

EVALUATION OF THE GDPR UNDER ARTICLE 97 – QUESTIONS TO DATA PROTECTION AUTHORITIES / EUROPEAN DATA PROTECTION BOARD

ANSWERS FROM THE ICELANDIC SUPERVISORY AUTHORITY

The General Data Protection Regulation ('GDPR') entered into application on 25 May 2018, repealing and replacing Directive 95/46/EC. The GDPR aims to create a strong and more coherent data protection framework in the EU, backed by strong enforcement. The GDPR has a two-fold objective. The first one is to protect fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data. The second one is to allow the free flow of personal data and the development of the digital economy across the internal market.

According to Article 97 of the GDPR, the Commission shall submit a first report on the evaluation and review of the Regulation to the European Parliament and the Council. That report is due by 25 May 2020, followed by reports every four years thereafter.

In this context, the Commission shall examine, in particular, the application and functioning of:

- Chapter V on the transfer of personal data to third countries or international organisations with particular regard to decisions adopted pursuant to Article 45(3) of this Regulation and decisions adopted on the basis of Article 25(6) of Directive 95/46/EC; and
- Chapter VII on cooperation and consistency.

The GDPR requires that Commission takes into account the positions and findings of the European Parliament and the Council, and of other relevant bodies and sources. The Commission may also request information from Member States and supervisory authorities. As questions related to Chapter VII concern more directly the activities of the DPAs, the present document focuses primarily on that aspect of the evaluation, while also seeking their feedback on Chapter V related issues.

We would be grateful to get the replies to the questions (in English) by 15 January 2019, at the following e-mail address: JUST-EDPB@ec.europa.eu.

Please note that your replies might be made public.

When there are several DPAs in a given Member State, please provide a consolidated reply at national level. In the context of the preparation of the evaluation report, and following the input from other stakeholders, it is not excluded that we might have additional questions at a later stage.

I. CHAPTER V

The GDPR provides that the adequacy decisions adopted by the Commission under Directive 95/46 remain in force under the GDPR until amended, replaced or repealed. In that context, the Commission is tasked to continuously monitor and regularly evaluate the level of protection guaranteed by such decisions. The 2020 evaluation provides a first opportunity to evaluate the 11 adequacy decisions adopted under the 1995

Directive. This does not include the decision on the Privacy Shield that is subject to an ad hoc annual review process and the Japanese adequacy decision that was adopted last year under the GDPR and is also subject to a specific evaluation exercise (the first one will be in 2021).

1. Has any stakeholder raised with your authority any particular question or concern regarding any of the adequacy decisions adopted under the 1995 Directive (with the exception of the EU-US adequacy decision which is not covered by this evaluation process)?

No

2. Does your authority have any information on the developments of the data protection system of any of the countries/territories subject to a Commission adequacy decision under the 1995 Directive that you would consider relevant for the Commission's evaluation?

No

3. In your view, should any third country or international organisation be considered by the Commission in view of a possible adequacy decision?

No

II. CHAPTER VII

The GDPR provided for one single set of data protection rules for the EU (by a Regulation) and one interlocutor for businesses and one interpretation of those rules. This "one law one interpretation" approach is embodied in the new cooperation mechanism and consistency mechanisms. In order to cooperate effectively and efficiently the GDPR equips the Data Protection Authorities (thereafter the DPA/DPAs) with certain powers and tools (like mutual assistance, joint operations). Where a DPA intends to adopt a measure producing effects in more than Member State, the GDPR provides for consistency mechanism with the power to ask for opinions of the European Data Protection Board (EDPB) on the basis of Article 64(1) and (2) GDPR. In addition, in situations where the endeavour to reach consensus in the cases of one-stop shop (OSS) does not work (i.e. there is a dispute between the DPAs in specific cases), the EDPB is empowered to solve the dispute through the adoption of binding decisions.

In this context, the Commission finds it appropriate to request the views of the DPAs / EDPB on their first experiences on the application of the cooperation and consistency mechanisms. To this aim, the Commission established the list of questions below, in order to help the DPAs framing their input. It is understood, that the Commission is also interested in any comments the DPAs may have which goes beyond the answer to the questions and which concerns the application of the two above-mentioned mechanisms.

