

Eurodac SCG

Report on the national preparation for the implementation of the Eurodac Recast



April 2016

1. Introduction & Background

Eurodac is an information system established for the comparison of fingerprints of asylum applicants and irregular immigrants. It facilitates the application of the Dublin Regulation¹, which aims at determining the Member State responsible for examining an application for asylum.

Eurodac was created by Council Regulation (EC) No 2725/2000 of 11 December 2000² ('the Eurodac Regulation'), as completed by Council Regulation (EC) No 407/2002 of 28 February 2002.³ In the interest of clarity, those two texts were recast in Regulation (EU) No 603/2013 of 26 June 2013⁴ ('the Eurodac Recast Regulation' or 'the Recast'). They remained valid until 20 July 2015, when the Eurodac Recast Regulation became applicable.

When the Eurodac Recast Regulation was published in the Official Journal, the Eurodac Supervision Coordination Group ('SCG') started to analyse the implications of the future changes brought by this new legislative act from a data protection point of view.

¹ Convention determining the State responsible for examining applications for asylum lodged in one of the Member States of the European Communities, signed in Dublin on 15 June 1990, OJ L 316, 15.12.2000, pp. 1 -12.

² Council Regulation (EC) No 2725/2000 of 11 December 2000 concerning the establishment of "Eurodac" for the comparison of fingerprints for the effective application of the Dublin Convention, hereinafter "Eurodac Regulation", OJ L 316, 15.12.2000, pp. 1 - 10.

³ Council Regulation (EC) No 407/2002 of 28 February 2002 laying down certain rules to implement Regulation (EC) No 2725/2000 concerning the establishment of "Eurodac" for the comparison of fingerprints for the effective application of the Dublin Convention, OJ L 62, 05.03.2002, pp. 1 - 5.

⁴ Regulation (EU) No 603/2013 of the European Parliament and of the Council of 26 June 2013 on the establishment of 'Eurodac' for the comparison of fingerprints for the effective application of Regulation (EU) No 604/2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person and on requests for the comparison with Eurodac data by Member States' law enforcement authorities and Europol for law enforcement purposes, and amending Regulation (EU) No 1077/2011 establishing a European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice, OJ L 180, 29.06.2013, pp. 1 - 30.

The first step was to discuss these changes within the Group meetings based on a Note entitled 'the Eurodac Regulation - Data protection implications for Eurodac SCG' prepared by the Secretariat. The Group then decided to further inquire into these implications by preparing in parallel two action points to be achieved by end 2015.

First, the Group adopted a questionnaire that deals with the basic principles and main items to be looked at (i.e. law enforcement access, data subjects' rights and advance erasure of data or marking of data) when the national Data Protection Authorities ('DPAs') will analyse at national level the state of play of how the new Eurodac rules will be implemented in each Eurodac country member.

Second, the Group organised a visit of eu-LISA's premises in Strasbourg, where the central system is located, in order to monitor the progress made on data protection requirements in the replacement of the old system. This visit took place on 22 September 2015.

After describing Eurodac's legal background in Part 2, and the content of the abovementioned questionnaire and the applied methodology in Part 3, this report presents the analysis of the answers to this questionnaire in Part 4, the outcome of a visit to eu-LISA in Part 5 and the resulting conclusions and recommendations in Part 6. The questionnaire is attached in the Annex to this report.

2. Legal background

The Eurodac Recast Regulation entered into force on 20 July 2015 and replaced the original Eurodac Regulation and Council Regulation (EC) No 407/2002. Therefore, the distinction between the past state of play and the new one has to be borne in mind throughout this document as this exercise focuses mainly on the new Eurodac framework.

Several new topics have become prominent under the new Eurodac rules. First of all, the Eurodac Recast Regulation has a set of different data protection rules applying either for the purpose of determining which Member State is responsible for examining an application for international protection based on the Dublin Regulation, or for law enforcement purposes.

Access to Eurodac data by law enforcement authorities ('LAEs') is the most relevant topic in terms of data protection implications of those new provisions. National LAEs and the European Police Office ('Europol') can now request access to Eurodac in order to compare fingerprints linked to criminal investigations with those contained in Eurodac for the purpose of preventing, detecting and investigating terrorist and criminal offences.

