



PERSONAL DATA
PROTECTION SERVICE

Personal Data Protection Service of Georgia Special Report

International Activities carried out by the Service in 2022-2024
to Implement the Best European Practices and
Standards of Personal Data Protection Law

The Special report has been prepared in accordance with Article 48, Paragraph 5 of the Law of Georgia on Personal Data Protection, which authorizes the Personal Data Protection Service of Georgia to publish a special report, at its own initiative, on matters related to its activities that it is significant. The report covers the activities carried out by the Service during the reporting period from March 1, 2022 to 2024.

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Foreward of the President of the Personal Data Protection Service of Georgia

We are pleased to present this special report of the Personal Data Protection Service of Georgia about the progress on the path to European integration. The report focuses on the cooperation with institutions of the European Union, Personal Data Protection Supervisory Authorities and efforts to raise international institutional awareness of the Service. It covers the international activities and initiatives undertaken by the Service from 2022 to 2024, aimed at implementing best practices and European standards in personal data protection law.

Since 2022, one of the strategic priorities of the Service has been to support European values and establish effective safeguards for personal data protection. In pursuit of this goal, the Service actively represented on various platforms operating under the European Union and the Council of Europe. We cooperate closely with data protection supervisory authorities of EU Member States and other countries, as well as with international organizations and we continue to seek opportunities to expand these partnerships.

This report outlines the key international activities carried out by the Service between 2022 and 2024, focusing on strengthening compliance with the personal data protection frameworks of the European Union and the Council of Europe, fulfilling international obligations in this field, enhancing the institutional capacity of the Service, and engaging in various forms of cooperation.

I would like to express my sincere gratitude to our European colleagues and international partners. Their continued support has enabled the successful implementation of numerous projects and initiatives by the Service. Of the particular importance is the unique cooperation established between our Service and European Data Protection Board (EDPB) and the European Data Protection Supervisor (EDPS), as well as our strong partnerships with supervisory authorities for personal data protection across the Europe.

I am pleased to highlight the significant international events planned by the Service for 2025. From May 6 to 9, the Service will proudly host the European Conference of Data Protection Supervisory Authorities (Spring Conference) in Batumi. Furthermore, in July, Tbilisi will host the 75th meeting of the International Working Group on Data Protection in the Field of Technology (the Berlin Working Group). These events will make a meaningful contribution to the development of the personal data protection legislation in Georgia and provide valuable platforms for international dialogue and exchange.

In conclusion, I would like to confirm the strategic objective of the Personal Data Protection Service: to promote a strong culture of privacy and personal data protection throughout Georgia, in full alignment with European values. The enduring priority of the Service remains the harmonization of national data protection legislation with European standards, the deepening of cooperation with partner supervisory authorities and the adoption of best practices to ensure the effective performance of our supervisory mandate.

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Introduction

In its efforts to strengthen our role in the global and regional personal data protection landscape, the Personal Data Protection Service aims to enhance international institutional awareness and deepen cooperation. To align national legislation with international legal instruments and adopt best European practices, the Service actively collaborated from 2022 to 2024 with counterpart data protection supervisory authorities from EU Member States and other countries, and international organizations. The Service remains committed to expanding these partnerships and continuing its work with these institutions. Throughout the reporting period, the Service systematically monitored international trends and identified challenges within the sector to introduce and implement the best European practices in personal data protection. This proactive approach has been essential in adopting these practices into the Service's daily operations and integrating.

Given the importance of high institutional representation at the international level and the aim of expanding cooperation with partner agencies, the Service regularly participated in key international events focused on personal data protection law and privacy. The Service continues to play a vital role in supporting and initiating the adoption of modern European data protection standards. In pursuit of Georgia's recognition as a country with an adequate standard of data protection, the Service holds ongoing consultations with relevant European Union structures and institutions. These discussions aim at understanding the requirements for achieving adequacy and improving data protection framework in Georgia. Additionally, the Service actively engages in bilateral meetings with foreign data protection authorities to share best practices, plan joint events, and coordinate activities. It is also worth noting that expert consultations and the support received through international cooperation frameworks have been invaluable in studying international data protection standards and ensuring their implementation in the Service's daily operations.

1. Cooperation with EU institutions

1.1. Obtaining Status of Observer for the Activities of the European Data Protection Board (“EDPB”)

In 2023, the Personal Data Protection Service of Georgia was granted observer status by the European Data Protection Board (EDPB). Since June 2023, the President of the Service, along with its staff, has been actively participating in the plenary sessions of the EDPB, representing the Service as a data protection supervisory authority with observer status in the Board’s activities.