1. Cooperation Mechanism

1.1. OSS – Article 60

- a. Has your DPA been involved in any OSS cases? If so, in how many cases since May 2018?
Yes, so far, they are 3.
- b. Did you encounter any problems/obstacles in your cooperation with the lead/concerned DPA? If yes, please describe them
No.
- c. How would you remedy these problems?
N/A.

- d. Is your national administrative procedure compatible with the OSS? (e.g. do you identify a clear step which can be referred to as a “draft decision”? Are the parties heard before you produce such draft decision?)

Yes, in part. Neither the IS Act implementing the GDPR No 90/2018 nor the Administrative Procedures Act No 37/1993 mention a draft decision as a specific step when finalising an investigation. The DPA has however identified this as a step in its internal procedures and the right to be heard must be fulfilled before the DPA reaches its decision. The right to be heard is provided for in Article 13 of the Administrative Procedures Act. The provision stipulates that a party to a case shall be given the opportunity to express his views on the subject-matter of the case before a public authority reaches a decision thereon, unless his reasoned position on the matter already appears in the documentation on the case, or it is clearly unnecessary for him to do so.

- e. Were you in the situation of the application of the derogation provided for in Article 56(2) GDPR (so-called “local cases”, i.e. infringements or complaints relating only to an establishment in your Member State or substantially affecting data subjects only in your Member State)?

No.

- f. Is the OSS living up to its expectations? If not, what would you identify as its shortcomings? How can they be remedied?

The main shortcomings are, in the IS DPA’s opinion, the following:

- *The IMI case handling system is too complicated for users. Many of the DPAs have a very heavy workload with limited resources and the amount of time that goes into navigating the IMI is way too high. In addition, it can be difficult to follow the same case throughout the whole lifecycle, i.e. it is difficult to see connections between different procedures (Article 56 – Article 65, etc.), even if they involve the same incident/complaint.*
- *Another (smaller) example is the use of the Voluntary Mutual Assistance procedure where a separate case has to be created for each request to the DPAs (which can mean that for every procedure, the DPA needs to create around 30 cases) – instead of creating one case and ticking a box to decide which DPAs should receive the request, for example. One way to remedy this is to look at the system again and try to simplify the procedures within the system – and make them more user friendly.*
- *Different procedural laws. It seems that procedural laws differ quite a bit between Member states. Some have very flexible procedural laws while others have very strict provisions. This – along with a lack of understanding between Member states when it comes to these differences – can be identified as a shortcoming. Some steps are being taken to make it easier for Member states to understand these differences and try to reach an understanding between them. One way forward would be to integrate information about different procedural laws into Confluence and/or IMI. Another would be to look into the possibility to coordinate case procedures by adding relevant provisions to the GDPR itself.*
- *Some issues regarding the substance of the OSS provisions remain unclear but as is the case with all new legislation, it is the IS DPAs opinion that as time passes, more knowledge is gathered, and the processes become more streamlined. As of today, our biggest concern regards how the OSS system functions when it comes to processors that operate on a cross-border basis, especially regarding data breaches, since they are not obliged to notify the DPAs about data breaches and it is not always clear from the notifications from controllers that a processor is involved. This can result in processors “flying under the radar”. An example of this would be a service provider that*

operates in several Member states and becomes aware of a data breach and notifies the controller. The controller then notifies its LSA in accordance with the GDPR but there is no direct requirement in the GDPR that the controller informs the LSA about the use of a processor or whether the breach is cross border (and the controller could be unaware that it can be considered a cross-border breach). Because of this, it could be argued that some data breaches would only be dealt with locally, even though they have occurred in other Member states as well.

- *Furthermore, since translation costs and resources is not included in the EEA Agreement or the Joint Committee Decision, it can be very time and cost consuming to translate documents, at least for Iceland.*

1.2. Mutual assistance – Article 61

- a. Did you ever use this tool in the case of carrying out an investigation?
Yes, the IS DPA has used the tool to gather information from other DPAs in connection with investigations (most of them in relation to local cases).
- b. Did you ever use this tool in the case of monitoring the implementation of a measure imposed in another Member State?
No.
- c. Is this tool effectively facilitating your work? If yes, how? If not, why?
As mentioned above, the IMI is not user friendly and it takes quite a long time to send requests to many DPAs. When the IS DPA has used it, it has been well received and it has helped the DPA in coming to certain conclusions in cases. However, the IS DPA rarely uses this procedure, mainly due to how time consuming the use of the IMI system is.
- d. Do you encounter any other problems preventing you from using this tool effectively? How could they be remedied?
See answers above. It would simplify things to be able to tick a box when choosing which DPAs should receive a request.

