

Data Protection Office

ANNUAL WORK REPORT
2025

www.eulisa.europa.eu

Document Control Information

Settings	Value
Document Title:	Data Protection Office Annual Work Report
Document Authors:	Data Protection Assistants, Data Protection Experts, DPO
Revision Status:	Final
Sensitivity:	Public
Issue Date:	23/2/2026

Summary of Changes:

Revision	Date	Created by	Short Description of Changes
[1]	04/12/2025	DP Assistant	Initial version of the document created
[2]	23/01/2026	DP Assistants, Administrative Support	Consolidation of the document
[3]	26/01/2026	DP Expert, Assistant to the DPO	Consolidation of the document
[4]	20/02/2026	DP Assistant	Final consolidation of the document
[5]	23/02/2026	Data Protection Officer ad interim	Approval

Contents

1. Introduction	4
2. Scope	4
3. DPO Activities and Actions	5
3.1 Awareness	5
3.2 Records of Processing as Activities as Controller	6
3.3 Records of Processing Activities as Processor	6
3.4 Personal Data Breach Register	7
3.5 Data Subjects Requests	7
3.6 Data Protection Impact Assessments (DPIAs)	8
3.7 Communication Information Systems	9
4. Reporting	9
4.1 Audit Compliance and Finance Committee (ACFC)	9
4.2 Management Board	10
4.3 Advisory Groups	10
4.4 Management Committee	10
5. EDPS Supervision and Collaboration	11
5.1 Follow-up on the EDPS Inspections and Recommendations	11
5.1.1 2022 Audit on Eurodac, SIS and VIS	11
5.1.2 2023 Audit on SIS	11
5.1.3 2024 Audit on VIS	12
5.1.4 2025 Audit on Eurodac	12
5.2 Supervision Coordination Group for Eurodac and Coordinated Supervision Committee for SIS	13
5.3 Collaboration with EDPS	14
6. Advice on Artificial Intelligence Matters	14
6.1 eu-LISA Generative AI Study	15
6.2 GPT@EC	15
6.3 Governance AI	15
7. External Consultations	16
7.1 Digital Travel Application - Digital Travel Credential	16
7.2 EU Visa Application Platform and Advance Passenger Information/Passenger Name Record	16
8. Outreach Activities	17
8.1 Justice and Home Affairs Agencies Network Meetings	17
8.2 EDPS - EUI DPO Network Meetings	18
8.3 International Association of Privacy Professionals	19
8.4 Europol Data Protection Experts Network	20
8.5 Data Protection Presentations during on-site visits at eu-LISA's Headquarters	20
9. DPO Function	21

1. Introduction

Article 2 of Regulation (EU) 2018/1726¹ ('eu-LISA Regulation') sets the objectives of the Agency. According to point (f), the Agency shall ensure a high level of data protection, in accordance with Union data protection law, including specific provisions for each EU Large-Scale IT System.

eu-LISA's Data Protection Officer ('DPO') supported by his team is required to advise controllers and processors on fulfilling their obligations. Application of the provisions of Regulation (EU) 2018/1725² ('EUDPR') is firstly ensured by the DPO of eu-LISA and, ultimately, by the supervisory role of the European Data Protection Supervisor ('EDPS').

2. Scope

Under Article 7(4) of eu-LISA's Management Board Decision No 2019-185 REV 1³ ('DPO Implementing Rules'), the DPO shall submit to the Agency's Management Board ('MB') an annual report on his activities and on the state of play as regards the data protection activities and compliance of the Agency.

This report presents the status of the data protection activities within the Agency and compiles the work performed by the DPO during the year 2025.

¹ **Regulation (EU) 2018/1726** of the European Parliament and of the Council of 14 November 2018 on the European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA) and amending Regulation (EC) No 1987/2006 and Council Decision 2007/533/JHA and repealing Regulation (EU) No 1077/2011 (OJ L 295, 21.11.2018).

² **Regulation (EU) 2018/1725** of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC. (OJ L 295, 21.11.2018).

³ **eu-LISA Management Board Decision No 2019-185 REV 1 on implementing rules concerning the Data Protection Officer** pursuant to Article 45(3) of Regulation (EU) No 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No. 45/2001 and Decision No. 1247/2002/EC ('DPO Implementing Rules').

3. DPO Activities and Actions

The following sections provide a comprehensive overview⁴ of the data protection activities performed by the Data Protection Office and dedicated team of experts supporting the DPO function in 2025.

3.1 Awareness

In order to raise awareness on data protection, the DPO organised relevant data protection awareness activities to strengthen the Agency's staff's knowledge and promote best practices. To celebrate the annual Data Protection Day, an awareness session on data protection principles and best practices was presented on 28 January, focusing on fundamental EUDPR requirements and its practical implementation at eu-LISA.

