

2020-2022

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Coordinated Supervision Committee Report of Activities



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1. FOREWORD

Over the last years, EU large-scale information systems connecting EU Member States' authorities and EU bodies (EUIs) have increased and evolved. Through these systems, the EUIs and national authorities share personal data electronically, with an unprecedented speed and volume. For instance, in 2019 alone, 58,396 information exchanges were sent through the Internal Market Information System (IMI)¹ on very diverse policy areas such as firearms authorisations, GDPR, e-commerce, services and patients' rights. In the law enforcement field, during 2020, the EU Agency for Criminal Justice Cooperation (Eurojust)² registered in its information system 4700 new cases, while provided assistance to 8800 cross-border criminal investigations. It supported 268 Joint Investigation Teams, facilitated the execution of 1284 European Arrest Warrants, enabled the use of 1359 European Investigation Orders and extended the network of Eurojust contact points to 55 countries.

To make sure that these processing operations are in line with the EU's data protection framework, supervision is two-fold: the European Data Protection Supervisor (EDPS) supervises the EU bodies' processing of personal data, while national data protection Supervisory Authorities (SAs) supervise data processing by the national competent authorities (e.g. administrative, police, border authorities,

judiciary). It is thus essential that the EDPS and national SAs coordinate their supervisory activities.

With the entry into application of [Regulation 2018/1725](#) in December 2019, this cooperation between the EDPS and the national Supervisory Authorities came within the framework of the European Data Protection Board. To steer this cooperation and the monitoring activities in the right direction, the Coordinated Supervision Committee (CSC) was established. The Committee aims to enhance cooperation among the different Supervisory Authorities and ensure a more effective supervision. It coordinates the supervision of those EU large-scale information systems and bodies whose legal acts refer to Article 62 of Regulation 2018/1725 or to the European Data Protection Board, and by implication, to the CSC.

Over the last two years, the Internal Market Information System (IMI), Eurojust, the European Public Prosecutor's Office (EPPO) and Europol have come into the scope of the CSC. Gradually, the Committee will also cover other IT systems, bodies, offices and agencies in the fields of Border, Asylum and Migration (SIS, EES, ETIAS and VIS), Police and Justice Cooperation (SIS, ECRIS-TCN) and the next generation Prüm.

1. https://ec.europa.eu/internal_market/imi-net/statistics/2021/02/exchanges/index_en.htm

2. [Eurojust Consolidated Annual Activity Report 2020](#)

This bi-annual report summarises the work completed by the CSC during the first two years of its existence. While a large part of the CSC is still under construction, the Committee has been working full speed to accommodate the large-scale information systems that have already come under its purview and to prepare the arrival of the others. Since December 2019, it has been closely following developments at IMI and Eurojust, as well as EPPO from June 2021 onwards, and Europol from June 2022. In December 2021, the first report was published concerning the use of the Internal Market System in the EU Member States.

Looking forward to the coming years, the CSC is ready to welcome more IT systems & EUIs within its purview. It will tackle the outstanding items in the work programme and continue to assist SAs in their work, by providing further clarification on the interpretation of EU and national law, stimulating the exchange of information and best practices, and providing support for joint audits or coordinated inspections.

Clara Guerra
CSC Coordinator





2. ABOUT THE COORDINATED SUPERVISION COMMITTEE

In accordance with Article 62 of Regulation 2018/1725, the national Supervisory Authorities (SAs) and the European Data Protection Supervisor (EDPS) shall cooperate actively to ensure effective supervision of large-scale IT systems and of EU bodies, offices and agencies. For this purpose, they shall meet at least twice per year within the framework of the EDPB. Additionally, several legal acts on large-scale IT systems and EU agencies refer to this model of coordinated supervision.

To ensure the consistency of supervision efforts on both levels, all SAs involved, including the EDPS, used to cooperate through Supervision Coordination Groups (SCGs). Each of these groups was dedicated to a specific EU database. Since December 2018, Regulation 2018/1725 has provided for a single model of coordinated supervision for large-scale EU IT systems and agencies within the framework of the EDPB. This replaces the current system of individual SCGs. The new model does not apply to all EU information systems and agencies at once, but progressively, according to when the revised version of the establishing act of each EU information system and agency becomes applicable.

