



Report on EU Data Protection Authorities

Part 4: Resources

Deloitte Privacy Services – Privacy Response

Report on EU Data Protection Authorities

Introduction

On 25 May 2019 the General Data Protection Regulation ("GDPR") celebrated its first anniversary and once more all eyes are turned towards the national **Data Protection Authorities** ("DPAs").

The **DPAs are facing busy times.** Whilst their primary task is to enforce the application of the GDPR and ensure compliance, the GDPR entrusts the DPAs with a number of additional tasks. They are responsible for awareness, guidance, handling complaints and conducting investigations – to name just a few of their tasks.

In some circumstances, the **GDPR also requires organizations to actively** work with their DPA(s). Organizations must, for example, cooperate in investigations, consult their relevant DPA for certain high-risk Data Protection Impact Assessments ("DPIAs"), obtain DPA approval for Binding Corporate Rules ("BCRs") and report certain personal data breaches within 72 hours.

It is therefore important for organizations to not only identify which DPAs they may need to engage with in the future, but also develop their knowledge on the characteristics of these DPAs. Some organizations may consider establishing a working relationship with their DPA(s), to ensure smooth communication in times of need.

At Deloitte we understand these needs. We have therefore conducted **extensive research** into certain key characteristics of the DPAs. The research seeks to paint a detailed picture and to provide you with a closer look at factors that may influence a DPA's way of working. Some key topics include data breach reporting, resources, guidance issued and enforcement actions taken.

The results of our research are published in a number of sub-reports. A comprehensive final report will be made available once all sub-reports have been published.

In this edition we present our findings on the **DPA's resources.**

How are DPAs staffed?
A tough question to answer





How are DPAs staffed?

A tough question to answer

A comprehensive analysis of the available data on employee numbers within DPAs is challenging. This is rooted in the fact that **DPAs have very different approaches** to publishing this information. Some DPAs publish the number of employees as an average or an approximate number of total employees, whereas other DPAs simply publish the total number employees. In some cases, DPAs publish a number without clarifying or providing context on how it was calculated.

To complicate the matter, some DPAs indicate their numbers in terms of full time equivalent (fte) whereas others provide a total number, regardless of whether this number may include part-time employees.

When looking at the data on employee numbers, it is important to keep in mind that there are big variations of labor costs across EU Member States. In Bulgaria, for example, the estimated cost of labor is €5.70 per hour. This is in stark contrast to the €49.30 per hour in Norway.* It is thus difficult to compare between Member States.

Despite these challenges, it is interesting to look at individual changes in terms of percentages. How much has changed in the past few years? We see, for example, that 19 DPAs have grown in the number of employees, which could be a reflection of the need for additional resources following the introduction of the GDPR.

Belgium appears to have seen the greatest percentage increase, with a 240% increase between 2016 and 2018 (from around 16 to around 54 employees). **The Netherlands** comes in second place with an increase of 117% (from around 72 to around 157 employees) and **Denmark** in third place with an increase of 58% (from around 36 to around 57 employees).

Other DPAs haven't grown in the same way. **Estonia**, for example, retained the same number of employees between 2016 and 2019, whereas 5 DPAs saw their numbers decrease over the years: **Bulgaria** (-8%), **Latvia** (-5%), **Lithuania** (-17%), **Portugal** (-23%) and **Romania** (-15%).

Germany, Malta and Poland were excluded from the study due to insufficient availability of data.

*Labor costs in the business services economy. Although this indication excludes public administration labor costs, it is a good indication of the labor costs DPAs might face. Please refer to the Appendix for the source and definition.

How are DPAs staffed?

What do we see in terms of changes between 2016 and 2018?

Country*	Percentage change	Description
Austria	31%	Increase
Belgium	240%	Increase
Bulgaria	-8%	Decrease
Croatia	4%	Increase
Cyprus	21%	Increase
Czech Republic	1%	Increase
Denmark	58%	Increase
Estonia	0%	No changes
Finland	35%	Increase
France	2%	Increase
Greece	13%	Increase
Hungary	56%	Increase
Ireland	57%	Increase

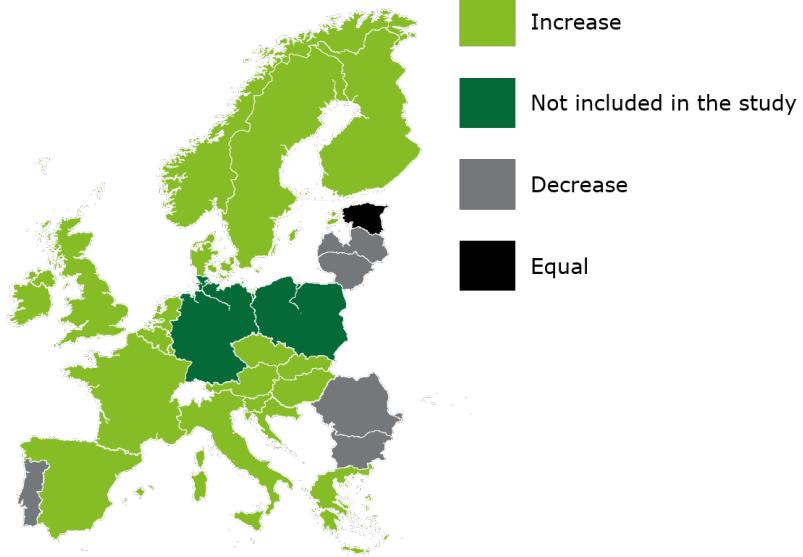
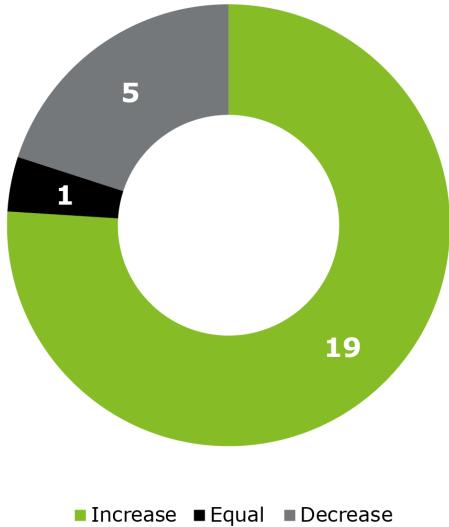
Country*	Percentage change	Description
Italy	6%	Increase
Latvia	-5%	Decrease
Lithuania	-17%	Decrease
Luxembourg	29%	Increase
Netherlands	117%	Increase
Portugal	-23%	Decrease
Romania	-15%	Decrease
Slovakia	17%	Increase
Slovenia	30%	Increase
Spain	4%	Increase
Sweden	36%	Increase
United Kingdom	23%	Increase

*Germany, Malta and Poland were excluded from the study due to insufficient availability of data.

How are DPAs staffed?

The data visualized

Changes in employees between 2016 and 2018



*Germany, Malta and Poland were excluded from the study due to insufficient availability of data.

Let's talk money

How have DPA budgets developed over the years?





How have DPA budgets developed over the years?

Observations on changes in budget between 2016 and 2019

The DPAs are facing busy times. Whilst their primary task is to enforce the application of the GDPR and ensure compliance, the GDPR also entrusts the DPAs with a number of additional tasks. They are responsible for awareness, guidance, handling complaints and conducting investigations – to name just a few. In order to be able to fulfil these tasks, it is evident that sufficient resources must be allocated.

Based on the collected data, Member States appear to be responding to the demands for additional resources. In our research we see that, of the 19 Member States that we were able to collect data on for the years 2016-2019, 16 DPAs saw their budgets increase. Between 2017 and 2018, we were able to collect data from 22 Member States and noted that 20 DPAs saw an increase in budgets, whereas the budget of the other two remained the same.

Whilst Germany was excluded in the studies on 2017 and 2018, we do see that the German Federal DPA is in the top 3 of the highest budgets within Europe and saw an 84% increase in budget between 2016 and 2019 (from €13.7 million to €25.2 million).*

The following changes between 2016 and 2019 are also notable:

- Ireland's budget increased the most. It went from €4.7 million in 2016 to €15.2 million in 2019.
- Belgium, Estonia and France all saw their budgets decrease between 2016 and 2019.
- Although France's budget increased between 2018 and 2019 (from €17.6 million to €18.8 million), its budget in 2016 was originally €18.9 and therefore its budget has essentially decreased by 0.16%.
- Of all countries included in the study, Estonia's budget decreased the most. Starting with a budget of €700,821 in 2016, this dropped to €653,000 in 2019 (a decrease of 6.82%). This is particularly interesting to note, considering the previous finding that Estonia's number of employees stayed the same between 2016 and 2018.

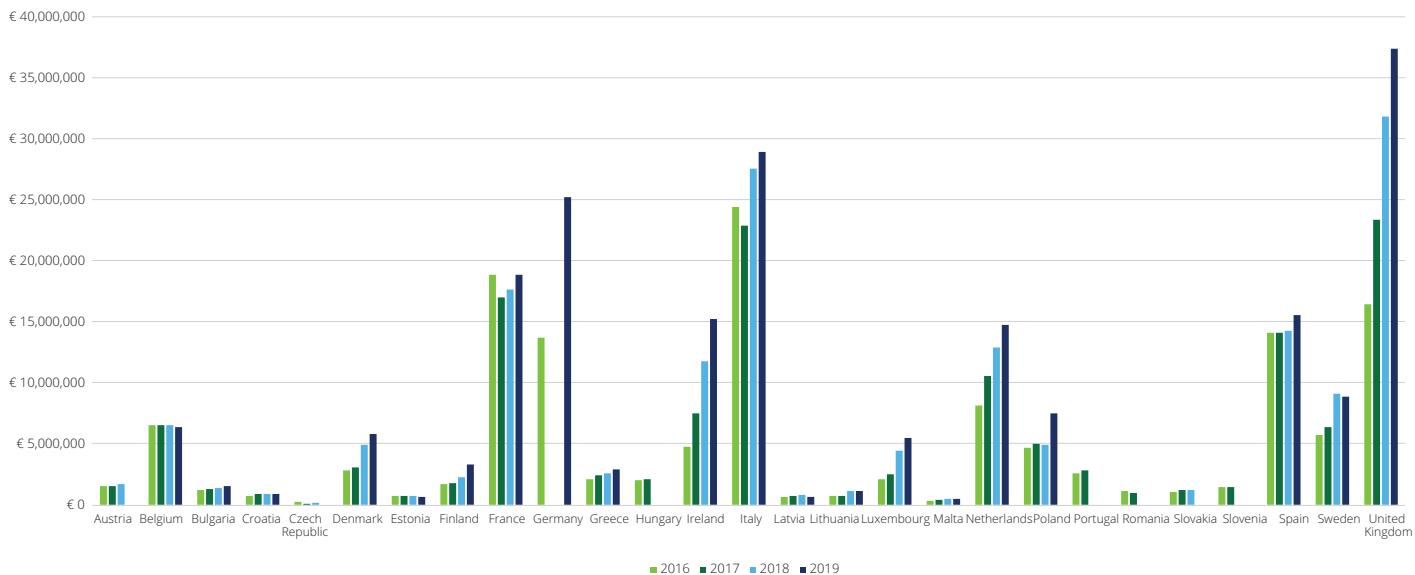
On the following page, we present a full overview of the DPA budgets converted into euros. However, since there are shortcomings in comparing these numbers, a further analysis of the budgets in comparison to central government spending can be found on the pages that follow.

The numbers on this page have been rounded up. Conversion to Euro took place with the exchange rates on 14.07.2019.

* In Germany, each Bundesland has a Data Protection Authority. For this report, we looked at the data published by the Federal Commissioner for Data Protection and Freedom of Information (BfDI). However, the BfDI did not publish budget data for 2017 and 2018.

How have DPA budgets developed over the years?

DPA budgets converted into Euros



Cyprus was excluded from the study. UK budget data runs from April–December.

Only available data has been included in this chart. Some years may appear empty, however this is no indication of the DPA's budget for that year.

How have DPA budgets developed over the years?

DPA budgets in percentage of central government spending (1)

In this report we have attempted to provide additional context on DPA budgets by analyzing the data against data on central government spending (based on Eurostat data).^{*} This is particularly interesting as it enables us to consider how central government spending varies amongst EU Member States and how a DPA with a small absolute budget may still play an important role nationally.

By looking at the data of DPA budgets on their own, we observed an increase in the majority of EU Member States from 2016 to 2019. This is a positive development, since an increase in budget may also mean that the DPA is becoming a more important institution nationally and that it is attracting a larger share of budgetary attention.

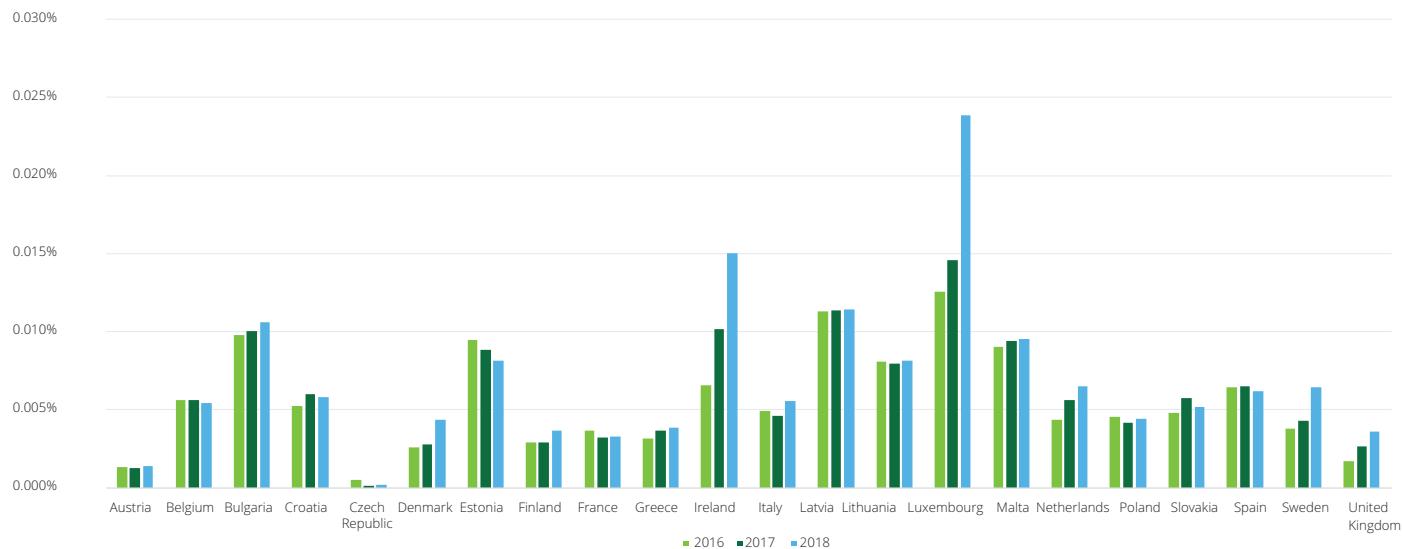
However, when looking at the DPA budgets in terms of central government spending we see nuances to this: while we do see an increase of the percentage in the majority of countries, we also see that there is significant variation across the years nationally and among Member States.



*Eurostat data is available up to the year 2018. For 2019, central government spending information is not yet available in the Eurostat database.

How have DPA budgets developed over the years?

DPA budgets in percentage of central government spending (2)



Excluded from this graph due to incomplete data are Germany, Hungary, Portugal, Romania, and Slovenia. For the Czech Republic, the data for 2017 may appear empty, but this is no indication of missing data.

How have DPA budgets developed over the years?

