

Strasbourg, 19 March 2026

T-PD BUR(2026)65RAPAbr_EN

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

(Convention 108)

65th Bureau Meeting

Paris Office
18-19 March 2026

ABRIDGED REPORT

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- 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.
- 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 November 2025 plenary, neither ratification nor signature was recorded to the Amending Protocol CETS No. 223.
- The Bureau welcomed the information from the representatives of the European Commission on its commitment to support EU Members States in their endeavor to ratify Convention 108+. It then strongly encouraged all State Parties to sign and ratify Convention 108+ as soon as possible and invited the Secretariat to organize a tour de table on the state of play of the ratification process at the next plenary meeting in June.
- As regards Costa Rica, the Bureau took note of the information provided by the Secretariat and held an exchange of views on the latest developments and decide on the necessary follow up.
- Item 4 **Transborder data flows of personal data**
The Bureau took note of the presentation by the Secretariat, notably on the Draft Action Plan on Model Contractual Clauses and adopted the underlying Questionnaire to be sent to representatives of the Parties, held an exchange of views and invited delegations to send comments on the draft Action Plan by 1 April. It also took note of the two Notes from the Secretariat on the mapping of data transfers tools and legal bases under Convention 108+ and the sheet for appointment of rapporteurs to participate in international data transfers initiatives, held an exchange of views and invited the Secretariat to update the Note on rapporteurs based on the comments received during the meeting and share the updated version ahead of the June plenary as a basis for the appointment of rapporteurs by the Committee.
- Item 5 **Data Protection in the context of Large Language Models (LLMs)**
The Bureau took note of the presentation by Ms Anamarija Mladinić, rapporteur and Ms Murielle Popa-Fabre (Responsible AI) and Isabel Barbera (DPA of the Netherlands), experts 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 1 April. The Bureau 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 first full reading during the June 2026 plenary.
- Item 6 **Draft Guidelines on Data Protection in the context of neurosciences**
The Bureau took note of the information provided by the rapporteur, Ms Alessandra Pierucci and the expert, Dr Eduardo Bertoni held an exchange of views and invited delegations to send comments on the draft document by 1 April. 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 second full reading during the June 2026 plenary.
- Item 7 **Cooperation with other Council of Europe bodies and entities**
The Bureau took note of the information provided by secretariat, notably on the establishment of the Steering Committee for New and Emerging Digital Technologies (CDNET) which is tasked to conduct and coordinate the intergovernmental work of the Council of Europe in the field of new and emerging technologies, and which also serves as custodian of the Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law (CETS No. 225) until the Conference of the Parties is established.
- Item 8 **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 organization of the Berlin Group Meeting (18-19 November 2025, Montevideo), the annual meeting of the AFADP (25 November 2025, Mauritius), the National Day in Uruguay (20 November 2025, Montevideo), the announcement of the mutual adequacy decision between the

European Union and Brazil (on 28 January 2026, Brasilia) and other events, in particular a conference jointly organized EDPS and the CoE in Brussels, conference in Chisinau in the framework of the Republic of Moldova's chairmanship of the Committee of Ministers and an online event organized by the Secretariat on 28 January 2026.

Item 9

Cooperation

The Bureau took note of the various cooperation programmes relevant to data protection, in particular the start of the South Programme VI in respect of the Mena region together with cooperation in the field of AI as well as on 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 10

Data Protection Commissioner

The Bureau took note of the information provided by the Secretariat.

Item 11

Observers

The Bureau took note of the information provided by the observers, notably by the representatives of the EDPB and welcomed the initiative to reinforce the cooperation between the EDPB and the Committee, by Ecuador on the latest development in their country, notably on the country's commitment to accede Convention 108+, by Brazil, on their new initiative to translate the official documents to other languages for publication on their website, on the launch of the pre-evaluation process of Brazil's domestic legal framework's compliance with Convention 108+, by Interpol on their wish to further the cooperation with the Committee also with regard to the operational cooperation within their Membership organizations.

Item 12

Next meetings

The Bureau took note of the dates of the next plenary meetings to be held on 9-11 June 2026 (50th) and on 17-19 November (51st) in Strasbourg, as well as of the next Bureau meeting on 23-24 September 2026 (66th) in Paris.

Item 13

Stefano Rodotà Award

The Bureau took note of the information provided by the Secretariat, notably on the assessment of the admissibility of the applications received for the 2026 edition of the prize and invited the Secretariat to prepare the prize ceremony for the June plenary.

Item 14

Any Other Business

ANNOTATED AGENDA

	1. Opening of the meeting
	Statement by the Chair
	Statement by the Secretariat
T-PD(2025)49RAPAbrEN <i>Pro memoria</i>	Abridged report of the 49 th Plenary meeting (3-5 November 2025)
T-PD-BUR(2025)64RAPAbr <i>Pro memoria</i>	Abridged report of the 64 th Bureau meeting (29-30 September 2025)
T-PD(2025)4rev2	Work Programme of the Committee 2026-2029
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
• Consolidated text of the modernised Convention ETS No. 108 • Explanatory report • Amending protocol CETS No.223	• Convention 108+: chart of signatures and ratification • Convention 108: chart of signatures and ratifications
T-PD(2020)08Rev - Expert Report	Costa-Rica <u>Required action:</u> The Bureau will take note of the information provided by the Secretariat, will hold an exchange of views on the latest developments and decide on the necessary follow-up.
	4. Transborder flows of personal data
Compendium of the Model Contractual Clauses and list of countries where they have been approved NEW- Draft Action Plan NEW- Draft Questionnaire NEW- Draft Inventory NEW- Draft Note on Appointment	Presentation by the Secretariat <u>Required action:</u> The Bureau will take note of the presentation by the Secretariat and will hold a discussion on the draft Action Plan on data transfers and related activities as proposed by the Secretariat in line with the Work Programme of the Committee 2026-2029.