The European Data Protection Board is an EU body established under Article 68 of the General Data Protection Regulation (GDPR) and, since May 25, 2018, has been the legal successor to the Article 29 Working Party established under Directive 95/46/EC of the European Parliament and Council (October 24, 1995), which concerned the protection of individuals with respect to personal data processing and the free movement of such data. The EDPB is composed of representatives from the data protection supervisory authorities of each EU Member State, the European Commission, and the European Data Protection Supervisor (EDPS). The European Commission also has the right to participate in its work. The Board plays a crucial role in ensuring the effectiveness of personal data protection regulations across the EU, fostering consistency and best practices among data protection supervisory authorities. It adopts legally binding decisions, publishes opinions, advises the European Commission on personal data protection issues, and develops guidelines and recommendations.

In 2023, following the application submitted by the President of the Service, the Council decided to grant the Office observer status. This decision was based on several criteria outlined in Article 8.1 of the Council’s Rules of Procedure (RoP). According to this provision, the Council may grant observer status to a data protection supervisory authority from a non-EU Member State upon a relevant request, provided that two cumulative conditions: the supervisory authority acts with full independence, and the authority is established in a non-EU Member State that, in its pursuit of EU membership, has committed to fully aligning its national data protection legislation with the European Union’s regulatory framework.

The participation of the Service in the plenary sessions of the Council is of significant importance for sharing best European practices. This cooperation fosters the introduction of modern approaches into the practice of the Service and enhancing its effectiveness.

1.2. Cooperation with the European Data Protection Supervisor (“EDPS”)

During the reporting period, the Service strengthened cooperation with the European Data Protection Supervisor (EDPS). A key milestone in this partnership was the opportunity for a long-term cooperation that Service had a representative in Brussels at the European Data Protection Supervisor’s Office (EDPS). This unique format of cooperation underscores the strong support of European colleagues for our Service. The European Data Protection Supervisor monitors the application of the European Union General Data Protection Regulation (GDPR) and primarily oversees the processing of personal data by EU institutions and bodies.

Notably, in 2024, the Head of the President’s Office had the opportunity to represent the Personal Data Protection Service of Georgia at the EDPS Office for three months. During this visit, he was introduced to best practices in data protection and privacy. Additionally, he participated in events marking the 20th anniversary of the EDPS and engaged in various activities hosted by the institution’s Secretary General. This cooperation is particularly valuable for the Personal Data Protection Service, as it supports the implementation of the new Law on Personal Data Protection. It also facilitates participation in research related to the EU Regulation on Artificial Intelligence and provides opportunities for experience sharing in the field of personal data protection. In December 2023, during a meeting in Brussels with the EDPS Secretary General, the President of the Service discussed the ongoing support from the EDPS in the implementation of the new Law and Georgia’s European integration path. The discussion also covered organizational issues related to the representation of the Service within the EDPS and the continued support provided by the EDPS offers to the Service during the European integration process.

Another significant aspect of this cooperation occurred on March 1, 2024, when, in conjunction with the enactment of Georgia’s new Law on Personal Data Protection, the Secretary General of the EDPS, Leonardo Cervera Navas, addressed a joint event organized by the Committee on Human Rights Protection and Civil Integration and the Service in the Parliament of Georgia. In his address, he praised the activities of the Georgian Personal Data Protection Supervisory Authority at the international level, highlighted the Service’s commitment to implementing European values, and commended the quality of Georgia’s contributions to the international data protection arena.

2. Service – Host Authority of the International Events

2.1. Participation of the Service in the “European Conference of Data Protection Supervisory Authorities”

The Service actively participates in the European Conference of Data Protection Supervisory Authorities, where the President of the Service annually presents reports on various areas of activity and shares the experiences of the Georgian Personal Data Protection Supervisory Authority.

In 2023, during the 31st European Conference, hosted by the Hungarian Personal Data Protection Supervisory Authority, the President of the Service moderated a closed session panel discussing the case law of the European Court of Human Rights (ECHR) and the European Court of Justice (CJEU) on personal data protection. In this panel, Dr. Marko Bošniak, President of the ECHR, presented a report on the Court's case law.

The second panel speaker, Professor Dr. Hielke Hijmans, President of the Litigation Chamber and member of the Executive Board of the Belgian Data Protection Authority, as well as an expert in international migration, refugees, and criminal law (Meijers Committee), and Academic Personnel of the Free University of Brussels and the University of Luxembourg, discussed recent case law from the CJEU and key decisions in personal data protection. Dr. Gergely Barabás, Legal Adviser and President of the Legal Department of the Hungarian Data Protection Supervisory Authority, also presented a report on the relationship between European Union and Hungarian law, highlighting recent national court rulings.

The 32nd European Conference took place in Riga, organized by the Latvian Personal Data Protection Supervisory Authority. During this event, the President of the Service presented a report on the topic: “Challenges of Implementing Legislation Regulating the Protection of Personal Data at the Level of the Personal Data Protection Supervisory Authority.” The report focused on new legislative framework for personal data protection in Georgia, the Service’s experience in international cooperation, and current issues in the field.

2.2. Coordination of the Working Group of the European Conference of Personal Data Protection Supervisors by the Service

In 2023, during the 31st European Conference of Data Protection Supervisory Authorities held in Hungary, new members of the Steering Group for the Conference were selected.