Furthermore, the DPO organised an additional awareness session on DPO processes, covering Personal Data Management and follow-up of EDPS audits. These sessions aimed to refresh participants' understanding of the processes' purpose, scope, key elements, ways of working, measurement, and future developments.

Likewise, the e-learning module on Data Protection available since 2023 on iLearn was continuously promoted to newcomers. This online training provides the fundamental knowledge on main data protection key concepts such as the main principles of data protection, roles in data protection activities, data breaches, international data transfers and so on. This e-learning module on data protection is part of the Onboarding Program of eu-LISA which is mandatory for all staff members and recommended for other personnel working for eu-LISA.

Other efforts to raise awareness across the Agency went to the internal newsletter which is sent to all staff members. This weekly newsletter includes a dedicated section on data protection, providing updates on the latest EDPS guidelines, audits, training opportunities and recent developments in the data protection field. During 2025, 8 articles on data protection were published, including a special feature in December on key takeaways from 2025.

⁴ The DPO would like to highlight that the respective sections cover the main tasks and activities of the DPO within 2025 but do not mention in detail all tasks performed. Among the tasks not mentioned in the 2025 DPO Annual report are the following: 1) resolving a discovery request from a Montenegrin court, 2) consultation on draft decisions on system owners and e-signatures; 3) providing opinion on how to implement the right to restrict processing of personal data in Central Business Systems and 4) actively participating in the Security and Business Continuity Exercise on 25 September.

3.2 Records of Processing as Activities as Controller

In compliance with Article 31(1) of the EUDPR, eu-LISA shall maintain records of processing activities under its responsibility. According to Article 4(3) of the eu-LISA DPO Implementing Rules, the DPO shall keep a central register of records of their processing activities as a controller.

Delegated data controllers within eu-LISA are required to document any new processing activity as a new record and notify the DPO to ensure that the central register is updated accordingly. Similarly, when an existing processing activity undergoes changes, the data controller must update the associated documentation and notify the DPO of the change.

To facilitate these tasks, the DPO provided step-by-step instructions and templates for documenting records of processing activities.

By the end of December 2025, the public register of data processing activities included 143 records of ongoing data processing activities. Within 2025, 8 new records were registered, and 9 existing records were updated in the data processing activities register. In addition, the DPO continued to provide advisory support to all units on other records that were notified to the DPO but are not yet finalised. This register is public, constantly updated and accessible on eu-LISA's website⁵.

3.3 Records of Processing Activities as Processor

Under Article 31(2) of the EUDPR, eu-LISA is required to maintain a record of all categories of processing activities carried out on behalf of one or more controllers. This public register is centrally managed by the DPO, constantly updated and available on eu-LISA's website⁶.

During 2025, 4 new records as processors were notified to the DPO but are not yet finalised and remain pending registration.

⁵ eu-LISA Website: https://www.eulisa.europa.eu/sites/default/files/documents/web_dpo_register.pdf#zoom=300

⁶ eu-LISA Website: https://www.eulisa.europa.eu/sites/default/files/documents/dpo_register_activities.pdf#zoom=300

3.4 Personal Data Breach Register

Article 34(6) of the EUDPR obliges data controllers to document any personal data breaches. According to Article 4(3) of the eu-LISA DPO Implementing Rules, the DPO shall keep a central register of records of data breaches.

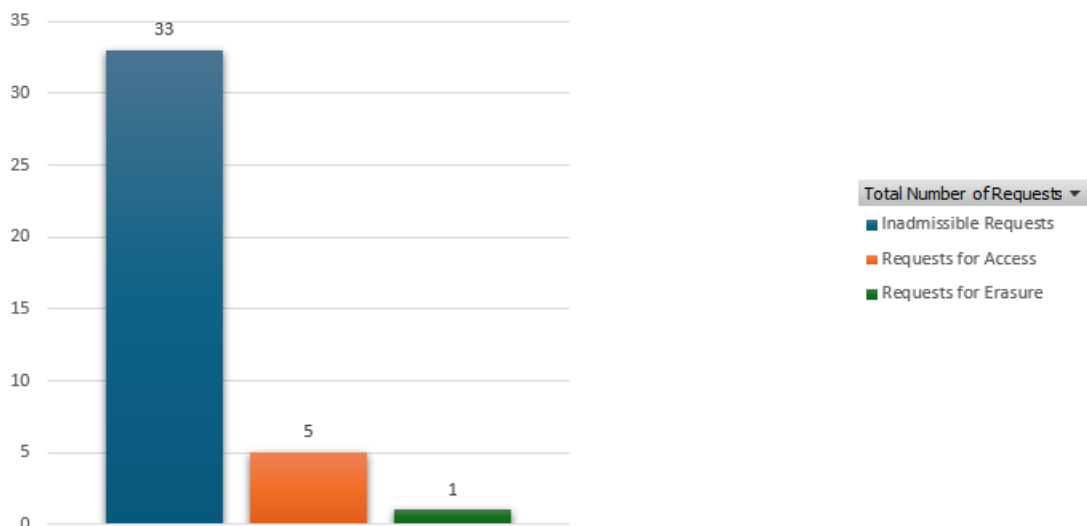
During the reference period for this report, and after investigation, 3 data breaches were reported and documented by the data controller. Regard was also given to conditions set out in Articles 34 and 35 of the EUDPR on notification to the EDPS and communication to affected data subjects. Reports of the data breaches were submitted, where applicable, to the EDPS.

