

Strasbourg, 11 June 2026

T-PD(2026)50RAPAbr_EN

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

(CONVENTION 108)

50th Plenary Meeting

Palais de l'Europe, Room 6
Strasbourg, 09-11 June 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 opening remarks and information provided by the Chair and Matthias Kloth, Head of Digital Governance and Sport Department from the Secretariat, notably on marking the 50th plenary meeting of the Committee of Convention 108 and on the major milestones achieved.
- 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 November 2025 plenary, the Republic of Moldova deposited on 15 May 2026 the instrument of ratification 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.
- The Committee took note of the presentation of HE Ambassador Gabriel REVEL, Permanent Representative of Monaco at the Council of Europe and Chair of the legal rapporteurs' group of the Committee of Ministers (GR-J), notably on the increased attention and expectations for the prompt entry into force of Convention 108+ among member States.
- 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 on the new Action Plan facilitating the recognition and approval of CoE Model Contractual Clauses (MCC), on the report by the Secretariat based on a questionnaire providing a comprehensive assessment of the current state of recognition and approval of the CoE MCC by the competent authorities in the Parties and decided to a) circulate the questionnaire iteratively, b) start developing a guide on the implementation of these clauses with the help of a scientific expert, c) instruct the Secretariat to develop a comprehensive study on the convergence between the CoE MCC and other similar standard contractual clauses and further data transfer tools, mechanisms or instruments (notably certification and code of conduct) to identify possible gaps and propose potential bridges for consideration, and to initiate capacity-building actions where appropriate and available.
- The Committee took note of the presentation by Commissioner Alain Herrmann, of the Luxembourg DPA, on the latest development in the area of certification, including at the level of the European Data Protection Board and decided to closely follow future developments and consider further steps under the Work Programme 2026-2029, if appropriate and relevant.
- The Committee instructed the Secretariat to proceed with the modification on the data protection website of the Council of Europe as proposed by the Note on possible legal regimes on transborder data flows.
- The Committee welcomed the volunteering of Delegations for rapporteur positions with regard to global forums on data flows as presented by the Note prepared by the Secretariat, invited all participants to send written comments on the document by 25 June 2026 and to prepare the first round of reporting for the November plenary.
- The Committee congratulated the Uruguayan DPA for approving the CoE MCC domestically as second Party allowing transborder data flows based on these contractual clauses for all data controllers in the country.
- Item 5 **Data Protection in the context of Large Language Models (LLMs)**
The Committee 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”

and the Secretariat, held an exchange of views, invited delegations to send comments on the draft Guidelines by 25 June with a view of further discussions at the next Bureau and plenary meetings.

Item 6 **Draft Guidelines on Data Protection in the context of neurosciences**

The Committee took note of the information provided by the rapporteur, Ms Alessandra Pierucci, the experts Dr Eduardo Bertoni and Dr Marcello Ienca and the Secretariat, held an exchange of views on the draft guidelines, instructed the Secretariat to prepare a new version of the guidelines taking into account all versions discussed at the plenary and all comments received by delegations, circulate it for comments by not later than 18 June allowing delegations to send written comments on the revised draft by 2 July in view of its finalization and adoption at the November plenary.

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

The Committee took note of the information provided by representatives of the Council of Europe Convention on Access to Official Documents (CETS No. 205), the Steering Committee for Human Rights in the fields of Biomedicine and Health (CDBIO), the Cybercrime Convention Committee (T-CY), the Steering Committee for New and Emerging Digital Technologies (CDNET) and the Committee of Experts on Foreign Information Manipulation and Interference (PC-FIMI), invited the Secretariat to look into opportunities to cooperate with those committees regarding topics of common interest and report back to the plenary in November.

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

The Committee took note of the information provided by the participants and Secretariat, notably on 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) the celebration of the Data Protection Day (28 January, Brussels, Strasbourg, Chisinau), the participation at the IAPP Global Summit 2026 (30 March-2 April 2026, Washington DC), participation at the Venice Privacy Symposium 2026 (12 -15 May, Venice), the 34th Spring Conference (5-8 May, Antalya and at the CPDP conference (22-24 May, Brussels) and the meeting of the Ibero-American network in Cartagena (26-28 May 2026).

