

GDPR DPO Appointments

EEA Member State Notification Requirements

The table below sets out the requirements for notifying an organisation's GDPR Data Protection Officer to the relevant local data protection authority in each Member State of the European Economic Area.

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
AUSTRIA	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	There is no specific form prescribed under Austrian Law. A simple e-mail to Austria's DPA (dsb@dsb.gv.at) with the relevant information is sufficient.	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.
BELGIUM	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The Belgian DPA's website provides an online form to communicate the DPO's contact details.	Yes. There is no explicit limitation in the draft privacy legislation/on the DPA's website, but the online communication form contains the following checkbox: "Does the petitioner only have establishments in Belgium? Yes/No" As a result, it is assumed the requirement only applies if the organisation has at least one local in-country establishment.	The amended Belgian Privacy Act will describe this requirement. The exact reference will have to be determined based on the final text of the legislation.

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
BULGARIA	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	Unclear. The form and the content of the notification form, as well as the procedure for submission will be determined by the subordinate normative act to the Bulgarian Data Protection Act (i.e. Regulation for determination of the activity of the commission and its administration).	Unclear. No explicit limitation under local law.	The form and the content of the notification form, as well as the procedure for submission will be determined by the subordinate normative act to the Bulgarian Data Protection Act (i.e. Regulation for determination of the activity of the commission and its administration). The exact reference will have to be determined based on the final text of the legislation.
CROATIA	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	Form provided on the official website of the national authority has to be sent by post, signed by the representative.	Unclear. No explicit limitation under local law.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.
CZECH REPUBLIC	No. Only a locally appointed DPO need be notified, unless the local Data Protection Authority acts as the lead authority for the organisation.	No online form is available. The Czech DPA <u>does not</u> require an electronic form to communicate DPO's contact details. Other means of communication can be used. The contact details can be communicated via e-mail to	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
		<p>posta@uouu.cz or data message delivered to an official data box (an electronic storage site, intended for delivery of official documents and for communication with public authority bodies, known and accessible to all companies having registered office in the Czech Republic), The official identifier of the data box is qkbaa2n.</p> <p>The subject line of an e-mail/data message shall include: "oznámení pověřence".</p>		
CYPRUS	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	Notification can be made via letter addressed to the Cyprus DPA. Delivery by hand, post email or fax is accepted.	Yes.	<p>Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.</p> <p>The information in this table has been obtained directly from the office of the Commissioner for Personal Data in Cyprus.</p>
DENMARK	Yes, if the DPO is appointed	Send an e-mail to	Yes.	Art. 37(7) GDPR only. Currently

