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Publication of Corrigendum to GDPR

Perhaps surprising given that its implementation date is now only four weeks away, the European Parliament has published a corrigendum to the [GDPR Regulation](#).

While the majority of the changes made to the GDPR simply clarify the existing text, it is worth noting that the corrigendum revises Article 35 of the GDPR which relates to the requirement to appoint a data protection officer (“**DPO**”) in certain circumstances.

In particular, while the original text of the GDPR indicated that it was necessary for a data controller or a data processor to appoint a DPO where its core activities involved the processing on a large scale of (i) special categories of personal data and (ii) personal data relating to criminal convictions and offences on a large scale, the corrigendum has revised this text to provide that a DPO must be appointed where it processes either category of personal data on a large scale, meaning that a larger number of organisations may now be required to appoint a DPO. In particular the potential impact of this requirement on regulated entities such as funds, fund service providers and investment firms will need to be carefully assessed.

A copy of the corrigendum is accessible [here](#). For a fuller discussion on the role of the DPO, see our linked [analysis](#).

If you have any questions relating to implications of the corrigendum for your organisation, please contact your usual contact at Dillon Eustace.

For further information on any of the issues discussed in this article please contact:



Etain de Valera

DD: + 353 (0) 1 673 1739

etain.devalera@dilloneustace.ie



Breeda Cunningham

DD: + 353 (0) 1 673 1846

breeda.cunningham@dilloneustace.ie



Áine McCarthy

DD: + 353 (0) 1 673 1861

aine.mccarthy@dilloneustace.ie

DILLON  EUSTACE

Dublin

33 Sir John Rogerson's Quay, Dublin 2, Ireland. Tel: +353 1 667 0022 Fax: +353 1 667 0042.

Cayman Islands

Landmark Square, West Bay Road, PO Box 775, Grand Cayman KY1-9006, Cayman Islands. Tel: +1 345 949 0022 Fax: +1 345 945 0042.

New York

245 Park Avenue, 39th Floor, New York, NY 10167, U.S.A. Tel: +1 212 792 4166 Fax: +1 212 792 4167.

Tokyo

12th Floor, Yurakucho Itocia Building, 2-7-1 Yurakucho, Chiyoda-ku, Tokyo 100-0006, Japan. Tel: +813 6860 4885 Fax: +813 6860 4501.

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