



22 July 2016

Members of the Article 29 Working Party
DG JUSTICE, WP 29 Secretariat
B – 1049 Brussels

RE: GDPR Implementation – Post-FabLab Structured Stakeholder Dialogue

Dear Members of the Article 29 Working Party,

We the below signing organisations welcome the opportunity to engage in dialogue with the Article 29 Working Party (WP29) during **next week's FabLab** (26th July). Consulting with all stakeholders will ensure that the implementation of the General Data Protection Regulation (GDPR) will reflect the practice of today's business reality. We believe in a **continuous dialogue** with the WP29 and eventually the European Data Protection Board (EDPB) while you examine the various provisions during the implementation of the GDPR, aimed at embedding the concept of accountability to ensure the effective protection of personal data.

However, we believe that the format and structure of next week's meeting **will not achieve the intended purpose**. The timing and restrictions placed on associations' participation will leave many able to only provide you with pre-agreed high-level text. Given the technical nature of the issues at hand, we fear that the format of the meeting will not lead to a meaningful dialogue with proper detailed exchanges. Our associations have the ability to offer the WP29 with experts from companies representing different sectors and geographies. These experts would be able to address the issues in-depth, which is critical to making sure that these complex topics are tackled in the appropriate manner.

With a view to the future and in an effort to **improve the consultation process**, we are confident you will support a consultation process that offers a more impactful interaction and in-depth knowledge exchange with stakeholders. Specifically, we would appreciate understanding how the WP29/EDPB plans to engage with stakeholders in the future throughout the implementation process. A clear vision and **timeline for consultation** would allow us to provide you with the proper experts and material necessary to make this exercise one that is valuable for both sides. Furthermore, we think that this would increase the transparency behind the process.

We hope that you will agree that a structured dialogue between stakeholders and the WP29/EDPB will help to ensure that the GDPR guidance will be **future-proof, insightful, implementable, pragmatic, proportionate and balanced**. We look forward to hearing your views next week on how a long-term structured dialogue with stakeholders can ensure that the GDPR implementation will effectively protect the fundamental right to privacy for European citizens while enabling Europe to remain competitive in the global data economy.

Yours sincerely,

AmCham EU, BSA | The Software Alliance, BusinessEurope, COCIR, DIGITALEUROPE, EACA, E-Commerce Europe, EDiMA, EMOTA, EPC, EuroISPA, FEDMA, FENCA, IAB Europe, and JBCE.