In accordance with the Conference's regulations, the Personal Data Protection Service of Georgia, along with the data protection supervisory authorities of Bulgaria, the United Kingdom, and Cyprus, were elected to the Steering Group. Notably, following an initiative from the Personal Data Protection Service of Georgia regarding the coordination of the Conference's permanent working group, and the vision presented for the future development of the group's activities, the newly formed working group, by consensus, appointed Personal Data Protection Service of Georgia as the coordinator of the working group starting in 2023. This marks a significant milestone, as the previous coordination was held by the United Kingdom's Supervisory Authority ("ICO").

The main objectives of the working group are to: support the hosting data protection supervisory authority of the Conference by providing strategic and practical advice; prepare draft resolutions for consideration and adoption by Conference members, and coordinate the implementation of these resolutions; support the Accreditation Committee, which reviews applications for conference membership and observer status; provide consultations on complex data protection issues.

2.3. Host Authority of the International Working Group on Data Protection in Technology

The International Working Group on Data Protection in Technology (also known as the Berlin Working Group or IWGDPT) is a significant platform established to address issues related to personal data protection in the telecommunications and Internet sectors. In addition to data protection supervisory authorities, the Working Group brings together representatives of public institutions from various countries, international organizations, and global experts in the field. It convenes twice a year, with meetings hosted by one of its member agencies or organizations.

The Personal Data Protection Service of Georgia actively participates in the activities and

meetings of the Working Group. In 2023, the Service took part in the 71st meeting of the Group, hosted by the Italian Data Protection Supervisory Authority (“Garante Per La Protezione Dei Dati Personali”). During this meeting, the President of the Service introduced members to key developments in Georgia’s personal data protection legislation, as well as international initiatives undertaken by the Service. At the 73rd meeting, hosted by the Norwegian Data Protection Authority, Georgia was represented by the First Deputy President of the Service and the Head of the President’s Office. At the 74th meeting, hosted by the European Data Protection Supervisor, the Service was represented by delegates from the Private Sector Oversight Department and the Department of International Relations, Analytics, and Strategic Development. Participants presented a report outlining the Service’s main strategic directions and recent decisions. Importantly, at the initiative of the Personal Data Protection Service and with the approval of the Secretariat of the Working Group, Georgia will host the 75th meeting of the Berlin Working Group in June 2025. This upcoming event will provide a platform for participants to discuss emerging challenges and current trends in personal data and privacy protection.

3. Cooperation with the European Union and Other Data Protection Supervisory Authorities

3.1. Memorandum of Cooperation with Counterpart Data Protection Authorities

During the reporting period, the Service strengthened its international cooperation by signing Memorandum of Cooperation with foreign data protection supervisory authorities.

3.1.1. Cooperation with the Croatian Personal Data Protection Agency

In May 2022, on the sidelines of the European Conference held in Dubrovnik, Croatia, the Head of the Personal Data Protection Service and the Director of the Croatian Personal Data Protection Agency (“Agencija za zaštitu osobnih podataka”) signed a Memorandum of Understanding between the two authorities. This agreement establishes a framework for cooperation, including the joint organization of activities and events in the field of personal data protection, such as workshops and conferences. In the context of aligning national data protection legislation with European standards, sharing the expertise and experience of the Croatian supervisory authority is of particular importance. As the most recent country to join the European Union, Croatia offers valuable insights into the legislative and institutional adjustments required for EU membership.

3.1.2. Cooperation with the Italian Data Protection Supervisory Authority

In October 2022, in Rome, Italy, a Memorandum of Cooperation was signed between the Italian Data Protection Supervisory Authority (“*Garante per la protezione dei dati personali*”) and the Personal Data Protection Service of Georgia. This agreement establishes a framework for cooperation aimed at organizing conferences and seminars focused on the exchange of best practices in the field of personal data protection, including expert exchanges between authorities. The signing ceremony was followed by a working meeting between representatives of both supervisory authorities. The meeting focused on future plans for institutional development and explored opportunities for deepening bilateral cooperation.

3.1.3. Cooperation with the San Marino Personal Data Protection Supervisory Authority

In July 2024, a Memorandum of Understanding was signed in San Marino between the Personal Data Protection Service of Georgia and the data protection supervisory authority of the Republic of San Marino (“Autorità Garante per la Protezione dei Dati Personali”). The agreement aims to facilitate cooperation through the organization of events, conferences, seminars, and study visits focused on sharing best practices in the field of personal data protection. It also provides for the exchange of information regarding the implementation of national legislation and European standards, as well as the exchange of experts for the purpose of mutual professional development.