3.5 Data Subjects Requests

According to Article 14 of the DPO Implementing Rules pursuant to article 45(3) of EUDPR, each responsible staff needs to consult the DPO before acting in reply to the data subjects' request, while the DPO may also act as responsible staff for managing the data subject's request on behalf of the Agency.

In 2025 the DPO was consulted in 39 data subject's requests. These requests were either received directly in the DPO's functional mailbox or indirectly from the responsible staff who then consulted the DPO before acting in reply to the data subjects' request. The following table provides an overview of the type of requests the DPO was involved with:

Data Subject Requests received by eu-LISA DPO in 2025



It is important to highlight that a large part of the requests is deemed inadmissible, as they concern requests to access or delete data stored in large-scale IT systems and Justice and Home Affairs ('JHA') information systems/ tools, such as: Schengen Information System ('SIS'), Visa Information System ('VIS') or EURODAC.

During the year 2025, the DPO also updated the Data Subjects Request Register and edited standard templates to maximise compliance.

3.6 Data Protection Impact Assessments (DPIAs)

Following eu-LISA's Regulation, the Agency is mandated to ensure a high level of data protection. Moreover, eu-LISA shall follow the principles of privacy by design and by default during the entire lifecycle of the development of new large-scale IT systems and the further development of existing systems.

DPIAs should not only be seen as an obligation for data controllers where a type of processing is likely to result in a high risk to the rights and freedoms of natural persons, but also a decision made by eu-LISA to achieve the above-mentioned objectives. The Agency may well decide to carry out DPIAs as a tool to generate knowledge and embed a data protection culture, analyse or audit data processing activities, improve the overall process management or control the level of risk accepted in each data processing activity in a systematic, methodical and documented way.

DPIAs shall be considered a 'live' document subject to regular review or re-assessment should the nature, scope, context or purpose of the processing change for any reason. Therefore, DPIAs will become a continuous practice in the activities of eu-LISA and therefore, it shall be adequately embedded in its processes.

In line with the EDPS Guidance⁷ and Article 29 Data Protection Working Party Guidelines on DPIAs⁸, the DPO has been supporting eu-LISA staff in Operation Department and its contractors with carrying out DPIAs, providing relevant advice and guidance, namely on the assessment carried out for an internal Document Management System, SIS Information Alert, revised VIS, European Criminal Records Information System - Third Country Nationals ('ECRIS-TCN'), Eurodac, Joint Investigations Teams Collaboration Platform ('JITs CP'), and European Travel Information and Authorisation System ('ETIAS') systems.

⁷ EDPS, 'Accountability on the ground: Guidance on documenting processing operations for EU institutions, bodies and agencies' (v.1.3, July 2029).

⁸ Article 29 Data Protection Working Party, 'Guidelines on Data Protection Impact Assessment (DPIA) and determining whether processing is "likely to result in a high risk" for the purposes of Regulation 2016/679' (wp248rev.01, 4 October 2017). The Guidelines were endorsed by the EDPB in its first plenary meeting.

One-to-one coaching sessions were also offered to eu-LISA staff seeking advice and guidance to comply with their obligations under the EUDPR.

Furthermore, the DPO has regularly contributed to DPIAs for corporate systems, ensuring that eu-LISA follows the principles of privacy by design and by default throughout their lifecycle and that the EDPS recommendations are considered during their risk assessment.

3.7 Communication Information Systems

Change Management Process

The DPO has been involved in the approval process of the Change Management procedure at the request of the MB. During the year of 2025, the number of changes assigned to the DPO were 5.

Go/No-Go Meetings

Stemming from the EDPS' past recommendation on the 2023 SIS audit, the DPO was actively involved during the internal Go/No-Go meetings for the entry into operation ('EiO') of upcoming systems. Specifically, the DPO participated in the Go/No-Go meetings on VIS4 / Shared Biometric Matching System (6 May), EES Public Website (7 July); EES core (6 October), and EES Web Services including the Carriers Onboarding and Support Tool (18 December), providing inputs on the current status of data protection compliance and his recommendation on the EiO decision.