DPA budgets in percentage of central government spending (3)

Based on the analysis, we can observe the following developments:

- In most countries, central government spending remained relatively stable or increased from 2016 to 2018. Only in Greece and the United Kingdom we can observe a decrease in central government spending in 2018 with reference to 2016.
- In several countries, we can observe that **both central government spending and the DPA budget in absolute numbers increased** from 2016 to 2018.
 - In countries such as Bulgaria, The Netherlands, Malta, and Lithuania, for example, this resulted in an increase in the DPA budget in percentage of central government spending.
 - The opposite can be observed in other countries such as Estonia, Croatia, and Slovakia.
- The majority of countries show an increase in the percentage of central government spending attributed to the DPA, which could signal that the **DPA is becoming a more important institution domestically**.
 - This is the case in Austria, Bulgaria, Denmark, Finland, Greece, Poland, Luxembourg, the Netherlands, Malta, Latvia, Italy, and Ireland.
 - In Greece and the UK, the percentage of central government spending attributed to the DPA also increased, despite the overall decrease of central government spending.
 - Nevertheless, in some countries, the **percentage of central government spending allocated to the DPA remained stable or decreased**.
 - In Belgium, for example, the percentage remained virtually the same. There was a small decrease from 0.0056% in 2016 to 0.0054% in 2018.
 - In Estonia, the percentage decreased more significantly, from 0.0095% in 2016 to 0.0081% in 2018, despite an increase of the DPA's budget in absolute numbers.

How have DPA budgets developed over the years?

DPA budgets in percentage of central government spending (3)

- In some countries, we can observe the highest value of the DPA budget in percentage of central government spending in 2017.
 - This development can be observed in Slovakia, for example, where the percentage was 0.0048% in 2016, 0.0058% in 2017 and 0.0052% in 2018. A similar development, although at a smaller scale, can be observed in Croatia and Spain.
- Other countries show the lowest percentage of central government spending attributed to the DPA in 2017. This is the case in Austria, the Czech Republic, France, Poland and Lithuania.

While the above does not describe all developments in all Member States (please refer to the second section of this report), it is clear that there is a lot of variation among Member States and across the years. It will be interesting to return to these numbers once all DPA budgets and Eurostat data for 2019 have been publicized.



How have DPA budgets developed over the years?

Highest budget, converted to Euros

Highest budget in absolute numbers

2016	€24,404,550 Italy
2017	€23,355,981 United Kingdom
2018	€32,112,505 United Kingdom
2019	€36,047,932 United Kingdom

Countries not included in the analysis due to a lack of clear information: 2016 (Cyprus), 2017 (Cyprus and Germany (BfDI)), 2018 (Cyprus, Germany, Hungary, Portugal, Romania and Slovenia) and 2019 (Austria, Cyprus, Czech Republic, Hungary, Poland, Portugal, Romania, Slovakia and Slovenia).

Highest budget in percentage of central government spending

2016	0.013% Luxembourg
2017	0.015% Luxembourg
2018	0.024% Luxembourg
2019	Insufficient availability of data

Countries not included in the analysis due to a lack of clear information: 2016 (Cyprus), 2017 (Cyprus and Germany (BfDI)), 2018 (Cyprus, Germany, Hungary, Portugal, Romania and Slovenia). 2019 was not included in the study for percentage of central government spending, as no central government spending data has yet been published by Eurostat.

How have DPA budgets developed over the years?

Lowest budget, converted to Euros

Lowest budget in absolute numbers

2016	€252,714 Czech Republic
2017	€54,410 Czech Republic
2018	€119,291 Czech Republic
2019	€480,000 Malta

Countries not included in the analysis due to a lack of clear information: 2016 (Cyprus), 2017 (Cyprus and Germany (BfDI)), 2018 (Cyprus, Germany, Hungary, Portugal, Romania and Slovenia) and 2019 (Austria, Cyprus, Czech Republic, Hungary, Poland, Portugal, Romania, Slovakia and Slovenia).

Lowest budget in percentage of central government spending

2016	0.0005% Czech Republic
2017	0.0001% Czech Republic
2018	0.0002% Czech Republic
2019	Insufficient availability of data

Countries not included in the analysis due to a lack of clear information: 2016 (Cyprus), 2017 (Cyprus and Germany (BfDI)), 2018 (Cyprus, Germany, Hungary, Portugal, Romania and Slovenia). 2019 was not included in the study for percentage of central government spending, as no central government spending data has yet been published by Eurostat.

How have DPA budgets developed over the years?

A couple of notes on the data analysis and calculations

The DPA budget study is based on data from various sources: online information, annual reports, government budgets and direct contact with national DPAs (a full overview can be found in the Appendix).

In order to compare the DPA budget with total central government spending, Eurostat data on central government spending was used. Central government, according to the Eurostat glossary, consists of all administrative departments of the state and other central agencies whose responsibilities cover the whole economic territory of a country, except for the administration of social security funds.

Due to the varying nature of the data, and the variety of sources, this report should be viewed as an indication of trends in privacy supervisory activity and importance. We do recommend to perform your own research, before taking any decisions or actions based on this data.



Budget graphs per country
Including percentage of central government
spending



Budget graphs per country

Including percentage of central government spending

The next part of this report shows a graphical representation of the DPA budget, central government spending, and the DPA's budget in terms of percentage of central government spending for each EU Member State except Cyprus. It is an illustration of these values over time, and not a comparison of these independent values with each other.

The graphs are not intended to provide an explanation as to why the development occurred as represented. Factors such as initial level of resources, expected workloads, changes in national regulatory frameworks, changes in political power and priorities, etc., may all play a role.

Reading the graphs

There are two vertical axes in the graphs. On the left axis, the DPA budget and central government spending are depicted. For presentation purposes, the central government spending data is expressed in units of 10,000. On the right axis, the weight of the DPA budget as percentage of central government spending is expressed.

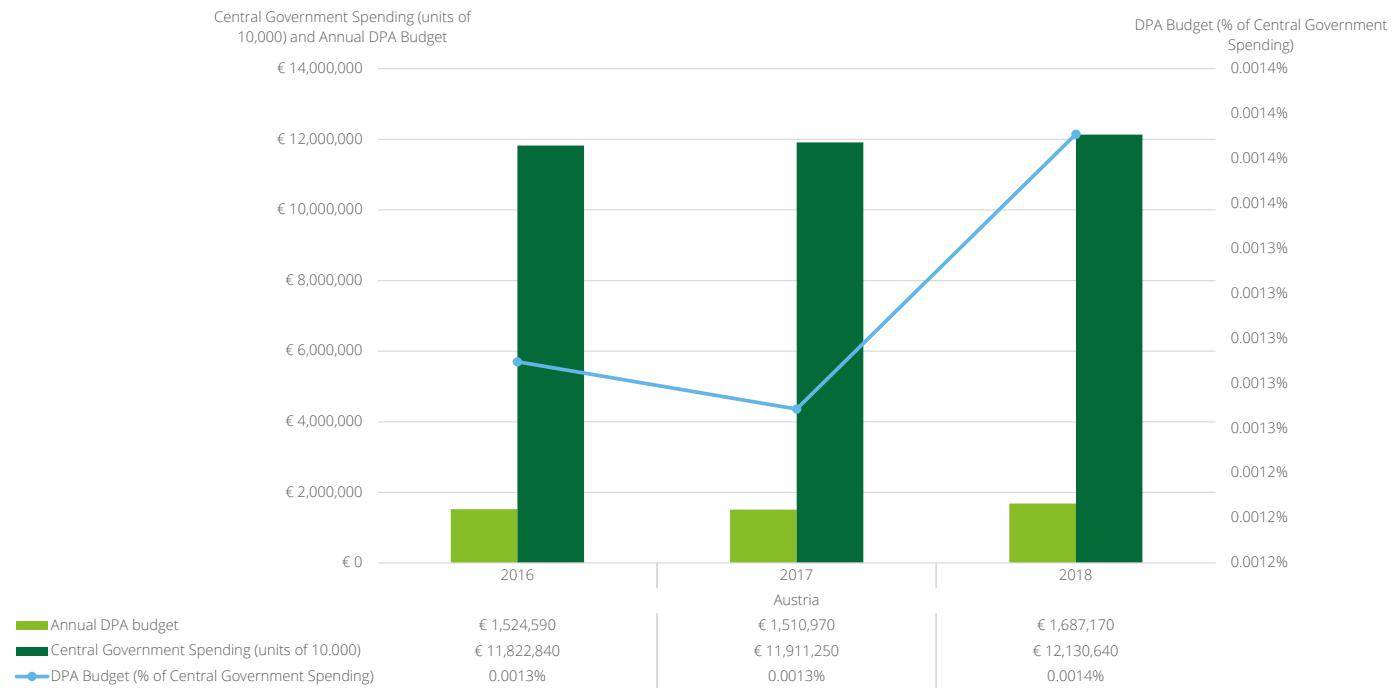
Source data and calculation steps

The data on central government spending originates from Eurostat's Government revenue, expenditure and main aggregates table (table 10a). DPA budgets were obtained directly from the national DPAs. Please refer to the appendix for the sources used in the report.

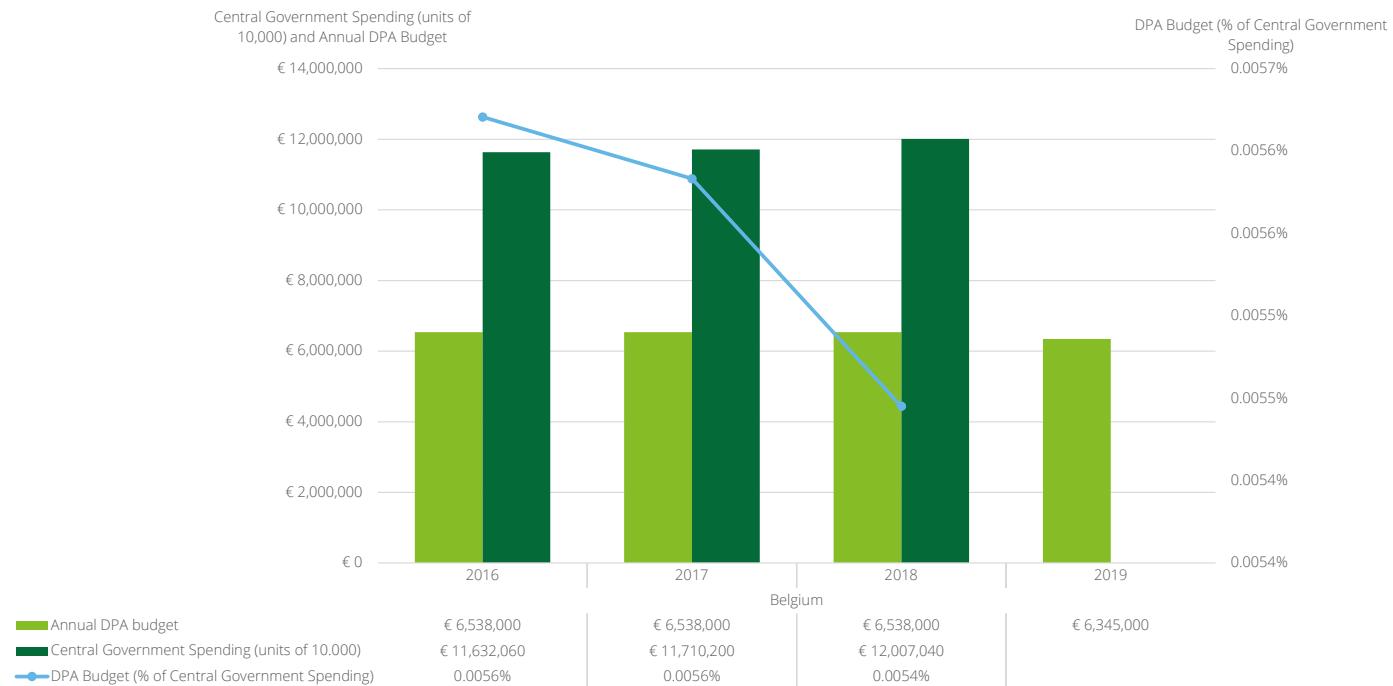
As Eurostat presents central government spending values in units of million Euro, the values of Eurostat were multiplied by 1,000,000 to obtain the actual values. For each year, the DPA's budget was divided by the actual value of central government spending to obtain the percentage weight of the DPA's budget in total central government spending.

Since Eurostat has not yet made data on central government spending available for 2019, the year 2019 is only included in the graphs for those EU Member States where the DPA has published data for its annual budget for 2019.

