



EUROPEAN MEDICINES AGENCY  
SCIENCE MEDICINES HEALTH

19 October 2020  
EMA/557140/2020  
European Medicines Agency

## Comments from the European Medicines Agency for the public consultation on EDPB Guidelines 7/2020 on the concepts of controller and processor in the GDPR

Dear European Data Protection Board,

Please find below the European Medicines Agency's comment regarding the public consultation on the draft [EDPB Guidelines 7/2020 on the concepts of controller and processor in the GDPR](#):

The Agency would like to request the European Data Protection Board to elaborate on the example regarding Clinical Trials (see page 21 of the Guidelines) to reflect a more complex situation which usually arises in the area of clinical trials. Accordingly, it would be useful to demonstrate in the example the controller-processor relationship in a multi-centre study where the sponsor involves several CROs (Contract Research Organization) who are then responsible to work with several investigation sites.

Thank you for the opportunity to provide comments on the draft Guidelines during this public consultation.

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