In December 2019, the Coordinated Supervision Committee (CSC) was formally established within the EDPB. It brings together the SAs of each EU Member State and the EDPS, as well as SAs of non-EU Members of the Schengen Area when foreseen under EU law. During its first meeting, Giuseppe Busia from the Italian SA was elected as Coor-

ordinator and Iris Gnedler from the German federal SA as Deputy Coordinator for a term of two years.

In December 2020, the CSC elected Clara Guerra from the Portuguese SA to succeed Giuseppe Busia as the CSC Coordinator, due to Mr. Busia's departure from the Italian SA and thus from the CSC. Sebastian Hümmeler from the German Federal SA was elected in December 2021 to succeed Ms. Gnedler as Deputy Coordinator, upon the end of her two years term.

Participation in the CSC meetings can occur under various arrangements, depending on the IT system, body, office or agency for which supervision is taking place, as well as the respective EU legal act.

Likewise, cooperation within the CSC can take many forms, ranging from exchanging information and assisting each other in carrying out audits and inspections to preparing harmonised proposals for solutions to identified problems and promoting awareness of data protection rights.

While the Committee is established within the framework of the EDPB, it enjoys an autonomous functioning and positioning, pursuant to Article 37.2 of the [EDPB Rules of Procedure](#). The Committee adopts its own rules of procedure and working methods. The EDPB Secretariat provides the Secretariat of the CSC.

2.1 Mission

The CSC ensures the coordinated supervision by Supervisory Authorities of large-scale IT systems and of EU bodies, offices and agencies falling under its scope, in accordance with Article 62 of Regulation (EU) 2018/1725 or with the EU legal act establishing the large-scale IT system or the EU body, office or agency.

The following EU large-scale IT systems, bodies, offices and agencies currently fall under the CSC's scope:

Internal Market:

- [Internal Market Information System \(IMI\)](#), which allows the exchange of information between public authorities involved in the practical implementation of EU law.
- The CSC ensures coordination in the supervision of the processing of personal data in the Internal Market Information System (IMI) in accordance with Article 21 of Regulation (EU) No 1024/2012 (as modified by Article 38 of Regulation (EU) No 2018/1724).

Police and Judicial Cooperation:

- [Eurojust](#), the agency responsible for judicial cooperation in criminal matters among EU Member States.
- The CSC ensures coordination in the supervision of the processing of operational personal data in the context of cooperation between the national members within Eurojust in accordance with Article 42 (2) of Regulation (EU) No. 1727/2018.
- [European Public Prosecutor's Office \(EPPO\)](#), the prosecution agency responsible for investigating, prosecuting and bringing to judgment crimes against the EU budget.
- The CSC ensures the coordination in the supervision of the processing of operational personal data with respect to specific issues requiring national involvement, in particular, if there are major discrepancies between practices of EU Member States, potential unlawful transfers using the EPPO communication channels, or questions raised by one or more national SAs on the implementation and interpretation of Regulation (EU) No. 1939/2017, in accordance with its Article 87.

- [Europol](#), the agency responsible for police cooperation among EU Member States.

→ The CSC ensures the coordination in the supervision of the processing of operational personal data in the context of the support by Europol to the national competent authorities of the Member States and their mutual cooperation in combatting serious crime, since the recent entry into force on 28 June 2022 of the recast of the Europol Regulation (EU) 2016/794, in accordance with Article 44 (2), amended by Regulation (EU) No. 2022/91.

2.2 Tasks & duties

Within its mission to ensure the coordinated supervision of some large-scale IT systems and of EU bodies, offices and agencies, the CSC can:

- Exchange relevant information;
- Assist the Supervisory Authorities in carrying out audits and inspections;
- Examine difficulties of interpretation or application of the EU legal act establishing the large-scale IT system or the EU office, body or agency subject to coordinated supervision;
- Study problems with the exercise of independent supervision or with the exercise of the rights of data subjects;
- Draw up harmonised proposals for solutions to problems;
- Promote awareness of data protection rights.



3. 2020-2022: AN OVERVIEW

3.1 Setting up the CSC

3.1.1 Rules of Procedure

The [Rules of Procedure](#) were adopted during the first meeting of the Coordinated Supervision Committee, which took place on 3 December 2019. They outline the most important procedural rules of the CSC. They describe:

- The CSC's guiding principles;
- The CSC's composition;
- The CSC's organisation;
- The election of its coordinator and deputy coordinators;
- The CSC's working methods.

