Strasbourg, 20 November 2026 T-PD(2026)51RAPAbr_EN

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

(CONVENTION 108)

51th Plenary Meeting

Palais de l'Europe, Room 3
Strasbourg, 18-20 November 2026

ABRIDGED REPORT

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Item 1 **Opening of the meeting / Statement by the Chair and the Secretariat**

The Committee took note of the information provided by the Chair and Ms Hanne Juncher, Director of Security, Integrity and Rule of Law.

Item 2 **Adoption of the agenda**

The Committee adopted the agenda.

Item 3 **Convention 108+ state of play**

The Committee 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, 34 ratifications. Since the June 2026 plenary, there was neither signature nor ratification registered of the Amending Protocol CETS No. 223.

The Committee held a *tour de table* on the state of play of the internal signature and ratification process in the Parties which have signed but not ratified Convention 108+ yet and those who have neither signed nor ratified. It took note of the information provided by the members of the Committee and strongly encouraged all State Parties to sign and ratify Convention 108+ as soon as possible.

As regards Costa Rica, the Committee took note of the information provided by the Secretariat, notably on the ratification of the Second Additional Protocol of the Budapest Convention by Costa Rica on 20 April 2026, held an exchange of views on the latest developments and decided on the necessary follow up.

Item 4 **Transborder flows of personal data**

The Committee took note of the presentation by the Secretariat and held a discussion on the proposed implementation of the Action Plan on data transfers and related activities. The Committee congratulated the Republic of Moldova and Argentina for approving the CoE MCC through the domestic legislation with the effect of 8 August 2026 and 25 November 2026 respectively. The Committee congratulated the decision by the European Commission and the EDPB to approve COE MCC for onward transfers, held an exchange of views and encouraged Parties to promote the model contractual clauses involved in the decision: EU SCC, LATAM SCC and CoE MCC and their potential combined use.

The Secretariat presented the draft documents aiming at supporting further approval and recognition process of the CoE MCCs. In particular, the Committee took note of the draft guide for implementation of the CoE MCCs, as prepared by the expert, M. Eduardo USTARAN and held an exchange of views and invited delegations to send written comments on the draft guide by 2 December 2026. The Secretariat also presented the study on complementary instruments on transborder flows of personal data, illustrating the interconnectivity of the CoE MCCs with other transfers mechanisms and tools. The Committee instructed the secretariat to finalise the guide for implementation of the CoE MCCs with the help of the expert and to launch additional work streams on the correlation of MCCs with other similar standard contractual clauses and other transfer related mechanisms or instruments (notably certification and code of conduct) and to engage with the competent stakeholders, notably the EDPB and ISO and present the outcomes at June 2027 plenary with a view of further discussions on possible gaps and potential bridges with regard to their complementary application.

The Committee also took note of the progress made on the webtool illustrating legal basis for transborder data flows under Convention 108+, held a discussion on the implementation of the provisions of Article 14 and decided on the development of an interpretative document regarding each provision and instructed the Secretariat to convene a drafting group for this purpose and present the work of the group at subsequent meetings.

The Secretariat also presented the Note on the appointment of the Committee of

Convention 108's Rapporteurs to international forums on transborder data flows and introduced the final list of the appointed volunteering Rapporteurs. The Committee took note of the list of volunteers, including the observers (in regions where no Parties are present), for the role of rapporteurs with respect of different global, regional initiatives and platforms for representing the transfer related work of the Committee of Convention 108 and reporting back, where appropriate, held an exchange of views, and appointed the rapporteurs as presented by the Note.

Item 5 **Data protection in the Context of Large Language Models**

The Committee took note of the new draft guidelines presented by the Secretariat, held an exchange of views, invited delegations to send comments on the new draft by 2 December and instructed the Secretariat to work with the rapporteur on an amended version of the guidelines based on comments received in view of its adoption at the June plenary meeting in 2027.

