

AI & GDPR MONTHLY UPDATE

April 2025

Welcome to another edition of the AI & GDPR MONTHLY UPDATE, bringing you the latest insights into artificial intelligence and data protection. We'll cover new AI regulations, opinions, court and authority decisions across the EU, and the latest use cases in AI implementation. Our AI & GDPR MONTHLY UPDATE lands in your inbox every month.

AI Act

EU Commission initiated a public consultation to obtain input for the upcoming guidelines on general-purpose AI models. Stakeholders can share their experience for the upcoming guidelines that will define key AI Act concepts for GPAI models, such as what constitutes a general-purpose AI model, who qualifies as a provider, and when a model is placed on the market. The consultation is open until 22 May 2025. [Read more](#)

AI Act implementation

New proposal of AI Act implementation in the Czech Republic. A material that proposes entrusting the Ministry of Industry and Trade with preparing the AI Act implementing law, has been submitted for the interdepartmental comments procedure. The Czech Telecommunications Office is suggested as the general market surveillance authority. The Office for Technical Standardization, Metrology and Testing could become the notifying authority responsible for the appointment and supervision of conformity assessment bodies for high-risk AI systems. The sandbox for AI testing under regulatory supervision would then be operated by the Czech Standards Agency. According to a conducted cost analysis, implementing and overseeing the AI Act will require additional funding of over CZK 232 million for the relevant authorities in the 2026–2028 period, which would also create approximately 50 new jobs. [Read more](#) (in Czech)

Spain published its draft law to implement and enforce the AI Act. On March 11, 2025, the Spanish government approved a preliminary draft of the implementing law. The draft law sets out sanctions for violations, procedures for the use of real-time biometric identification in public spaces, and assigns oversight roles to various national authorities, including the Spanish AI Supervisory Agency (AESIA). [Read more](#) (in Spanish)

The Italian Senate approved an AI bill setting national priorities, including a controversial data localization requirement. On March 20, 2025, the Italian Senate passed a bill which complements the AI Act by establishing a national regulatory framework led by the Agency for Digital Italy (AgID) and the Italian Cybersecurity Agency (ACN). The AI Bill also introduces controversial provision requiring that AI intended for use in the public sector shall operate on servers located within Italy. [Dentons summary](#)

The European Commission launched its AI Continent Action Plan. The plan featuring five strategic areas—investments into better computing infrastructure, improved access to data, support for AI skills, accelerated AI development, and simplified rules—aims to boost the EU's AI innovation capabilities and make it a global AI leader. [Read more](#)

GDPR enforcement

Ireland's Data Protection Commission launched an inquiry into X's use of users' public posts to train its AI chatbot Grok. The investigation will assess whether X Internet Unlimited Company (formerly Twitter International) lawfully processed personal data from publicly accessible posts by EU users to develop Grok, a large language model integrated into the X platform. [Read more](#)

France's competition authority fined Apple €150 million for using its App Tracking Transparency (ATT) system to disadvantage app developers. The authority found that Apple's ATT—an app privacy framework for iOS devices introduced in 2021—required third-party apps to display multiple consent popups for tracking users, while Apple's own apps faced fewer restrictions. [Read more](#)

Germany Federal Court of Justice confirmed that GDPR violations can trigger unfair competition claims. In a series of judgments delivered March 27, 2025, the Federal Court of Justice (BGH) held that competitors and consumer associations may bring civil actions under competition law for certain GDPR breaches—particularly failures to meet transparency obligations. The court emphasized that such omissions could mislead consumers and distort market behavior, even in the absence of individual complaints by data subjects. The decision creates a new enforcement channel alongside standard GDPR supervision, increasing litigation risks for companies, especially in the e-commerce sector. [Read more](#) (in German)

The Czech Data Protection Authority (ÚOOÚ) published its recent decision on unsolicited direct marketing via push notifications. The authority issued a fine for sending marketing messages via email and push notifications without valid user consent. The decision confirms that push notifications fall under the same legal regime—established by the ePrivacy Directive—as any other forms of electronic direct marketing and require prior consent. [Read more](#) (in Czech)

A Luxembourg court confirmed a €746 million GDPR fine against Amazon for unlawful data processing in online advertising. This second-largest GDPR fine was originally imposed by the Luxembourg data protection authority (CNPD) in 2021 for profiling website users without a valid legal basis, failing to properly inform them, and not offering clear opt-out options. [Read more](#) (in French)

Guidelines and other regulatory updates

The EDPB published new draft guidelines on processing of personal data through blockchain technologies. The guidance addresses privacy challenges posed by blockchain technology, particularly regarding data minimization and the rights to rectification and erasure. Public consultation on the draft is open until June 14, 2025 [Read more](#)

The French data protection authority (CNIL) published recommendations to guide public sector AI projects. The guidance is based on real-life cases from CNIL's AI sandbox program, which supported public sector initiatives like personalized training for job applicants, raising water consumption awareness, and advanced video analytics for public safety. [Read more](#)

The Czech Data Protection Authority published its 2024 Annual Report, featuring key enforcement highlights. In particular, inspectors reviewed how companies use fingerprints or face scans to register employee attendance. The authority also dealt with a record number of complaints about the so-called “consent or pay” models. In total, ÚOOÚ imposed fines of CZK 351 million for personal data violations and over CZK 7 million for breaches in marketing communications. [Read more](#)

Dentons resources

- [AI & GDPR Updates](#)
- [Dentons Newsletter AI Act \(Czech\)](#)
- [Dentons Global AI trends report: key legal issues for 2025](#)
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