3.1.2 Organisation of meetings

The Committee must meet at least twice a year. The Coordinator may also decide to convene extraordinary meetings, on his/her own initiative or at the request of the majority of the Committee's participating authorities.

The COVID-19 crisis has led EU institutions to adapt to new ways of working and to hold meetings remotely to be able to

continue their activities. The Committee has also resorted to remote meetings and will need to do so again in the future.

Participation in the CSC meetings can occur under various arrangements, depending on the IT system, body, office or agency for which supervision is taking place, as well as the respective EU legal act:

- **IMI:** The EDPS and the national Supervisory Authorities (SAs) of the 27 EU Member States participate in the activities of the CSC in relation to IMI. The national SAs of Iceland, Liechtenstein, and Norway also participate, as their respective countries also apply the EU legal acts governing IMI;
- **Eurojust:** The EDPS and the national SAs of 26 EU Member States participate in the activities of the CSC in relation to Eurojust;
- **EPPO:** The EDPS and the national SAs of the 22 participating EU Member States participate in the activities of the CSC in relation to the EPPO;
- **Europol:** The EDPS and the national SAs of 26 EU Member States participate in the activities of the CSC in relation to Europol.

An overview of the CSC members and their participation in relation to the respective IT system, body, office or agency can be found on the [CSC webpage](#).

3.1.3 Working methods

The Committee elects a Coordinator and at least one Deputy Coordinator from among its members for a term of office of two years.

The Coordinator convenes and chairs the meetings, acts as a contact point in CSC matters, sets the draft agenda, carries out all the tasks that have been assigned to them in the Rules of Procedure and updates the European Data Protection Board of the work of the Committee at least twice a year. The Deputy Coordinator will perform these tasks if the Coordinator is unable to attend. Both cooperate in liaison with the EDPB Secretariat to ensure the smooth functioning of the Committee, prepare the draft agenda, the draft work programme, and the draft joint report of activities on coordinated supervision.

The Secretariat of the Committee is provided by the EDPB Secretariat. The Secretariat assists the Committee in the performance of its tasks and acts solely in the best interests of the Committee.

The Committee or the Coordinator may designate one or several (co-) rapporteur(s) for specific issues. The rapporteurs are responsible for the elaboration of documents, incorporating comments into revised drafts, finalising the documents, and presenting them to the Committee.

The Committee created its own logo and a dedicated website, within the EDPB's website, to communicate on its work with the public. On this website, the Committee publishes general information, documents it produces, and summaries of its meetings' discussions, in accordance with Article 9 of the [CSC Rules of Procedure](#).

As mentioned in its [Work Programme 2020-2022](#), the Committee seeks through its activities and meetings a regular dialogue and engagement with controllers, processors and third parties, including civil society organisations, to ensure a comprehensive reflection on the issues at stake, while always taking into account its role as an independent body.



4. ACTIVITIES

In line with its biannual work programme, the Committee carried out the following main activities from 2020 to 2022:

1. Promote and facilitate the exercise of data subject rights;
2. Examine difficulties of interpretation or application of EU and national law;
3. Exchange information and conduct joint audits or coordinated inspections;
4. Prepare for the start of the EPPO's activities and other EU bodies and information systems that will fall under the Committee's scope.

4.1 Promote and facilitate the exercise of data subject rights

One of the main legal tasks of the Committee is to study problems related to the exercise of independent supervision or the exercise of data subject rights and to propose solutions to these problems.

Large-scale EU information systems and networks such as IMI, Eurojust, and EPPO, which connect EU and national authorities seamlessly, have a hybrid nature: both national-EU and trans-European. Data may transit and be stored in multiple places and be processed by diverse entities. Data subjects may not know at a given point in time if their data is being processed at EU and/or at national level. As such, they may not know to whom they can address their requests.

The Committee focused its activity on the exercise of data subjects rights in relation to IMI, by identifying the current practices, based on an evaluation of the level of compliance at national level, carried out in a coordinated manner, in order to decide on the joint action to be taken to tackle the deficiencies found.