The Committee also took note of the information by the DPA of the Republic of Moldova on the events organised under the chairmanship of the Republic of Moldova of the Committee of Ministers and subsequent events on the supervision of lawfulness of data processing by DPAs; by the Ombudsman Office of Ukraine on the conference “Media and Data Protection” organised on 28 January 2026 and the subsequent training of police forces on data protection; by the DPA of France (the CNIL) on the recent publication on best practices regarding smart glasses and the follow up work to assess the compliance of these tools with applicable data protection laws in cooperation with other DPAs at the level of EDPB; by the DPA of Georgia on the recent changes in the status of the authority and the recent decision of the Spring conference granting full membership to the authority, its renewed partnership with the Berlin group and their endeavour of reengagement with other international forum; by the DPO of the Ministry of Justice of Portugal on the recent work and developments, including the publication of 7 recommendations and the organisation of a national conference; by the chair (DPA of Argentina) on the developments on the new data protection bill in Argentina and on the meeting of the federal council and the data protection programme for the public sector; by the DPA of Senegal on the training co-organised with Interpol on the processing of biometric data by the police (13 April 2026, Dakar); by the DPA of Ecuador on the launch of a cooperation project on public administration.

Item 9 **Cooperation**

The Committee took note of the various cooperation programs relevant to data protection and of the information provided by the Secretariat on the potential for further cooperation projects and the regional conference on data protection and AI governance in South Programme VI partner countries (23–24 June 2026) in Cyprus.

Item 10 **Data Protection Commissioner**

The Committee took note of the information provided by Ms Tamar Kaldani, Data Protection Commissioner of the Council of Europe. The Committee welcomed current developments with the involvement of the Data Protection Commissioner, notably on the Resolution by the Spring Conference on the Establishment of a Cooperation Sub-Group adopted on 07 May 2026 in

Antalya, Türkiye, and the next edition of the International Organization Workshop, co-organized with the EDPS to be held on 1-2 December 2026 in Strasbourg at the Council of Europe.

Item 11

Case Law of the ECtHR

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

Item 12

Observers

The Committee adopted the request for observer status from the Republic of Kazakhstan and the International Institute for Certification in Technology (IICTEC) based on the note prepared by the Secretariat.

The Committee welcomed the participation of Mr Doszhan Mussaliyev, Vice Minister of Artificial Intelligence and Digital Development of the Republic of Kazakhstan, and thanked him for his presentation on the latest developments in the field of data protection in the country. The Committee offered its availability for support and cooperation with regard to any ongoing and future developments in the Republic of Kazakhstan.

The Committee took note of the information provided by the Observers, notably by Abu Dhabi Global Market Authority, Brazil, the Philippines, EDPB and Interpol, and welcomed their participation and the respective developments in their countries.

Item 13

Next meetings

The Committee took note of the dates of the next plenary meeting to be held on 18-20 November 2026 (51st) in Strasbourg, as well as of the next Bureau meeting on 16-17 September 2026 (66th) in Paris.

Item 14

Stefano Rodotà Award

The Committee took note of the information provided by the Secretariat and decided on the ongoing preparation for the award ceremony to be held during the 51st plenary meeting.

Item 15

Any Other Business

APPENDIX I

ANNOTATED AGENDA

	1. Opening of the meeting
	Statement by the Chair Statement by the Secretariat Mr Matthias Kloth, Head of the Digital Governance and Sport Department
T-PD(2024)49RAPAbrEN Pro memoria	Abridged report of the 49 th Plenary meeting (03-05 November 2025)
T-PD-BUR(2026)65RAPAbr Pro memoria	Abridged report of the 65 th Bureau meeting (18-19 March 2026)
T-PD(2025)4rev2 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 <u>Required action:</u> The Committee will take note of the information provided by the Secretariat and will hold a <i>tour de table</i> 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
T-PD(2020)08Rev - Expert Report	Costa-Rica <u>Required action:</u> 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 Action Plan MCC • NEW Mapping legal Regimes • NEW Inventory of Global Forums Compendium of the Model Contractual Clauses and list of countries where they have been approved	Presentation by the Secretariat <u>Required action:</u> The Committee will take note of the presentation by the Secretariat and will hold a discussion on the proposed plan for the implementation of the Action Plan on data transfers and related activities

	5. Draft Guidelines on Privacy and Data Protection in the context of LLM-based systems
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 (independent expert) and Murielle Popa Fabre (Responsible AI) and the Secretariat <u>Required action:</u> 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 Draft Guidelines on Data Protection in the context of neurosciences Experts' proposal 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 Dr Eduardo Berton (American University Washington College of Law) and Prof Marcello Ienca (Technical University of Munich) <u>Required action:</u> The Committee 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 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 <u>Required action:</u> 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. <u>Required action:</u> The Committee will take note of the information provided by the secretariat
	10. Data Protection Commissioner
Activity Report of the Data Protection Commissioner (June 2024 – May 2025) CM Resolution on the new Regulations on the Protection of Personal Data	Information provided by the Data Protection Commissioner <u>Required action:</u> The Committee will take note of the information provided by the Data Protection Commissioner
	11. Case Law of the ECtHR
	Information provided by the Secretariat. <u>Required action:</u> The Committee will take note of the information provided by the Secretariat