The Committee took note of the information provided by the Secretariat regarding the opportunity of submitting the final draft document to the Council of Europe Steering Committee for New and Emerging Digital Technologies (CDNET) for their consideration and feedback, as appropriate. The Committee instructed the Secretariat to send the revised draft document and gather feedback, where appropriate.

Item 6 **Draft guidelines on data protection in the context of neurosciences**

The Committee took note of the presentation of the revised draft guidelines by Ms Alessandra PIERUCCI, rapporteur and the Secretariat, held an exchange of views and adopted the document. The Committee instructed the Secretariat to take necessary steps for its final publication and accessibility via the CoE data protection webpage and other means.

The Committee took note of the information provided by the Secretariat regarding its intervention during the plenary meeting of the Council of Europe Steering Committee for New and Emerging Digital Technologies (CDNET), where the draft guidelines were presented and invited the Secretariat to propose solutions how to integrate this instrument in the comprehensive strategy for the Council of Europe on new and emerging digital technologies by the CDNET.

Item 7 **Cooperation with other Council of Europe bodies and entities**

The Committee took note of the information provided by the Secretariat on the ongoing work within the Steering Committee for New and Emerging Digital Technologies (CDNET), Steering Committee for Human Rights in the fields of Biomedicine and Health (CDBIO) and the Committee on cybercrime (T-CY).

Item 8 **Development and activities in the field of data protection**

The Committee took note of the information shared by the delegations and the Secretariat (list of events in the Annex).

Item 9 **Cooperation**

The Committee took note of various cooperation programmes relevant to data protection, in particular on the on-going institutional support to beneficiaries of the Southern Mediterranean region (South Programme VI), initiative to prepare a Council of Europe cooperation programme on global reach of the Convention 108+ as well as ongoing and possible future cooperation with data protection authorities under several Council of Europe Action Plans, notably in the Republic of Moldova, Armenia, and Ukraine.

The Secretariat shared information regarding the ongoing international tender call for the provision of international consultancy services in the areas of data protection and privacy and kindly invited interested parties to submit their applications within the deadline (**15 December 2026**).

Item 10 **Data Protection Commissioner**

The Committee took note of Report (July 2025 – October 2026) and information

presented by Ms Tamar KALDANI, Data Protection Commissioner of the Council of Europe. The Committee welcomed the information regarding the current developments and upcoming initiatives as presented by the Commissioner. The Committee took note of the next edition of the International Organisations Workshop (IOW) scheduled for 1 – 2 December 2026 in Strasbourg and co-hosted by the Council of Europe and the European Data Protection Supervisor (EDPS).

The Committee also took note of Ms Tamar Kaldani having been asked to ensure the Data Protection Commissioner function for the Council of Europe Development Bank and the consultation with the ethics officer and the Secretary General of the Organisation without raising any objection.

Item 11 **Elections**

The Secretariat presented the drafted memorandum on the Consultative Committee Bureau elections which outlines the rules of procedures, present composition of the Bureau, the vacant positions and procedure for elections. The Secretariat informed the Committee regarding the received number of applications and reminded the procedure for elections.

The Committee took note of presentations delivered by the candidates and elected

Caroline GLOOR SCHEIDEGGER (Switzerland) as chair; **Anamarija MLADINIĆ** (Croatia), as first vice-chair and **Virpi KOIVU** (Finland), as second vice-chair by acclamation for a term of two years for each. The Committee elected **Alessandra PIERUCCI** (Italy), **Francisco PEREZ BES** (Spain) **Gonzalo SOSA BARRETO** (Uruguay) **Ousmane THIONGANE** (Senegal), by secret ballots during two consecutive rounds for a term of two years for each. The Committee confirmed **Beatriz de ANCHORENA** (Argentina), as *de iure* honorary (outgoing) chair for a term of two years.

Item 12 **Observers**

The committee welcomed the participation of Dr. Kyung Hee Song, Chairperson of the Republic of Korea's Personal Information Protection Commission and took note of her presentation on the latest work with regard to data protection in the context of data processing by AI.