4.1.1 Report on the use of the IMI system with proposals on the exercise of data subject rights

The Committee requested and received information on the retention of personal data in the IMI system and the users with access to it, the information recorded in the IMI logs and the information available to data subjects from the European Commission. The European Commission confirmed that there are no common European templates with information for data subjects on how they may

exercise their rights at national level in relation to the processing in IMI of their personal data.

The Committee subsequently discussed how to ensure that data subjects have access to sufficient information on the exercise of their rights with respect to the processing of their personal data in IMI.

Before taking concrete and coordinated actions, the CSC members decided to obtain more information on the use of IMI and, in particular, on the information available to data subjects on IMI at national level.

To this end, the Committee prepared a questionnaire, to be filled out by its members in consultation with the national IMI Coordinators (NIMIC), on the use of the Internal Market Information System (IMI) in their respective countries by various authorities (including data protection authorities) to process personal data.

The questionnaire consisted of four parts: questions about the general implementation of IMI in the Member State, questions about data subject rights, questions about the information policy in the Member State, and questions about the implementation of IMI in the supervisory authority.

In December 2021, the Committee produced a [report](#) based on the responses to the questionnaire obtained from the CSC members. The report provides a general overview of the use of IMI and will form the basis for the CSC's future work on this topic.

The report identifies some diversity among the EU Member States in their use of IMI concerning the number of registered authorities and users, the practice of access allocation, and the roles in place in the system. In other areas, there were fewer discrepancies, for example concerning the tasks performed by the National IMI Coordinators (NIMIC) and the general rules for assigning user rights.

The responses further showed that in the majority of Member States, data subjects' requests are dealt with directly by the controllers (i.e. the competent authorities) and there is therefore no centralised view in terms of the number of requests received.

In terms of the information policy at national level for IMI, a significant number of the Committee members indicated that they considered either that controllers do not provide sufficient information about IMI, or they were not in a position to respond to this.

In view of the conclusions taken, the CSC decided that it would develop recommendations to the national competent authorities, as controllers, regarding GDPR transparency obligations for the IMI data processing. These recommendations should include a standardised text model to be used on a voluntary basis by the controllers.

4.1.2 List of national competent supervisory authorities

After discussing the information available to data subjects on the exercise of their rights in relation to the processing of their personal data in the IMI at the EU and national level, the Committee drew up an [updated list of national Supervisory Authorities competent to receive complaints or any other referrals from data subjects](#) concerning IMI, Eurojust and EPPO with their contact details and made it available to the public via the Committee's public website.

4.2 Examine difficulties of interpretation or application of EU and national law

Another legal task of the Committee is to examine difficulties of interpretation or application of Regulation 2018/1725 and other EU laws to their activities in relation to EU large-scale information systems and bodies.

In order to effectively, and in harmonized manner, apply EU law to their activities, Supervisory Authorities need to reach a common understanding on the interplay between EU instruments with a general nature (such as Regulations 2018/1725 and Directive 2016/680) and those with a specialised nature (such as the IMI, Eurojust and EPPO Regulations).

The application of some of these EU instruments also needs to be reconciled with the application of national law, which may apply for instance to the processing of law enforcement data.

4.2.1 Discussions about the interplay between EU and national law and its application to the activities of supervisors

The Committee members took note of and considered the study commissioned by the EDPB on data protection in the judiciary and the concept found in the GDPR and in the EU Data Protection Law Enforcement Directive (LED)³ of courts/judicial authorities acting in their judicial capacities.

3. [Directive \(EU\) 2016/680 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data.](#)

The Committee received a presentation from the Eurojust DPO on Eurojust's functioning, its legal basis, its processing of personal data and the attribution of responsibilities. The Committee discussed the interpretation and application of Article 42 of the Eurojust Regulation - "Cooperation between the EDPS and national Supervisory Authorities"- and a proposal for cooperation between Supervisory Authorities and law enforcement authorities in the area of cybercrime.

The Committee also discussed its preparation for the entry into operation of the European Public Prosecutor's Office (EPPO) on 1 June 2021. The Committee members received presentations from an academic, who had studied the interpretation of the EPPO Regulation in view of its supervision by the EDPS and the self-monitoring by the EPPO DPO. The discussions addressed the interplay between the regulations applicable to the EPPO's processing of data, as well as controllership over the personal data in question. The Committee also discussed the next steps to be taken regarding the supervision of the EPPO at the European and national level.