	12. Observers
NEW Note observer status Supporting declaration for the note List of Observers T-PD(2018)04Rev3 - State of play and admission criteria Pro memoria	Information provided by the observers and the Secretariat <u>Required action:</u> 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
	<u>Plenary meetings:</u> 50th Plenary: 9-11 June 2026 51st Plenary: 18-20 November 2026 (TBC) NEW! <u>Bureau meetings:</u> 66th Bureau: 16-17 September 2026, Paris NEW! <u>Required action:</u> The Committee will take note of the dates of the forthcoming meetings.
	14. Stefano Rodotà Award
Stefano Rodotà Award	Stefano Rodotà Award ceremony <u>Required action:</u> 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 / LISTE DES PARTICIPANTS

T-PD MEMBERS / MEMBRES DU T-PD

Country	Name	Title	Institution
ALBANIE / ALBANIA	Erik Veizi	Inspector	Complaints and Harmonization Department
ALBANIE / ALBANIA	Rin Zela	Inspector	Sectorial Investigation and Data Security Department
ARGENTINA / ARGENTINE	Beatriz de Anchorena	Director	Argentina National Authority, Access to Public Information Agency (AAIP)
ARMENIA / ARMENIE	Mihran Bulghadaryan	Acting Head	Administrative Proceedings Unit, Personal Data Protection Agency
BOSNIA AND HERZEGOVINA / BOSNIE HERZEGOVINE	Vesna Pehar	Assistant Director	Personal Data Protection Agency
BOSNIA AND HERZEGOVINA / BOSNIE HERZEGOVINE	Dragoljub Reljic	Director	Personal Data Protection Agency
CABO VERDE / CAP VERT	Faustino Varela Monteiro	President	National Commission of Data Protection
CROATIA / CROATIE	Anamarija Mladinić		Head of Department for Legal Affairs, Cooperation and Projects
ESTONIA / ESTONIE	Kristi Värk	Head of of the Data Protection Law Division	Ministry of Justice
FINLAND / FINLANDE	Virpi Koivu	Senior Ministerial Adviser	(Data Protection Affairs), Department for Democracy and Public Law, EU Law and Data Protection, Ministry of Justice
FRANCE	Ines Saint-Joly	Conseillère juridique	Sous-direction des droits de l'Homme du ministère de l'Europe et des Affaires étrangères
FRANCE	Clarence Tocchio	Consultante	Bureau de la protection des données et du numérique du

			ministère de la Justice
FRANCE	Najma Bichara	Juriste	Service des affaires européennes et internationale de la Commission nationale informatique et liberté (CNIL)
GERMANY / ALLEMAGNE	Stefan Niederer		The Federal Commissioner for Data Protection and Freedom of Information - Division G3 - European and International Affairs
GEORGIA / GEORGIE	Nikoloz Popiashvili	Deputy Head	Personal Data Protection Department of the State Audit Office of Georgia
GEORGIA / GEORGIE	Tamta Shamatava	First Category Senior Specialist	Department of International Relations, State Audit Office of Georgia
HUNGARY / HONGRIE	Tamas Bendik	General Vice-President	National Authority for Data Protection and Freedom of Information (NAIH)
ITALY / ITALIE	Alessandra Pierucci		Garante per la protezione dei dati personali
LATVIA / LETTONIE	Ieva Zeimunde	Lawyer	Legal department of Data State Inspectorate
LIECHTENSTEIN	Julia Stütz	Deputy Data Protection Commissioner	Data Protection Authority
LUXEMBOURG	Victor Bojko	Chargé des relations européennes et internationales	Commission Nationale pour la Protection des Données (CNPd)
LUXEMBOURG	Alain Herrmann	Commissioner	Commission nationale pour la protection des données
MONACO	Estelle Sourmaille	Chef de section	Secrétariat Général du Ministère d'Etat
NORWAY / NORVEGE	Olav Benum	Adviser	Ministry of Justice and Public Security
POLAND / POLOGNE	Maria Owczarek	Director	Personal Data Protection Office (UODO), International Cooperation Department
PORTUGAL	Maria da Luz Rodrigues do Ó	Legal Advisor	Ministry of Justice General Secretariat, Data Protection Officer for the Ministry of Justice
REPUBLIC OF MOLDOVA / REPUBLIQUE DE MOLDOVA	Victoria Muntean	Director	National Centre for Personal Data Protection of the Republic of Moldova
REPUBLIC OF MOLDOVA / REPUBLIQUE DE MOLDOVA	Zoia Cojocari	Head of the External Relations and European Integration Department	National Centre for Personal Data Protection of the Republic of Moldova