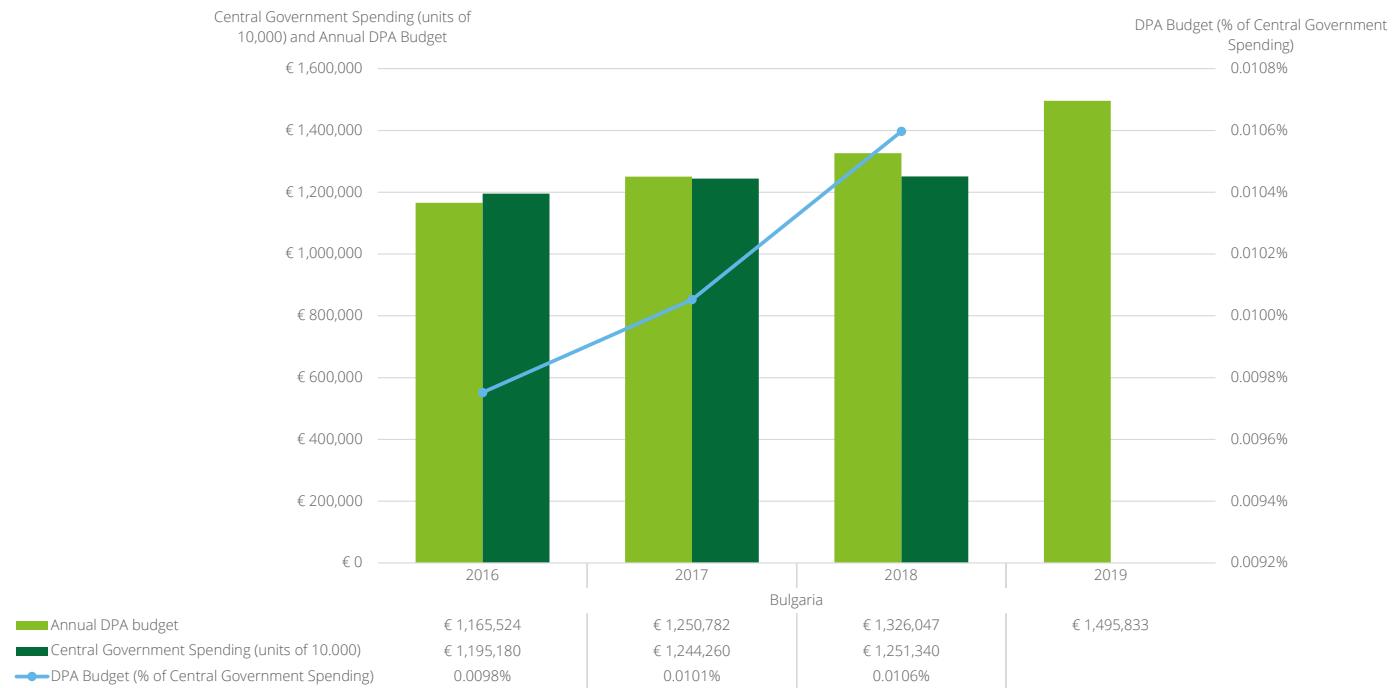
Austria



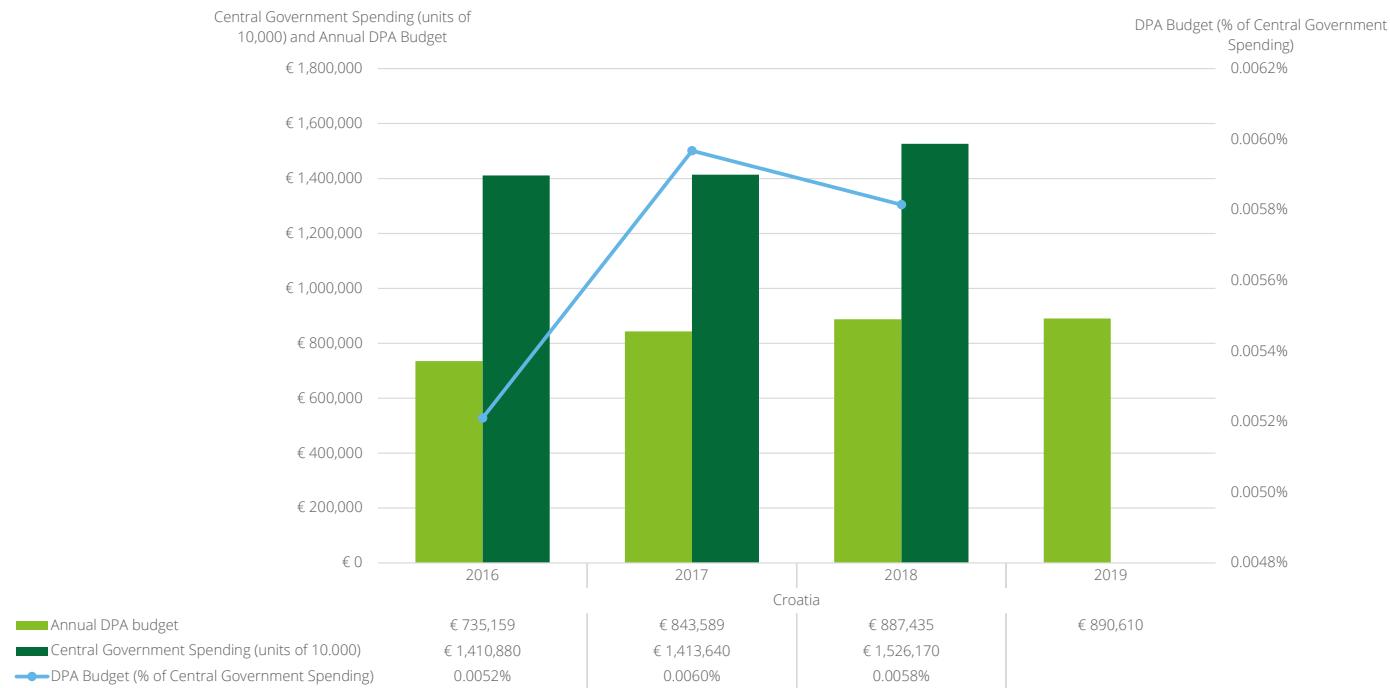
Belgium



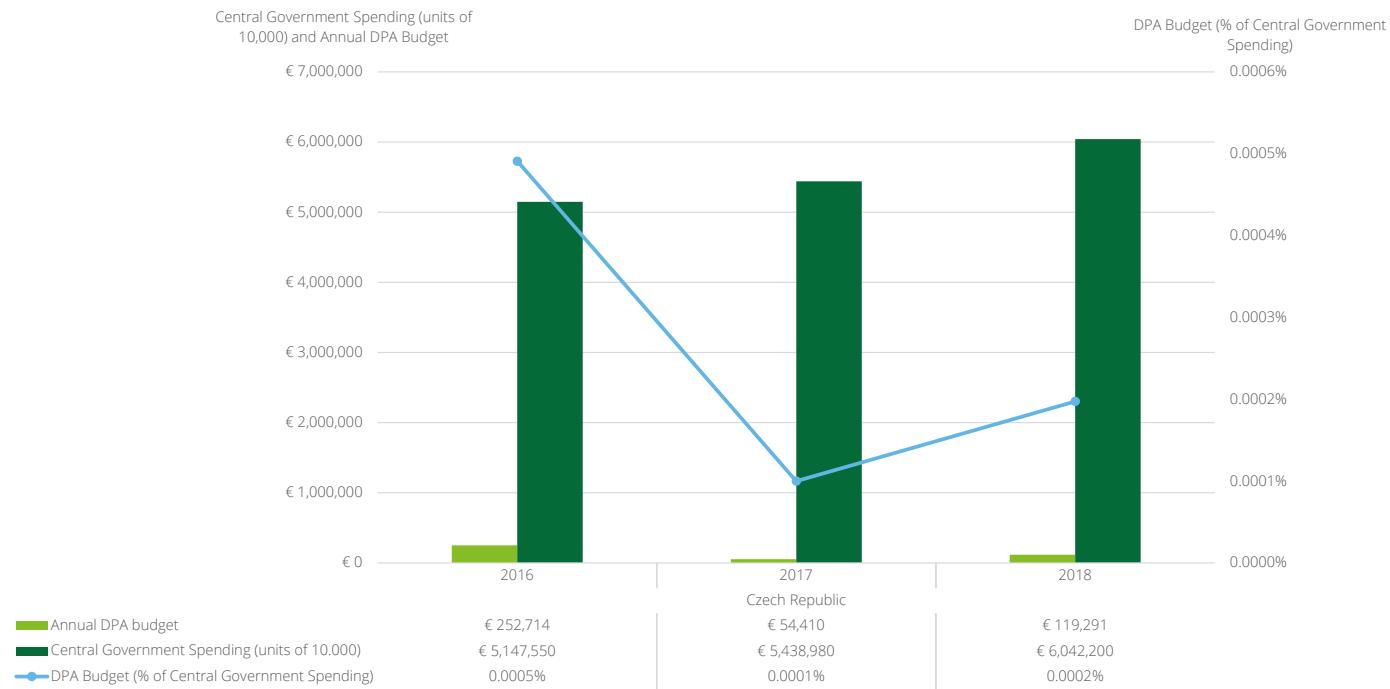
Bulgaria



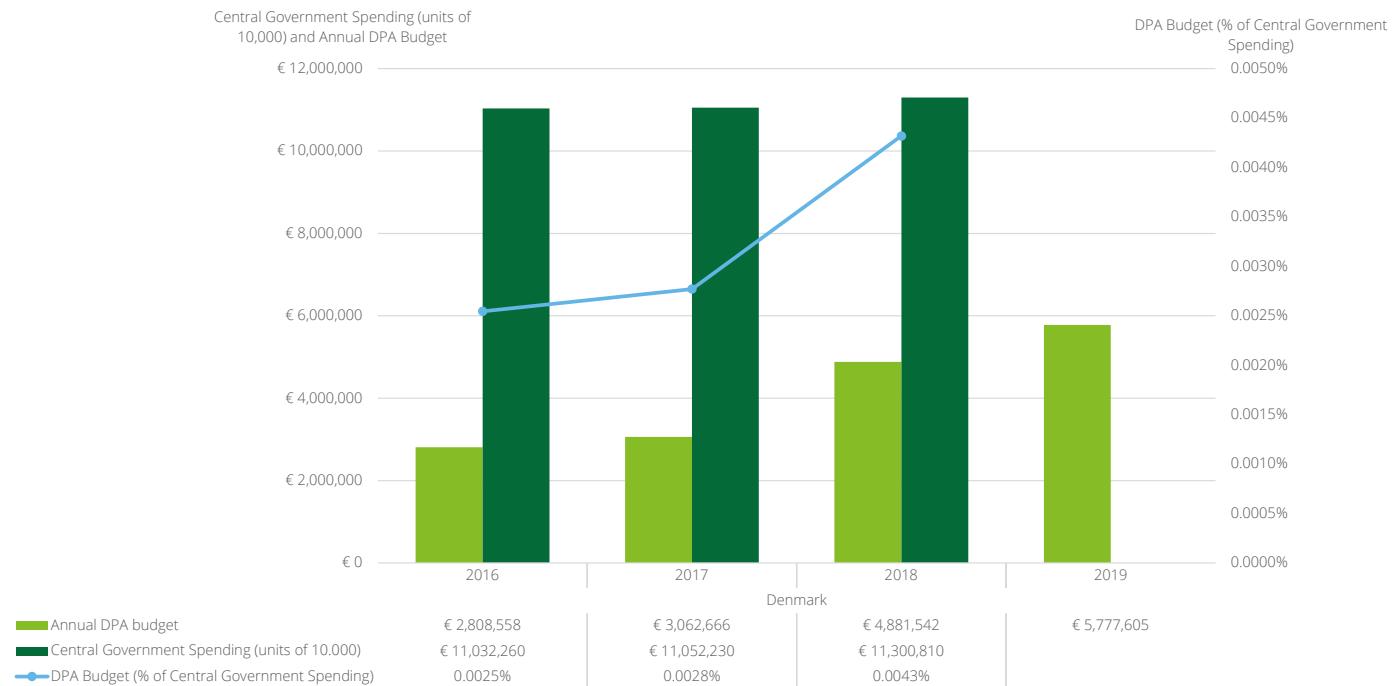
Croatia



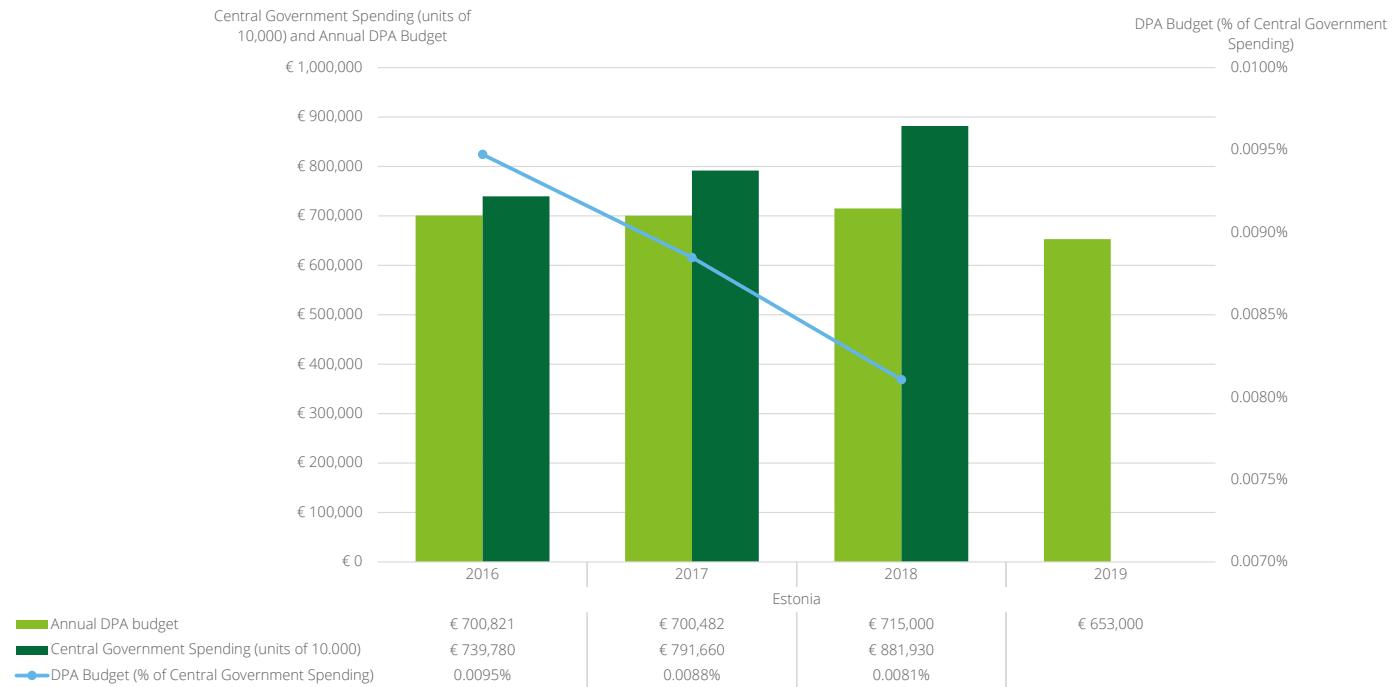
Czech Republic



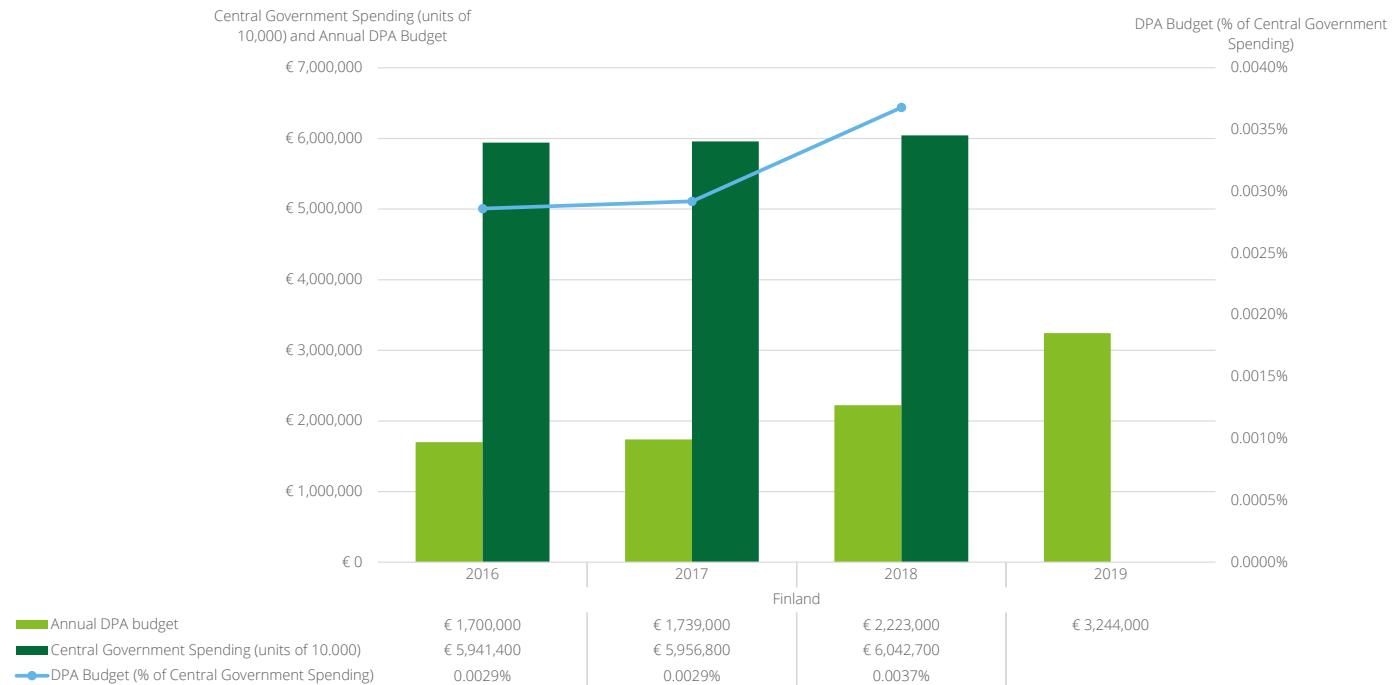
Denmark



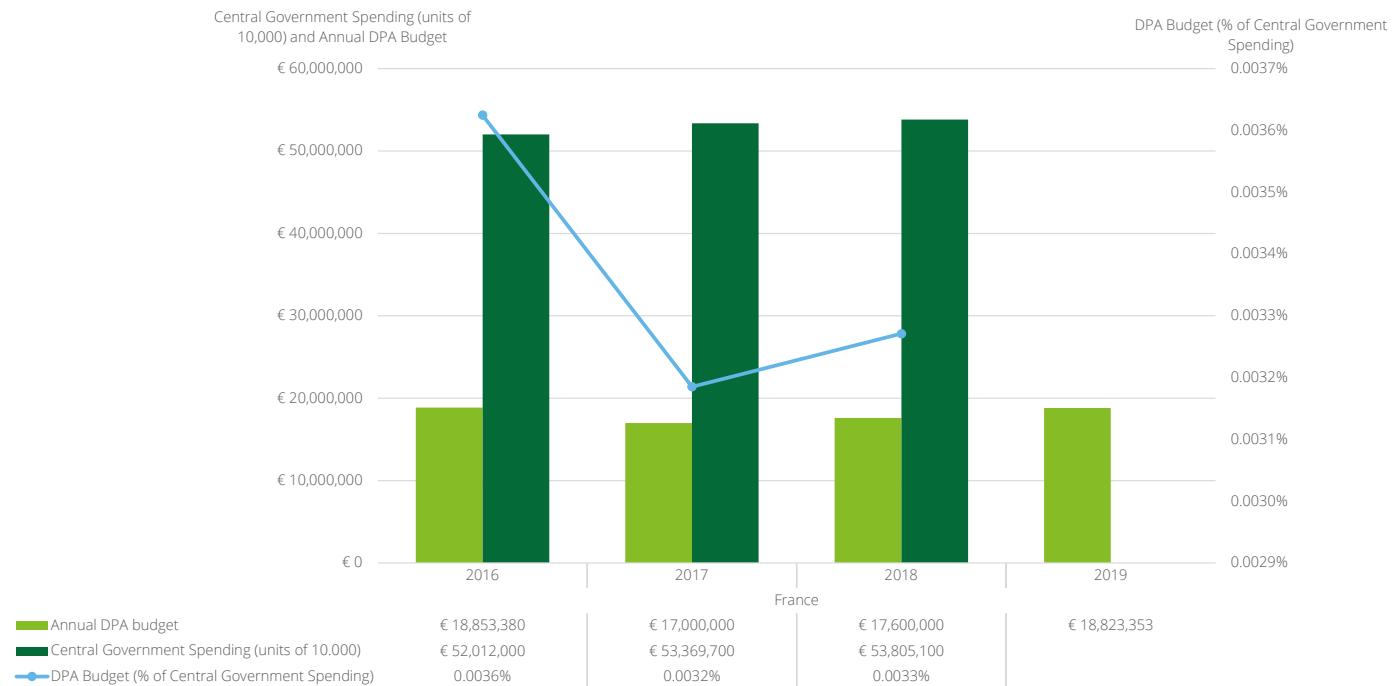
Estonia



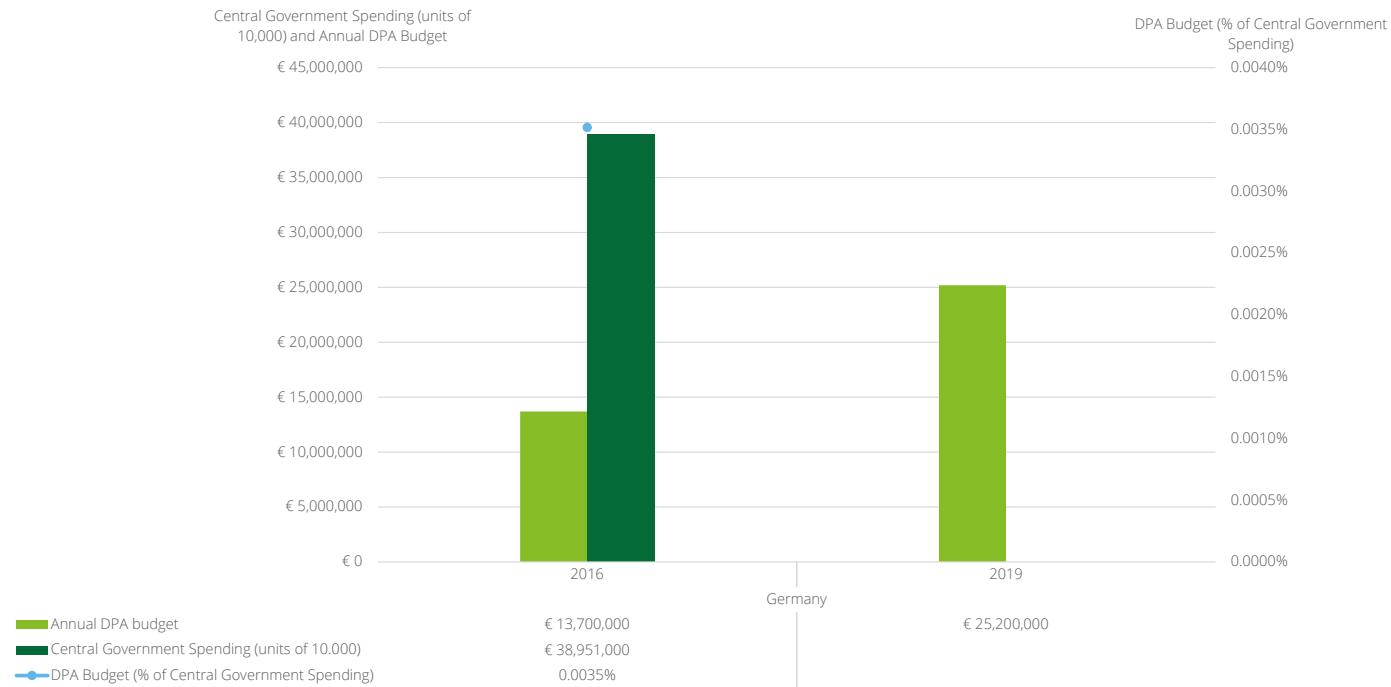
Finland



France