4.3 Exchange information and conduct joint audits or coordinated inspections

Another of the Committee's key tasks is to enable Supervisory Authorities to exchange relevant information and assist each other in carrying out audits and inspections. Information exchange and mutual assistance are necessary because of the complexity and size of the information systems supervised, the transition and retention of personal data across various national and EU information systems, and the multiple and diverse data controllers, processors, data subjects and other parties that may be involved.

Supervisory Authorities are already experienced in supervising EU bodies and large-scale information systems such as Europol, SIS, CIS, Eurodac and others. Building on this experience, they sought to identify those processing operations or practices involving personal data in relation to IMI, Eurojust and the EPPO that require or could benefit from an exchange of information and assistance at European level.

In this context, the Committee members discussed how to prepare a common European-wide framework for audits of IMI conducted at the national level.

The Committee also engaged with Eurojust representatives, including its DPO, to obtain more information on matters such as the Eurojust Counter-Terrorism Register, the communication channels used between national authorities and Eurojust to exchange information, and other data protection matters. In addition, the EDPS presented the draft report on its audit on Eurojust, which took place

on 25-26 October 2021. The audit was based on consultation with the agency. Its scope focussed on the processing of operational data only and on areas subject to legislative changes. The Committee took note of the EDPS' audit and identified issues for follow-up at national level.

4.4 Prepare for the start of the EPPO's activities and other EU bodies and information systems that will fall under the Committee's scope

4.4.1 EPPO

The European Public Prosecutor's Office (EPPO) started its operations in June 2021. The Committee has closely followed the EPPO's implementation at Member State level.

After having obtained information from the EPPO DPO, the Committee decided that its members should engage with the European Delegated Prosecutors (EDPs) in their respective Member States. The objective was to open communication channels with them, to obtain more information on the state of play of the EPPO's start of operations at national level and to learn about their interaction with the national competent authorities (such as courts and law enforcement authorities) and the use of relevant national systems and databases. To this end, the Committee prepared a common questionnaire and discussed the answers provided by its members.

The Committee discussed the national legal framework and the organisation of the EDPs' work environment, in particular the communication with EPPO and the interaction with other national competent authorities. The Committee noted that in many Member States the EDPs are still being set up and that there were some delays and provisional arrangements. The Committee will continue to monitor closely the EPPO's implementation and the need for advice during this phase.

4.4.2 Europol

The Committee began preparing for its role in the coordinated supervision of Europol, which fell under the Committee's purview on 28 June 2022. The Committee engaged with the Europol Cooperation Board (ECB) and its Secretariat to prepare this transition.

4.4.3 Preparation of the new large-scale EU Information Systems

The Committee noted that eight additional EU information systems are expected to fall under its purview in the

coming two years. These systems are of a technical and complex nature and raise especially sensitive data protection issues. Some of these issues will result from the foreseen interoperability between them.

In the future, the CSC will become the single forum for data protection coordinated supervision of the EU systems. This horizontal approach will enable DPAs to have a holistic view of all the data processing involved, including the multiple cross-access rights from EU agencies to different systems, as well as the envisaged interoperability among several EU information systems, and to be more effective in their monitoring activities.

In light of the above and to prepare its coordinated supervision over these information systems, the Committee discussed its future internal organisation and working methods. The CSC members underlined the need for the CSC to be flexible in this regard.

While complying with the requirement to hold at least two meetings per year, the CSC will hold an increased number of meetings, whose attendance will vary in accordance with the systems being discussed. The meetings will be organised, preferably, based on three configurations (border management, police and judicial cooperation, IMI). It will still be possible to have combined configurations, if necessary, for general affairs, specific items or coordinated actions.

The Committee addressed additional matters, such as access to the information of the supervision coordinated groups, from which it will take over coordinated supervision, the need for a secure platform for the handling of documents, and cooperation with external stakeholders, in particular those from other EU bodies, such as the EU Agency for Fundamental Rights (FRA), Joint Research Centre (JRC), European Union Agency for Law Enforcement Training (CEPOL) or European Union Agency for Cybersecurity (ENISA), and NGOs working in relevant areas.