During the signing ceremony, the President of the Personal Data Protection Service of Georgia spoke about the importance of fostering cooperation between supervisory authorities and emphasized the Service’s active participation in international sectoral platforms and networks. In the opening session of the ceremony, the Minister of Finance of the Republic of San Marino and the Head of the Directorate for European Affairs at the Ministry of Foreign Affairs, International Economic Cooperation and Telecommunications addressed attendees with welcoming remarks. Both speakers highlighted the value of Georgia’s experience in the European integration process, particularly for San Marino, which is currently negotiating an Association Agreement with the European Union. The President of the data protection supervisory authority of the Republic of San Marino also stressed the importance of close cooperation with the Personal Data Protection Service of Georgia and expressed readiness to engage in joint initiatives aimed at promoting the exchange of best practices.

The Vice President of the data protection supervisory authority of the Republic of San Marino highlighted the historical significance of signing the first Memorandum of Understanding in the Authority’s history. He emphasized the importance of cooperation with the Georgian Personal Data Protection Service, particularly in the context of sharing best practices. The Vice President also spoke about the San Marino Supervisory Authority’s involvement in international platforms and expressed a commitment to further expanding its international cooperation in the future. Following the signing ceremony, a working meeting was held between authorities. The discussion focused on the mandates of the supervisory bodies and the main directions of their activities.

4. Representation of the Service in Sectoral International Forums

Data protection supervisory authorities play a crucial role in establishing sectoral dialogue platforms. These platforms foster effective cooperation among supervisory bodies and facilitate the exchange of knowledge and experience. Such collaboration is particularly valuable for addressing sector-specific challenges from a comparative legal perspective and for working toward the development of consistent, harmonized approaches in response to emerging issues.

4.1. International Events Organized by the Service

- **“European Case Handling Workshop” (ECHW)**

In 2022, the Personal Data Protection Service of Georgia, as an active partner of foreign counterpart supervisory authorities, made a significant contribution to the advancement of sectoral dialogue platforms addressing key issues in modern personal data protection law. Notably, for the first time in the history of Georgia’s data protection supervisory authority, the Service hosted the “European Case Handling Workshop” (ECHW). The “European Case Handling Workshop” is an annual international forum that brings together supervisory authorities from various countries to exchange best practices and discuss pressing matters in the fields of privacy and personal data protection.

The workshop welcomed over fifty delegates from twenty-six countries, representing counterpart data protection supervisory authorities. Twenty-seven speakers from sixteen countries shared their expertise during the sessions, including representatives from the supervisory authorities of Austria, Albania, Gibraltar, Denmark, Italy, France, Croatia, and Switzerland. Additionally, the European Data Protection Supervisor (EDPS) and the International Committee of the Red Cross (ICRC) contributed with presentations and expert insights. Beyond the formal agenda, the event featured a range of social and cultural activities aimed at introducing participants to Georgia’s rich history and cultural heritage. Among the distinguished attendees were the Head of the Delegation of the International Committee of the Red Cross in Georgia and a representative of the Delegation of the European Union to Georgia.

- **International Scientific Conference: “The Status of Personal Data Protection and Its Legal Aspects in Georgia”**

To foster comparative legal analysis of sectoral trends and strengthen international dialogue, the Personal Data Protection Service organized an international scientific conference titled *“The Status of Personal Data Protection and Its Legal Aspects in Georgia”* on March 1, 2023. The conference featured four thematic panel sessions, during which representatives of the Service, the judiciary, academia, and expert communities delivered presentations on a range of key issues. Topics included the legal status of the Personal Data Protection Service, data protection of minors, corporate governance, and judicial practice related to personal data protection. Event was also attended by Leonardo Cervera Navas, Secretary General of the European Data Protection Supervisor (EDPS), who joined remotely and presented a keynote address as the guest of honor.

- **The 22nd Meeting of Central and Eastern Europe Data Protection Authorities (CEEDPA)**

From February 28 to March 1, 2024, the Personal Data Protection Service of Georgia hosted the 22nd Conference of Central and Eastern European Data Protection Authorities (CEEDPA) in Tbilisi. The conference brought together leaders and representatives from data protection supervisory authorities across Central and Eastern Europe, as well as representatives from non-member European supervisory authorities. Delegates from European Union institutions - including the European Data Protection Board (EDPB), the European Data Protection Supervisor (EDPS), EUROPOL, and EUROJUST - also participated. The primary goal of the event was to promote international data protection standards and to facilitate the exchange of best practices among supervisory authorities across the region.

4.2. Participation of the Service in Sectoral International Forums

During the reporting period, the Personal Data Protection Service participated in a number of international forums focused on personal data protection and the inviolability of private life. The Service not only deepened its engagement with these forums but also acquired membership and observer status in various sectoral international platforms. These developments significantly contribute to enhancing the Service's institutional awareness and expanding its existing international partnerships, further strengthening Georgia's role in the global data protection community.

4.2.1. Membership in International Sectoral Platforms

In 2022, the Personal Data Protection Service assumed the role of Chair of the Working Group on Data Protection Metrics within the Global Privacy Assembly (GPA). The Working Group, established in 2016, was created following the adoption of a resolution aimed at developing a “New Metric” for data protection regulation. Its primary goal is to create internationally comparable statistical data on data protection and privacy, while also studying the experiences of data protection supervisory authorities worldwide. Additionally, it is noteworthy that employees of the Personal Data Protection Service represent the supervisory authority in several other key working groups of the Privacy Assembly, including the Digital Citizen and Consumer and Ethics Working Group, the Data Protection in Artificial Intelligence Working Group, and the Data Protection and Other Rights and Freedoms Working Group, among others.