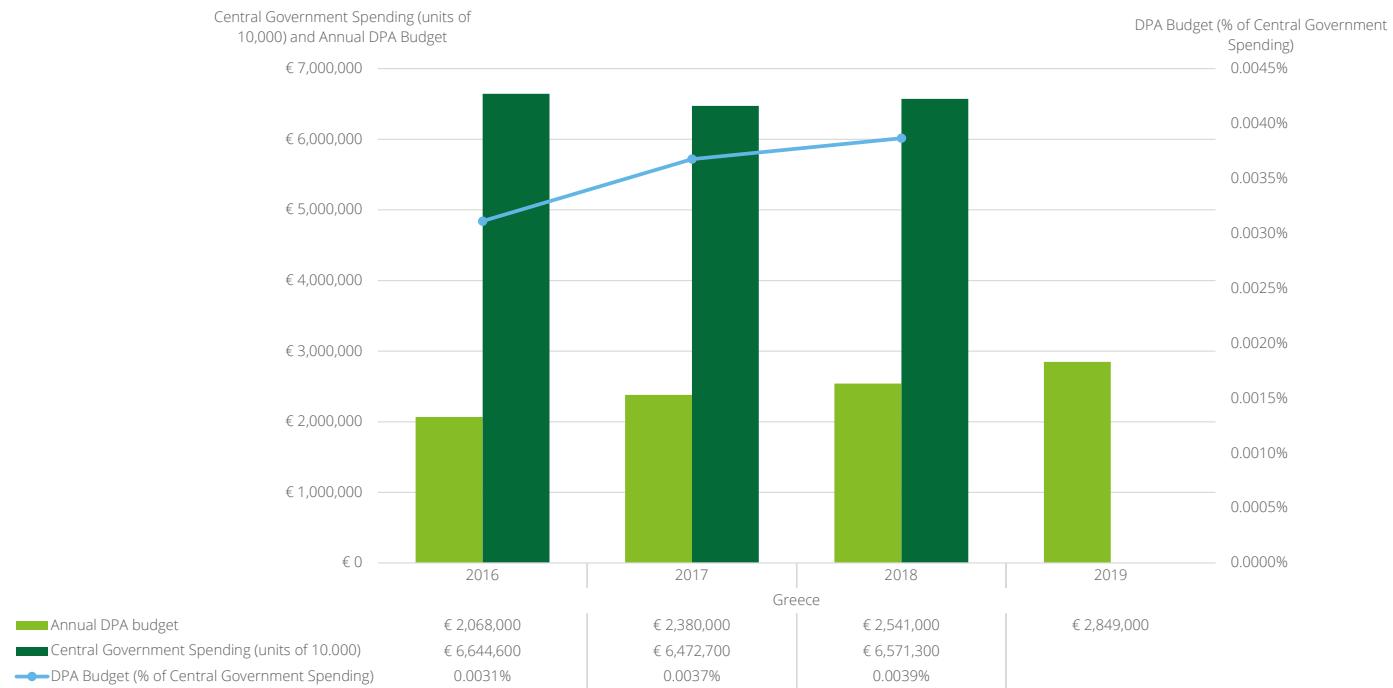


Germany (Federal Commissioner for Data Protection and Freedom of Information)*

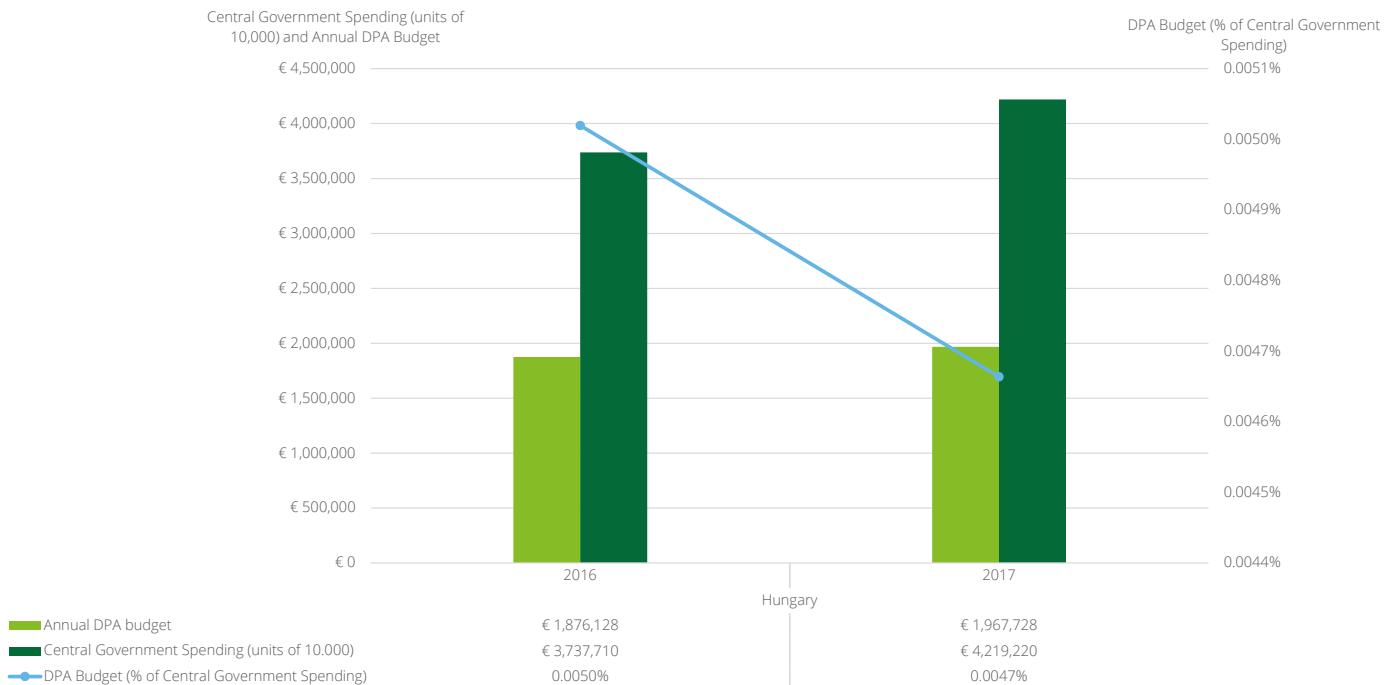


*At the time this report was written, the German DPA had not published budget data for 2017 and 2018.

Greece

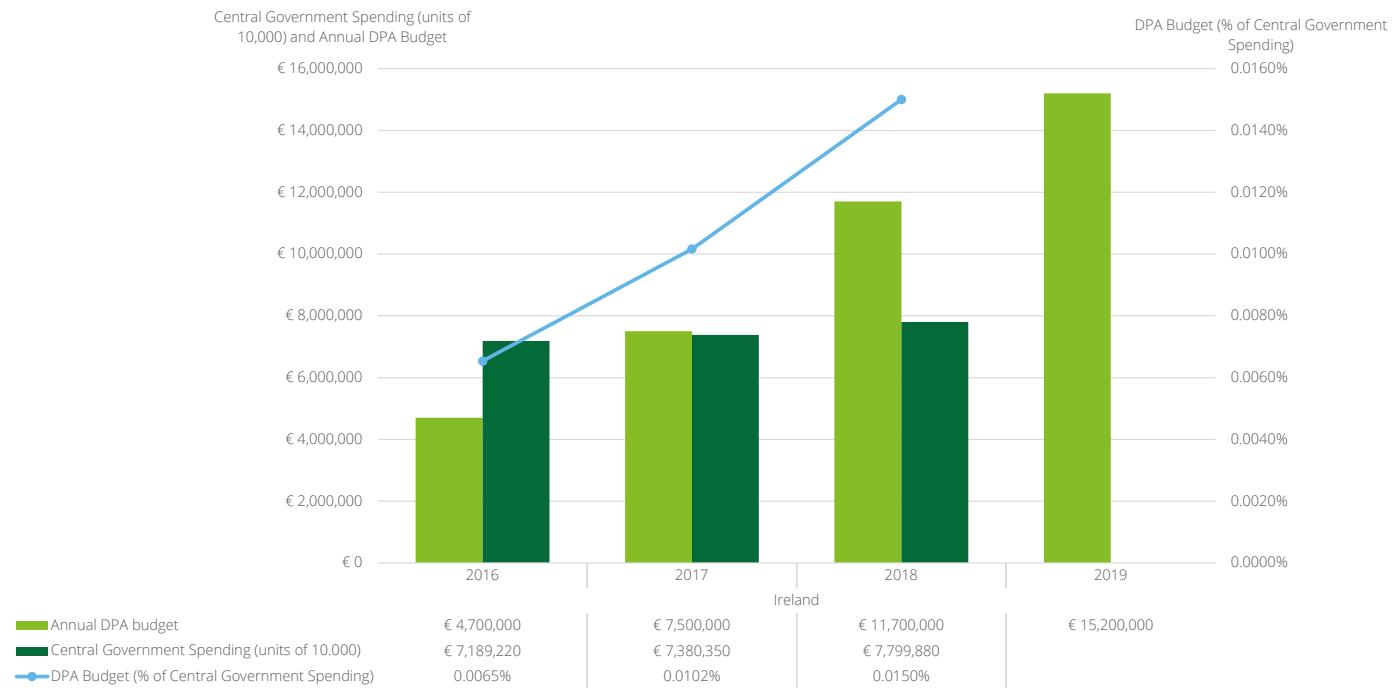


Hungary*

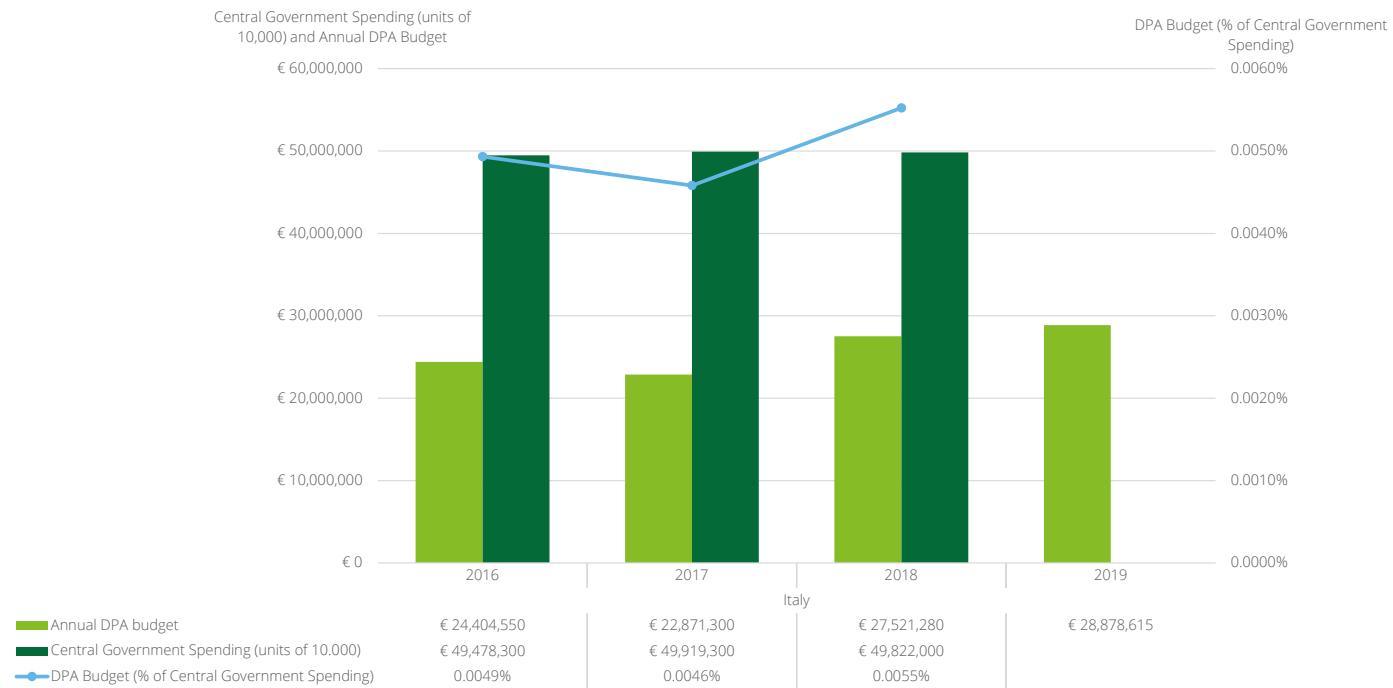


*At the time this report was written, the Hungarian DPA had not published budget data for 2018.

