



Brussels, 5 September 2025
(OR. en)

12411/25

DATAPROTECT 190
JAI 1185
DIGIT 164
MI 611
FREMP 222

NOTE

From:	Presidency
To:	Delegations
Subject:	Commission summary conclusions of the Implementation Dialogue on the application of the GDPR

For their information, delegations will find in the annex the Commission summary conclusions of the Implementation Dialogue on the application of the GDPR, held in Brussels on 16 July 2025.

Summary Conclusions

The Implementation Dialogue on the Application of the General Data Protection Regulation was held on 16 July 2025 in Brussels. The meeting was attended by representatives of selected stakeholders, representing in particular business, civil society, and academia, from different sectors and fields of life.

The objective of the Implementation Dialogue was to collect stakeholders' views and ideas on the possible need and ways to simplify and improve the application of the GDPR, keeping in mind that these should not result in lowering the high level of data protection in the EU.

The feedback from stakeholders can be summarised as follows:

- Overall, stakeholders consider that the GDPR is a balanced legal framework which has met its objectives.
- While stakeholders cautioned against a general reopening of the GDPR, some industry representatives suggested targeted measures including possible amendments to the rules to enhance clarity of certain concepts or simplifying obligations for data controllers, insisting on the respect of the GDPR risk-based principle, notably as regards AI and other new technologies.
- Businesses also underlined that they have invested in compliance and a general reopening could create uncertainty, including in the context of international data transfers.
- Civil society organisations strongly opposed any amendment of the GDPR, highlighting that the GDPR is an expression of the fundamental right to data protection.
- Stakeholders share the view that there is a need to ensure consistent and harmonised enforcement and application.
- All stakeholders underlined the need for more practical guidance and increased stakeholder engagement from the national data protection authorities and the European Data Protection Board.
- They also called for tailor-made support, such as templates and checklists, especially for SMEs. Several stakeholders referred to the codes of conduct as a useful compliance tool, but their development and adoption procedure were considered cumbersome.
- The importance of clear articulation of different pieces of EU legislation was raised by most stakeholders, who mainly referred to the interplay between the GDPR and the AI Act, and many considered that this could be achieved through guidance and enhanced cooperation of different regulatory authorities.

Commissioner McGrath reaffirmed the Commission's commitment to high standards of data protection and to a balanced approach that both fosters innovation and protects fundamental rights.

List of participating entities

Bundesverband Digitale Wirtschaft (BVDW)
Bureau Européen des Unions de Consommateurs (BEUC)
Business Europe
Cloud Infrastructure Services Providers in Europe (CISPE)
Confederation of European Data Protection Organisations (CEDPO)
Connect Europe/GSMA
Digital Europe
Ecommerce Europe
European AI Forum (EAIF)
European Automobile Manufacturers' Association (ACEA)
European Banking Federation (EBF)
European Centre for Digital Rights NoyB
European Digital Rights (EDRi)
European Federation of Pharmaceutical Industries and Associations (EFPIA)
European School Heads Association (ESHA)
Federation of European Direct and Interactive Marketing (FEDMA)
France Digitale
IAB Europe
Insurance Europe
Irish Council for Civil Liberties (ICCL)
Privacy International
SMEunited
Stiftung Digitale Chancen (SDC)
Transatlantic Consumer Dialogue (TACD)
Union Fédérale des Consommateurs - Que Choisir (UFC - Que Choisir)
Verbraucherzentrale Bundesverband (vzbv)
2 academics