In the same year, the Service was granted observer status at the International Conference of Information Commissioners. This global forum unites agencies responsible for overseeing freedom of information and access to information, and grants observer status to related agencies with an interest in the field. The decision was based on a comprehensive assessment of the Personal Data Protection Service's key activities, vision, mission, and its growing international engagement in the area of data protection.

The Conference Executive Board successfully completed the process of granting observer status to the Personal Data Protection Service in December 2022. Notably, the International Conference of Information Commissioners includes supervisory authorities from approximately twenty-five countries across Europe as members, among them the data protection authorities of Belgium, Germany, the United Kingdom, Spain, Ireland, Catalonia, Switzerland, and Croatia.

2022 marked a significant milestone in the development of the Personal Data Protection Service's international relations with its membership in the Committee of Experts on Artificial Intelligence of the Council of Europe (“Committee on Artificial Intelligence” or CAI). One of the key issues within the Committee's scope is the processing of personal data through artificial intelligence, an area where the Service will contribute expert opinions and provide relevant recommendations.

In 2023, the Personal Data Protection Service became a member of the Assembly of the French-speaking Association of Personal Data Protection Authorities (AFAPDP). It is worth noting that the Service's membership was supported by all nineteen data protection

supervisory authorities participating in the Assembly. The Association established in 2007, aims to enhance the effectiveness of its members' activities, create a French-speaking expert platform in the field of data protection, share best practices, and facilitate cooperation with other international organizations.

Additionally, in 2023, the Service joined another working group of the Global Privacy Assembly (GPA) — the Working Group on the Role of Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis Management. This working group focuses on the strategic objectives of the Assembly, particularly in privacy and personal data protection. It aims to deepen relations with international bodies and networks prioritizing these issues. The group developed a plan for international development and humanitarian assistance, identified countries whose laws lack adequate personal data protection guarantees, and conducted a survey of relevant actors. The group is chaired by the Swiss Federal Commissioner for Data Protection and Information and co-chaired by the Monaco Personal Data Supervisory Commission, bringing together twenty-four data protection supervisory authorities and international organizations.

In this year, the Personal Data Protection Service of Georgia assumed the role of co-chair of the newly established Working Group on Intersectional Gender Perspective in Data Protection within the framework of the Global Privacy Assembly (GPA). The Working Group is co-chaired by the National Institute of Transparency, Access to Information and Protection of Personal Data (INAI) and brings together approximately fifteen data protection supervisory authorities and international organizations. The main objective of the Group is to ensure that data protection policies and practices are developed and implemented in a gender-sensitive manner. In this context, the Working Group identifies gender-related risks in data processing and promotes mitigation and prevention strategies that uphold the principles of inclusiveness and fairness.

Additionally, in 2024, the Service became a member of the committee established to determine the winner of the “Privacy and Human Rights Award”, launched under the GPA’s Working Group on “Data Protection and Other Rights and Freedoms.” This award seeks to recognize and celebrate initiatives in the field of privacy and human rights at both international and national levels. The Personal Data Protection Service continues to actively participate in the Global Privacy Assembly (GPA) and its various sub-platforms, including the AI Working Group, contributing to periodic meetings and collaborative efforts on emerging issues at the intersection of technology, privacy, and fundamental rights.

4.2.2. Participation in International Conferences and Events

The Personal Data Protection Service actively participates in the work of consultative Committee of the Convention for The Protection of Individuals With Regard To Automatic Processing of Personal Data (Convention 108) – “T-PD”. The Committee brings together the Parties to Convention 108 and representatives of other States with observer status and international organizations. The Committee clarifies the provisions of the Convention with a view to implementing uniform practices. It is noteworthy that the President of the Service presents the Supervisory Authority of Georgia at the plenary sessions of the Committee, and provides information on national legislation and the activities of the Service.

During the reporting period, the Personal Data Protection Service actively engaged in the work of the Global Privacy Assembly (GPA). A significant development in 2022 was the Service’s inclusion as a member of the Selection Commission for the Secretariat of the Assembly. In this capacity, the Service collaborates with the data protection supervisory authorities of Mexico, the United Kingdom, and Switzerland. It participated in the preparation of several draft documents designed to guide the selection process for the Assembly’s Secretariat and will continue its involvement in the upcoming stages of this process.

