

## **5 December**

<u>EDPB Binding Decisions</u> concerning Meta services Facebook and Instagram. The EDPB considers that contract is not an appropriate legal basis for processing of personal data for behavioural advertising purposes.

### 31 December

Irish DPA Final Decisions adopted on the basis of the <u>FDPB Binding Decisions</u>. They included orders to bring processing into compliance within three months.

# **April**

Meta informs Irish DPA that it is changing the legal basis for behavioural advertising from contract to legitimate interest; DPAs begin assessing compliance of this change.

# May

Norwegian DPA sends request for mutual assistance to the Irish DPA, asking it to issue a temporary ban on the processing of personal data for behavioural advertising based on legitimate interest and to share a timeline on how the Irish DPA will ensure that Meta complies with the GDPR.

### June

Irish DPA informs other DPAs that it is awaiting the judgment of the Court of Justice of the European Union in the Bundeskartellamt case and that it will finalise its assessment of Meta's compliance with its final decisions afterwards.

# 4 July

CJEU Buderskartellamt Judgement relating to Meta, including the legal basis used for their processing carried out for advertising purposes.

## 11 July

Irish DPA informs other DPAs of its preliminary conclusion that Meta has not complied with its decisions. No corrective measures to stop the processing were envisaged.

## 14 July

Norwegian DPA imposes temporary ban on Meta's processing. In accordance with Art. 66 (1) GDPR, the Norwegian DPA takes urgent measures and bans Meta from processing the personal data of Norwegians for the purposes of behavioural advertising on the legal bases of contract and legitimate interest. This ban takes effect on August 4th, is limited to three months and only applies in Norway.

# 26 September

Norwegian DPA sends request for final measures to the EDPB. The Norwegian DPA requests the EDPB to adopt an urgent binding decision pursuant to Art. 66 (2) GDPR in order to implement final measures that would apply to the whole EEA. The EDPB Secretariat starts the assessment of the completeness of the file.

#### 13 October

The file is complete. The two weeks for the EDPB to adopt its urgent binding decision start.

### 27 October

<u>EDPB urgent binding decision</u>: EDPB considers that there is a need for urgent measures and instructs Irish DPA as lead supervisory authority (LSA) to issue a ban on Meta's processing of personal data for behavioural advertising purposes on the legal bases of contract and legitimate interest across the EEA.

# **10 November**

Irish DPA adopts the <u>decision</u> imposing a ban on Meta's processing. Meta is given one week to implement the ban, as of the notification of the national decision to them.