The Committee adopted the request for observer status from the State Personal Data Protection Agency under the Cabinet of Ministers of the Kyrgyz Republic based on the note prepared by the Secretariat. The Committee welcomed the participation of delegations from the Kyrgyz Republic.

The Committee also took note of the presentation of the EU Fundamental Rights Agency on the report regarding the implementation of the EU Law Enforcement Directive; of the presentation from the EDPS on the latest development with regard to data flows, GPA resolutions and upcoming events jointly organised with the Council of Europe; by Brazil, by Ecuador and by Gabon on the latest development in the country with regard to data protection.

The Committee took note of the information regarding the roundtable on "Economic Impact of Accession to Convention 108+ (Amending Protocol CETS No. 223) for States", discussing economic costs and benefits associated with legal alignment and accession to Convention 108+.

Furthermore, the delegates were presented with the pre-recorded video message from the founder and executive director of the World Privacy Forum, Ms Pam DIXON, who in her video delivered information regarding the organisation's request on obtaining the observer's status.

Item 13 **Next Meetings**

The Committee took note of the dates of the next plenary meeting to be held on 8-10

June 2027 (52nd) in Strasbourg, as well as of the next Bureau meeting on 10-11 March 2027 (67th) in Paris.

Item 14 **Stefano Rodotà Award**

The Committee took note of the Stefano Rodotà Award ceremony and the presentation of the awardees. The Committee warmly congratulated Natalia MENÉNDEZ GONZÁLEZ and Timothée CHARMEIL for being this edition's awardee and for their outstanding work in the field.

Item 15 **Any Other Business**

APPENDIX I

	1. Opening of the meeting
	Statement by the Chair **Statement by the Secretariat** Hanne Juncher, Director of Security, Integrity and Rule of Law
T-PD(2026)50RAPAbrEN Pro memoria	Abridged report of the 50th Plenary meeting (09-11 June 2026)
T-PD-BUR(2026)66RAPAbr *Pro memoria*	Abridged report of the 66th Bureau meeting (16-17 September 2026)
T-PD(2025)WP2026-2029 *Pro memoria*	Work Programme of the Committee 2026-2029
TPD43(2022)7 *Pro memoria*	Rules of procedure
	2. Adoption of the agenda
	3. Convention 108+ State of play
	Information provided by the Secretariat Required action: The Committee will take note of the information provided by the Secretariat and will hold a *tour de table* inviting those Parties who have signed but not yet ratified Convention 108+, as well as those who have neither signed, nor ratified to present the state of play of their domestic processes.
• 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
Expert Report	Costa-Rica Required action: The Committee 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
NEW T-PD(2026)4rev3 NEW T-PD(2026)3 NEW Annex NEW Guide to Implementation Compendium of the Model Contractual Clauses and list of countries where they have been approved	Presentation by the Secretariat Required action: The Committee will take note of the presentation by the Secretariat and will hold a discussion on the proposed implementation of the Action Plan on data transfers and related activities (Guide on MCC, Study on complementary instruments, interpretative document on article 14) and will appoint Rapporteurs for International Forum on transborder data flows.

	5. Draft Guidelines on Privacy and Data Protection in the context of LLM-based systems
NEW T-PD(2025)5rev5 Expert Report on "Privacy and Data Protection Risks in Large Language Models (LLMs)"	Presentation by the rapporteur Anamarija Mladinić, and the Secretariat Required action: The Committee will take note of the presentation 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 (Corrigendum) T-PD(2025)1rev7corr Expert report CDBIO report on Neurotechnologies and human rights framework: do we need new rights?	Information and the presentation provided by the rapporteur, Alessandra Pierucci and the Secretariat Required action: The Committee will take note of the information provided by the rapporteur and the Secretariat, will hold an exchange of views on the draft guidelines presented in view of the adoption of the document.
	7. Cooperation with other Council of Europe bodies and entities
	Information provided by the Secretariat Required action: The Committee 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 Required action: The Committee 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. Required action: The Committee will take note of the information provided by the secretariat
	10. Data Protection Commissioner
NEW Activity Report of the Data Protection Commissioner (July 2025 – October 2026) CM Resolution on the new Regulations on the Protection of Personal Data	Information provided by the Data Protection Commissioner Required action: The Committee will take note of the information provided by the Data Protection Commissioner
	11. Elections
NEW Memorandum on Elections	Required action: The Committee will proceed to the elections of the Bureau. **Deadline for application: 18 November, 18.00**