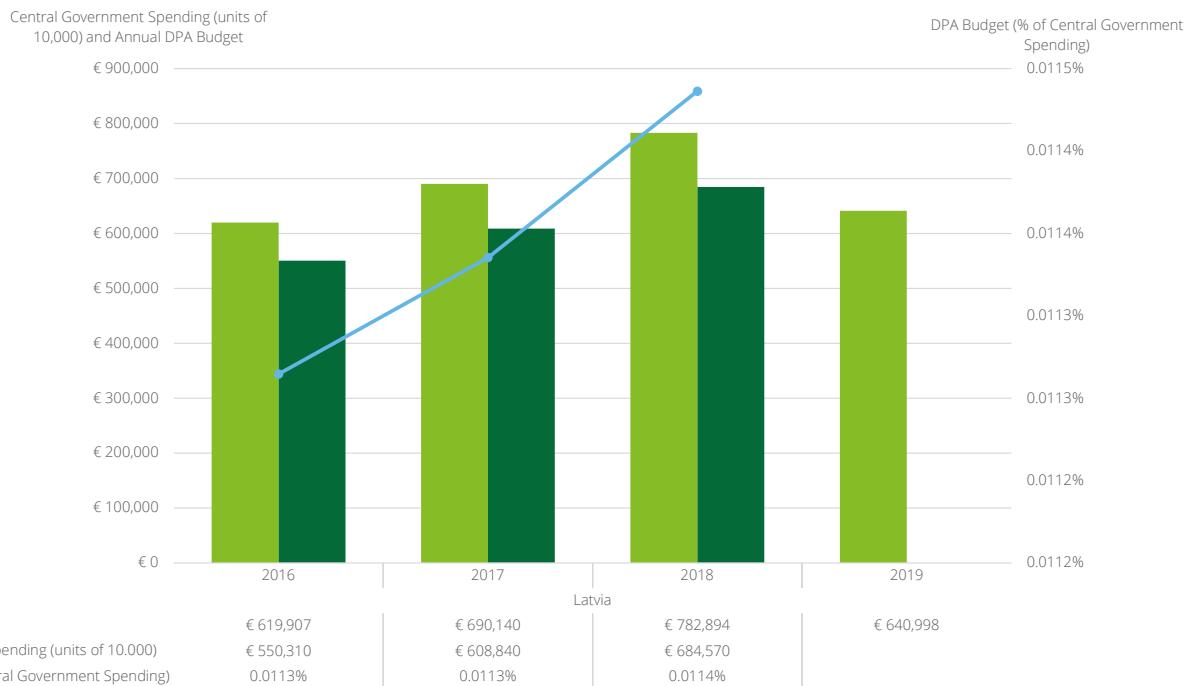
Ireland



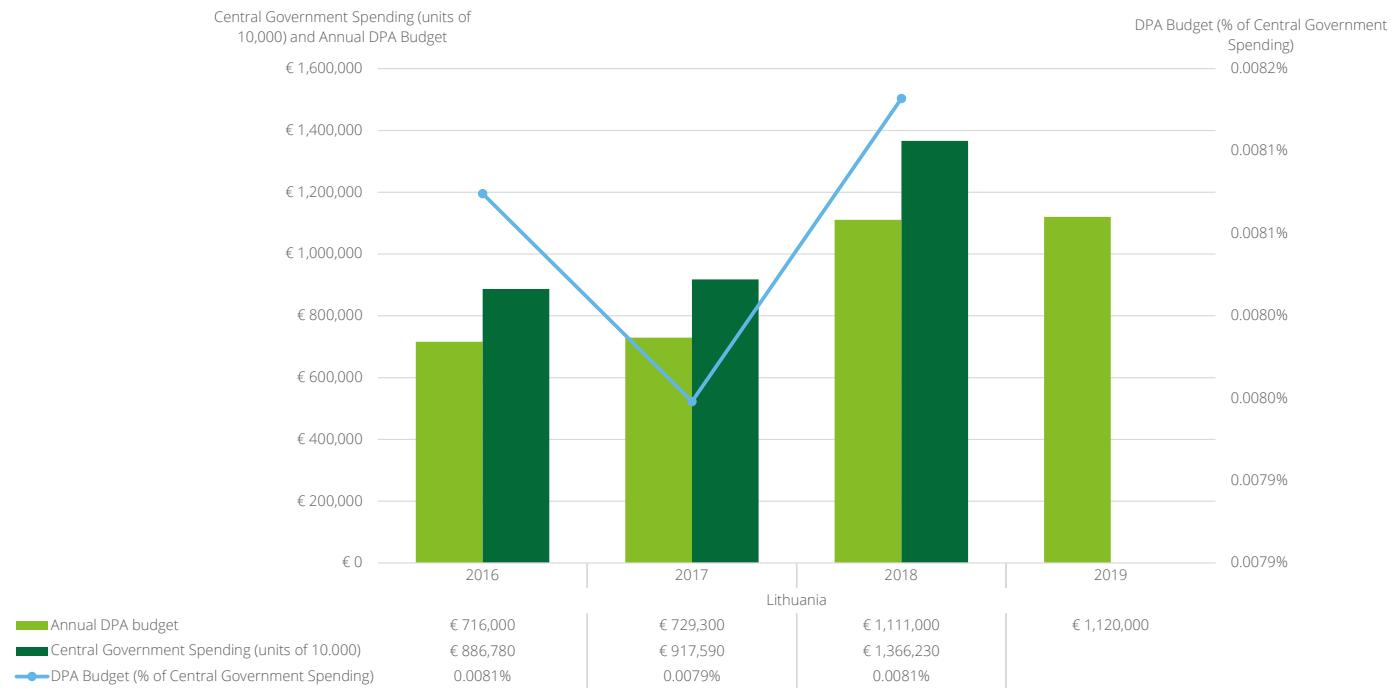
Italy



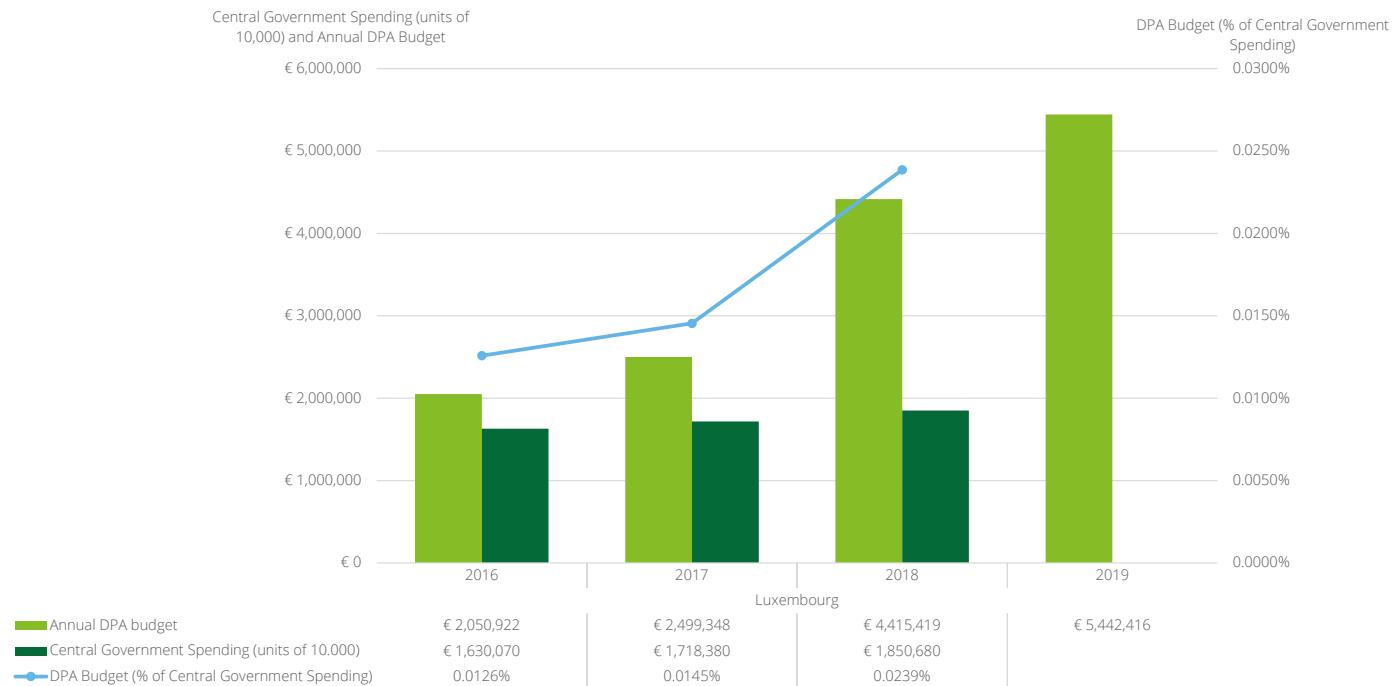
Latvia



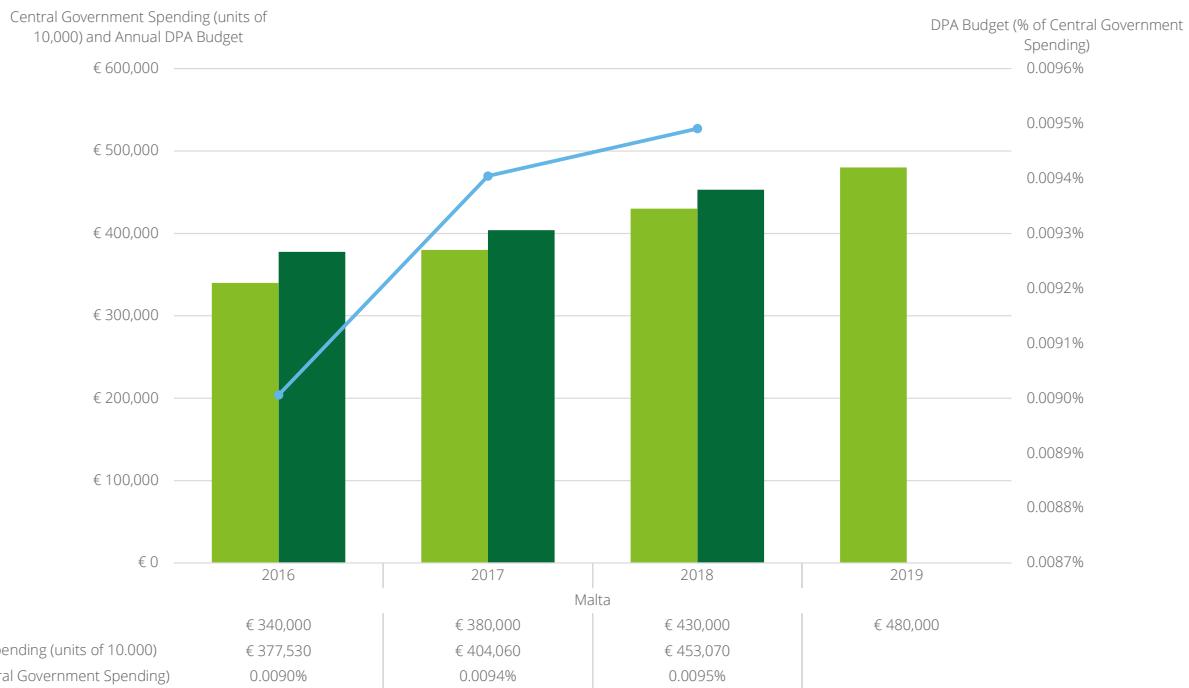
Lithuania



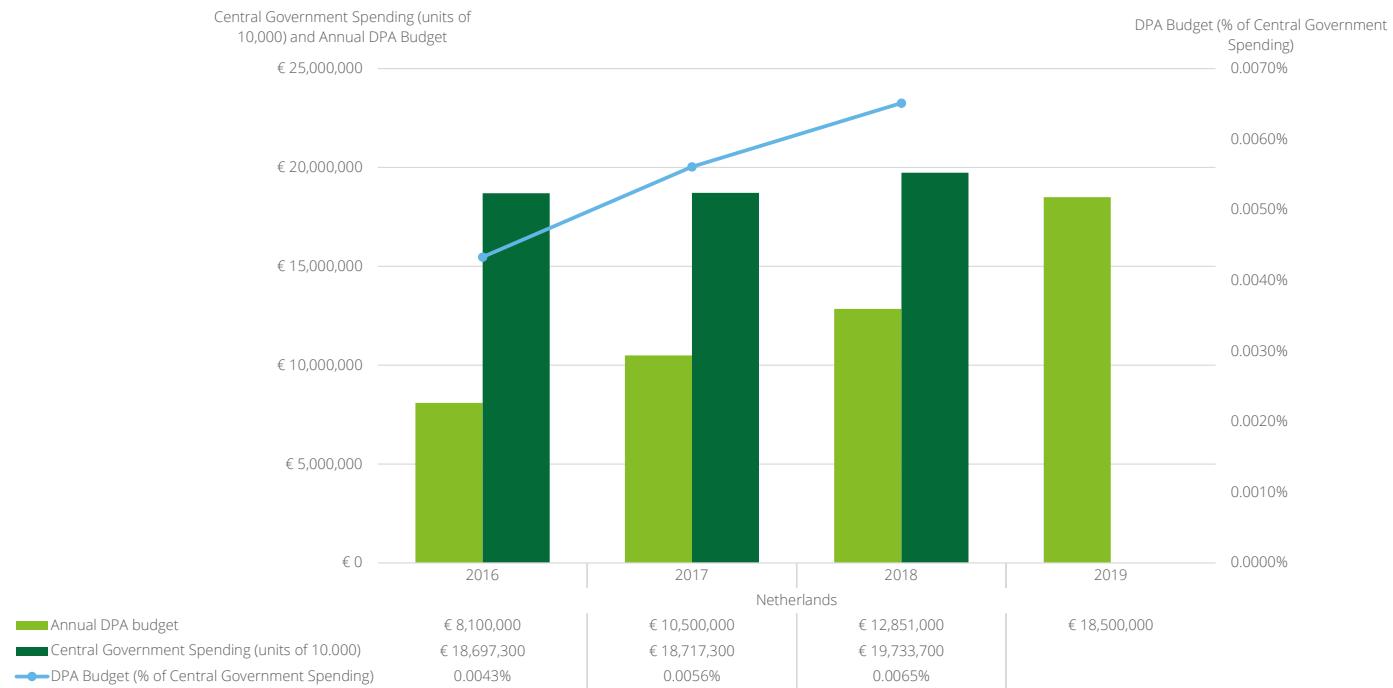
Luxembourg



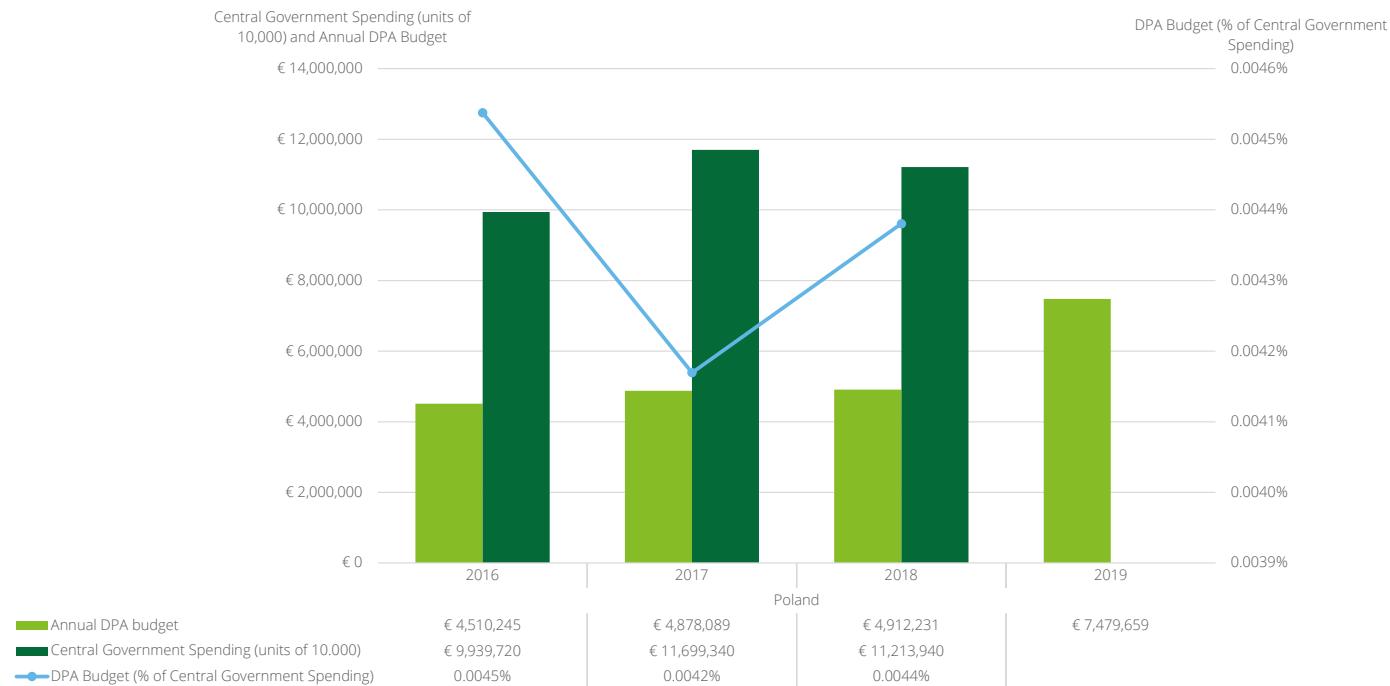
Malta



