

Data Protection Ireland

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Headlines

- DPC and Coimisiún na Meán formalise joint regulatory approach to protect children’s data, p.18
- Civil groups question DPC’s independence, p.18;
- Latest GDPR and UK GDPR fines, p.19

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DPC probes sale of real-time location data across EU

The Data Protection Commission has opened a statutory inquiry into what is being called a “GDPR test case” for how the law applies to so-called anonymous mobility data.

The regulator has taken the unusual move of issuing three statements since the news broke from RTE’s Prime Time in early September that the real-time and historical movement of tens of thousands of individuals in Ireland could be purchased via a network of intermediaries.

The allegations have raised serious concerns about transparency, lawful basis for processing, pro-

filings, and potential unlawful onward transfers of personal data.

In its first update, on 18th September, the DPC noted that it was “extremely concerned” and was working to identify the data broker.

The second update, issued on 26th September, reported the DPC’s identification of the two companies involved, one of which is headquartered in Ireland.

The third update, given on 6th October, stated that as a result of the DPC’s engagement, the Irish data broker had suspended

all services involving location data relating to Irish users for a minimum of 28 days. In addition, the DPC reported that it identified two companies based in two other EU Member States and was engaging with the relevant Supervisory Authorities. The third update also confirms that the so-called real-time bidding system does not disclose precise location data to third parties, addressing concerns raised in reports.

The DPC’s investigation will focus on whether location and behavioural

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Government designates 15 national authorities under the EU AI Act

The government has formally designated 15 national competent authorities responsible for enforcing the EU Artificial Intelligence Act.

The designation marks a significant step in preparing Ireland’s regulatory framework for the oversight of AI systems, particularly those classified as “high-risk.”

As might be expected, the DPC has been named as

one of the authorities, reflecting the strong link between AI governance and data protection, particularly in areas involving automated decision-making, personal data processing, and biometric or behavioural analysis.

The Department of Enterprise will act as the Single Point of Contact, coordinating activities among the designated bodies to ensure con-

sistent enforcement.

The EU Artificial Intelligence Act entered into force on 1st August 2024. While most operational obligations are not yet enforceable, on 2nd February 2025, the prohibitions on “unacceptable risk” AI systems came into effect. These are AI practices that the EU considers fundamentally incompatible with funda-

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