



Privacy in Bavaria

News for the Bavarian public sector

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The Bavarian Data Protection Commissioner, Destruction and disposal of data storage media [Vernichtung und Entsorgung von Datenträgern] - Working paper. | **Identifiability of natural persons [Identifizierbarkeit natürlicher Personen]** - Working paper.

<https://www.datenschutz-bayern.de/infothek>

EDPB, Guidelines 1/2026 on processing of personal data for scientific research purposes

Draft for consultation. Closed for feedback.

https://www.edpb.europa.eu/our-work-tools/documents/public-consultations/2026/guidelines-12026-processing-personal-data_en

EDPB, Template for data protection impact assessment

Draft for consultation. Closed for feedback.

https://www.edpb.europa.eu/our-work-tools/documents/public-consultations/2026/edpb-dpia-template_en

European Court of Justice, judgement of 18 June 2026, C-484/24

Compatibility of domestic rules on the judicial determination of facts with the GDPR.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62024CJ0484>

Bavarian Constitutional Court, order of 21 May 2026, 19-VII-17

On the compatibility of Bavarian school data protection law with the Constitution of the Free State of Bavaria.

<https://www.gesetze-bayern.de/Content/Document/Y-300-Z-BECKRS-B-2026-N-13788>

Higher Administrative Court of North Rhine-Westphalia, order of 19 May 2026, 15 A 1705/22

Restrictions on access under freedom of information law where the files of a youth welfare office are concerned.

https://nrwe.justiz.nrw.de/ovgs/ovg_nrw/j2026/15_A_1705_22_Beschluss_20260519.html

Higher Administrative Court of Saxony-Anhalt, judgement of 20 May 2026, 3 L 193/24

Insolvency administrator's right of access to data of the insolvent debtor's account with a statutory health insurance body; restrictions imposed by social data protection law.

<https://www.landesrecht.sachsen-anhalt.de/bsst/document/NJRE001644815>

Munich Administrative Court, judgement of 18 May 2026, 26a K 25.5210

Right of access under section 11 (8) State Treaty of the Länder on Public Broadcasting Fees [Rundfunkbeitragsstaatsvertrag] as a permissible restriction of the general right of access under data protection law pursuant to Art. 23(1)(e) and (2) GDPR.

<https://www.gesetze-bayern.de/Content/Document/Y-300-Z-BECKRS-B-2026-N-13894>

Berlin Administrative Court, judgement of 6 May 2026, VG 42 K 73/25

CCTV surveillance in public swimming pools following documented incidents.

<https://gesetze.berlin.de/bsbe/document/NJRE001643568>

Higher Social Court of North Rhine-Westphalia, judgement of 26 March 2026, L 5 KR 773/25

"Appropriate" investigation of the facts by the data protection supervisory authority: as a rule, there is no obligation to conduct extensive factual investigations; burden upon the complainant to substantiate his or her complaint.

https://nrwe.justiz.nrw.de/sgs/lsg_nrw/j2026/L_5_KR_773_25_Urteil_20260326.html

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