In this regard, each Member State is obliged to keep a list of the designated authorities and a list of the operating units within the designated authorities that are authorised to request comparisons with Eurodac data through the National Access Point for law enforcement purposes (Article 5). The procedure and the conditions to access Eurodac for law enforcement purposes are laid down in Articles 19 and 20 of the Recast.

With regard to data subjects' rights, and compared to the original Eurodac Regulation, the wording regarding the leaflets informing data subjects has been enhanced to ensure that it

is simple and written in a language the applicant can understand or is reasonably supposed to understand (Article 29(3)). In addition, another change is that, whenever a person requests data relating to him or her, the competent authority shall keep a record in the form of a written document that such a request was made and how it was addressed, and shall make that document available to the national supervisory authorities without delay (Article 29(11)).

Finally, references to the "blocking of data" in the original Eurodac Regulation were changed to the "marking of data" concerning recognised beneficiaries of international protection (Article 18). Under the original Eurodac Regulation, the data of persons granted international protection remained on the Eurodac system but were blocked. As such, the Eurodac system recorded when there were hits concerning the fingerprints of recognised beneficiaries of international protection, but Member States were not informed of these hits. The new Regulation was designed to "mark" those data instead of blocking them, in order to for Member States to be informed when there is a hit for a marked data subject. This is to inform Member States if an existing beneficiary of international protection attempts to put in a fresh claim for asylum.

3. Content of the questionnaires & Methodology

The questionnaire was adopted following the Group's meeting of 7 May 2014 and subsequently sent to all the Member States⁵. It aimed at checking how the national Eurodac authorities are implementing the Eurodac Recast Regulation.

To this end, the questionnaire was divided into four sections; the first section encompasses general questions with regard to the preparation for the implementation of the Eurodac Recast Regulation, while the next three sections focus on specific relevant topics such as law enforcement access, data subjects' rights and advance erasure of data or marking of data.

The full questionnaire is reproduced in Annex I.

4. Analysis of answers

Answers to the questionnaires were first collected from end 2014 to early 2015, thus before the entry into force of the Eurodac Recast Regulation in July 2015. At that time, 27 answers were provided⁶.

[Following the entry into force of the Recast, Member States were given the possibility to update their answers. Before the end of 2015, four⁷ Member States provided updated answers to several specific questions. These more recent and updated answers will be highlighted throughout the present Report.]

⁵ When referred to 'Member States' in this report, it must be understood as all countries having access to Eurodac.

⁶ AT, BE, BG, CH, CY, CZ, DE, DK, EE, FI, FR, HR, HU, IE, IS, LI, LT, LU, LV, MT, NL, PL, RO, SE, SI, SK and UK.

⁷ CH, CZ, LT and PL.

The number of respondents does not represent the entirety of the 32 countries having access to Eurodac⁸ but still is a sufficient number to draw conclusions.

4.1. General questions

Q1. The first question aimed to assess how the new Eurodac Recast Regulation would apply in the Member States and notably whether they would apply the law enforcement aspects.

Twelve Member States unambiguously confirmed that access to Eurodac data would be granted to LAEs with the application of the Recast Regulation. Three Member States claimed that such an access was foreseen but not yet in place. One Member State added that related laws had to be modified in order to ensure consistency with the new Eurodac Regulation. [\[In this regard, one Member State reported that the necessary laws at national level had been adopted.\]](#) Several Member States referred to the fact that the Recast Regulation is directly applicable and stated that no additional legislation was needed in their country.

Three answers conveyed that law enforcement access could not yet be granted because of future political decisions on adherence to the Prüm contract, or because the designated LAEs did not fulfil the conditions for the application of law enforcement aspects at that moment. Two Member States answered that they had not yet taken a decision regarding law enforcement aspects.

Four Member States conveyed that they would not apply the law enforcement aspects of the Recast Regulation, one of them commenting that an upgrade to the existing system is not obligatory from the law enforcement perspective. Finally, one country highlighted that the scope of its parallel agreement with the EU does not cover law enforcement access to Eurodac.