In 2022, the President of the Service represented the Personal Data Protection Service of Georgia at the GPA Annual Conference held in Turkey. The conference focused on the theme: “A Matter of Balance: Privacy in the Era of Rapid Technological Advancements”, underscoring the growing need to reconcile technological innovation with the protection of personal data and privacy rights. In 2023, the President of the Personal Data Protection Service moderated a closed-session panel “Privacy Trends: Moving Forward” during the 45th meeting of the Global Privacy Assembly, held in Hamilton, Bermuda. The session was dedicated to discussions regarding recent developments, emerging challenges, and evolving trends in the field of personal data protection and privacy.

The panelists were: Dr. Kaori Ishii, Commissioner for International Academic Exchange at the Japan Personal Data Protection Supervisory Authority and Professor at Chuo University; Dr. Gabriela Zafir-Fortuna, Vice-President of the Global Privacy Forum (Washington State, USA); Pam Dixon, Founder and Executive Director of the World Privacy Forum; Luigi Montuori, Head of the International and EU Affairs Service at the Italian Data Protection Supervisory Authority; and Professor Dr. Rafael Yuste, Director of the Neurotechnology Center at Columbia University and founder of the U.S. BRAIN Initiative. The submitted reports focused on the processing of personal data through artificial intelligence, its impact on

fundamental human rights and freedoms, “Smart Cities,” the processing of special categories of data — such as neurological data — and other thematic issues. Additionally, at the 45th meeting of the Assembly, the Personal Data Protection Service of Georgia, in its capacity as co-chair of the “Working Group on Data Protection Metrics,” presented the annual report on the Working Group’s activities.

The Personal Data Protection Service of Georgia actively participates in the international conference: “Privacy Symposium”, hosted by Ca’ Foscari University (Venice, Italy) in 2023 and 2024. Notably, within the framework of this international conference, the President of the Service annually presents reports on the mandate, key areas of activity, and international relations of the Georgian Personal Data Protection Supervisory Authority. One of the panels of the 2023 conference was dedicated to promoting cooperation between non-member personal data protection supervisory authorities of the European Data Protection Board (“EDPB”). As part of this panel, the President of the Service spoke about the mandate of the Georgian Personal Data Protection Supervisory Authority, national legislation and the new Law of Georgia “On Personal Data Protection”, the international relations of the Service, as well as the importance of the bilingual, scientific periodical publication with an international editorial board established by the Service – the “Journal of Personal Data Protection Law”. At the 2024 event, the President of the Service presented reports at two conference panel sessions: “International Cooperation for Data Protection, Policy and Compliance Research” and “Extending Cooperation between European Data Protection Supervisory Authorities beyond the EU”. The sessions focused on sharing European best practices and formats for close cooperation between the Service and the European Data Protection Board (“EDPB”), the European Data Protection Supervisor (“EDPS”), the Council of Europe’s Data Protection Division, as well as international activities carried out jointly with the European Data Protection Supervisory Authorities. Notably, one of the panels at the 2025 event will be dedicated to sharing the experience of the Personal Data Protection Service of Georgia in hosting the European Conference of Data Protection Authorities. Within this framework, the President of the Service will present an overview of the content of the 33rd European Conference.

The employees of the Service also participate annually in the meetings of the European Case Handling Workshop (“ECHW”), a subgroup of the “European Conference of Data Protection Supervisors”. The 2023 meeting was organized by the Swiss Data Protection Supervisory Authority, within the framework of which the employees of the Service shared information with their data protection counterpart supervisory authorities on the new Law “On Personal Data Protection”, as well as introduced the practice of the Georgian Data Protection Supervisory Authority on certain issues. The 2023 event was dedicated to topical issues of

personal data protection law and the best practices of the participating supervisory authorities, including the practice of managing excessive complaints, reviewing cross-border complaints and informing about data breaches. At the 2024 event, which Organized by the Estonian Personal Data Protection Supervisory Authority, the employees of the Personal Data Protection Service of Georgia presented a report on the legislative and practical aspects of regulating the legal relationship between the data controller and data processor. Within the framework of the current year's workshop, important and problematic issues for supervisory authorities were discussed, which were related to the implementation of video monitoring, data protection impact assessment, artificial intelligence, complex decisions of supervisory authorities, etc.

The First Deputy President of the Personal Data Protection Service of Georgia presented the Georgian Supervisory Authority at the 2023 International Symposium: "Portals, Registers, Platforms – Digital and Transparent?" organized by the German Federal Commissioner for Data Protection and Freedom of Information. The symposium participants, representatives of European data protection supervisory authorities and international experts, discussed the dissemination of personal information on the Internet, open data platforms, registers and portals. It is noteworthy that in parallel with the event, in order to strengthen future cooperation between the authorities, the First Deputy President of the Service held a meeting with the Brandenburg Commissioner for Data Protection and Access to Information, Dagmar Hartge.

