

Paris, 17 September 2026

T-PD-BUR(2026)66RAPAbr_EN

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

(Convention 108)

66th Bureau Meeting

[Paris Office](#)

16-17 September 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, 34 ratifications. Since June 2026 plenary, no ratifications or 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 finalise their ratification procedures as soon as possible and invited the Secretariat to organise 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.
- Item 4 **Transborder flows of personal data**
The Bureau took a note of the presentation by the Secretariat and the expert, M Eduardo Ustaran and held an exchange of views, notably on the *Action Plan on the Promotion of Council of Europe Model Contractual Clauses (MCC)* and on the preparation of a guide for supporting the recognition and approval of the CoE MCC and promotion thereof. The Bureau invited its members and delegations to send comments on the draft structure of the guide by 15 October.
- The Bureau congratulated the Republic of Moldova for approving the CoE MCC through the domestic legislation with the effect of 8 August 2026.
- The Bureau instructed the Secretariat furthermore to initiate a workstream on developing an explanatory document on the inventory of the data transfer legal regimes based on Article 14 of the Convention 108+ adopted during the plenary in June, notably on legal conditions and scope of application of each legal basis for transborder transfers and the application of respective exceptions.
- The Bureau took note of the volunteering by delegations, including by 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 Committee of Convention 108 and reporting back during the plenary meetings, held an exchange of views and decided to propose the list of volunteers for adoption by the plenary in November.
- Finally, the Bureau took note of the information by the Secretariat on the development of the 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 and encouraged the Secretariat to finalise the study and present it to the plenary in November.
- Item 5 **Data protection in the context of Large Language Models**
The Bureau took note of the presentation of the draft guidelines presented by Ms Anamarija Mladinić, rapporteur and the Secretariat, held an exchange of views and invited delegations to send comments on the new draft document by 15 October and instructed the Secretariat to work with the rapporteur on an amended version of the draft guidelines based on comments received in view of its discussion at the November plenary meeting.
- The Bureau took note of the information by the Secretariat regarding the opportunity of

submitting the final draft document to the CoE Steering Committee for New and Emerging Technologies (CDNET) for their consideration and feedback, as appropriate. The Bureau called upon the Secretariat to send the revised draft upon the integration of received comments and extend an invitation to CDNET to share relevant comments.

- Item 6 **Draft guidelines on data protection in the context of neurosciences**
The Bureau took note of the presentation of the revised draft guidelines by Ms Alessandra Pierucci, rapporteur and the Secretariat, held an exchange of views and invited the delegations to send comments on the new draft document by 15 October. The Bureau instructed the Secretariat to work with the rapporteur on the revised draft guidelines based on comments received in view of its adoption at the November plenary meeting.
- The Bureau took note of the information by the Secretariat regarding the opportunity of submitting the final draft document to the CoE Steering Committee for New and Emerging Technologies (CDNET) and Steering Committee for Human Rights in the fields of Biomedicine and Health (CDBIO) for their consideration and feedback, as appropriate. The Bureau called upon the Secretariat to share the revised draft upon the integration of received comments and extend an invitation to CDNET and to CDBIO to share relevant comments by 15 October 2026.
- Item 7 **Cooperation with other Council of Europe bodies and entities**
The Bureau took note of the information provided by the Secretariat on the ongoing work within the Steering Committee for New and Emerging Digital Technologies (CDNET) and Steering Committee for Human Rights in the fields of Biomedicine and Health (CDBIO).
- Item 8 **Development and activities in the field of data protection**
The Bureau took note of the information provided by the participants and the Secretariat, notably on the Roundtable meeting of G7 Data Protection Authorities (June 2026, Paris), meeting of Lusophone Data Protection Authorities (July 2026, Brasilia), LATAM CPDP (Rio de Janeiro, July 2026), NIC Brazil (Sao Paolo, August 2026) entry into the force of the new law on data protection in the Republic of Moldova (8 August 2026), conference for the private sector on data protection (10 July 2026, Chisinau), meeting of the Berlin Group (23-25 June 2026, Warsaw), study visit of African DPAs (7-11 September, Dakar), new status of Brazilian Data Protection Authority as regulator (June 2026, Brasilia).
- Item 9 **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 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 10 **Data Protection Commissioner**
The Bureau took note of the information provided by the Secretariat regarding the activities of Data Protection Commissioner and her participation at the next plenary meeting in November.
- Item 11 **Observer**
The Bureau took note of the information by observers, notably by Brazil and Ecuador.
- Item 12 **Next meetings**
The Bureau took note of the dates of the next plenary meeting to be held on 18 November starting at 14:30 until 20 November (51st meeting) in Strasbourg, as well as of the next Bureau meeting in March 2027 (67th meeting) in Paris.
- Item 13 **Stefano Rodotà Award**
The Bureau took note of the information provided by the Secretariat, including the note supporting the selection of the winners and held an exchange of views based on which members identified the winning candidates in both categories.
- Item 14 **Any Other Business**
No item was raised.