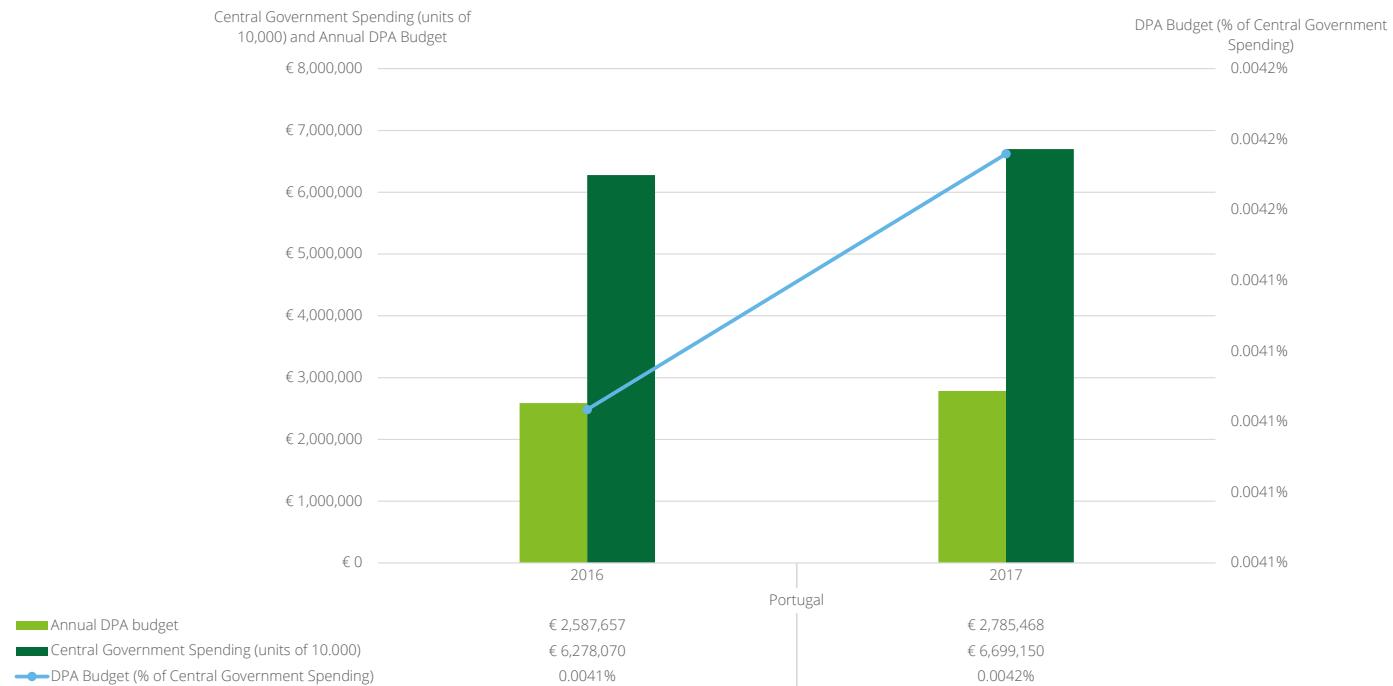
The Netherlands



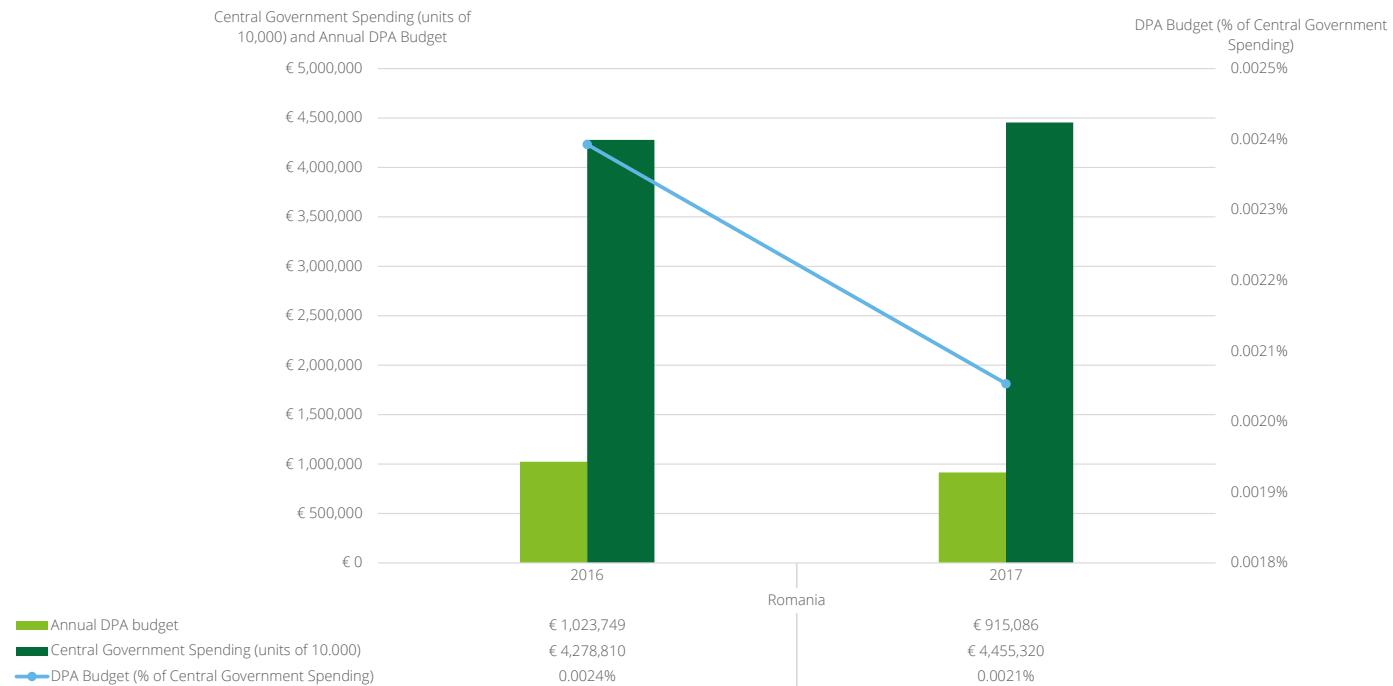
Poland



Portugal*

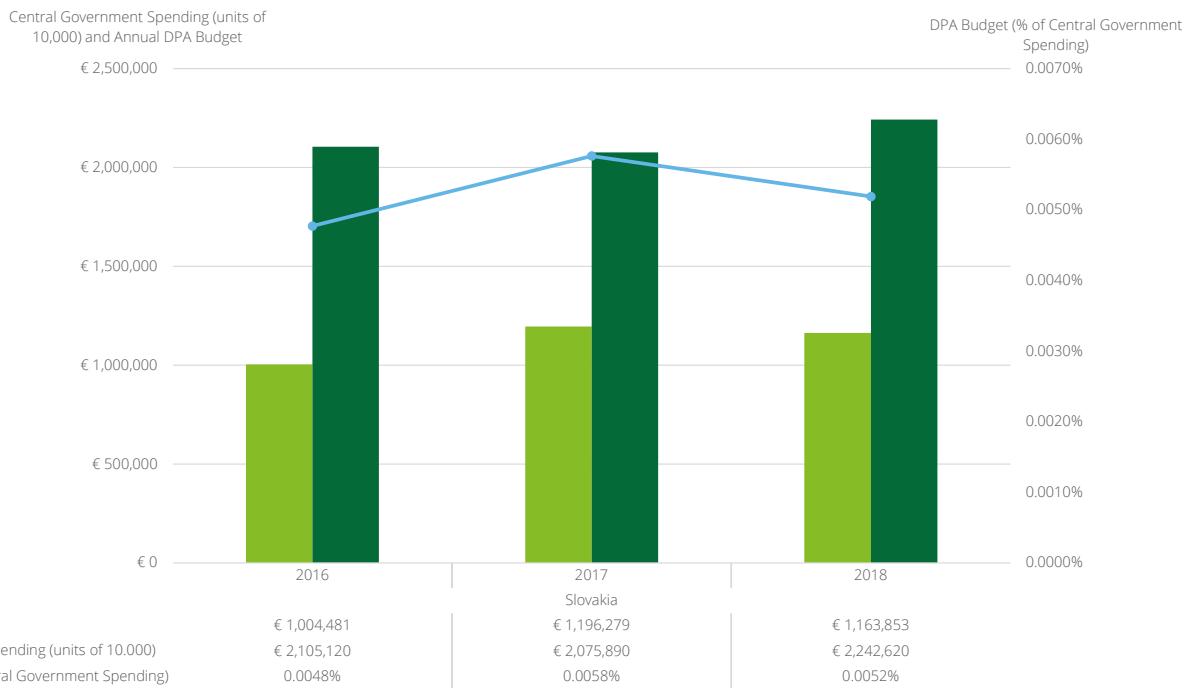


Romania*

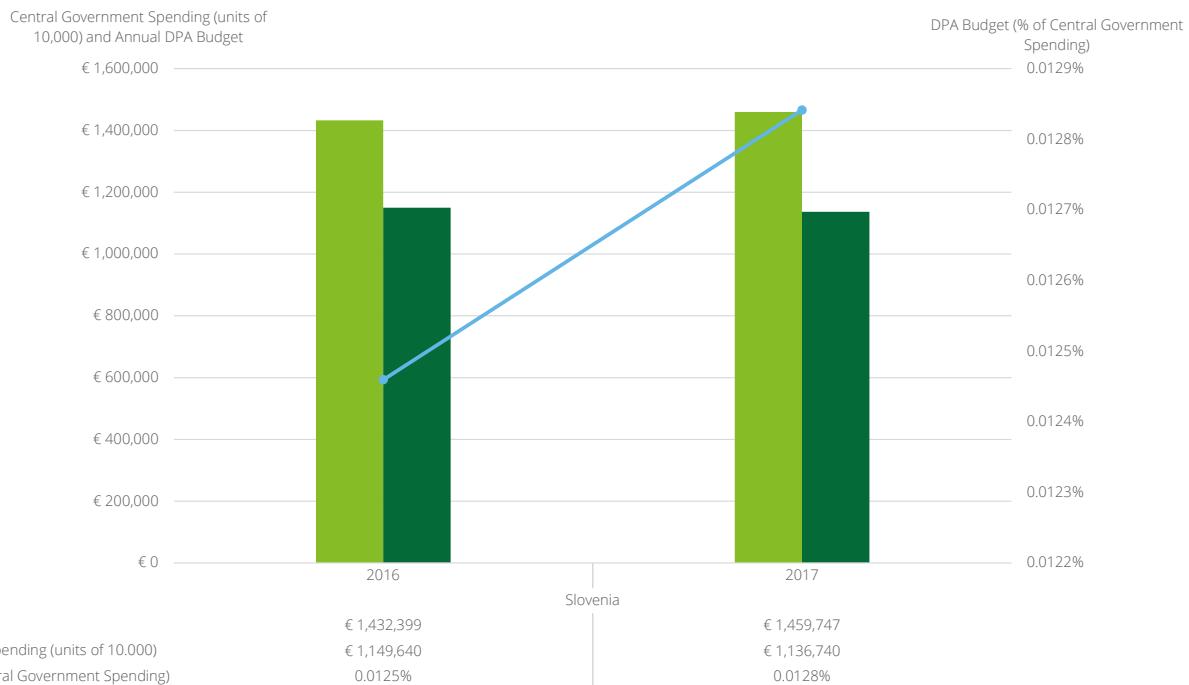


*At the time this report was written, the Romanian DPA had not published budget data for 2018.