	12. Observers
NEW Memorandum on Observer Status NEW Agenda- Roundtable NEW Concept Note- Roundtable List of Observers	Information provided by the observers and the Secretariat Required action: The Committee will take note of the information provided by observers and the Secretariat, hold an exchange of views and decide on the observer status requests received.

	13. Next meetings
	Plenary meetings: 52nd Plenary: 8-10 June 2027 Bureau meetings: 67th Bureau: 10-11 March 2027, Paris Required action: The Committee will take note of the dates of the forthcoming meetings.
	14. Stefano Rodotà Award
Stefano Rodotà Award	Stefano Rodotà Award ceremony Required action: The Committee will take note of the Stefano Rodotà Award ceremony and the presentation of the awardees.
	15. Any Other Business

APPENDIX II

List of Participants

T-PD MEMBERS

	Country	Name	Title	Institution
1.	ALBANIA	Denada Hysi	Head of Sector of International Relations and Projects	Data Protection Commissioner Office
2.	ALBANIA	Malvina Tagani	Specialist	Data Protection Commissioner Office
3.	ANDORRA	Jèssica Obiols Obiols	Director	Andorran Agency on Data Protection
4.	ANDORRA	Belina Babi	Inspector	Andorran Agency on Data Protection
5.	ARGENTINA	Beatriz de Anchorena	Director	Argentina National Authority, Access to Public Information Agency (AAIP)
6.	ARMENIA	Julieta Matevosyan	Head of the Monitoring and Registry management Department	Personal Data Protection Agency
7.	AUSTRIA	Evelyn Schmidt		Federal Ministry of Justice, Directorate for Data Protection
8.	BELGIUM	Karlien Deleu		Permanent Representation of Belgium to the CoE
9.	BOSNIA AND HERZEGOVINA	Dragoljub Reljic	Director	Personal Data Protection Agency
10.	CABO VERDE	Faustino Varela Monteiro	President	National Commission of Data Protection
11.	CROATIA	Anamarija Mladinić	Head of Department for Legal Affairs, Cooperation and Projects	Personal Data Protection Agency (AZOP)
12.	ESTONIA	Pille Lehis	Director General	Estonian Data Protection Inspectorate
13.	ESTONIA	Kristi Värk	Head of of the Data Protection Law Division	Ministry of Justice
14.	FINLAND	Virpi Koivu	Senior Ministerial Adviser	Data Protection Affairs, Department for Democracy and Public Law, EU Law and Data Protection, Ministry of Justice
15.	FRANCE	Ludovica Robustelli	Rédactrice	Bureau de la protection des données et du numérique (DACS), ministère de la Justice
16.	FRANCE	Ines Saint-Joly	Legal Adviser	Human Rights Directorate of the Ministry for Europe