In 2023, the Service also participated in a hybrid conference: "The way of Privacy" ("Ruta de la Privacidad"), which was held in coordination with the "Institute of Transparency, Public Information and Protection of Personal Data" (ITEI) of the State of Jalisco, Mexico, the "National Institute of Transparency, Access to Information and Protection of Personal Data" (INAI) of Mexico, and the Personal Data Protection and "National Transparency System" ("SNT"), as well as at the invitation of the "Personal Data Protection Commission" ("CPDP") of the "National Transparency System" ("SNT"). Within the framework of the event, the conference participants discussed current issues related to personal data protection, and a report was presented to the conference audience on the mandate of the Georgian Supervisory Authority for Personal Data Protection and the Service's experience in protecting the personal data of minors.

In 2024, representatives of the Personal Data Protection Service of Georgia participated in the "Digital Almaty 2024" forum at the invitation of the Ministry of Digital Development, Innovations and Aerospace Industry of the Republic of Kazakhstan. During a panel discussion on personal data protection and cybersecurity, Service representatives shared insights on the

practices of Georgia’s supervisory authority, key innovations introduced by the new Law of Georgia “On Personal Data Protection,” the obligations of data controllers, and the rights of data subjects. In parallel with the forum, representatives of the Service also held a meeting with the Secretary of the Information Security Committee of the Ministry, under whose authority the Supervisory Authority for Personal Data Protection of Kazakhstan operates.

In April of this year, representatives of the Personal Data Protection Service of Georgia participated in the 5th Armenian-Georgian Legal Forum held in Yerevan. At a panel session held within the framework of the forum, the employees of the Service spoke about the institutional independence of the Georgian supervisory authority, its organizational structure, and mechanisms for controlling the legality of data processing. They also discussed legislative innovations, activities carried out to raise public awareness, and international cooperation. In turn, the Head of the Personal Data Protection Agency of Armenia reviewed the structure of the supervisory authority, international cooperation, and activities carried out to raise public awareness. Other employees of the Personal Data Protection Agency of Armenia also presented reports at the plenary session.

It is noteworthy that in order to share best practices, this year, the employees of the Personal Data Protection Service of Georgia also participated in an online conference organized by the Greek counterpart supervisory authority. Within the framework of the conference, the “European Data Protection Board” (“EDPB”) presented a new project for business entities, which will help them maintain the standard of personal data protection while carrying out their activities.

In September 2024, the First Deputy President of the Service participated in the conference “Data Protection and Cybersecurity as Core Activities of Law Enforcement Agencies” co-organized by the “EUROPOL” Data Protection Experts Network in The Hague. The event lasted for two days, during which data security, disinformation, the lawful use of surveillance technologies by law enforcement agencies, data protection officers of law enforcement agencies, etc. were discussed. It is worth noting that the following speakers at the conference were: Executive Director of EUROPOL — Catherine De Bolle, President of the Republic of Slovenia — Nataša Pirc Musar, and European Data Protection Supervisor (“EDPS”) — Wojciech Wiewiórowski.

This year, employees of the Service attended the hybrid-format “Privacy Conference 2024,” organized by Germany’s Digital Association, Bitkom. The conference featured approximately seventy speakers, including representatives from EU institutions, supervisory authorities, and major technology companies such as Microsoft, Google, OpenAI, and TikTok. The speakers shared their perspectives on the future of personal data protection.

In November 2024, in Strasbourg, the Head of the President’s Office participated in a conference organized by the Council of Europe on “Artificial Intelligence and Personal Data Protection: Interrelated and Integrated Approaches”. The international conference was attended by members of the Council of Europe’s “Committee on Artificial Intelligence” (“CAI”), members and observers of the Advisory Committee to Convention 108 (“T-PD”), representatives of the Council of Europe member states, as well as representatives of academia. The conference highlighted the strategy of the Personal Data Protection of Georgia on the implementation of European standards and presented the Service’s institutional development plan for the implementation of European best practices in the activities of the Personal Data Protection Service of Georgia. Within the framework of the presented report, the Head of the President’s Office addressed the relationship between artificial intelligence and data protection, focusing on proportionality between the capabilities and risks of artificial intelligence and highlighting institutions established under the new Law of Georgia “On Personal Data Protection”.

One of the main directions of the mandate of the Personal Data Protection Service of Georgia is raising public awareness and educational activities. To this end, the Service conducts a number of activities, including within the framework of cooperation with university institutions. In November 2024, representatives of the Service and Professor Thomas Hoeren from the University of Münster, with the support and organization of the Faculty of Law of the Ivane Javakhishvili Tbilisi State University, held a public lecture-seminar on law of Georgia “On personal data protection” and the EU “General Data Protection Regulation”.

It is worth noting that since 2022, the Service has also been represented at the Global Security Forum (“GLOBSEC”), the “Global Privacy Enforcement Network” (“GPEN”) and the “Privacy Enhancing Technologies” (“PETs”) workshops.

5. Cooperation with international organizations

In order to implement legislative changes on personal data protection, raise public awareness, as well as support the institutional development of the Personal Data Protection Service of Georgia, the Service actively cooperates with international organizations. Since 2022, the Service has implemented a number of activities and initiatives with their support.