Q2. The Member States reported on different activities they had conducted with the assistance of eu-LISA to ensure the implementation of the new functionalities of Eurodac and a smooth transition from the old system to the new one by 20 July 2015. Those activities are listed below:

- communicating to the Commission which would be the designated authorities empowered to access the central system, and more specifically the exact units responsible for carrying out tasks related to the application of the Recast. This information is to be published in the Official Journal of the European Union;
- establishing a working group entrusted with the implementation of the Eurodac Recast Regulation and in charge of finding both technical and legal solutions;
- concluding a procurement contract with a private company in charge of implementing the changes to the national Eurodac system, notably by updating its

⁸ Eurodac is currently used by 32 countries, i.e. the 28 EU Member States and all four European Free Trade Association (EFTA) member states - Iceland, Liechtenstein, Norway, and Switzerland.

software to include the additional functionalities foreseen in the Recast and providing the necessary hardware;

- conducting tests to validate the changes implemented in the national Eurodac system in advance of the transition; and
- amending several national acts to ensure consistency with the Eurodac Recast Regulation.

Q3. The Eurodac Recast Regulation mentions that the Member States should ensure that the national supervisory authorities are able to supervise the use of and access to Eurodac data adequately (Recital 46) and that each Member State shall ensure that its national supervisory authority has access to advice from persons with sufficient knowledge of fingerprint data (Article 30 (2)).

Sixteen Member States reported that so far no specific provisions had been introduced or specific funds assigned to their DPA in order to carry out the new tasks provided by the Eurodac new rules. Only one Member State answered positively. Another one has made the request to the relevant national Ministry.

Eight Member States confirmed that their national supervisory authority has access to advice from persons with sufficient knowledge of fingerprint data.

Q4. When asked if they had performed or were planning to perform training sessions for their staff with regard to the new capabilities of the Eurodac system, all Member States answered positively. The Member States reported that different types of training sessions were/will be organised. Special training sessions on the taking of fingerprint data were foreseen but also training courses dedicated to the designated national LAEs. Some of these sessions will be provided by the supplier of the new system. Eu-LISA also organised a training course on the technical use of Eurodac back in November 2014 based on the principle 'train the trainer'.

In addition, several Member States mentioned that a handbook or guidelines will be drafted and issued for end users. [One of them indeed reported that a user manual had been drafted and a newsletter explaining the new functionalities of the system was mailed to the users.]

Q5. Twenty-five Member States confirmed that they had regular contacts with eu-LISA for technical support regarding the new system, either directly or in the framework of the Eurodac Advisory Group⁹ or through the Project Management Forum¹⁰. In general the Member States described eu-LISA's support as very useful. [In addition, one Member State

⁹ More information on the Eurodac Advisory Group is available at: <http://www.eulisa.europa.eu/Organisation/GoverningBodies/Pages/AdvisoryGroup3.aspx>

¹⁰ To better coordinate the implementation efforts of the Eurodac Recast Regulation both at central and national levels, a Project Management Forum has met monthly since October 2014.

later informed that since the entry into force relevant staff could have counted on several occasions on the support of eu-LISA's helpdesk.]

4.2. Law enforcement access

Eight Member States did not provide much information to the following questions at the time of answering the questionnaire.

Q6. A few Member States reported having encountered problems in adapting the system to the new legal requirements and features, mainly due to budgetary constraints to pay for the public procurement or difficulties to meet the deadline of 20 July 2015. Most Member States mentioned that they had not encountered major technical difficulties to implement the new legal requirements and features.

Three Member States confirmed they had a security plan for the law enforcement aspects, while four others answered that such security plan is not yet in place but is in preparation. One Member State stated that its security plan was going to be fully operational soon.

Q7. Article 36 of the Eurodac Recast Regulation provides that Member States and Europol shall ensure that all data processing operations resulting from requests for comparison with Eurodac data for law enforcement purposes are logged or documented for the purposes of checking the admissibility of the request, monitoring the lawfulness of the data processing and data integrity and security, and self-monitoring.

Most Member States reported that the requirements referred to in the above mentioned Article had been addressed and met. They had created a request form to be filled in by LAEs when they request comparison with Eurodac data in order to document those data processing operations. These same Member States did not report any technical difficulties encountered when creating the new logs system. The logs and request forms will be provided to the verifying authority on demand. However one Member State raised a question regarding the retention period of all logging data, which is not clearly defined in the Recast. Another Member State chose to apply national law in this respect, providing for retention periods between 6 months and 2 years.

Three Member States reported that this part of the Recast was still being discussed when they filled in the questionnaire and thus this part of the new Eurodac system was still under construction. [One of these Member States reported later on that no technical problem had occurred to implement this requirement.] Others stated that they had not yet had time to take measures regarding this issue.