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
	locally or a single DPO is appointed for the group (even if not appointed locally).	dt@datatilsynet.dk , containing the name of the organisation, and the name, telephone number and e-mail address of the DPO.		there are no local provisions on the notification of a DPO. The only guidance is the description currently found on the webpage of the Danish Data Protection Authority as referred to in the description of the process to the left.
ESTONIA	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The Company can notify the Estonian Data Protection Inspectorate (DPI) via e-Business Register's Company Registration Portal (https://ettevotjaportaal.rik.ee/index.py?chlang=eng , DPI's guide in Estonian: http://www.aki.ee/et/andmekaitse-spetsialisti-maaramine/kuidas-ettevotjaportaalis-andmekaitse-spetsialisti-andmed-esitada). Alternatively, the Company can send the DPI a written notification. The notification must contain hand-written signatures or it must be signed	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
		digitally.		
FINLAND	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The Finnish DPA's website provides an online form to communicate the DPO's contact details.	Unclear. No explicit limitation under local law.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.
FRANCE	No. Only a locally appointed DPO need be notified.	The designation process of a local DPO in France consists in the submission of an online form available on the CNIL's website.	Yes.	The provisions concerning the designation of a local DPO can be found under articles 22 of the Data Protection Act of 6 January 1978 (amended) and articles 42 to 46 of the implementing Decree n°2005-1309 of 20 October 2005.
GERMANY	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	Several regulators of the various Länder already have a website up or a pdf document for an online registration.	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.
GREECE	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The Greek DPA's website provides a special form and an email address where the DPO's details must be sent.	Unclear. No explicit limitation under local law.	Draft local privacy law implementing Art. 37(7) GDPR .
HUNGARY	Yes, if the DPO is appointed locally or a single DPO is	There will be an online platform on the website of the Hungarian	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
	appointed for the group (even if not appointed locally).	DPA (naih.hu) for the registration of the DPOs. This platform currently is under construction, but it is expected to go live soon. Until then registrations are accepted via e-mail (ugyfelszolgalat@naih.hu). We are not aware whether the platform will be available in English.		the notification of a DPO.
ICELAND	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The notification is made via the DPA's email address (postur@personuvernd.is).	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.
IRELAND	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	Where applicable, the Irish Data Protection Commission should be notified by means of the DPO Notification Form available on https://www.dataprotection.ie/docs/DPO-Notification-Form/m/1723.htm .	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.
ITALY	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The designation process of a local DPO in Italy consists in the submission of an online form available on the Garante's	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
		website. (https://servizi.gdpp.it/comunicazione-rpd/).		However, the Garante's website provides instructions for filling the online form are available. https://www.garanteprivacy.it/garante/doc.jsp?ID=9167361 .
LATVIA	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	A notification on the appointment of a DPO is submitted by post or by e-mail using the contact information on the DPA website . The notification must take the form of an official petition or a letter. The notifier must provide the contact information of the DPO, basic company information of the appointer, and state the legal document on the basis of which the DPO was appointed.	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.
LIECHTENSTEIN	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	In general notification via email is sufficient. In addition, the Liechtenstein Data Protection Office's (DPO) website provides an online form to communicate the DPO's contact details.	Unclear. No explicit limitation under local law.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
		https://www.lv.li/#/1901/neu-datenschutzbeauftragter-gem-art--dsgvo).		
LITHUANIA	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The Lithuanian DPA's website provides an online form to communicate the DPO's contact details https://www.ada.lt/go.php/lit/Pranesimas-apie-duomenu-apsaugos-pareiguna-bdar/4).	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO. However, there is public consultation on the Lithuanian DPA's website, which describes how to inform the State Data Protection Inspectorate about the DPO.
LUXEMBOURG	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	An online form available on the CNPD's website must be completed. https://cnpd.public.lu/en/professionnels/dpo.html .	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.
MALTA	No. Only a locally appointed DPO need be notified, unless the local Data Protection Authority acts as the lead authority for the organisation.	The designation process of a local DPO in Malta consists in the notification of the details which need to be sent including the name of Data Controller, Name	Unclear. No explicit limitation under local law.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
		of DPO, Position, Mailing Address, Email Address, Contact Number, Nature of Business, Date of Appointment and whether the DPO is fulfilling this role for other data controllers. This is sent via email to idpc.info@idpc.org.mt .		
NETHERLANDS	No. Only a locally appointed DPO need be notified, unless the local Data Protection Authority acts as the lead authority for the organisation.	The designation process of a DPO in the Netherlands consists in the submission of an online form available on the website of the Autoriteit Persoonsgegevens (https://autoriteitpersoonsgegevens.nl/nl/aanmeldenfg).	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.
NORWAY	No. Only a locally appointed DPO need be notified, unless the local Data Protection Authority acts as the lead authority for the organisation.	The registration of a DPO in Norway shall be done by submission of an online form available on the website of Altinn (https://www.altinn.no/en/forms-overview/data-protection-authority/registeringsskjema-for-personvernombud/) Registration via Altinn is not	No. It will apply to any organisation that is either (a) established locally, or (b) processes personal data in the course of providing goods and services to, or monitoring the behaviour of, individuals locally.	Art. 37 (7) GDPR , as well as the amended Personal Data Act Chapter 2.

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
		possible for DPOs with a foreign postal address. In such cases, registration must be done via email to the Norwegian DPA (personvernombud@datatilsynet.no).		
POLAND	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The Polish DPA's website provides an online form to notify the local DPO to the Polish Data Protection Authority.	Yes. Note that according to Polish DPA (https://uodo.gov.pl/): "A controller whose main establishment is in another country and which has a branch in Poland is obliged to notify the Polish DPA of the designation of a DPO via the branch office if such a DPO has been designated."	See: <ul style="list-style-type: none"> • Article 8-11 of the Polish Data Protection Act (art. 8-11); • Instructions for filing an on-line form: https://ewnioski.biznes.gov.pl/suppliant/upage/general/unauth_step0.page?eservice=871&type=procedura,wniosek&referer=external.
PORTUGAL	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The Portuguese DPA's website provides an online form to notify the local DPO to the Portuguese Data Protection Authority (https://www.cnpd.pt/DPO/). The form is in Portuguese and requires information on the	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO.