1.3. Joint operations – Article 62

- a. Did you ever use this tool (both receiving staff from another DPA or sending staff to another DPA) in the case of carrying out and investigation?
No.
- b. Did you ever use this tool in the case of monitoring the implementation/enforcement of a measure imposed in another Member State?
No.
- c. Is it effectively facilitating your work? If yes, how? If not, why?
N/A.
- d. Did you encounter any problems (e.g. of administrative nature) in the use of this tool? How could they be remedied?
N/A.

2. Consistency mechanism

2.1 Opinion - Article 64 GDPR

- a. Did you ever submit any draft decision to the Board under Art 64(1)?
Yes.
- b. Did you ever submit any draft decision to the Board under Art 64(2)?
No, not yet.

- c. Did you have any problems by complying with the obligations under Article 64(7) GDPR, i.e. taking utmost account of opinion of the EDPB? If so please describe them.

No.

- d. Was the “communication of the draft decision” complete? Which documents were submitted as “additional information”?

N/A.

- e. Were there any issues concerning the translations and/or any other relevant information?

Because the IS DPA is not a member of the EU, documents are neither translated from English to Icelandic nor vice versa in the IMI system. This means that the resources of the DPA must go into translations. As of now, the case handlers themselves translate documents when needed.

- f. Does that tool fulfil its function, namely to ensure a consistent interpretation of the GDPR?

Yes, in part. Nevertheless, the IS DPA would like to reiterate its previous comments about the functioning of the IMI system.

2.2 Dispute resolution - Article 65 GDPR

- a. Was this procedure used? If yes, what was your experience during the process?

No, not yet.

- b. Which documents were submitted to the EDPB?

N/A.

- c. Who prepared the translation, if any, of that documents and how much time did it take to prepare it? Were all the documents submitted to the EDPB translated or only some of them?

N/A.

2.3 Urgency Procedure – Article 66

- a. Did you ever adopt any measure under urgency procedure?

No.

3. Exchange of information: Standardised communication

- a. What is your experience with the standardised communication through the IMI system?

The IS DPA has not enough experience with the standardised communication through the IMI system to be able to give concrete views on the matter. Nevertheless, previous comments about the complexity of the IMI are also relevant here. In the IS DPA’s view there are too many “clicks” that need to be made in order for a communication to be sent through.

4. European Data Protection Board

- a. Can you provide an indicative breakdown of the EDPB work according to the tasks listed in Article 70?

An overview of the work of the EDPB can be found on the Board’s website.

- b. For the EDPB Secretariat: Can you provide an indicative breakdown of the EDPB Secretariat work and allocation of resources (full-time equivalent) according to the tasks listed in Article 75?

5. Human, technical and financial resources for effective cooperation and participation to the consistency mechanism

- a. How many staff (full-time equivalent) has your DPA? Please provide the figures at least for 2016, 2017, 2018, 2019 and the forecast for 2020.

2016: 7,1
 2017: 7,2
 2018: 10,8
 2019: 16,5
 2020 (est.): 17

- b. What is the budget of your DPA? Please provide the figures (in euro) at least for 2016, 2017, 2018, 2019 and the forecast for 2020.

Year	2016	2017	2018	2019	2020
Currency	Euro	Euro	Euro	Euro	Euro
Income items					
Budget	850.494	909.091	1.527.695	2.149.512	2.156.220
Other income		4.785	81.587	14.906	23.850
Contributions to depreciation		8.772	11.227	16.397	18.633
Total income	850.494	922.648	1.620.509	2.180.815	2.198.703
Investment contribution		1.834	12.725	91.675	95.401
Total income (with investment contribution)	850.494	924.482	1.633.234	2.272.490	2.294.104