Slovakia



Slovenia*

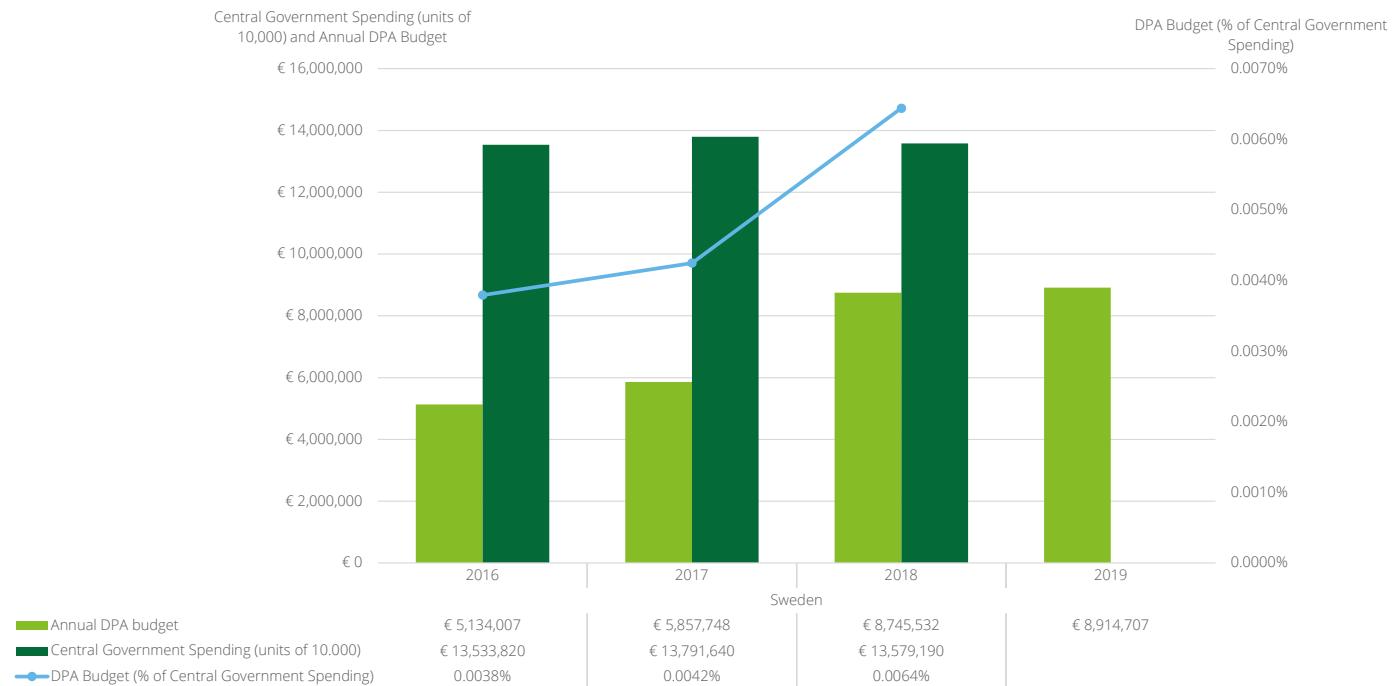


*At the time this report was written, the Slovenia DPA did not publish budget data for 2018.

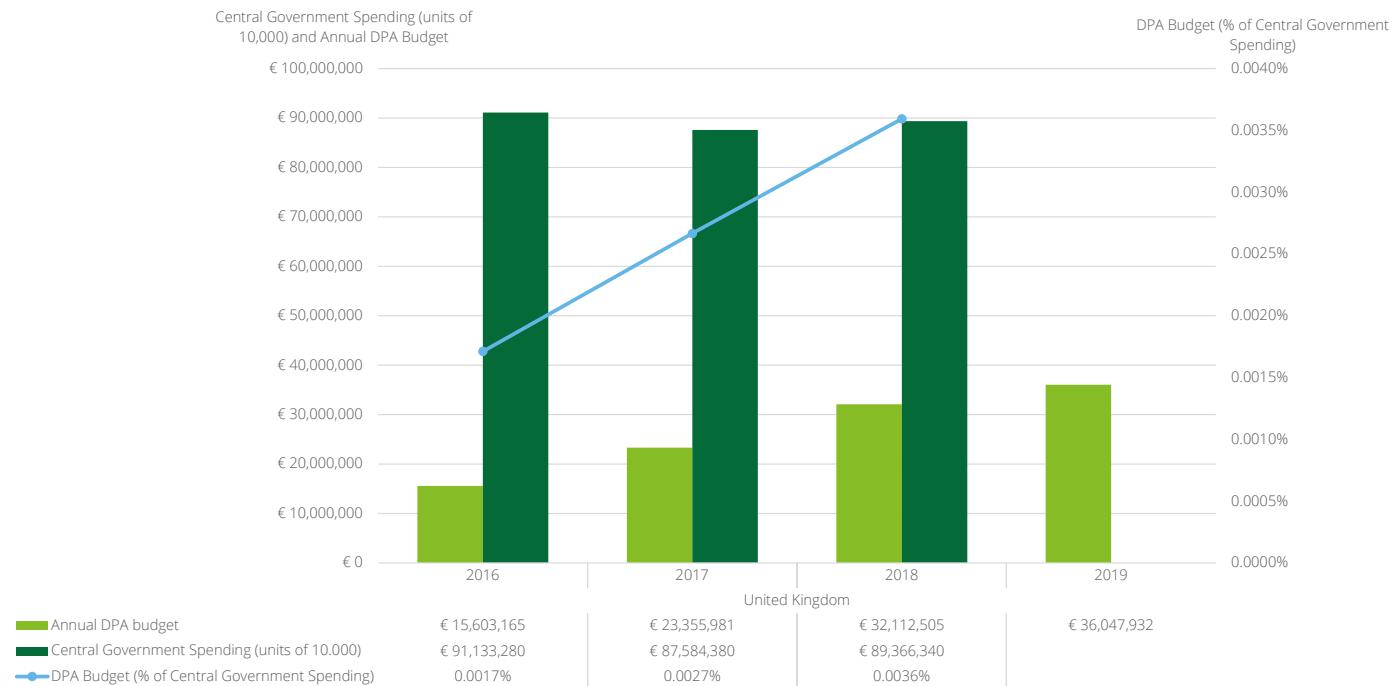
Spain



Sweden



United Kingdom



More information?



More information?

Contact Deloitte's Privacy Response Services

Preparation is key. Knowing the characteristics of your DPA(s) is an important component of preparing for a personal data breach.

At Deloitte's Privacy Response Services, we aim to enable you to prepare for privacy emergencies. We support in understanding the impact and practical implications of personal data breaches before they actually occur, as well as assisting in the response where necessary.

For more information on Deloitte's Privacy Response Services and other privacy-related services, please contact:



Annika Sponselee

Partner

M: +31 (0) 6 10 99 93 02

E: asponselee@deloitte.nl



Shay Danon

Manager

M: +31 (0) 6 13 72 10 52

E: sdanon@deloitte.nl

Appendix



Data on the number of employees



Number of employees

An overview of the data (1/8)

Country	Year	Type	Nr	Source
Austria	2016	Actual number	26	https://www.dsb.gv.at/documents/22758/115209/Datenschutzbericht_2016.pdf/f6020700-9776-4791-9108-d9ed03307950
Austria	2017	Actual number	27	https://www.parlament.gv.at/PAKT/VHG/BR/III-BR/III-BR_00652/imfname_691545.pdf
Austria	2018	Actual number	34	https://www.dsb.gv.at/documents/22758/115209/datenschutzbericht_2018.pdf/86c43a23-7778-487a-88c4-a151d4b00a77
Belgium	2016	Approximate	16	https://www.gegevensbeschermingsautoriteit.be/jaarverslag-rapport-annuel-2016/nl/structuur-en-samenstelling-van-de-privacycommissie.html
Belgium	2017	Approximate	16	https://www.gegevensbeschermingsautoriteit.be/jaarverslag-rapport-annuel/nl/werkzaamheden-van-het-directiecomite.html
Belgium	2018	Actual number (fte)	54.41	https://www.gegevensbeschermingsautoriteit.be/jaarverslag-rapport-annuel/nl/werkzaamheden-van-het-directiecomite.html
Bulgaria	2016	Actual number	75	https://www.cpdp.bg/download.php?part=rubric_element&aid=3811
Bulgaria	2017	Actual number	69	https://www.cpdp.bg/download.php?part=rubric_element&aid=4105
Bulgaria	2018	Actual number	69	https://www.cpdp.bg/download.php?part=rubric_element&aid=4350
Croatia	2016	Actual number	27	https://azop.hr/images/dokumenti/217/godisnje-izvjesce-o-radu-za_2016-godinu.pdf
Croatia	2017	Actual number	26	https://azop.hr/images/dokumenti/217/godisnjeizvjesce.pdf

Number of employees

An overview of the data (2/8)

Country	Year	Type	Nr	Source
Croatia*	2018	Unclear	28	https://www.europeandatajournalism.eu/eng/News/Data-news/Are-European-data-watchdogs-prepared-for-GDPR
Cyprus	2016	Actual number	14	http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/D0EAA8CBCF803865C2258209004C0E13/\$file/2016%20annual%20report.pdf
Cyprus	2017	Actual number	15	http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/64DE4B83284311F7C225836700400096/\$file/%CE%95%CF%84%CE%AE%CF%83%CE%B9%CE%B1%20%CE%88%CE%BA%CE%B8%CE%B5%CF%83%CE%B7%202017.pdf
Cyprus	2018	Unclear	17	https://www.europeandatajournalism.eu/eng/News/Data-news/Are-European-data-watchdogs-prepared-for-GDPR
Czech Republic	2016	Actual number	100	https://www.uouu.cz/en/assets/File.ashx?id_org=200156&id_dokumenty=1580
Czech Republic	2017	Actual number	100	https://www.uouu.cz/en/assets/File.ashx?id_org=200156&id_dokumenty=1726
Czech Republic	2018	Actual number	101	https://www.uouu.cz/assets/File.ashx?id_org=200144&id_dokumenty=33526
Denmark	2016	Actual number	36	https://www.datatilsynet.dk/media/6516/datatilsynets_arsrapport_2016.pdf
Denmark	2017	Actual number	43	https://www.datatilsynet.dk/media/6824/aarsrapport_2017_-dat_soegbar_120318_endelig.pdf

*Not a primary data source.

Number of employees

An overview of the data (3/8)

Country	Year	Type	Nr	Source
Denmark	2018	Actual number	57	https://www.datatilsynet.dk/media/6962/aarsrapport_2018.pdf
Estonia	2016	Actual number	19	https://www.aki.ee/sites/www.aki.ee/files/elfinder/article_files/aastaraamat_2017.pdf
Estonia	2017	Actual number	19	https://www.aki.ee/sites/www.aki.ee/files/elfinder/article_files/aastaraamat_2017.pdf
Estonia	2018	Actual number	19	https://www.aki.ee/sites/www.aki.ee/files/elfinder/article_files/Aastaraamat%202018%20kohta.%20Soovitused%20aastaks%202019.pdf
Finland	2016	Actual number	23	https://tietosuoja.fi/henkilosto-ja-talous
Finland	2017	Actual number	26	https://tietosuoja.fi/henkilosto-ja-talous
Finland	2018	Actual number	31	https://tietosuoja.fi/henkilosto-ja-talous
France	2016	Actual number	195	https://www.cnil.fr/sites/default/files/atoms/files/cnil-37e_rapport_annuel_2016.pdf
France	2017	Actual number	198	https://www.cnil.fr/sites/default/files/atoms/files/cnil-38e_rapport_annuel_2017.pdf
France	2018	Actual number	199	https://www.cnil.fr/sites/default/files/atoms/files/cnil-39e_rapport_annuel_2018.pdf
Germany (Bfdi)*	2016	Unclear	110.5	https://www.europeandatajournalism.eu/eng/News/Data-news/Are-European-data-watchdogs-prepared-for-GDPR

*Not a primary data source.

Number of employees

An overview of the data (4/8)

Country	Year	Type	Nr	Source
Germany (Bfdi)*	2017	Unclear	160.5	https://www.europeandatajournalism.eu/eng/News/Data-news/Are-European-data-watchdogs-prepared-for-GDPR
Germany (Bfdi)	2018	N/A	N/A	N/A
Greece	2016	Average number	39	http://www.dpa.gr/pls/portal/url/ITEM/68D7DF1A26F2BA08E050A8C07C240478
Greece	2017	Average number	45	http://www.dpa.gr/pls/portal/url/ITEM/7E99700AB4ABC5DEE050A8C07C241ABC
Greece*	2018	Unclear	44	https://www.europeandatajournalism.eu/eng/News/Data-news/Are-European-data-watchdogs-prepared-for-GDPR
Hungary	2018	Actual number	114	https://www.naih.hu/files/Beszamolo-2018-MR.PDF
Hungary	2016	Actual number	73	https://www.naih.hu/files/NAIH-BESZ-MOL--2016_Mid-Res.pdf
Hungary	2017	Actual number	77	https://www.naih.hu/files/NAIH-BESZAMOLO-2017-mid-res.pdf
Ireland	2016	Approximate	70	https://www.dataprotection.ie/sites/default/files/uploads/2018-11/Annual%20Report%202016.pdf
Ireland	2017	Actual number	85	https://www.dataprotection.ie/sites/default/files/uploads/2018-11/Annual%20Report%202017.pdf

*Not a primary data source.

Number of employees

An overview of the data (5/8)

Country	Year	Type	Nr	Source
Ireland	2018	Actual number	110	https://www.dataprotection.ie/sites/default/files/uploads/2018-11/DPC%20annual%20Report%202018_0.pdf
Italy	2016	Actual number	113	https://www.garanteprivacy.it/documents/10160/0/Relazione+annuale+2016+-+Il+testo.pdf/0d7b0e13-0f02-4fef-b18a-0a33bd351f71?version=1.1
Italy	2017	Actual number	116	https://www.garanteprivacy.it/documents/10160/0/Relazione+annuale+2017+-+Il+testo.pdf/47802018-2729-61a0-4b12-f3e295671143?version=1.0
Italy	2018	Actual number	120	https://www.garanteprivacy.it/documents/10160/0/Relazione+annuale+2018.pdf/e5bc382b-c5e9-b41b-b0d8-882f0904e546?version=1.0
Latvia	2016	Average number	21	https://www.dvi.gov.lv/lv/wp-content/uploads/Gada_parskats_publiskais_2016_FINAL.pdf
Latvia	2017	Average number	22	https://www.dvi.gov.lv/lv/wp-content/uploads/Gada_parskats_publiskais_2017_FINAL.pdf
Latvia	2018	Average number	20	https://www.dvi.gov.lv/lv/wp-content/uploads/Gada_parskats_publiskais_2018_konsolidetais.pdf
Lithuania	2016	Approximate	30	https://www.ada.lt/get_file....
Lithuania	2017	Approximate	30	https://www.ada.lt/get_file....
Lithuania	2018	Approximate	25	https://www.ada.lt/get_file....

Number of employees

An overview of the data (6/8)

Country	Year	Type	Nr	Source
Luxembourg	2016	Actual number	24	https://cnpd.public.lu/dam-assets/en/publications/rapports/cnpd/rapport-activite-2016.pdf
Luxembourg	2017	Actual number	26	https://cnpd.public.lu/dam-assets/fr/publications/rapports/cnpd/rapport-annuel-%2B-annexes-2017-CNPD-BD.pdf
Luxembourg*	2018	Actual number	31	https://www.europeandatajournalism.eu/eng/News/Data-news/Are-European-data-watchdogs-prepared-for-GDPR
Malta	2016	N/A	N/A	N/A
Malta	2017	N/A	N/A	N/A
Malta	2018	N/A	N/A	N/A
Netherlands	2016	Actual number (fte)	72.5	https://www.autoriteitpersoonsgegevens.nl/sites/default/files/atoms/files/ap_jaarverslag_2016.pdf
Netherlands	2017	Actual number (fte)	109	https://autoriteitpersoonsgegevens.nl/sites/default/files/atoms/files/ap_bijlage_2018.pdf
Netherlands	2018	Actual number (fte)	157	https://autoriteitpersoonsgegevens.nl/sites/default/files/atoms/files/ap_bijlage_2018.pdf
Poland	2016	N/A	N/A	N/A
Poland	2017	N/A	N/A	N/A

*Not a primary data source.

