

Politiscope - Annual Report of Activities 2024.

Politiscope is a privacy watchdog dedicated to protecting personal data and ensuring the full enforcement of the GDPR as a foundation for transforming the digital public sphere.

Politiscope actively engaged in shaping digital rights policies at national, regional, and EU levels. We contributed to key consultations on data protection, including the European Commission's GDPR evaluation, the European Data Protection Board's stance on Meta's "consent or pay" model, and the CNIL's AI guidelines. Our involvement extended to capacity-building efforts in Bosnia and Herzegovina and public advocacy following the KBC Zagreb data breach—the most serious personal data incident in EU history to date.

In the field of artificial intelligence, we co-authored a global study on biometric surveillance, assessed Croatia's readiness for responsible AI deployment, and promoted critical AI governance discussions. Regionally, we strengthened cooperation within the Southeast Europe Digital Rights Network and contributed to the EU-wide Collective Redress Database, supporting strategic litigation on digital rights.

Politiscope also joined numerous open letters and public reactions addressing pressing digital rights risks, including surveillance, cybersecurity, AI regulation, and data protection adequacy decisions, underscoring our commitment to defending fundamental rights in the digital sphere.

Politiscope regularly provides free legal aid to citizens in area of data protection, as well as free GDPR consultancy services to NGOs looking to strengthen their data protection practices.

Data Protection

Politiscope participated in the European Commission's Call for evidence on the initiative dealing with a Report on the General Data Protection Regulation. [We highlighted two significant issues](#) are impeding the effective application of GDPR in Croatia (and the EU). Firstly, there are significant challenges regarding the institutional resources and technical capacities of Data Protection Authorities (DPAs). Secondly, Croatian public bodies currently face no administrative fines, leading to impunity for GDPR violations.

Politiscope participated in public consultations of the European Data protection Board on Meta's consent or pay model. We highlighted freely given and informed consent is the only valid legal basis for targeting users for marketing purposes. The right to privacy and personal data protection are not a commodity. Offered choices of consent or pay model are not equally accessible – giving consent requires just a single click, while choosing the paid option requires creating an account and completing a payment process.

Politiscope actively participated in preparation of EDRI's contribution to [public consultation held by the French Data Protection Authority \(CNIL\)](#) on the "how-to sheets" on the development of artificial



intelligence systems. We highlighted indiscriminate scraping of the whole internet does not pass the legitimate interest assessment as data subjects do not expect their personal data will be processed in such a manner.

Politiscope was a partner organization on the [DATA ROL project](#) led by Sarajevo Open Centre. Project “Data Protection and the Rule of Law in Bosnia and Herzegovina” was focused on building capacities of the Initiative for Monitoring the European Integrations of Bosnia and Herzegovina in data protection and influencing candidate country’s legal framework using the leverage of EU negotiations and *acquis communautaire*. A study visit in Croatia was organized for members of the initiative enabling them to learn first-hand on GDPR enforcements issues in Croatia. Politiscope team conducted two training sessions and held a mentorship process for members of the initiative, which resulted in the creation of policy briefs with recommendations for full alignment of the new data protection law with the GDPR.

Following the cyber-attack on KBC Zagreb on June 27, Politiscope participated at the [roundtable held on July 10](#) in the Croatian Parliament. We have stressed that the hospital has still not transparently informed patients about the scope of the stolen personal data or the potential risks. We have highlighted as particularly concerning the media reports about cancer patients unable to receive chemotherapy due to lost medical records. Based on publicly available information and individual cases we are aware of, it appears that KBC Zagreb has yet to take the necessary steps to reduce risks to patients’ rights and freedoms. Politiscope is not aware of any other data breach in Europe that has directly endangered patients’ lives, which makes this case the most serious personal data breach in European data protection history.

Artificial Intelligence

Politiscope team members co-authored the global study [Beyond the Face: Biometrics and Society](#), which examines the societal impacts of facial recognition technology. Part of the ongoing MASA (Monitoring AI-backed Surveillance Architectures) project, led by the SHARE Foundation, the book details biometric surveillance technologies and compares regulations in the US, EU, and several countries across Africa, Asia, and Latin America. The study also covers practical cases from Myanmar, the UK, New York, and Belgrade, illustrating how these systems are used for border control, public space monitoring, and suppression of opposition. It highlights the tension between human rights and profit-driven biometric surveillance. Croatian [promotion](#) of the book was organized in Zagreb by Politiscope.

Duje Prkut, Executive Director of Politiscope, was contracted as the country researcher for Croatia for the Global Index for Responsible (GIRAI). Prkut mapped all AI-related activities of state administration, public bodies, academia, civil sector and the private sector, covering a span of two years. Croatia scored among the lowest in EU, indicating that an extremely low number of stakeholders engage with activities aimed at responsible development and deployment of AI systems.



Regional and International Collaboration

Politiscope actively participated in the Southeast Europe Digital Rights Network, which expanded to include 39 civil society and media organizations by 2024. In May 2024, network members met in Bjelašnica, Bosnia and Herzegovina, for a [strategic retreat](#) to discuss improvements to the network's activities and future collaboration. The meeting aimed to establish effective governance and enable impactful collaboration on digital rights issues across the region

Politiscope contributed to the [Collective Redress Database](#), a comprehensive two-year research project led by the Digital Freedom Fund as part of the digiRISE initiative. The organization's team analyzed legal mechanisms for collective redress actions in Croatia, contributing to a database that tracks collective redress mechanisms, practices, and case law across ten EU Member States. This research supports strategic litigation for protecting digital rights under EU regulations including GDPR, AI Act, and DSA.

Public reactions and open letters:

- [Open letter to the UN Ad Hoc Committee on Cybercrime](#), expressing serious concerns about the draft UN cybercrime treaty
- Open Letter to AI Convention Negotiators: Protect Our Rights – [No Broad Exemptions, No Weakened Standards](#).
- [Joint Statement](#) on the dangers of the May 2024 Council of the EU compromise proposal on the EU CSAR
- [Joint statement on the future of the CSA Regulation](#) – open letter against CSAR draft
- [Serbian authorities must prosecute illegal hacking of journalists and activists](#) – open letter to EU institutions
- [Shedding light: We address the flawed Going Dark Report](#) – open letter against dangerous proposals in the High Level Group on Access to Data for Effective Law Enforcement Report
- [Underscoring the Importance of Protecting Fundamental Rights When Modernising ePrivacy Legislation](#) – open letter to the European Commission
- [Concerns Regarding European Commission's Reconfirmation of Israel's Adequacy Status](#) in the Recent Review of Adequacy Decisions – open letter to the European Commission on the review of adequacy decision
- [Oppose "Pay or Consent models"](#) - open letter to the European Data Protection Board
- Public [reaction](#) of Politiscope to data breaches in the health sector resulting in significant risks to rights and lives of affected data subjects.
- [Interview for national newspapers](#) on GDPR breaches by debt collection agencies and the possibility for individuals to sue them over these violations.

Projects and Donors:

- **DATA ROL** – Data Protection and the Rule of Law in BiH; The Central European Initiative
- **NERA AI** – National Enforcement and Rights-Based Approach to Artificial Intelligence; EDRI
- **LIT DATA** – Strategic Litigation in Data Protection (2023-); Digital Democracy Fund
- **MASA** - Monitoring AI-backed Surveillance Architecture (2022-); European AI and Social Fund
- *Privacy Defenders (2022); Active Citizens Fund*
- *Privacy in the time of Corona (2021); Active Citizens Fund*