The Committee also began preparing for the entry into operation of new information systems by inviting technical experts to discuss their future operations and identify high risks in relation to data protection.

In this context, the Committee received a presentation from a representative from FRA on its last research on EU large-scale IT systems and their interoperability, with a focus on the Entry Exit System (EES), the European Travel Information and Authorisation System (ETIAS), and the EU Interoperability Regulations.

The Committee also identified some of the files it could soon inherit from the Europol Cooperation Board (ECB) and the SIS II Supervision Coordinated Group (SIS II SCG).

5. MAIN OBJECTIVES FOR 2022-2024

Two years after the creation of the CSC, the Committee is looking ahead and evaluating where its focus should be in the coming years. A high number of additional EU agencies and information systems will fall under the CSC's purview in 2022 and 2023. The Committee will continue adjusting its working methods and organisation of meetings to cover them effectively. The Committee will engage with existing coordinated supervision groups on specific EU information systems and agencies and with the EDPS, which provides the secretariat for these SCGs, to prepare their transition to the CSC.

For the next biennium, the Committee will focus on providing clear guidance to data subjects about their data protection rights vis-à-vis the several EU information systems and how they can in practice exercise them.

The Committee will strive to reach a holistic view considering the interaction and interoperability of the European information systems, in order to improve effectiveness in the coordinated supervision activities.

5.1 Getting ready for the new large-scale EU Information Systems

The Committee will continue its preparations to assume the coordinated supervision over the EU information systems and agencies that will fall within the scope of the CSC.

The following IT systems, bodies, offices, and agencies will gradually be moved to the CSC:

Border, Asylum and Migration:

- Schengen Information System (SIS), which ensures border control cooperation (before the end of 2022);
- Entry Exit System (EES), which registers entry and exit data and refusal of entry data of third country nationals crossing the external borders of the Schengen States (expected in 2023);
- European Travel Information and Authorisation System (ETIAS), which tracks visitors from countries who do not need a visa to enter the Schengen Zone (expected in 2023);
- Visa Information System (VIS), connecting consulates in non-EU countries and all external border-crossing points of Schengen States (expected in 2023);
- Eurodac, which compares fingerprints of asylum applicants to see if they have previously applied for asylum or entered the EU irregularly via another Member State (expected in 2023);

- Customs Information System (CIS), which is an automated information system that assists EU State administrative authorities in preventing, investigating and prosecuting operations that are in breach of customs or agricultural legislation (No estimated date for the entry into force and the date of application of legislative proposal).

Police and Judicial Cooperation:

- SIS, which also ensures law enforcement cooperation (before the end of 2022);
- European Criminal Records Information System on third country nationals (ECRIS-TCN), which allows EU Member State authorities to identify which other Member States hold criminal records on third country nationals or stateless persons being checked (expected in 2023);
- In addition, the interoperability of EES, Eurodac, ETIAS, ECRIS-TCN, SIS, and VIS is expected to go live by the end of 2023.

5.2 Coordination and effective supervision

5.2.1 Promote and facilitate the exercise of data subject rights

The CSC will continue its work to facilitate the exercise of data subject rights vis-à-vis the large-scale information systems within its purview. Among others, the CSC will develop recommendations to the national competent

authorities, as controllers, regarding GDPR transparency obligations for IMI data processing. In addition, the CSC will work on guidance regarding the different EU information systems and continue to exchange best practices.

5.2.2 Examine difficulties of interpretation or application of EU and national law

The CSC will continue its work in this area to ensure the effective application of EU law by Supervisory Authorities and to clarify the interplay between national and EU law where relevant.

5.2.3 Exchange information and conduct joint audits or coordinated inspections

As one of the Committee's main *raison d'être*, the CSC will continue to promote the exchange of information among its members and to provide support for joint audits or coordinated inspections. Among others, the CSC plans to develop general standards or reference frameworks for national audits and inspections. In addition, the Committee will work to promote best practices based on the Committee members' experience supervising EU large-scale information systems and bodies

The Committee will explore avenues for an effective dialogue between Supervisory Authorities and public authorities acting as data controllers, such as the European Commission, Eurojust, Europol and the EPPO, which could be beneficial for them and in turn, for EU citizens. Such dialogue should also involve civil society organisation to ensure a comprehensive reflection on the issues at stake.

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