- c. Is your DPA dealing with tasks beyond those entrusted by the GDPR? If yes, please provide an indicative breakdown between those tasks and those entrusted by the GDPR.
- i. *Yes, the data protection law is mentioned in over 100 Icelandic legal acts approved by parliament. The IS DPA is entrusted with various tasks according to other laws, for example:*
 - ii. *According to Art. 4, para. 3 of Act No. 90/2018 on data protection and the processing of personal data (implementing the GDPR) the act and the GDPR shall apply to the processing of personal data of deceased natural persons, where appropriate, for a five-year period from their deaths or longer, when this concerns personal data which is fair and reasonable to keep confidential.*
 - iii. *Article 13 of the [Act on Scientific Research in the Health Sector No. 44/2014](#) stipulates that the National Bioethics Committee and institutional review boards shall submit to the Data Protection Authority a summary of each application for a scientific study. The DPA then decides whether to consider the case further and has 10 working days to do that. The National Bioethics Committee or institutional review board may grant approval ten working days after receipt of the summary by the Data Protection Authority, unless the Authority has within that time notified the relevant committee otherwise. Should the Data Protection Authority do so, the committee may not grant approval until the Authority has reached a finding. In 2018, the IS DPA received in total 295 applications for scientific studies for review. In November 2019, it had already received 334 applications for the year 2019. In most cases, no comments are made about the study by the DPA, but in larger studies, such as when the Icelandic DNA data bank (owned by DeCode Genetics) is used, several comments can be made, orders given and prior authorisations granted. The IS DPA has in several cases over the years given orders where the intended processing is deemed unlawful.*

- iv. *Schengen related issues. According to Act No 16/2000 on the Schengen Information System the IS DPA shall monitor that the processing of personal data is in accordance with the Act and the DPA shall also monitor the security of the system.*
- v. *Article 9 of the Act on a DNA Register for Law Enforcement Purposes No. 88/2001 stipulates that the DPA shall monitor the processing of personal data in the database as well as the security of the database. The DPA shall be granted access to all documents when exercising its powers. If the DPA has comments about the use of the register, they shall be directed at the Commissioner of the National Police and the Minister of Justice, and the DPA can use all its corrective powers according to the implementing act for the GDPR as well as the Act on the Processing of Personal Data for Law Enforcement Purposes (implementing Directive (EU) 2016/680).*
- vi. *Act on Biobanks No 110/2000 stipulates that the DPA shall have various tasks, i.e. issuing rules regarding the security of such biobanks and opinions on whether an entity shall be granted a permit by the Minister to operate as a biobank. Various acts in Icelandic law require ministers or other public authorities to seek the opinion of the DPA before a certain processing of personal data commences, i.e. Act on Postal Services, Act on Foreigners, Act on Telecommunication Services, etc.*
- vii. *Various provisions in Icelandic law stipulate that the processing of personal data required for by each act, shall be in accordance with the data protection legislation and under the supervision of the DPA.*

- d. How would you assess the resources from your DPA from a human, financial and technical point of view?

Human and financial resources

The IS DPA has tripled in size since 2015 and now has a staff of 17, including lawyers, information security experts, archivists and financial staff. Three years in a row, the IS DPA has been ranked in 1st place as the [best public body to work at with staff under 20 persons \(2017, 2018 and 2019\)](#).

Human resources are closely connected to financial resources and in that area IS DPA's resources are limited. The DPA is divided into three sub-units, plus archivists and financial staff. Each of these units has around 3-5 staff members. In practice, this means that there is little or no backup if staff members are unable to attend work (i.e. because of a sick leave or other issues). Currently, the IS DPA has around 800 open registered cases, including, for example, complaints, own-volition cases, audits, international work, inquiries from individuals and organisations, requests for opinions by organisations, public bodies and parliament, requests for permits, etc.

In addition, the DPA has experienced a heavy workload on staff members for a long time now and the effects are starting to show, with sick leaves becoming more frequent. The IS DPA has tried to respond to this situation by making structural changes (took effect on [23 August 2019](#)) along with a tighter cooperation between staff members and Heads of Units, i.e. with weekly progress meetings within units where staff members are given assignments on a weekly basis. This has proved to enhance the use of time and that the case is handled correctly from the beginning. The three Heads of Units also have weekly progress meetings with the Commissioner. Furthermore, the DPA has introduced morning exercises after Friday staff meetings which has been very well received.

The number of inquiries from the media has been quite high for the last couple of years and 2018 was a record year in that respect with the DPA being mentioned 656 times in the news compared to 288 times in 2017. It should also be mentioned that the Commissioner appeared in some 160 media interviews in 2018 (Television, radio, newspapers).

