

# Data Protection Ireland

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## Headlines

- HSE discloses data breach data, p.18
- Cyberattack takes France's postal and banking services offline before Christmas, p.19
- Nomad faces FTC action after \$186m hack, p.20

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## DPC intervention leads LinkedIn to revise AI training plans

The Data Protection Commission has confirmed significant modifications to LinkedIn's generative AI training plans following its detailed review and engagement with the platform's documentation and risk assessments.

In March 2025, LinkedIn formally informed the DPC of its intention to begin training proprietary generative AI models using the personal data of EU/EEA LinkedIn members starting in early November 2025. This was a voluntary notification, although companies that intend to undertake large-scale or high-risk processing are expected un-

der the GDPR to engage proactively with their Lead Supervisory Authority.

Upon receiving LinkedIn's notification and associated documentation, the DPC carried out a detailed review of the proposed processing. This included examining LinkedIn's risk assessments, lawful basis justifications, transparency materials and the overall scope of the data intended to be used for training the AI models.

The DPC identified a series of risks and issues with LinkedIn's original proposal, in particular, around how personal data

would be processed, the clarity of transparency notices, the potential inclusion of sensitive information, and protections for minors. These concerns were communicated to LinkedIn along with recommendations for changes to better safeguard data protection rights.

LinkedIn has agreed to implement several key compliance measures designed to bring the processing more closely in line with GDPR principles. These include improved transparency notices so users better understand

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## DPC asked to investigate Microsoft over alleged unlawful data processing

The Data Protection Commission has received a formal complaint seeking an urgent investigation into Microsoft Ireland's processing of personal data in connection with alleged mass surveillance activities by the Israeli military.

The complaint was filed in early December by the Irish Council for Civil Liberties ('ICCL'), supported by the NGO Ekō, and cen-

tres on the use of Microsoft's Azure cloud infrastructure to store and process vast amounts of communications data relating to Palestinians in Gaza and the West Bank.

The ICCL alleges that the processing was unlawful under the GDPR and that Microsoft's role as processor for the Israeli Defence Forces ('IDF') may have facilitat-

ed serious human rights violations, including actions the complainants describe as war crimes and crimes against humanity.

Central to the complaint is reporting that an elite IDF intelligence unit, Unit 8200, stored "a giant trove" of intercepted phone calls, texts and other communications on

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