

Public consultation on: Guidelines 08/2022 on identifying a controller or processor's lead supervisory authority

Adopted on 10 October 2022

*(*The comments below represent exclusively the personal point of view of the author)*

The Guidelines in question represent very useful tool and examples in order to assess the scenarios regarding the identification of the lead supervisory authority under GDPR in Europe.

The scenarios illustrated cover mostly the cases where the subsidiaries of multinational group are in EEA with a Head Quarter in EEA too.

It will be interesting to see in reality how the Supervisory Authorities in different EU Member States will interpret the practical cases of cross-border processing.

However, several big multinational groups have the real point of decisions in a Head Quarter outside Europe with subsidiaries located in different EU Member States. It will be useful, therefore, to have also more examples on this kind of scenarios. In any case, from the personal point of view of the undersigned, the international cooperation among different Supervisory Authorities not only in EEA but also outside Europe will be a crucial key in order to deal with the international nature of big multinational groups and the relative cross border processing.

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