TESTA Service Level Agreement ('SLA')

In light of the Trans European Services for Telematics between Administrations (TESTA) and the recent DG DIGIT launch of the TESTA-Enhanced Infrastructure for Reliable Interconnectivity and Security ('TESTA EIRIS') programme, the DPO reviewed the Service Level Agreement in terms of data protection compliance.

4. Reporting

4.1 Audit Compliance and Finance Committee (ACFC)

Due to the increasingly important role of data protection and compliance, the DPO was asked to begin reporting directly to the ACFC of the Management Board of eu-LISA. The ACFC expects quarterly reporting from the DPO on the status of open EDPS audit recommendations, starting with the meeting on 10 September 2025. The focus of that intervention was the most recent draft audit report of 16 July 2025 on VIS.

On 28 October 2025 the DPO took part in the second ACFC meeting, presenting the state of play of open EDPS recommendations in relation to the audits on SIS/VIS/Eurodac in 2022 and on SIS in 2023.

4.2 Management Board

Throughout 2025, the DPO presented three times at Management Board meetings. These reports primarily addressed the EDPS inspections, the progress made in implementing the resulting recommendations, and preparations for forthcoming inspections. The DPO also provided regular updates on the development of the team structure.

During the MB meeting of 20 March 2025, the DPO presented the annual activities and tasks performed throughout 2024, in light of article 7(4) of the DPO Implementing Rules. During the MB meeting of 18 September 2025, the most recent audit report received by the Agency on 16 July 2025, concerning the VIS system, was presented. The intervention focused on presenting the details of the report and draft response, including all comments and proposed amendments that the Agency intended to submit. As these amendments required the explicit approval of the MB, such approval was sought and granted.

During the last 2025 MB meeting of 20 November, the DPO presented a consolidated overview of the activities carried out throughout 2025, highlighting key achievements as well as internal and external collaborations.

4.3 Advisory Groups

On 13 November, the DPO took part in the 27th JITs CP Advisory Group ('AG') meeting. The intervention by the DPO focused on outlining and analysing the potential data protection implications of two possible operational solutions under discussion by the members of the Advisory Group.

The DPO also took part in the 55th VIS, 56th Eurodac, 80th EES-ETIAS, 70th ECRIS-TCN, and 70th Interoperability AGs. There he presented the new EDPS Large-Scale IT Systems ('LSITs') security incident notification obligation and procedure. Additionally, he briefed the 62nd and 63rd SIS AG on the status of open EDPS recommendations following the 2022 and 2023 audits.

4.4 Management Committee

The DPO reported to the Management Committee ('MC') of 11 August and 8 December on the State of play of implementation of EDPS recommendations. It was agreed to resume quarterly status updates.

5. EDPS Supervision and Collaboration

5.1 Follow-up on the EDPS Inspections and Recommendations

Ensuring a high level of data protection is one of the main objectives of the Agency. External audits on data protection compliance contribute to facilitate this goal and add value to the Agency's activities as a trustworthy IT partner. Including audit recommendations as part of the eu-LISA continuous improvement plan for the operational management of the EU LSITs makes this process much more effective.

5.1.1 2022 Audit on Eurodac, SIS and VIS

In October 2022, the EDPS carried out an inspection on Eurodac, SIS and VIS. The final report of the EDPS received on 25 September 2023, contained 37 recommendations which eu-LISA incorporated in an action plan. The DPO actively monitored implementation progress and organised follow-ups with the responsible staff to ensure compliance.

Throughout 2025, the DPO liaised with the EDPS and provided proactive updates on the status of the recommendations in March, May and October 2025. Regarding Recommendation #33, quarterly reports on the status of the solution implementation were prepared and made available to the EDPS.

As a result of these efforts and following the provision of comprehensive documentation and additional clarifications, the EDPS confirmed the closure of 33 out of 37 recommendations in a follow-up letter issued on 18 December 2025.

5.1.2 2023 Audit on SIS

In December 2023, the EDPS conducted an inspection on SIS in accordance with relevant international auditing standards. The final report, received on 19 September 2024, contained 22 recommendations with implementation deadlines ranging from 3 to 12 months following the adoption of the report. eu-LISA incorporated all the recommendations in an action plan.

In the course of 2025, the DPO in collaboration with the teams responsible for each recommendation and kept the EDPS informed by the providing regular updates on the progress made.

As a result of these combined efforts, along with the submission of comprehensive documentation and clarifications as evidence, the EDPS confirmed the closure of 14 out of 22 recommendations in a follow-up letter issued in December 2025. For some of the remaining recommendations, the deadline for the implementation has been extended granting additional timeline to finalize required actions.

5.1.3 2024 Audit on VIS

The EDPS conducted an inspection on VIS on 3-4 December 2024.