	Country	Name	Title	Institution
				and Foreign Affairs
17.	FRANCE	Najma Bichara	European and International Affairs Department	CNIL
18.	GEORGIA	Nikoloz Popiashvili	Deputy Head	Personal Data Protection Department of the State Audit Office of Georgia
19.	GERMANY	Matthias Wolter	Desk Officer	V II 4 – Data Protection Law, Federal Ministry of the Interior
20.	GERMANY	Stefan Niederer	European and International Affairs	Federal Commissioner for Data Protection and Freedom of Information - Division 14
21.	HUNGARY	Tamas Bendik	General Vice-President	National Authority for Data Protection and Freedom of Information (NAIH)
22.	ITALY	Alessandra Pierucci		Garante per la protezione dei dati personali
23.	LIECHSTENSTEIN	Julia Stütz	Deputy Data Protection Commissioner	Data Protection Authority
24.	LITHUANIA	Danguolė Morkūnienė	Deputy Director	State Data Protection Inspectorate
25.	LUXEMBOURG	Victor Bojko	Head of European and International Relations	Commission Nationale pour la Protection des Données (CNPD)
26.	LUXEMBOURG	Angeliki Xintara	Juriste, politique numérique	Ministère d'État
27.	MALTA	Ingrid Camilleri	Head of Legal Unit	Office of the Data Protection Commissioner
28.	MONACO	Estelle Sourmaille	Head of Division for Data Protection	Ministry of State
29.	MONACO	Logane Rolland		Permanent Representation of Monaco to the Council of Europe
30.	POLAND	Maria Owczarek	Director of International Cooperation Department	Personal Data Protection Office (UODO)
31.	PORTUGAL	Natália Campbell	Deputy to the Permanent Representative	Permanent Representation of Portugal to the Council of Europe
32.	REPUBLIC OF MOLDOVA	Victoria Muntean	Director	National Centre for Personal Data Protection of the Republic of Moldova
33.	REPUBLIC OF MOLDOVA	Zoia Cojocari	Head of the External Relations and European Integration Department	National Centre for Personal Data Protection of the Republic of Moldova
34.	SAN MARINO	Patrizia Gigante	Vice President	Data Protection Authority of the Republic of San Marino
35.	SENEGAL	Ousmane Thiongane	President	Commission de protection des données personnelles (CDP)

	Country	Name	Title	Institution
36.	SERBIA	Sanja Unković	Deputy Commissioner	Information of Public Importance and Personal Data Protection
37.	SERBIA	Milan Marinović	Advisor to the Commissioner	Information of Public Importance and Personal Data Protection
38.	SLOVENIA	Nuša Kavšek Kostevc	Personal Data Protection Advisor	Information Commissioner
39.	SPAIN	Cristina Varas Crespo	Head of Service	International Relations Division, AEPD
40.	SPAIN	Francisco Pérez Bes	Deputy Commissioner. Vicepresident	AEPD
41.	SWEDEN	Sofia Unsgaard	Legal Adviser	Constitutional Law Unit (L6), Ministry of Justice
42.	SWITZERLAND	Caroline Gloor Scheidegger	Cheffe du Domaine de direction Relations internationale	Préposée fédérale à la protection des données et à la transparence (PFPDT)
43.	SWITZERLAND	Camille Dubois	Senior Legal Advisor	Office fédéral de la Justice
44.	TUNISIA	Chokri Ben Mansour	Director of Legal Affairs and Litigation	Ministry of Communications Technology
45.	TÜRKİYE	Beste Ekin	Data Protection Expert	Personal Data Protection Authority (KVKK)
46.	UNITED KINGDOM	Lydia Parkes	Multilateral Data Policy Lead	DSIT
47.	UNITED KINGDOM	Anne Phillips	Head of International Data Sovereignty and Security	
48.	UNITED KINGDOM	Gerard Fitzgerald	Deputy Head of Information Rights	Gibraltar Regulatory Authority
49.	UKRAINE	Yuliia Derkachenko	Representative of the Commissioner for Information Rights	
50.	URUGUAY	Flavia Baladan	Data Protection Coordinator	AGESIC

OBSERVERS AND PARTICIPANTS

	Country/Institution	Name	Title	Institution
51.	BRAZIL	Thiago Guimarães Moraes		ANPD
52.	EDPS	Olivier Matter	Head of International Cooperation	EDPS

