

# Data Protection Ireland

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## Headlines

- Group warns against Public Services Card system expansion, p.18
- Ireland advances EU Data Act implementation with multi-regulator model, p.19
- New DPC Commissioner signals strategic shift in enforcement approach, p.20

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## Oireachtas discusses DPC capacity ahead of Ireland’s EU Presidency

The Data Protection Commission’s effectiveness as a regulator is under scrutiny once more as Ireland gets ready for its upcoming Presidency of the Council of the EU. Members of the Oireachtas have been raising questions on the handling of major cross-border cases during recent meetings.

Among the main themes being raised are the pace and duration of investigations — TDs have queried why some high-profile cross-border inquiries, especially those involving large technology companies, take several years to conclude. The concern is that lengthy timelines may dilute the deterrent effect

of enforcement and create uncertainty for both complainants and organisations.

Another theme of questions is the handling of ‘big tech’ cases under the one-stop-shop. Members of the Oireachtas are questioning whether the DPC has sufficient resources and structures to manage complex, multi-jurisdictional cases efficiently, and whether outcomes are being delivered at the scale expected by other EU regulators.

There has also been focus on whether the DPC’s use of corrective powers (fines, reprimands, and

orders) has been sufficiently robust and timely to ensure compliance. This includes questions about the practical impact of large fines that are subsequently appealed and remain unpaid for extended periods.

Parliamentarians also raised issues around staffing, funding, and technical expertise, particularly in light of the expanding remit of the DPC beyond GDPR into areas intersecting with newer EU digital laws.

Another line of questioning concerns the DPC’s engagement with the European Data Protection Board, including how disputes with

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## Decision from High Court clarifies limits on appeals of DPC decisions

The High Court has ruled on a number of preliminary issues arising in LinkedIn’s appeal of a DPC decision, clarifying the nature and limits of appeals against the regulator’s enforcement decisions.

The DPC decision, issued in October 2024, followed an inquiry triggered by a complaint originally lodged with the French Supervisory Authority and subsequently handled by Ireland

under the GDPR’s one-stop-shop mechanism.

Acting as lead Supervisory Authority, the DPC found that LinkedIn had infringed core GDPR principles, including lawfulness, fairness and transparency, in its use of personal data for targeted advertising. The regulator concluded that LinkedIn could not validly rely on consent, legitimate interests or con-

tractual necessity as lawful bases for aspects of its processing.

In addition to a reprimand and compliance order, the DPC imposed fines totalling €310 million, placing the decision among the more significant administrative penalties issued by the DPC to date.

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