The purpose of the audit was to verify on-the-spot compliance with the EUDPR and Regulation (EU) 767/2008⁹. It focused on the compliance with the legal requirements governing the security, operation, technical implementation, logging, and data retention of the central VIS. The inspection covered obligations on secure data processing, operational and security measures managed by eu-LISA, technical implementation measures for VIS, record-keeping of data processing activities (including retention of business logs), and rules on how long personal data may be stored.

The final audit report was received on 3 October 2025 and contained 44 recommendations. The deadline for implementation varies per each recommendation from 'immediate' to '18 months after the adoption of the report'. The DPO coordinated the submission of the implementation plan to the EDPS within three-month timeframe. This included organising internal meetings and coordination of the related discussions. By the end of December 2025, eu-LISA already worked, implemented and provided evidence for the closure of 10 recommendations, including all that required immediate adoption. Two additional recommendations are considered implemented by eu-LISA and evidence has been provided to the EDPS.

5.1.4 2025 Audit on Eurodac

After the announcement letter issued on 13 October 2025, the EDPS undertook an inspection of the Eurodac to evaluate compliance with the EUDPR, Regulation (EU) 603/2013¹⁰ and eu-LISA Regulation. The audit took place on 9 and 10 December 2025 in Strasbourg and addressed the following key areas:

- 1) eu-LISA's implementation of Regulation 603/2013 and compliance with:
 - Articles 3, 4, 23 and 34 on Eurodac system's architecture, operational management, responsibility for data processing, security and security incidents notifications
 - Articles 11, 12, 13 on data recording, data storage and advance data erasure of applicants for international protection
 - Articles 15 and 16 on data recording, data storage of applicants for third country nationals or stateless persons
 - Article 18 on the marking of data and article 27 of access, correction or erasure of data

⁹ **Regulation (EC) No 767/2008** of the European Parliament and of the Council of 9 July 2008 concerning the Visa Information System (VIS) and the exchange of data between Member States on short-stay visas ('VIS Regulation') (OJ L 218, 13.8.2008).

¹⁰ **Regulation (EU) No 603/2013** of the European Parliament and of the Council of 26 June 2013 on the establishment of 'Eurodac' for the comparison of fingerprints for the effective application of Regulation (EU) No 604/2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person and on requests for the comparison with Eurodac data by Member States' law enforcement authorities and Europol for law enforcement purposes, and amending Regulation (EU) No 1077/2011 establishing a European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (recast) (OJ L 180, 29.6.2013).

- Article 28 on the keeping of records and the security measures applied.
- 2) Compliance with Articles 33, 34 and 35 of the EUDPR regarding security and personal data breaches
- 3) Compliance with Article 41(3) of eu-LISA's Regulation in respect to eu-LISA's cooperation with the European Union Agency for Network and Information Security

Throughout the last quarter of 2025, the DPO lead the coordination of the inspection, serving as the central contact point between the EDPS and eu-LISA. This included organising and facilitating audit-related meeting with internal stakeholders as well as with the auditors.

The DPO also coordinated the preparation, consolidation and submission of all documentation requested by the EDPS before, during and following the inspections (over 140 documents), and supported the timely fulfilment of additional information requests, including those issued after the on-site audit.

5.2 Supervision Coordination Group for Eurodac and Coordinated Supervision Committee for SIS

In compliance with Article 5(1)(f) of the DPO Implementing Rules, by invitation, the DPO represents eu-LISA at meetings of the Supervision Coordination Group (SCG) of Eurodac, VIS and SIS as well as the Coordinated Supervision Committee (CSC) for SIS, within the framework of the European Data Protection Board (EDPB).

These groups and the committee, composed by representatives of the National Data Protection Authorities along with the EDPS, requested updates on the operational aspects of the three EU Large-Scale IT Systems. The updates addressed matters such as system performance, incidents, and data quality. The DPO together with SIS and VIS experts were invited to the 19th meeting of the Coordinated Supervision Committee (CSC) on 10-11 June 2025, where they gave updates on matters such as system performance, incidents and data quality for SIS, VIS and the interoperability components of the JHA Interoperability framework. In addition, the DPO together with a Eurodac expert were invited to the SCG Meeting for Eurodac on 8 December 2025, where they gave updates on operational statistics such as processing time, false hits, incidents, the latest status of upcoming system updates as well as the status of EDPS open recommendations from the 2022 audit.

5.3 Collaboration with EDPS

Implementation of the right to erasure ('right to be forgotten') by controllers.

As part of the fourth Coordinated Enforcement Action (CEF2025) launched by the EDPB in the context of the Coordinated Enforcement Framework, the EDPS invited all EU institutions, including eu-LISA to complete a questionnaire on the implementation of the right to erasure by data controllers (Article 19 of the EUDPR). The DPO provided an overview of the Agency's existing policies and practices related to the right to be forgotten. This exercise proved to be valuable also in identifying areas of improvement. The results of the survey will be included in an EEA- wide report and will be used to identify specific issues which need to be addressed.