	5. Data protection in the context of Large language Models (LLMs)
NEW - T-PD(2025)3rev2 Privacy and Data Protection Risks in Large Language Models (LLMs)	Presentation by the rapporteur, Anamarija Mladinić and the experts Isabel Barberá (Rhite) and Murielle Popa Fabre (Responsible AI) of the draft “Guidelines on data protection in the context of Large language Models”. <u>Required action:</u> The Bureau will take note of the presentations by the rapporteur and the experts will hold an exchange of views and decide on the necessary follow-up.
	6. Draft Guidelines on Data Protection in the context of neurosciences
NEW - T-PD(2025)1rev3 Expert report CDBIO report on Neurotechnologies and human rights framework: do we need new rights?	Information and the presentation provided by the rapporteur, Ms Alessandra Pierucci and the experts Dr Eduardo Bertoni (American University Washington College of Law) and Prof Marcello Ienca (Technical University of Munich) <u>Required action:</u> The Bureau will take note of the information provided by the rapporteur and the experts, will hold an exchange of views on the draft guidelines presented and decide on the necessary follow-up.
	7. Cooperation with other Council of Europe bodies and entities
	Information provided by the Secretariat <u>Required action:</u> The Bureau will take note of the information provided by the Secretariat.
	8. Developments and activities in the field of data protection
	Information provided by the Secretariat <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.
	9. Cooperation
	The Secretariat will provide information on on-going cooperation projects. <u>Required action:</u> The Bureau will take note of the information provided by the secretariat
	10. Data Protection Commissioner
CM Resolution on the new Regulations on the Protection of Personal Data	Information provided by the Secretariat <u>Required action:</u> The Bureau will take note of the information provided by Secretariat

	11. Observers
NEW- Draft Memorandum on Request for Observer Status List of Observers T-PD(2018)04Rev3 - State of play and admission criteria <i>Pro memoria</i>	Information provided by the observers and the Secretariat <u>Required action:</u> The Bureau will take note of the information provided by observers and the Secretariat, hold an exchange of views in particular on the observer status requests received.
	12. Next meetings
	<u>Plenary meetings:</u> 50th Plenary: 9-11 June 2026 51st Plenary: 17-19 November 2026 Bureau meetings: 66th Bureau meeting: 23-24 September 2026, Paris <u>Required action:</u> The Bureau will take note of the dates of the forthcoming meetings.
	13. Stefano Rodotà Award
Stefano Rodotà Award	Information provided by the Secretariat <u>Required action:</u> The Bureau will take note of the information provided by the Secretariat on the on-going selection procedure for the next edition of the award and decide on the necessary follow-up.
	14. 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 Mladinić**, second Vice-Chair / seconde Vice-présidente
- **Virpi Koivu**, Bureau member / membre du Bureau
- **Alessandra Pierucci**, Bureau member / member du Bureau
- **Ousmane Thiongane**, Bureau member / member du Bureau
- **Gonzalo Sosa Barreto**, Bureau member / membre du Bureau

COMMITTEE MEMBERS AND DELEGATIONS / MEMBRES DU COMITÉ ET DÉLÉGATIONS

FRANCE

- Emilie Brunet, Ministère de la Justice
- Clarence Tocchio, Ministère de la Justice.
- Inês Saint-Joly, Ministère de l'Europe et des affaires étrangères.

GERMANY / ALLEMAGNE

- Raja HaehlPfeifer,
- Stefan Niederer – adviser/conseiller, Office of the Federal Commissioner for Data Protection and Freedom of Information
- Heiko Haupt – adviser/conseiller, Head of Division G3 - European and International Affairs at the Office of the Federal Commissioner for Data Protection and Freedom of Information in Germany (BfDI)

REPUBLIC OF MOLDOVA / RÉPUBLIQUE DE MOLDOVA

- Victoria MUNTEAN – representative/représentante, Director of the National Center for the Protection of Personal Data
- Zoia COJOCARI – adviser/conseillère, Head of the External Relations and European Integration Department

UNITED KINGDOM / ROYAUME-UNI

- Lydia Parkes
- David Heather

OBSERVERS AND PARTICIPANTS / OBSERVATEURS ET PARTICIPANTS

BRAZIL / BRÉSIL

Eduardo Gomes Salgado, General Coordinator for Institutional and International Relations, National Data Protection Authority (ANPD)

EDPB / EDPB

Gwendal Le Grand, Deputy Head of the EDPB Secretariat

EDPS / CEPD

Michele Dubrocard

ECUADOR / ÉQUATEUR

- Manuel Jacho Chávez, Intendente General de Regulación de Protección de Datos Personales.
- Israel Castro Enríquez, Especialista de Regulación de Protección de Datos Personales.
- Camila Valdez González, Especialista de Regulación de Protección de Datos Personales.

EUROPEAN COMMISSION

David Cilberti

INTERPOL

Jorge Oliveira e Carmo, Data Protection Officer

EXPERTS

- Eduardo Bertoni, Center for Human Rights and Humanitarian Law, American University Washington College of Law
- Isabel BARBERA, Independent researcher specializing in Responsible AI and Privacy Engineering / chercheuse indépendante spécialisée en IA responsable et en ingénierie de la vie privée.
- 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**

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

Péter Kimpian, Secretary of the Committee / Secrétaire du Comité