Q8. Article 23(3) of the Eurodac Recast Regulation provides that any processing of information to be obtained by Europol from comparison with Eurodac data shall be subject to the authorisation of the Member State of origin (i.e. the Member State which transmitted the personal data to the Central System). Such authorisation shall be obtained via the Europol national unit of that Member State.

When asked if a procedure for the granting of such an authorisation to Europol will be created, one Member reported that a request form to grant authorisation to Europol already existed. Three Member States unambiguously confirmed that such a procedure will be created, while five others answered negatively. [\[In the meantime, one of them has indeed created such a procedure.\]](#) Several Member States answered that a procedure was envisaged but that this possibility was still under discussion at this stage. Another had not yet had time to discuss this issue.

One Member State specified that access request by Europol will be treated as unique when they appear and will be handled on a case by case basis. Two Member States did not provide information on this issue.

Q9. Article 33(5) of the Eurodac Recast Regulation provides that personal data, as well as the records of the searches, shall be erased in all national and Europol files after a period of one month, unless the data are required for the purposes of a specific ongoing criminal investigation for which they were requested by a Member State or by Europol.

When asked if a procedure regarding the erasure of data in case the data is required for the purposes of a specific ongoing criminal investigation is in place or foreseen, a majority of Member States answered that this procedure already exists or will be created in the near future, while one Member answered negatively. Two Member States had not made a definite decision on the establishment (or not) of such a procedure. Two other Member States referred to the provisions of their national law.

In addition, one Member reported that the establishment of such a procedure had been recommended by eu-LISA. Finally, one Member did not provide information on this issue.

Q10. According to Article 5 of the Eurodac Recast Regulation, each Member State shall designate the authorities that are authorised to request comparisons with Eurodac data, as well as well as the National Access Point through which those requests for comparison are made. They shall also keep a list of the operating units within the designated authorities that are authorised to request such comparison for law enforcement purposes. Article 19 of the same Regulation describes the procedure for the comparison of fingerprint data with Eurodac data.

When asked if a list of the duly empowered staff whose role is described in Article 19 already existed, six Member States answered that the list was not yet in place. [\[One of these Member States reported that the list had been issued in time for the entry into force of the Recast.\]](#) Seven Member States answered that that list already exists. One Member answered that every federal verifying/designated authority is responsible to hold its own list of duly empowered staff.

With regard to the training given to these staff members, seven Member States mentioned that they will be trained in due time and one Member informed that the staff will receive relevant information and comprehensive instructions. [\[Two Member States further reported that the duly empowered staff had been trained.\]](#)

Q11. Article 19 of the Eurodac Recast Regulation describes the procedure for the comparison of fingerprint data with Eurodac data. The Member States explained how they will apply this procedure by referring to several articles of the Recast.

The designated LAE, which wishes to compare fingerprint data with Eurodac data, can submit within its competences a reasoned electronic request for data stored in the Central System, only if previous comparisons with the databases mentioned in Article 20 of the Recast did not lead to the identification of the data subject. In other words, only if other databases did not show any results, the LAE in question has the right to submit a request to the verifying authority, which shall verify whether all the conditions for requesting a comparison referred to in Articles 20 or 21, are fulfilled. If all conditions are fulfilled, the verifying authority shall transmit the request for comparison to the National Access Point which will process it to the Central System in accordance with Article 9(3) and (5) for the purpose of comparison with the data transmitted to the Central System pursuant to Articles 9(1) and 14(2).

Sixteen Member States informed that they had not yet performed tests at the time of their answer but were planning to do so. Two of them reported that they intended to use generated fingerprints. [\[Also three of these Member States later informed that they had successfully passed the required tests.\]](#) One Member answered that tests had already been carried out, with fully anonymized real fingerprints voluntarily given for the purpose of testing.

Q12. A majority of Member States informed that they did not have yet a model for the electronic reasoned request, but they intend to create one in the near future. One Member reported that such model already exists in its country. Four Member States will not put such a model in place. Finally, three Member States informed that the establishment of such a model was still being discussed. [\[One of them later confirmed that it had put such model in place.\]](#)

4.3. Data subjects' rights

Q13. Article 29(2) of the Eurodac Recast Regulation provides that when fingerprinting an applicant for international protection or a third-country national who is a minor, the Member States shall provide the information referred to in Article 29(1) in an age-appropriate manner.