	Country/Institution	Name	Title	Institution
53.	ECUADOR	Manuel Jacho Chávez	General Intendant	Office of Personal Data Protection Regulation
54.	ECUADOR	Paula Solarte	Specialist	Office of Personal Data Protection Regulation
55.	EUROPEAN COMMISSION	David Ciliberti	Legal and Policy Officer	EUROPEAN COMMISSION
56.	FRA	Elise LASSUS	Project Officer, Justice, Digital and Migration Unit	FRA
57.	GABON	Steve Jean Bertrand Singault Ndinda	Commissaire Permanent	APDPVP
58.	ICRC	Stéphane Kolanowski	Regional Data Protection Legal Coordinator	ICRC
59.	INTERPOL	Elpis Nikandrou	Compliance Assistant	INTERPOL
60.	ISRAEL	Narmin Barhum	Adviser	Office of Legal Counsel and Legislative Affairs, Department Constitutional Law, Ministry of Justice
61.	ISRAEL	Nir Gerson	Deputy Head of Legal Department	Israeli Privacy Protection Authority
62.	REPUBLIC OF KOREA	Kyung Hee Song	Chairperson	Personal Information Protection Commission (PIPC)
63.	REPUBLIC OF KOREA	Minji Kang	Director	Personal Information Protection Commission (PIPC)
64.	REPUBLIC OF KOREA	Chae Eun Hwang	Deputy Director	Personal Information Protection Commission (PIPC)
65.	REPUBLIC OF KOREA	Dongil Lee	Deputy Director	Personal Information Protection Commission (PIPC)
66.	REPUBLIC OF KOREA	Minseo Lee	Assistant Director	Personal Information Protection Commission (PIPC)
67.	REPUBLIC OF KOREA	Seung-Hee Do	Assistant Director	Personal Information Protection Commission (PIPC)

GUESTS

	Country	Name	Title	Institution
68.	EGYPT	Ahmed Abdelfattah Saleh Aly Sherif	Minister Plenipotentiary, Acting Deputy Assistant Minister for Artificial Intelligence and Emerging Technologies	
69.	EGYPT	Habiba Aly Mohamed Salem	Legal Affairs Specialist	PDPC
70.	KYRGYZ REPUBLIC	Kylymbek Madalbekov	Deputy Director	State Personal Data Protection Agency
71.	KYRGYZ REPUBLIC	Tursun Mambetakunova	Head of the Department of Legal Support	State Personal Data Protection Agency
72.	KYRGYZ REPUBLIC	Daiana Tursunbaeva	Chief Inspector of the Department of Legal Support	State Personal Data Protection Agency
73.	KYRGYZ REPUBLIC	Uson Moldodosov	Senior Inspector of the Department of Supervision and Control	State Personal Data Protection Agency
74.	KYRGYZ REPUBLIC	Thomas Honnet	Expert	Expertise France
75.	KYRGYZ REPUBLIC	Aigerim Aukenova	Expert	Expertise France
76.		Natalia Menéndez González	Stefano Rodota Awardee	European University Institute
77.		Timothée Charmeil	Stefano Rodota Awardee	

COUNCIL OF EUROPE BODIES

	Name	Title	Institution
78.	Hanne Juncher	Director	Directorate of Security, Integrity and Rule of Law
79.	Tamar Kaldani	Data Protection Commissioner	
80.	Aisling Kelly	Executive Secretary to T-CY	Cybercrime Division

SECRETARIAT

	Name	Title	Institution
81.	Matthias Kloth	Head of Department	Digital Governance and Sport
82.	Albina Ovcearenco	Head of Division	AI and Data Protection Division
83.	Peter Kimpian	Secretary to the T-PD, Head of Data Protection Unit	AI and Data Protection Division
84.	Moritz Taylor	Senior Project Manager	AI and Data Protection Division
85.	Ana Tokhadze	Seconded Official	AI and Data Protection Division