ANNOTATED AGENDA

	1. Opening of the meeting
	Statement by the Chair Statement by the Secretariat
T-PD(2026)50RAPAbrEN Pro memoria	Abridged report of the 50 th Plenary meeting (9-11 June 2026)
T-PD-BUR(2025)65RAPAbr Pro memoria	Abridged report of the 65 th Bureau meeting (18-19 March 2026)
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 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
Guide to Implementation of the Council of Europe MCCs Compendium of the Model Contractual Clauses and list of countries where they have been approved	Presentation by the Secretariat <u>Required action:</u> The Bureau will take note of the presentation by the Secretariat and the expert and will hold a discussion based on the Action Plan on data transfers and related activities (on a report on the current state of play of the CoE MCC; on the preparation of a guide on the implementation of these and on the preparation of a comprehensive study on the convergence between the CoE MCC and other similar standard contractual clauses and further data transfer tools, mechanisms or instruments).
	5. Data protection in the context of Large language Models (LLMs)
T-PD(2025)3rev4 Expert report	Presentation by the rapporteur, Anamarija Mladinić and the Secretariat on 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 Secretariat, will hold an exchange of views and decide on the necessary follow-up.

	6. Draft Guidelines on Data Protection in the context of neurosciences
T-PD(2025)1rev6 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 Secretariat <u>Required action:</u> The Bureau 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 its finalization and adoption at the November plenary
	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 participants and 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
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> 51st Plenary: 18-20 November 2026 52nd Plenary: June 2027 <u>Bureau meetings:</u> 67th Bureau meeting: March 2027, 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 – *online*

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

Inês Saint-Joly, Ministère de l'Europe et des affaires étrangères – *online*

GERMANY / ALLEMAGNE

Stefan Niederer, The Federal Commissioner for Data Protection and Freedom of Information- Division 14 - European and International Affairs

Matthias Wolter, Desk Officer, V II 4 – Data Protection Law, Federal Ministry of the Interior Germany – *online*

UK

David Heather-Steventon, International Data Flows, DSIT

OBSERVERS AND PARTICIPANTS / OBSERVATEURS ET PARTICIPANTS

BRAZIL / BRÉSIL

Waldemar Gonçalves Ortunho Junior, President, National Data Protection Authority

Virgínia de Melo Dantas Trinks, Coordinator of International Affairs, National Data Protection Authority

ECUADOR / ÉQUATEUR

Camila Valdez, Especialista de Protección de Datos Personales, Superintendencia de Protección de Datos Personales del Ecuador

Manuel Jacho, Intendente General de Regulación de Protección de Datos Personales, Superintendencia de Protección de Datos Personales del Ecuador

EDPS / CEPD

Michele Dubrocard, Legal Officer - Policy and Legislative Consultation Unit

INTERPOL

Jorge Oliveira e Carmo, Data Protection Officer - *online*

EXPERTS

Eduardo Ustaran, Hogan Lovells Cadwalader International LLP - *online*

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

Péter Kimpiàn, Secretary of the Committee / Secrétaire du Comité

Kristian Bartholin, Head of the Data Protection Unit / Chef de l'Unité de Protection des Données

Ana Tokhadze, Seconded Official in the Data Protection Unit / Fonctionnaire mis à dispositions de l'Unité de
Protection des Données