At this point in time, the IS DPA is only able to attend a limited number of sub-group meetings within the EDPB, and often they are attended via Jabber, since the travels are both costly and time consuming (usually three working days away from the office).

Furthermore, it is now official that the DPA will not get additional resources for the year 2020, despite a steady increase in cases. The year 2018 was a record year and we expect to get at least a similar amount of registered cases in 2019. A formal serious concern regarding this state of play will be brought to the attention of the Ministry of Justice later this month.

Technical resources

- A) New case handling system: In the year 2018, the IS DPA started work on implementing a new case handling system, a software called GoPro Foris. The new system was launched on 1 April 2019 and the DPA is now able to get detailed reports of the case load, i.e. statistics on how each case ended (i.e. was a fine issued, etc.), which provisions of the implementing act and the GDPR were considered in the case, overview of the average handling time of cases, etc. The DPA is now also able to send the DPA's Board relevant documents and draft decisions, without the documents ever leaving the secure space of the DPA's server. A DPIA was conducted before the system was implemented.*
- B) Outsourcing and new e-mail software: At the same time, the IS DPA decided to outsource its servers and hosting of data to a third party provider, after performing a DPIA and reaching the conclusion that the data would be more secure with a third party rather than the DPA trying to secure the data on its own servers, especially with regard to cyber security threats. The DPA didn't opt for a cloud solution but uses Exchange services. The data is stored in Iceland and separate from other controllers' data (on separate hardware). Also, the DPA moved its e-mail services from Lotus Notes to Outlook, following a DPIA.*
- C) New website: The IS DPA launched its new website in the summer of 2018. All material was rewritten, and new material added, partly via a grant from the COM. This is an ongoing project since it's the DPA's view that it still gets a lot of e-mail inquiries from the public regarding data protection related matters, answers to which can be found on the website. However, the public doesn't always seem to use it – or the material isn't accessible enough. The IS DPA recently subscribed to an analytics service from a company called SiteImprove to better understand how the website is being used. The IS DPA is thus looking into ways to improve the website. The IS DPA doesn't have a designated staff member in charge of the website and this is one of the issues that need to be resolved.*
- D) Hardware: The IS DPA is quite well equipped as regards to hardware. All staff members now have laptops and two new monitors. The Commissioner and one head of unit (who travels frequently) have tablets when travelling. Tablets have also been issued to members of the DPA's Board, where they can access relevant documents and draft decisions before board meetings, to ensure the security of documents provided to them. Recently, the DPA set up a closed Wi-Fi connection inside the premises, only for staff members and the Board, so that the staff members can move around the office freely. Access to the Wi-Fi is authenticated through each staff member's LDAP/Active Directory.*

E) *Education of staff: The IS DPA hired two IT-experts in the spring of 2018, one has a BS degree in computer science and the other a BS in Biology but years of experience working in the field of IT Security. They are a part of the DPA's investigation unit. The IS DPA has encouraged them to take part in seminars and other continuing education programs as much as possible. For example they, along with their Head of Unit, recently finished a course in ISO 27001:2013. They have also visited the Danish DPA to learn more about their work.*

- e. More specifically, is your DPA properly equipped to contribute to the cooperation and consistency mechanism? How many persons work on the issues devoted to the cooperation and consistency mechanism?

The IS DPA is of the view that more resources are needed for the DPA to be able to contribute to the cooperation and consistency mechanism. The IS DPA has approximately the equivalent of one full time position that contributes to this work, including meetings related to the EDPB. This position is largely managed by one person, but some tasks are delegated to other staff members. The person in charge of the cooperation and consistency mechanism also oversees various other tasks. The IS DPA would need at least three full time positions to be able to participate sufficiently (including meetings within the EDPB). Logistics are also a part of this since Iceland is at the outer borders of Europe. Direct flights are not always available and travelling time can be long.

6. Enforcement

- a. How many complaints (excluding request for information) did you receive since May 2018? What kind of communication with you/request do you qualify as a complaint?

Number of complaints, excluding cases regarding request for information:

Since beginning of May 2018: 180

Since 25 May 2018: 173

Since 15 July 2018 (when the GDPR became applicable in Iceland): 167

The IS DPA offers a complaint form on its website and on-site that data subjects can fill out if they choose. We also receive complaints via e-mail and letters. If there is any doubt whether the communication should be considered a complaint, the IS DPA contacts the data subject and asks for a clarification. According to the IS Administrative Procedures Act No 37/1993, the procedure usually takes place in written form. Thus, complaints via phone only are not accepted but are rather considered to be tips.

