

Data Protection Ireland

Volume 19, Issue 2

March / April 2026

Headlines

- Cybersecurity Act 2.0 signals new compliance pathway for Irish organisations, p.18
- CJEU decision may produce more litigation-resistance draft decisions from the DPC, p.19
- DPC continues to focus on keeping children safe online, p.20

Contents

<i>Expert comment</i>	2
<i>The DPC as an enforcer</i>	4
<i>Navigating compliance with children's data protection requirements in Ireland and the EU</i>	8
<i>Adequacy maintained: The Commission's assessment of UK data protection, post-DUAA</i>	12
<i>Ultimate transparency — growing data protection filing requirements in Asia</i>	15
<i>News & Views</i>	17

DPC investigates X over 'nudification' of images via Grok

The Data Protection Commission has [opened](#) a large-scale statutory inquiry into social media company X's generative AI tool Grok, focusing on alleged creation and dissemination of potentially harmful, non-consensual sexualised images, including those involving children.

The inquiry is examining whether Grok's functionality, which users have reportedly used to generate intimate and sexually explicit images of real people without their consent, complies with core GDPR obligations such as the lawfulness, fairness and transparency principles, data protection by design

and default, and the requirement for robust Data Protection Impact Assessments ('DPIAs') where high-risk processing is involved.

The inquiry positions the DPC once again in a uniquely influential role over the future interpretation of the GDPR to generative AI tools. The outcome could shape best practices for DPIAs, the extent of vendor oversight requirements and compliance with data minimisation and privacy-by-design standards — areas that already represent key enforcement priorities across Europe.

The DPC's inquiry is happening within a wider context of parallel probes into Grok's processes. The European Commission has opened a formal probe under the EU's Digital Services Act into whether X adequately assessed and mitigated risks associated with Grok's deployment, including the spread of illegal sexualised content such as deepfakes and images of minors. The UK's Information Commissioner's Office has also opened a data protection probe into compliance with UK privacy law, assessing how Grok handles personal data and whether safeguards are sufficient.

[\(Continued on page 17\)](#)

DPC defends big tech oversight and AI enforcement record

The Data Protection Commission has publicly defended its approach to regulating large technology companies and emerging AI risks, asserting that it applies data protection law with "no fear or favour" amid ongoing scrutiny of its enforcement work.

The statements came during recent parliamentary committee appearances in Dublin where the DPC's Commissioners faced

questions about the pace and effectiveness of actions against major platforms.

The hearings were sparked primarily by public and political concern over how the DPC is exercising its enforcement powers, particularly in light of the regulator's announcement that it has opened a formal investigation into the generative AI tool Grok (see above).

Legislators pressed the DPC on whether it is being sufficiently robust in holding large technology companies to account, given the high-stakes nature of AI-related harms and the broader GDPR enforcement picture.

In response to criticism that multinational platforms are not held suffi-

[\(Continued on page 17\)](#)