International transfers and Artificial Intelligence

The DPO provided inputs for the forthcoming EDPS Guidelines on the use of derogations (Article 50 EUDPR) by EUIs and the update of the first EDPS Orientations for EUIs using Generative Artificial Intelligence ('AI').

6. Advice on Artificial Intelligence Matters

In 2025, the DPO observed that AI continued to gain prominence in discussions on future business practices. This trend was accompanied by a growing demand for advice, as stakeholders increasingly sought early guidance on regulatory requirements, risk considerations, and responsible approaches to the potential use of AI by eu-LISA.

In October 2025 an AI questionnaire was launched within the DPO network. The survey aimed to provide an overview of the current state of AI maturity within European Union Institutions ('EUIs'). The AI Act¹¹ and its upcoming implementation were taken into account. DPOs' views on progress made, existing challenges, and support required for effective AI governance were gathered. The results of the survey will support the development of common approaches and strengthen cooperation within the DPO network.

¹¹ **Regulation (EU) 2024/1689** of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act), (OJ L, 2024/1689, 12.7.2024).

DPO representatives also took part in the 2nd AI Act Correspondent Network ('AICN') Meeting organised by the EDPS on 7 October 2025. The meeting provided an opportunity to exchange views with other EUIs and to gain insights into the AI Office recent and upcoming AI Act activities. Preliminary findings of the first mapping of AI systems within EUIs by the EDPS were also presented while the role of the Fundamental Rights Impact Assessment ('FRIA') to assess risks and the current AI Act implementation and compliance status within EUIs was also discussed.

6.1 eu-LISA Generative AI Study

The DPO, in collaboration with the legal team, has conducted an initial mapping of data privacy and AI Act requirements for three key use cases currently under consideration to enhance operations in contract management, procurement, and legal advice support. This work forms part of an ongoing study within the Agency on the potential use of generative AI across its activities.

6.2 GPT@EC

In 2024, the Commission launched the pilot phase of GPT@EC, a secure general-purpose corporate tool using generative AI. As eu-LISA is considering joining other EU Agencies who are part of the EUAN Working Group on AI in onboarding to the pilot phase as users of GPT@EC, the DPO was consulted and provided inputs and comments to the current Service Level and Data Protection draft agreements particularly in relation to data protection and compliance considerations.

6.3 Governance AI

AI governance and guidance on the application of the AI Act continue to evolve within the Agency. The DPO is actively engaged in discussions on the establishment of a structured AI governance framework at eu-LISA and supports colleagues by providing advice on selected issues related to the AI Act.

Future eu-LISA projects foresee the use of large language models (LLMs), and several LSITs already in operation make use of machine-learning solutions. In this context, a clear understanding of the Agency's role and responsibilities is essential to ensure a high level of compliance and the effective protection of fundamental rights.

The DPO acknowledges the intersection between the AI Act and data protection legislation and continues to closely monitor regulatory developments and emerging guidance in this area (including by attending the AICN meetings organised by the EDPS), while strengthening internal cooperation on AI-related matters.

7. External Consultations

7.1 Digital Travel Application - Digital Travel Credential

In the context of the legislative proposals for the Digital Travel Application¹² ('DTA') and Digital Travel Credential¹³ ('DTC') -covering the EU Digital Travel application and the issuance and technical standards of digital travel credentials- eu-LISA participated in the interinstitutional negotiations by providing expert input and comments on successive draft provisions. The DPO's involvement focused primarily on provisions defining roles and responsibilities under data protection law, with additional attention dedicated to trust services.

The DPO also participated in meetings on these issues with the European Commission, notably DG HOME and DG CNECT and the Danish Presidency of the Council of the European Union, to discuss the evolution of the proposals and implications of the envisaged solutions.

7.2 EU Visa Application Platform and Advance Passenger Information/Passenger Name Record

With regards to the EU VISA Application Platform which was introduced under Regulation (EU) 2023/2667¹⁴ in an effort to modernise and digitalise the current visa procedure, the DPO collaborated with eu-LISA's legal and policy teams and was regularly consulted on the EC's draft 'Implementing Regulation on specifying the relationship between the joint controllers and the processor, and the responsibilities of the processor, for the processing of personal data in the EU visa application platform' and on the EC's draft 'Implementing Decision on specifying the responsibilities and the relationships between Member States as joint controllers for the processing of the personal data in the EU visa application platform'. The DPO also provided his opinion on the potential access to logs on the external service gateway by Member States.

