

AI & GDPR MONTHLY UPDATE

September 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 has started a consultation on targeted adjustments of the AI Act. On 16 September, the Commission launched a call for evidence on the digital package: the Commission's digital simplification agenda. The initiative proposes inter alia targeted adjustments to the Artificial Intelligence Act to ensure the optimal application of the rules. The initiative follows up on the comprehensive consultation on the Apply AI strategy which concluded in June. Stakeholders are invited to provide feedback by 14 October 2025. [Read more](#)

EU Commission has started a consultation on transparency rules under Article 50 of the AI Act. The process aims to create guidelines and a Code of Practice for labelling AI-generated or manipulated text, audio and video, as well as disclosure obligations for biometric categorization and emotion recognition. [Read more](#)

EU Commission has started a consultation on draft guidance and reporting template on serious AI incidents. Feedback can be provided by 7 November. [Read more](#)

Data protection news

CJEU issued a landmark decision on pseudonymization of personal data (C-413/23). The Court held that pseudonymisation can - depending on the circumstances - prevent entities other than the controller from identifying the data subject. The decision could have major practical impacts on how companies handle pseudonymized data. [Read more](#)

The EU General Court dismissed an action for annulment of the EU–U.S. Data Privacy Framework. The court dismissed a challenge by MEP Philippe Latombe, confirming that U.S. safeguards meet EU adequacy standards. This ruling secures the current transatlantic transfer mechanism, though a further appeal to the CJEU remains possible. [Read more](#)

The EDPB published draft guidelines on the interplay between the DSA and the GDPR. The guidelines aim to clarify how the GDPR applies to obligations under the Digital Services Act (DSA). The guidelines cover areas where platforms process personal data, such as notice-and-action mechanisms or recommender systems. It also calls for closer cooperation between Digital Services Coordinators and Data Protection Authorities. Guidelines are subject to public consultation which ends on 31 October 2025. [Read more](#)

France's CNIL issued multiple fines for cookie use. For example, CNIL fined fashion retailer SHEIN (€150 million) for placing cookies without user consent and Google (€325 million) over Gmail ads and invalid cookie consent. [Read more](#)

The Austrian DSB ordered YouTube to grant full access to personal data under Art. 15 GDPR. The decision requires disclosure of processing purposes, storage periods, data recipients and tracking cookies, making clear that generic tools or privacy policies do not meet access obligations. [Read more](#)

IP & AI news

Swedish rights society Stim launched AI music licensing framework. The license is based on voluntary collective management and covers only works by creators who have explicitly given their consent. This move aims to bridge the gap between copyright law and the growing demand for AI training data. Interestingly, STIM explained the license requires the use of independent attribution technology, allowing AI-generated music to be traced back to the human-created works to enable transparent and accurate revenue distribution. [Read more](#)

Anthropic agrees to settlement in class-action over the use of copyrighted books in AI training. The settlement, covering around 500,000 works, provides about \$3,000 per book and requires Anthropic to delete the LibGen and PiLiMi datasets once litigation holds expire. If approved, this would be one of the first major settlements in similar disputes. [Read more](#)

Market Updates

China unveiled its Global AI Governance Action Plan days after the U.S. announced its own AI strategy. The plan promotes international cooperation and proposes a global AI governance organization. While framed as collaborative, the move reflects China's strategic ambition to lead AI development by 2030. [Read more](#)

ETH Zurich and partners launched "Apertus," a fully open-source multilingual AI model released under a permissive license. The model comes in 8B and 70B parameter versions and is trained on 15 trillion tokens across 1,811 languages. It provides a legally sound tool for research and commercial use due to safeguards like opt-out compliance and non-memorization of training data. [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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