SAN MARINO / SAN MARIN	Patrizia Gigante	Vice-Présidente	Autorité de Protection des Données de la République de Saint-Marin
SENEGAL	Ousmane Thiongane	Présidente	Commission de protection des données personnelles (CDP)
SLOVAK REPUBLIC / RÉPUBLIQUE SLOVAQUE	Maria Drabekova		Office for Personal Data Protection of the Slovak Republic
SPAIN / ESPAGNE	Cristina Varas Crespo	Head of Service	International Relations Division, Agency of Data Protection
SWITZERLAND / SUISSE	Caterina Arias Hernandez	Senior Legal Advisor	Federal Office of Justice FOJ, Public Law Division
SWITZERLAND / SUISSE	Caroline Gloor Scheidegger	Cheffe du Domaine de direction Relations internationales	Préposée fédérale à la protection des données et à la transparence (PFPDT)
TUNISIA / TUNISIE	Najla Amdouni	Conseiller des affaires étrangères	Consulat général de Tunisie à Strasbourg
TÜRKIYE	Aysenur Kurtoglu	Member of the Personal Data Protection Board	Personal Data Protection Authority (KVKK)
TÜRKIYE	Cennet Alas Sekerbay	Member of the Personal Data Protection Board	Personal Data Protection Authority (KVKK)
TÜRKIYE	Mustafa Celayir	Legal Counselor	Permanent Representation of Türkiye to the CoE
UKRAINE	Yuliia Derkachenko	Representative of the Commissioner for Information Rights	
UNITED KINGDOM / ROYAUME-UNI	Lydia Parkes	Multilateral Data Policy Lead	DSIT
UNITED KINGDOM / ROYAUME-UNI	Rebecca Mutsatsa	Head of Data Sovereignty	DSIT
URUGUAY	Gonzalo Sosa Barreto		Executive Council of the URCDP, AGESIC

OBSERVERS / OBSERVATEURS

Country / Institution	Name	Title	Institution
BRASIL / BRESIL	Waldemar Gonçalves Ortunho Junior		Brazilian National Data Protection Agency (ANPD)
BRASIL / BRESIL	Thiago Guimarães Moraes		Brazilian National Data Protection Agency (ANPD)
ECUADOR/ EQUATEUR	René Orbe-Pacheco	Intendente General de Control y Sanci	Superintendente de Protección de Datos Personales
GABON	Steve Jean Bertrand Singault Ndinda	Commissaire Permanent, Rapporteur	APDPVP
PHILIPPINES	Jose Amelito S. Belarmino II	Deputy Privacy Commissioner	National Privacy Commission
PHILIPPINES	Issa G. Gayas	Attorney	National Privacy Commission
REPUBLIC OF KAZAKHSTAN	Doszhan Mussaliyev	Vice Minister	Ministry of Artificial Intelligence and Digital Development
REPUBLIC OF KAZAKHSTAN	Aruzhan Azmagambetova	Expert	Personal Data Protection Development Division
REPUBLIC OF KAZAKHSTAN	Aigerim Rysmetova	Lead Manager	Product Promotion Department of JSC (National Information Technologies)
REPUBLIC OF KAZAKHSTAN	Anel Bakytbekkyzy		Consul General of Kazakhstan
EDPS	Olivier Matter	Head of International Cooperation	
Office of Data Protection (ADGM)	Sami Mohammed	Commissioner of Data Protection	
Office of Data Protection (ADGM)	Amna Alzaabi	Associate	
Council of Europe Data Protection Commissioner	Tamar Kaldani		

EDBP / CEPD	Diletta De Cicco	Legal Officer	
INTERPOL	Jorge Oliveira e Carmo	Data Protection Officer	
European Commission	David Ciliberti	Legal and Policy 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.
Marcello Ienca	TUM School of Medicine and Health, Technical University of Munich

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

- Laurence Lwoff, Head of Human Rights and Biomedicine Division / Chef de la division Droits humains et biomédecine (CDBIO)
- Jean Kralik, Programme Manager, Cybercrime Convention Committee (T-CY) / Responsable de Programme, Comité de la Convention sur la cybercriminalité (T-CY)
- Elvana Thaci, Head of Unit, Tromsø Convention / Cheffe de l'unité, Convention de Tromsø
- Albina Ovcearenco, Secretary to the CDNET / Secrétaire du CDNET

Data Protection Unit / Unité de la protection des données

- Kristian Bartholin, Head of Data Protection Unit / Chef de l'unité de protection des données
- Péter Kimpiàn, Secretary of the Committee / Secrétaire du T-PD
- Ana Tokhadze, Seconded Official in the Data Protection Unit / Fonctionnaire mis à dispositions de l'Unité de Protection des Données