¹² **Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL** establishing an application for the electronic submission of travel data ("EU Digital Travel application") and amending Regulations (EU) 2016/399 and (EU) 2018/1726 of the European Parliament and of the Council and Council Regulation (EC) No 2252/2004, as regards the use of digital travel credentials (COM/2024/670 final).

¹³ **Proposal for a COUNCIL REGULATION** on the issuance of and technical standards for digital travel credentials based on identity cards (COM/2024/671 final).

¹⁴ **Regulation (EU) 2023/2667** of the European Parliament and of the Council of 22 November 2023 amending Regulations (EC) No 767/2008, (EC) No 810/2009 and (EU) 2017/2226 of the European Parliament and of the Council, Council Regulations (EC) No 693/2003 and (EC) No 694/2003 and Convention implementing the Schengen Agreement, as regards the digitalisation of the visa procedure (OJ L, 2023/2667, 7.12.2023).

In light of Regulation (EU) 2025/12¹⁵, the DPO collaborated with eu-LISA's legal and policy teams and provided comments on and suggestions for two EC's draft Implementing Regulations on establishing the respective responsibilities of the joint controllers, and the respective obligations between the joint controllers and the processor for the processing of Advance Passenger Information data ('API') in the API/ Passenger Name Record ('PNR') router. The DPO also attended regular meetings with DG HOME and DG JUST to discuss the latest drafts and attended the 3rd, 6th, and 7th Meetings of the Air Travel Information Expert Group on 16 May 2025, 24 October 2025 and 12 December 2025 respectively.

8. Outreach Activities

8.1 Justice and Home Affairs Agencies Network Meetings

In April 2025, as part of Justice and Home Affairs Agencies Network ('JHAAN'), members of the eu-LISA DPO team have attended the meeting of the Working Group on Data Protection, hosted by the European Union Agency for Fundamental Rights ('FRA'). The meeting focused on exchanges between JHAA DPOs and contributions from FRA and the EDPS on key data protection and fundamental rights developments, including:

- Assessing high-risk artificial intelligence systems and Fundamental Rights Impact Assessments under the AI Act
- Artificial intelligence governance and data protection compliance across JHAA agencies
- Handling data subject rights requests, audits, and supervisory interactions with the EDPS
- Cybersecurity incidents, breach response, and lessons learned
- DPO network activities, including DPIAs, Microsoft tools (Microsoft 365, Copilot), and AI use case
- Cooperation between JHAA DPOs, the EDPS, and FRA on emerging regulatory challenges.

The meeting has proved to be an important forum for sharing best practices and aligning approaches to data protection, AI, and fundamental rights between the JHAA agencies.

¹⁵ **REGULATION (EU) 2025/12** OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 December 2024 on the collection and transfer of advance passenger information for enhancing and facilitating external border checks, amending Regulations (EU) 2018/1726 and (EU) 2019/817, and repealing Council Directive 2004/82/EC (OJ L, 2025/12, 8.1.2025).

A second meeting held online on 13 November, included participation from JHAA DPOs and the DPO of European Public Prosecutor's office (EPPO). Participant DPOs and guest speakers from FRA and CEPOL and the EDPS addressed topics, including:

- FRA's guidance on the Entry-Exit System
- Generative AI
- Lessons learnt from CEPOL's data protection incident response
- FRA's upcoming report assessing high-risk AI
- Data retention limits for administrative personal data
- Recent EDPS' activities relevant to JHAA, collaboration with AI Unit and focus areas of the EDPS in 2026.

The participants provided updates on their agency's data protection efforts, highlighting sharing insights into accomplishments, recent developments, and ongoing challenges in the field. The meeting was concluded with the presentation of EDPS' Head of Sector, Area of Freedom, Justice and Security and an overview of the work of the DPO's network working groups.

8.2 EDPS - EUI DPO Network Meetings

In 2025, the DPO took part in the 56th EDPS – EUIs DPO Meeting on 1- 2 July.

The meeting focused on strategic and operational data protection developments at EUI's level, with relevant contributions from the EDPS and the DPO from the Network, covering in particular:

- EDPS priorities and supervisory outlook, including technology and privacy developments
- Updates on supervision, enforcement activities, and relevant EDPB matters
- Practical case studies on the role and positioning of DPOs
- Awareness and compliance initiatives, including website compliance and monitoring tools
- Recent case law on privacy and data protection
- Open exchange of views on any emerging challenges and similar issues faced by the EUI DPOs.

The meeting provided a great opportunity to align on supervisory expectations, share common experiences within the DPO Network, and discuss evolving data protection challenges in a rapidly changing technological and regulatory environment.

