Seconded Official in the Data Protection Unit / Fonctionnaire mis à dispositions de l'Unité de Protection des Données

INTERPRETERS / INTERPRÈTES

- **Mrs. Odile MONTPETIT**
- **Mrs. Paloma LE DU**
- **Mrs. Clémence PENIN**