The Member States reported different measures that they had taken to ensure the respect of this obligation, which are described below:

- Guidelines addressed to staff members on best ways to communicate with minors are available.
- Several staff members are given a specific training for dealing with minors.
- A representative or legal guardian is appointed to take care of unaccompanied minors during the whole asylum procedure. The information referred to in Article 29(1) is provided to the minor in presence of this person.

- Specific leaflets or brochures are made for minors. In this regard, the European Commission has made available a specific leaflet for unaccompanied children applying for international protection in Annex XI of Commission Implementing Regulation (EU) n°118/2014¹¹.

Q14. Article 29(11) of the Eurodac Recast Regulation provides that, whenever a person exercises his/her right of access personal data relating to him/her, the competent authority shall keep a record in the form of a written document that such a request was made and how it was addressed, and shall make that document available to the national supervisory authorities without delay.

Twelve Member States reported that the technical conditions to apply this new procedure had not yet been prepared, but that there should be no technical difficulties to apply these changes and that the Member States should be ready in time for the entry into force of the Recast. [Two of these Member States later on reported that this new procedure had indeed been established in time.] One Member replied that the best way to put Article 29(11) in practice was being examined.

Thirteen Member States reported that the procedure was already in place. Furthermore, several of them mentioned that these measures already existed under the previous Eurodac Regulation and that Article 29(11) had not required any additional preparation.

4.4. Marking of data

Q15. Article 18 of the Eurodac Recast Regulation is entitled 'Marking of data', while the corresponding Article 12 of the original Eurodac Regulation was entitled 'Blocking of data'. This new provision provides that the Member State of origin which granted international protection to an applicant whose data were previously recorded in the Central System, shall mark the relevant data (instead of blocking it) in order to inform the Member States if there is a hit for a marked data subject.

Three Member States reported that there was no need of technical adaptations at national level. Most Member States informed that the technical adaptations needed at national level to implement this change had been built in the new system. Others stated that these adaptations had not yet been made at the time they answered the questionnaire but would be provided shortly. [One of these Member States later on reported that the necessary adaptations had been made in time.]

A majority of Member States informed that this new functionality had not yet been tested, but that this would be done in due time and in any case by 20 July 2015 when the new system would become operational. Three Member States originally stated that they had passed the necessary tests [and one confirmed later on that it had been done].

¹¹ Commission Implementing Regulation (EU) n°118/2014 of 30 January 2014 amending Regulation (EC) No 1560/2003 laying down detailed rules for the application of Council Regulation (EC) No 343/2003 establishing the criteria and mechanisms for determining the Member State responsible for examining an asylum application lodged in one of the Member States by a third-country national, OJ L 39, 08.02.2014, pp. 1-43.

5. Outcome of visit to eu-LISA

In September 2015, a team of experts from the three different Supervision Coordination Groups of SIS II, VIS and Eurodac, as well as participants from the EDPS, visited the operational center of eu-LISA in Strasbourg, France. The purpose of the visit was to obtain an overview of the eu-LISA's handling of Eurodac, especially with regard to the adoption and entry into force of the new Eurodac Regulation, but also to see how the SIS II and the VIS were dealt with. The team consisted of IT-experts from the Portuguese and Italian DPAs, the chair of Eurodac from the Swedish DPA and two experts from the EDPS.

The operational center in Strasbourg holds and manages the databases and infrastructure of the three different IT systems for SIS II, VIS and Eurodac and employs about 85 persons. A few of these employees are also continuously located in eu-LISA's back-up centre in St Johann im Pongau, Austria. The staff is divided so that specific staff is dedicated to each of the three different systems.

At the visit, the team was given an overview of the architecture of each system, the routines for quality checks of data in VIS and Eurodac and the monitoring of the SIS II communication network between eu-LISA and the Member States. Staff from eu-LISA also gave an account of the procedure for the migration from sTESTA to the new generation, TESTA-ng, which at the time of the visit was still going on. Matters such as unavailability incidents, security measures and support function to Member States were also discussed.

Eu-LISA kindly agreed to receive the team of experts within the frame of this study visit and it should be emphasized that this was not a formal inspection. The team of experts was given ample and adequate information about all three different systems and the impression was that security and data protection issues are taken seriously. Training and awareness raising on these matters are provided continuously to the staff. The Eurodac SCG will continue to follow eu-LISA's work and further developments regarding Eurodac and the implementation of the new regulation.