The DPO also participated in the 57th EDPS – EUI DPOs Network meeting on 26 – 28 November. The meeting covered various topics under the data protection domain, such as:

- Modalities of cooperation between the EDPS and the DPO network
- Recent case law on privacy and data protection (including EDPS' analysis of cases C-413 and T-384 before the European Court of Justice ('ECJ'))
- DPO's approach to Microsoft COPILOT risk assessment and COPILOT DPIA'S
- EDPS view on Microsoft 365 components used by EUI's
- Discussion on templates related to the COPILOT DPIA process developed by different EUI'S
- Digital Omnibus package changes introduced in 2025
- Update on the AI Act
- Workshop on pseudonymisation and processing of data; the case scenario was based on the recent ECJ ruling C-413/23 P (EDPS V SRB).

Discussions and presentations among EUI DPOs included but were not limited to introduction of recently appointed DPOs, update and discussion on the existing working groups, their activities, continuation and/or closure. The new EDPS guidelines on generative AI were discussed, including the liaison officer/focal point function.

These meetings serve as a platform for discussions on data protection issues. The DPOs can learn from other experiences and share their views. Building on each other's experiences will inform their work, and foster compliance with EUDPR.

8.3 International Association of Privacy Professionals

The International Association of Privacy Professionals ('IAPP') Europe Data Protection Congress 2025 provided strategic insights into the evolving EU regulatory environment, particularly regarding the operational implementation of the AI Act and its intersection with EU data protection regime.

A representative of the DPO actively contributed by participating in a panel dedicated to the article 25 of the AI Act, alongside the European Data Protection Supervisor, Wojciech Wiewiórowski. The session addressed responsibilities across the high-risk AI value chain and responsibilities of different actors engaged in AI provision and development. This joint panel strengthened eu-LISA's visibility and positioning as a knowledgeable actor in discussions on AI governance and data protection compliance.

Engagement at the congress directly supported the DPO's mission by enhancing its capacity to anticipate regulatory developments and translate them into practical guidance for the Agency. AI Act readiness emerged as a dominant theme, with a strong focus on risk classification, documentation, and conformity assessments, all highly relevant to eu-LISA's systems and operations. Discussions on supervisory authorities' enforcement priorities reinforced the importance of consistent application of the GDPR/EUDPR in conjunction with the AI Act. The congress also highlighted challenges linked to overlapping EU regulatory frameworks, underscoring the need for coordinated compliance approaches. Overall, participation enabled the DPO to strengthen its advisory role, promote accountability, and support the development of trustworthy and compliant digital systems within eu-LISA.

8.4 Europol Data Protection Experts Network

A representative of the DPO also participated at the 15th Europol Data Protection Experts Network (EDEN) Conference, held on 21–22 October 2025 in Valletta, Malta, co-hosted by the Maltese Police Force, the University of Malta, and the Academy of European Law ('ERA').

The conference addressed data protection and cybersecurity in the law enforcement domain, with a focus on ensuring compliance with fundamental rights and data protection principles in increasingly complex operational and technological environments. Under the theme "Red Light, Green Light – Reduce Complexity, Increase Speed, Defend EU Values", discussions covered key developments related to the use of artificial intelligence and machine learning, biometric and surveillance technologies, data retention and proportionality, judicial oversight, data ethics, and cross-border data sharing.

Participation supported the DPO's tasks of monitoring regulatory and technological developments, raising organisational awareness, and exchanging best practices with data protection officers, supervisory authorities, and other stakeholders at EU and national level, in line with the EUDPR and EDPS guidance.

8.5 Data Protection Presentations during on-site visits at eu-LISA's Headquarters

On Wednesday, 23 September, eu-LISA welcomed Dr Kathrin Wahlmann, Minister of Justice of Lower Saxony (Germany), accompanied by a delegation from her Ministry and the German Embassy. Among other discussions, the DPO presented the Agency's integrated approach to data protection and security. On 15–16 September, eu-LISA also welcomed a delegation from the European Parliament's Committee on Civil Liberties, Justice and Home Affairs ('LIBE') at our headquarters in Tallinn. During the two-day visit, the DPO had a dedicated session during which the key security and data protection safeguards within the systems were presented, with an emphasis on the steps taken on EES and ETIAs.

9. DPO Function

Article 44 of the EUDPR and Article 6 of the eu-LISA DPO Implementing Rules address the need to provide the DPO with the necessary resources to carry out his or her tasks and duties.

In light of the above, and the Agency's important current and envisaged growing tasks and responsibilities, the DPO function grew substantially in 2025 by adding 1 Data Protection Expert and 3 Data Protection Assistants to its roster. In total the DPO team consists of nine staff members, including one trainee and one external support member.

It should also be noted that the tasks and duties presented in this annual report were performed by the DPO *ad interim* who as of 20 January 2025 - and until the new DPO takes up office - was appointed by Decision No 2024-608 of the Management Board to exercise the tasks laid down in EUDPR. The newly selected DPO should take up duties on 16 April 2026. A hand over document is being prepared.