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
		organisation as well on the DPO.		
ROMANIA	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The designation process of a local DPO in Romania consists in the submission of an online form available on the DPA's website. (http://www.dataprotection.ro).	Yes.	Art. 37(7) GDPR only. Currently there are no local provisions on the notification of a DPO. However, instructions for filling the online form are available on DPA's website. (http://www.dataprotection.ro).
SLOVAKIA	No. Only a locally appointed DPO need be notified, unless the local Data Protection Authority acts as the lead authority for the organisation.	An online form (in Slovak, available at https://dataprotection.gov.sk/uo/zo/register-zo) can be used to communicate the contact details of the DPO. The contact details can also be communicated using regular mail to the Office for Personal Data Protection at its address Hraničná 12, 820 07 Bratislava 27 or e-mail to statny.dozor@pdp.gov.sk . However, the subject should choose only one of the available	Yes.	Art. 37(7) GDPR and Section 44 (8) of the Act on personal data protection.

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
		means of communication.		
SLOVENIA	<p>Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).</p> <p>Please note that this is based on draft legislation not yet adopted.</p>	<p>The notification may be executed by submitting to the Information Commissioner the form available on the IC's webpage, available at: https://www.ip-rs.si/fileadmin/user_upload/doc/obrazci/ZVOP/OBRAZEC_-_Obvestilo_o_imenovanju_pooblascene_osebe_za_varstvo_osebnih_podatkov.doc.</p>	No. It will apply to any organisation that is either (a) established locally, or (b) processes personal data in the course of providing goods and services to, or monitoring the behaviour of, individuals locally.	The local legislation has not been adopted yet and is not yet applicable in Slovenia. At the moment, the relevant provision is paragraph 3 Art. 43 of the draft Slovenian Data Protection Act.
SPAIN	<p>Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).</p>	<p>Notification must be made within a 10 day period following DPO designation.</p> <p>For more information, the URL of the notification procedure and the Guidelines document is available at:</p> <p>https://sedeagpd.gob.es/sede-electronica-web/vistas/formDelegadoProteccionDatos/procedimientoDelegadoProteccion.jsf</p> <p>and</p>	Yes.	<p>The amended Spanish Data Protection Act establishes the following:</p> <ol style="list-style-type: none"> 1. Notify the designation, appointment and cessation of a DPO in a 10 day period. 2. The list of entities that must have a DPO (e.g. professional bodies, educational institutions, network operators and other electronic communications services providers whenever they process large-scale personal data regularly and

Country	Must an organisation's GDPR DPO be notified to the local data protection authority? (Yes/No)	If yes, what is the process for notifying the GDPR DPO to the local data protection authority?	Does this requirement apply only if the organisation in question has a local in-country establishment or representative? (Yes/No)	What are the local law legislative or regulatory instruments / references that describe the notification requirement?
		https://www.aepd.es/media/guias/guia-rapida-dpd.pdf .		systematically, etc...) See Art. 34 Spanish Data Protection Act.
SWEDEN	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	The Swedish DPA's website provides an online form to communicate the DPO's contact details. You can find the online form here .	Unclear. No explicit limitation under local law.	Art. 37(7) GDPR , no local legislation but it is also stated on the Swedish DPA's website.
UNITED KINGDOM	Yes, if the DPO is appointed locally or a single DPO is appointed for the group (even if not appointed locally).	DPOs can be notified as part of the registration process with the ICO when paying the UK data protection fee (see here). Alternatively, organisations can e-mail the ICO at dataprotectionfee@ico.org.uk with the subject line "Add a DPO" to provide details of their DPO (see explanation here).	No. It will apply to any organisation that is either (a) established locally, or (b) processes personal data in the course of providing goods and services to, or monitoring the behaviour of, individuals locally. (s.207 DPA 2018).	See: <ul style="list-style-type: none"> • s.4 Data Protection Act 2018; • s.207 Data Protection Act 2018; and • Art. 37(3) GDPR.