6. Conclusions & Recommendations

Based on the analysis of the answers received and the outcome of the visit to eu-LISA's premises in September 2015, the Eurodac SCG welcomes the efforts that were made both by competent national authorities and eu-LISA in order to ensure the implementation of the new Eurodac rules and a smooth transition to the new Eurodac system by 20 July 2015.

Furthermore, the Group welcomes all in all the progress achieved so far and encourages the Member States to go further to ensure full compliance with the Eurodac Recast Regulation in every detail as soon as possible. The Group welcomes in particular that:

- all Member States provided for training sessions or guidelines to prepare the relevant staff to use the new functionalities of the Eurodac system;
- most Member States had no major technical problems while updating the system;

- most Member States already addressed the requirements of Article 36 concerning the logging of access;
- the Member States have taken various measures to ensure that minors receive information in an age-appropriate manner in line with the Recast Regulation;
- keeping records of requests of access to personal data by data subjects does not pose problems in the Member States;

Nonetheless, the Group would draw attention to some important features and urge those Member States that did not yet do so to take the following necessary steps to implement them:

- provide for a security plan;
- provide for a specific procedure for authorisation of access to Eurodac data by Europol;
- establish a procedure for the erasure of data in accordance with Article 33(5) of the Recast;
- adopt a model for electronic reasoned requests; and
- provide specific data protection training to end-user staff.

Brussels, April 2016

Annex I. Questionnaire on how the national Eurodac authorities are implementing the new Eurodac Regulation

General questions - These questions were addressed to the national authorities responsible for the application of the Regulation.	
Q 1	How will the new Eurodac regulation apply in your country? It will include also law enforcement aspects?
Q 2	What are the activities in place for ensuring the implementation of the new functionalities of EURODAC? Are there other measures that you are planning? In case you have adopted legal and/or technical measures, please provide details.
Q 3	The Regulation mentions that the Member States should ensure that the national supervisory authorities are able to supervise the use of and access to Eurodac data adequately (Recital 46) and each Member State shall ensure that its national supervisory authority has access to advice from persons with sufficient knowledge of fingerprint data (Article 30 (2)). In this context, are there specific provisions introduced or specific funds assigned to the DPA in order to carry on the new tasks provided by the Eurodac new rules?
Q 4	Have you performed /planned to perform training sessions to your staff with regard to the new capabilities of the system? Please provide details on how you will ensure the needed level of technical expertise to your staff?
Q 5	Have you been in contact with eu-LISA on technical support for the new system? If yes, how useful was their support?
Law enforcement access - These questions were addressed to the law enforcement authorities and to those responsible for implementing the technical features of the new system.	
Q 6	Did you encounter/are you encountering difficulties in adapting the system to the new legal requirements and features? If yes, how are they solved? Do you have a Security Plan for the LEA aspects?
Q 7	How are /will the requirements referred to in Article 36 being/be addressed? Have you encountered/are you encountering technical issues with the creation of new logs under this Article?
Q 8	Did you set up / do you envisage creating a procedure for the granting of authorisation to Europol on the basis on Article 21 (3)?
Q 9	Is there any procedure in place or foreseen with regard to the application of Article 33 (5) on the erasure of data when the data is required for the purposes of the specific on-going criminal investigation for which they were requested by a Member State or by Europol?
Q 10	Do you already have a list of the duly empowered staff (part of) whose role is described in

	accordance with Article 19 of the Regulation? If, not when will it be ready? Are they going to be trained or have they been trained already?
Q 11	How will you apply the procedures described in Article 19 on the comparison of fingerprint data with Eurodac data? Have you already performed tests/are you planning to do so? If yes: did you use/are you going to use generated or real data?
Q 12	Do you have a model for the electronic reasoned request or do you envisage creating one?
Data subjects' rights	
Q 13	For the case of minors, which measures will you take to ensure that the information is provided in an age-appropriate manner (Article 29 (2))?
Q 14	Did you prepare the technical conditions to apply the new procedure in Article 29 (11) which says that the competent authority shall keep a record in the form of a written document that such a request was made and how it was addressed, and shall make that document available to the national supervisory authorities without delay when a person requests data relating to him or her?
Marking of data	
Q 15	The new provision is designed to "mark" the data instead of blocking it in order to inform the Member States if there is a hit for a marked data subject. Are any technical adaptations needed at national level to make this change and if yes did you test them to see how they are going to work?