During the reporting period, the Service implemented a number of activities with the support of the European Union (“EU”), the Council of Europe (“CoE”), the United States Agency for International Development (“USAID”), as well as the German Corporation for International Cooperation (“GIZ”) Public Governance Eastern Partnership Regional Fund, the European

Union (“EU”) and the United Nations Development Program (“UNDP”). The Service cooperates with the “Regional Institute for Security Studies” (“RISS”), as well as the United Nations Office for Project Services (“UNOPS”), which is the coordinator of the European Union project “Support to Advancing Technical Capacities for Ensuring Human Security”. In addition, the Service participated in meetings organized by the European Union and the Council of Europe project “CyberEast”, which was dedicated to the exchange of information between agencies regarding cyber incidents, incident response, obtaining electronic evidence, and measures to raise public awareness.

6. Various Activities Carried Out To Promote International Cooperation

- **“Journal of Personal Data Protection Law”**

In order to promote the development of the field of personal data protection law and a scientific discussion platform, starting from 2022, the Personal Data Protection Service of Georgia publishes a fully open access, bilingual, scientific, periodical publication with an international editorial board —“Journal of Personal Data Protection Law”¹. Its establishment was connected with the fourth anniversary of the entry into force of the European Union’s “General Data Protection Regulation”. The main focus of the journal is to conduct comparative legal discourse in the field of public law and to establish an international, scientific platform for researchers. The journal publishes scientific works on various topical issues in the field of privacy and personal data protection law. The mission of the journal is to promote the process of harmonizing the Georgian personal data protection law with European law and internationally recognized standards, and to share the results of sectoral research with the academic community, practicing lawyers, and in general, with those interested in the topic of data protection and the right to privacy.

It is noteworthy that in order to obtain the international scientific status of the journal, promote its awareness and internationalization process, the publication was integrated into the “HeinOnline” scientific database in July 2023. For the purpose of indexing, the journal was evaluated taking into account various criteria, including its publishing policy, mission, and academic standards, and by the decision of the heads of the “HeinOnline” scientific database, the issue of its integration was positively resolved. Publications published in each issue of the scientific journal will be available in the “HeinOnline” scientific database from October of this year. The journal is published twice a year in both print and digital formats. Three issues were published during the reporting period, featuring contributions from Georgian and international researchers and officials.

- **International Publications**

The May 2022 Newsletter of the Global Privacy Assembly (“GPA”) published information on the mandate of the Personal Data Protection Service of Georgia, its main areas of activity and international relations.² Later, the September 2022 Newsletter, among other publications, was

¹ See the official website of “Journal of Personal Data Protection Law”: <<https://journal.pdps.ge/?leng=eng>>.

² GPA, Newsletter, Issue 2, May, 2022, p. 6, <https://globalprivacyassembly.org/wp-content/uploads/2022/06/Newsletter_GPA-may2022-v.3.pdf>.

also devoted to an article by the President of the Service on the topic: “Privacy Data Protection and Gender-Sensitive Issues in Georgia”.³ The article notes the independent importance of the right to personal data protection from the right to privacy in the European legal framework. When protecting privacy, the Personal Data Protection Service of Georgia also takes into account gender aspects. In the published work, the President of the Service noted the future international activities to be carried out by the Service to promote international cooperation with data protection supervisory authorities and the periodic scientific journal established by the Service to provide a discussion platform.

In 2023, an interview with the President of the Personal Data Protection Service was published on the official website of the “Privacy Assembly”, which dealt with the new Law “On Personal Data Protection”, the issue of obtaining the status of an observer of the activities of the “European Data Protection Board” (“EDPB”) by the Service, and various activities of the Personal Data Protection Service of Georgia.⁴ Within the framework of the interview, the President of the Service, along with various initiatives implemented by the Service to raise public awareness, also spoke about the experience as a member of the “Privacy Assembly”. As a member of the Assembly, the Georgian Personal Data Protection Service of Georgia participates in the formation of global data protection policy and is an active initiator in conducting sectoral discussions. At the end of the interview, the President of the Service expressed the readiness of the Georgian Personal Data Protection Supervisory Authority to actively continue cooperation in order to promote the implementation of the Assembly’s goals and action plan.

- **Future prospects for deepening international cooperation**

Starting in 2025, the Personal Data Protection Service of Georgia will join the “International Association of Privacy Professionals” (“IAPP”) as a corporate member. Corporate membership in the association will give the Personal Data Protection Service of Georgia a significant advantage in accordance with its institutional development and strategic goals. Of particular note is the opportunity to expand international cooperation and harmonize with global data protection standards through the status of a member of the association.

³ GPA, Newsletter, Issue3, September, 2022, p. 7-8, <https://globalprivacyassembly.org/wp-content/uploads/2022/09/Newsletter-GPA_29-sep-final.pdf>.

⁴ See the official website of the Assembly, <<https://globalprivacyassembly.org/regulating-the-digital-economy-why-privacy-and-competition-authorities-should-talk-to-each-other-copy-copy-2-copy-copy-copy/>>.



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