

Privacy & Data Protection

Volume 25, Issue 3

January / February 2025

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- Ryanair faces further GDPR complaint over face-scanning verification, p.19
- EDPB publishes Guidelines on data requests from third country authorities, p.20

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ICO's public sector approach to become standard

The UK Information Commissioner has announced that, as regards public bodies breaching data protection law, his office will endeavour to continue issuing reprimands instead of imposing heavy fines.

In June 2022, the Commissioner published an open letter to public sector leaders announcing a two-year trial of a revised approach to working more effectively with public authorities across the UK.

The so-called 'public sector approach' involved the use of the Commissioner's discretion to reduce the impact of fines on

public bodies and improving data protection standards in the sector through guidance and proactive engagement.

According to its [findings report](#), since the trial began, 60 reprimands have been issued to public bodies and are viewable on the ICO website.

Commissioner John Edwards said public bodies "saw the publication of reprimands as effective deterrents, mainly due to reputational damage and potential impact on public trust, and how they can be used to capture the attention of senior leaders."

Although the Commissioner intends to continue with the public sector approach and its aims will remain the same, the ICO intends to adjust it in line with the learnings from the trial period and the responses and input it receives from a [new consultation](#).

"We want to provide greater clarity to organisations on how the public sector approach [applies]," said the Commissioner.

In recognition of the broad scope of the term 'public sector', the consultation is

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Fingerprinting not a fair means of tracking users online, says regulator

The Information Commissioner's Office is consulting on [new guidance](#) on the use of storage and access technologies, seemingly prompted by a policy U-turn from Google on fingerprinting.

On 18th December 2024, Google announced to organisations using its advertising products that from 16th February 2025, it will no longer prohibit them from employing fin-

gerprinting techniques. The change to Google's policy means that fingerprinting could now replace the functions of third-party cookies.

The following day, the ICO's Executive Director of Regulatory Risk, Stephen Almond, issued a statement that "our response is clear: businesses do not have free rein to use fingerprinting as they please. Like all

advertising technology, it must be lawfully and transparently deployed – and if it is not, the ICO will act." Almond went on to announce the consultation.

Fingerprinting involves the collection of pieces of information about a device's software or hardware, which, when combined, can uniquely iden-

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