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Dutch DPA announces three-year enforcement focus on commercial use of data and AI

The Dutch Data Protection Authority has published its supervision and enforcement priorities for 2020-2023 (in Dutch). Although the selected areas of focus are predictable, the publication gives an indication of what the enforcement risks will be for years to come. It also reveals a shift in the supervision and enforcement strategy of the data protection watchdog. Instead of setting a few annual priorities, as it has done so far, the Dutch DPA will, through 2023, target a specific set of companies with investigations stretching out over several years. The priorities indeed overlap with the strategies adopted by DPAs across Europe. After decades of relative calm, companies that process customer data for commercial purposes on a large scale should prepare for data watchdogs to knock on their door, critically questioning the commercial use or re-use of personal data. In relation to artificial intelligence, another major theme for the Dutch DPA, clients should stay ahead of the curve and prepare for the legal and ethical regulatory framework on AI that is sure to come in the near future.