- b. Which corrective powers did you use since May 2018?

Article 58, para 2., lit. (c), (d), (e), (f), (g).

- c. Are you resolving any possible infringements of the Regulation with the help of so-called "amicable settlements"?

Yes, the IS DPA has recently implemented a new workflow where smaller complaints, i.e. when access requests are not answered, etc., are handled with amicable settlements. The IS DPA usually contacts the controller via phone and asks if they can respond to the request. If the controller complies and the data subject is satisfied with the result, the case is closed without further action. At the same time,

repeated delays are monitored by the IS SA. The IS DPA is also in the process of simplifying its procedures, especially regarding smaller cases.

- d. How many fines did you impose since May 2018? Please provide examples.

None, please note that several cases are in final preparations where a fine could be imposed.

- e. Which attenuating and or aggravating circumstances did you take into account?

N/A. In two cases, the IS DPA has considered whether to issue a fine but decided not to since the legal provisions (specific provisions in Icelandic law) were deemed to be unclear as to whether the processing in question was allowed for the controller.

In those cases that are in their final stages the IS DPA is considering the following circumstances to be attenuating:

viii. Willingness to work with the DPA to provide access to the premises of the controller and relevant documents.

ix. Actions taken by the controller after a data breach, including that the data controller himself notified the DPA of a security breach.

The IS DPA is considering the following circumstances to be aggravating:

i. Reluctance of the controller to work with the DPA, i.e. not providing access to premises, CCTV footage, relevant documents.

ii. How the IS DPA became aware of the matter (data breach), via news, tips or complaints.

7. Number of data breaches from 25 May 2018-31 December 2019

*The number of reported data breaches to the IS DPA is **340** during this period. Please note that the population in Iceland is approximately 350.000 people.*

8. Overview of the IS DPA's activities regarding SMEs

Please note that over 99% of all businesses in Iceland are SME's. Therefore, all material for organisations is mostly focused on SME's. The leaflets, nationwide tour, service desk and the education material for DPO's was possible because of funding from the EU.

Furthermore, the IS SA has held ½-1 day conferences/workshops for: The education system (from kindergarten to university), the health care sector, the Government Offices of Iceland (all ministries), Judicial system (district courts and The Supreme Court), local authorities and public bodies. In addition, the representatives of the IS SA regularly speak at conferences on data protection, both locally and abroad.

Activities for SMEs in relation to the GDPR:

1. Publication of **five information leaflets**:

- [New Data Protection Rules \(controllers; business and governmental entities\)](#)
- [New Data Protection Rules \(processors\)](#)
- [Data Protection for Minors \(focus on teenagers\)](#)
- [Data Protection for Minors \(focus on parents and those working with young children\)](#)
- [Data Protection for Individuals](#)

2. **IS DPA's nationwide tour** in October and November 2018.

- *Nine informational sessions were held across Iceland with the last one, which took place in Reykjavik, also being live streamed. PowerPoint presentations along with video recordings from the final session in Reykjavik are available on the IS SA's [website](#).*
- 3. Various conferences on data protection**
- *A kick-off conference on the GDPR in September 2016 held by the IS DPA focusing on the GDPR and changes that needed to be made within organisations and data subject rights. 300 people attended the conference. Two information leaflets were published simultaneously.*
 - *Annual presence (booth-set up) at the [UT-messa](#) in February, the largest technology conference in Iceland, both for organisations (1000+ attendees) and the general public (10000+ visitors).*
- 4. The IS DPA's new and improved website**
- *A new and updated Q&A for [organisations](#) and [data subjects](#) was published in August 2018. More Q&A was published on the Data Protection Day 28 January 2020.*
 - *A template for a data processing agreement and record of processing activities.*
 - *Excerpts of some EDPB Guidelines regarding the GDPR.*
 - *Education material and slides for DPOs.*
 - *Guidance on security measures.*
 - *List of guidance and excerpts of EDPB Guidance can be found at the IS SAs [website](#).*
- 5. A special section on the IS DPA's website for SME's where specific questions on the implementation of the new legislation and related topics could be posed. The DPA strived to prioritize those queries and to answer them within a few working days.**