Number of employees

An overview of the data (7/8)

Country	Year	Type	Nr	Source
Poland	2018	N/A	N/A	
Portugal	2016	Actual number	26	https://www.cnpd.pt/bin/relatorios/anos/Relatorio_2016.pdf
Portugal	2017	Actual number	22	https://www.cnpd.pt/bin/relatorios/anos/Relatorio_201718.pdf
Portugal	2018	Actual number	20	https://www.cnpd.pt/bin/relatorios/anos/Relatorio_201718.pdf
Romania	2016	Actual number	41	https://www.dataprotection.ro/?page=Rapoarte%20anuale&lang=ro
Romania	2017	Actual number	39	https://www.dataprotection.ro/servlet/ViewDocument?id=1533
Romania*	2018	Unclear	35	https://www.europeandatajournalism.eu/eng/News/Data-news/Are-European-data-watchdogs-prepared-for-GDPR
Slovakia	2016	Actual number	36	https://dataprotection.gov.sk/uouu/sites/default/files/vyrocnasprava_2015_2016_11_08_2017_fin.pdf
Slovakia	2017	Actual number	40	https://dataprotection.gov.sk/uouu/sites/default/files/sprava_o_stave_ochrany_ou_od_1_januara_2017_do_24_maja_2018.pdf
Slovakia	2018	Approximate	42	https://dataprotection.gov.sk/uouu/sites/default/files/sprava_o_stave_ochrany_ou_od_1_januara_2017_do_24_maja_2018.pdf
Slovakia	2016	Actual number	33	https://www.ip-rs.si/fileadmin/user_upload/Pdf/porocila/Letno_porocilo_2016_web.pdf

*Not a primary data source.

Number of employees

An overview of the data (8/8)

Country	Year	Type	Nr	Source
Slovakia	2017	Actual number	34	https://www.ip-rs.si/fileadmin/user_upload/Pdf/porocila/Letno_porocilo_2017_konca.pdf
Slovakia	2018	Actual number	43	https://www.ip-rs.si/fileadmin/user_upload/Pdf/porocila/Letno_porocilo_2018_FINAL.pdf
Spain	2016	Actual number	150	https://www.aepd.es/media/memorias/memoria-AEPD-2016.pdf
Spain	2017	Actual number	157	https://www.aepd.es/media/memorias/memoria-AEPD-2017.pdf
Spain	2018	Actual number	156	https://www.aepd.es/media/memorias/memoria-AEPD-2018.pdf
Sweden	2016	Average number	55	https://www.datainspektionen.se/globalassets/dokument/arsredovisningar/datainspektionen-arsredovisning-2018.pdf
Sweden	2017	Average number	57	https://www.datainspektionen.se/globalassets/dokument/arsredovisningar/datainspektionen-arsredovisning-2018.pdf
Sweden	2018	Average number	75	https://www.datainspektionen.se/globalassets/dokument/arsredovisningar/datainspektionen-arsredovisning-2018.pdf
United Kingdom	2016	Actual number (fte)	409	https://ico.org.uk/media/about-the-ico/documents/1624517/annual-report-2015-16.pdf
United Kingdom	2017	Actual number (fte)	439	https://ico.org.uk/media/about-the-ico/documents/2014449/ico053-annual-report-201617-s12-aw-web-version.pdf
United Kingdom	2018	Actual number (fte)	504.8	https://ico.org.uk/media/about-the-ico/documents/2259463/annual-report-201718.pdf

Budget data



DPA Budgets

An overview of the data (1/5)

Country	Year	Currency	Budget
Austria	2016	EUR	1,524,590.00
Austria	2017	EUR	1,510,970.00
Austria	2018	EUR	1,687,170.00
Austria	2019	EUR	N/A
Belgium	2016	EUR	6,538,000.00
Belgium	2017	EUR	6,538,000.00
Belgium	2018	EUR	6,538,000.00
Belgium	2019	EUR	6,345,000.00
Bulgaria	2016	BGN	2,283,000.00
Bulgaria	2017	BGN	2,450,000.00
Bulgaria	2018	BGN	2,597,428.00
Bulgaria	2019	BGN	2,930,000.00
Croatia	2016	HRK	5,443,308.00
Croatia	2017	HRK	6,246,154.00

Country	Year	Currency	Budget
Croatia	2018	HRK	6,570,802.00
Croatia	2019	HRK	6,594,310.00
Cyprus	2016	EUR	N/A
Cyprus	2017	EUR	N/A
Cyprus	2018	EUR	N/A
Cyprus	2019	EUR	N/A
Czech Republic	2016	CZK	6,475,910.00
Czech Republic	2017	CZK	1,394,270.00
Czech Republic	2018	CZK	3,056,890.00
Czech Republic	2019	CZK	N/A
Denmark	2016	DKK	21,000,000.00
Denmark	2017	DKK	22,900,000.00
Denmark	2018	DKK	36,500,000.00

DPA Budgets

An overview of the data (2/5)

Country	Year	Currency	Budget
Denmark	2019	DKK	43,200,000.00
Estonia	2016	EUR	700,821.00
Estonia	2017	EUR	700,482.00
Estonia	2018	EUR	715,000.00
Estonia	2019	EUR	653,000.00
Finland	2016	EUR	1,700,000.00
Finland	2017	EUR	1,739,000.00
Finland	2018	EUR	2,223,000.00
Finland	2019	EUR	3,244,000.00
France	2016	EUR	18,853,380.00
France	2017	EUR	17,000,000.00
France	2018	EUR	17,600,000.00
France	2019	EUR	18,823,353.00

Country	Year	Currency	Budget
Germany	2016	EUR	13,700,000.00
Germany	2017	EUR	N/A
Germany	2018	EUR	N/A
Germany	2019	EUR	25,200,000.00
Greece	2016	EUR	2,068,000.00
Greece	2017	EUR	2,380,000.00
Greece	2018	EUR	2,541,000.00
Greece	2019	EUR	2,849,000.00
Hungary	2016	HUF	612,400,000.00
Hungary	2017	HUF	642,300,000.00
Hungary	2018	HUF	N/A
Hungary	2019	HUF	N/A
Ireland	2016	EUR	4,700,000.00

DPA Budgets

An overview of the data (3/5)

Country	Year	Currency	Budget
Ireland	2017	EUR	7,500,000.00
Ireland	2018	EUR	11,700,000.00
Ireland	2019	EUR	15,200,000.00
Italy	2016	EUR	24,404,550.00
Italy	2017	EUR	22,871,300.00
Italy	2018	EUR	27,521,280.00
Italy	2019	EUR	28,878,615.00
Latvia	2016	EUR	619,907.00
Latvia	2017	EUR	690,140.00
Latvia	2018	EUR	782,894.00
Latvia	2019	EUR	640,998.00
Lithuania	2016	EUR	716,000.00
Lithuania	2017	EUR	729,300.00

Country	Year	Currency	Budget
Lithuania	2018	EUR	1,111,000.00
Lithuania	2019	EUR	1,120,000.00
Luxembourg	2016	EUR	2,050,922.00
Luxembourg	2017	EUR	2,499,348.00
Luxembourg	2018	EUR	4,415,419.00
Luxembourg	2019	EUR	5,442,416.00
Malta	2016	EUR	340,000.00
Malta	2017	EUR	380,000.00
Malta	2018	EUR	430,000.00
Malta	2019	EUR	480,000.00
Netherlands	2016	EUR	8,100,000.00
Netherlands	2017	EUR	10,500,000.00
Netherlands	2018	EUR	12,851,000.00

DPA Budgets

An overview of the data (4/5)

Country	Year	Currency	Budget
Netherlands	2019	EUR	18,500,000.00
Poland	2016	PLN	19,287,000.00
Poland	2017	PLN	20,860,000.00
Poland	2018	PLN	21,006,000.00
Poland	2019	PLN	31,985,000.00
Portugal	2016	EUR	2,587,657.00
Portugal	2017	EUR	2,785,468.00
Portugal	2018	EUR	N/A
Portugal	2019	EUR	N/A
Romania	2016	RON	4,851,000.00
Romania	2017	RON	4,287,000.00
Romania	2018	RON	N/A
Romania	2019	RON	N/A
Slovakia	2016	EUR	1,004,481.00

Country	Year	Currency	Budget
Slovakia	2017	EUR	1,196,279.00
Slovakia	2018	EUR	1,163,853.00
Slovakia	2019	EUR	N/A
Slovenia	2016	EUR	1,432,399.00
Slovenia	2017	EUR	1,459,747.00
Slovenia	2018	EUR	N/A
Slovenia	2019	EUR	N/A
Spain	2016	EUR	14,101,070.00
Spain	2017	EUR	14,101,070.00
Spain	2018	EUR	14,228,680.00
Spain	2019	EUR	15,546,430.00
Sweden	2016	SEK	54,352,000.00
Sweden	2017	SEK	62,014,000.00

DPA Budgets

An overview of the data (5/5)

Country	Year	Currency	Budget
Sweden	2018	SEK	92,586,000.00
Sweden	2019	SEK	94,377,000.00
United Kingdom	2016	GBP	14,009,000.00
United Kingdom	2017	GBP	20,754,000.00
United Kingdom	2018	GBP	28,535,000.00
United Kingdom	2019	GBP	32,032,000.00

DPA Budgets

Sources of budget data (1/7)

Country	2016	2017	2018	2019
Austria	Bundesfinanzgesetz 2018. Link here .		N/A	N/A
Belgium	http://www.dekamer.be/FLWB/PDF/54/1352/54K1352001.pdf	http://www.dekamer.be/FLWB/PDF/54/2109/54K2109001.pdf	http://www.dekamer.be/FLWB/PDF/54/2690/54K2690001.pdf	http://www.dekamer.be/FLWB/PDF/54/3294/54K3294001.pdf
Bulgaria	https://www.cpdp.bg/?p=element&aid=944	https://www.cpdp.bg/?p=element&aid=1053	https://www.cpdp.bg/download.php?part=rubric_element&aid=4350	https://www.cpdp.bg/?p=element&aid=1174
Croatia	https://azop.hr/images/dokumenti/217/godisnje-izvjesce-o_radu_za_2016_godinu.pdf	https://azop.hr/images/dokumenti/217/proracun_za_2018_godinu_i_projekcije_za_2019_i_2020_godinu.pdf	https://azop.hr/images/dokumenti/217/proracun_za_2018_godinu_i_projekcije_za_2019_i_2020_godinu.pdf	
Cyprus	N/A	N/A	N/A	N/A
Czech Republic	https://www.uouu.cz/en/assets/File.ashx?id_org=200156&id_dokumenty=1580	https://www.uouu.cz/en/assets/File.ashx?id_org=200156&id_dokumenty=1726	https://www.uouu.cz/assets/File.ashx?id_org=200144&id_dokumenty=33526	N/A

DPA Budgets

Sources of budget data (2/7)

Country	2016	2017	2018	2019
Denmark	https://www.fm.dk/publikationer/2016/finanslov-for-2016	Finanslovdatabase (http://www.oes-cs.dk/olapdatabase/finanslov/index.cgi)	Finanslovdatabase (http://www.oes-cs.dk/olapdatabase/finanslov/index.cgi)	Finanslovdatabase (http://www.oes-cs.dk/olapdatabase/finanslov/index.cgi)
Estonia	https://www.aki.ee/sites/www.aki.ee/files/elfinder/article_files/aastaraamat_2016.pdf	https://www.aki.ee/sites/www.aki.ee/files/elfinder/article_files/aastaraamat_2016.pdf	https://www.riigiteataja.ee/akt/129122017031	https://www.riigiteataja.ee/akt/128122018045
Finland	http://budjetti.vm.fi/index/sisalto.jsp?year=2016&lang=fi&maindoc=/2016/aky/aky.xml&id=/2016/aky/YksityiskohtaisetPerustelut/25/01/01.html	http://budjetti.vm.fi/index/sisalto.jsp?year=2017&lang=fi&maindoc=/2017/aky/aky.xml&id=/2017/aky/YksityiskohtaisetPerustelut/25/01/01.html	http://budjetti.vm.fi/index/sisalto.jsp?year=2018&lang=fi&maindoc=/2018/aky/aky.xml&id=/2018/aky/YksityiskohtaisetPerustelut/25/01/01.html	http://budjetti.vm.fi/index/sisalto.jsp?year=2019&lang=fi&maindoc=/2019/aky/aky.xml&id=/2019/aky/YksityiskohtaisetPerustelut/25/01/01.html
France	https://www.data.gouv.fr/fr/datasets/budget-de-la-cnil-1/	https://www.cnil.fr/sites/default/files/atoms/files/cnil-38e_rapport_annuel_2017.pdf	https://www.cnil.fr/sites/default/files/atoms/files/cnil-39e_rapport_annuel_2018.pdf	https://www.performance-publique.budget.gouv.fr/sites/performance_publique/files/farandole/ressources/2019/pap/html/DBGPMJPEPGM308.htm

DPA Budgets

Sources of budget data (3/7)

Country	2016	2017	2018	2019
Germany	https://www.bfdi.bund.de/SharedDocs/Publikationen/Taetigkeitsberichte/TB_BfDI/26TB_15_16.pdf?blob=publicationFile&v=7	N/A	N/A	https://www.bfdi.bund.de/SharedDocs/Publikationen/Taetigkeitsberichte/TB_BfDI/27TB_17_18.pdf?blob=publicationFile&v=2
Greece	http://www.dpa.gr/pls/portal/url/ITEM/68D7DF1A26F2BA08E050A8C07C240478	http://www.dpa.gr/pls/portal/url/ITEM/7E99700AB4ABC5DEE050A8C07C241ABC	http://www.dpa.gr/pls/portal/url/ITEM/7E99700AB4ABC5DEE050A8C07C241ABC	https://www.hellenicparliament.gr/UserFiles/c8827c35-4399-4fbb-8ea6-aebdc768f4f7/10884663.pdf
Hungary	https://www.naih.hu/files/Koeltsegvetes_2012-2013-2014-2015-2016-2017---2017.03.22..pdf	https://www.naih.hu/files/NAIH-Annual-report-2017-v180606.pdf	N/A	N/A
Ireland	https://www.dataprotection.ie/en/news-media/press-releases/data-protection-commission-welcomes-significant-increased-funding-eu35	https://www.dataprotection.ie/en/news-media/press-releases/data-protection-commission-welcomes-significant-increased-funding-eu35	https://www.dataprotection.ie/en/news-media/press-releases/data-protection-commission-welcomes-significant-increased-funding-eu35	https://www.dataprotection.ie/en/news-media/press-releases/data-protection-commission-welcomes-significant-increased-funding-eu35

DPA Budgets

Sources of budget data (4/7)

Country	2016	2017	2018	2019
Italy	https://www.garanteprivacy.it/documents/10160/4524990/Bilancio+di+previsione+sintetico+2016.pdf/f916d40b-9399-4736-887b-efbb7e058dec?version=1.1	https://www.garanteprivacy.it/documents/10160/0/Bilancio+di+previsione+2017+-+Sintetico	https://www.garanteprivacy.it/documents/10160/7536785/Bilancio+di+previsione+2018+-+Sintetico.pdf/c8b09c6e-7b68-441d-8653-6814600561af?version=1.0	https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9073216
Latvia	https://www.dvi.gov.lv/lv/wp-content/uploads/Gada_parskats_publiskais_2016_FINAL.pdf	https://www.dvi.gov.lv/lv/wp-content/uploads/Gada_parskats_publiskais_2017_FINAL.pdf	https://www.dvi.gov.lv/lv/wp-content/uploads/Gada_parskats_publiskais_2018_konsolidetais.pdf	Through contact with DPA
Lithuania	https://www.ada.lt/go.php/lit/Veiklos-ataskaitos	https://www.ada.lt/go.php/lit/Veiklos-ataskaitos	https://www.ada.lt/go.php/lit/Planavimo-dokumentai	https://www.ada.lt/go.php/lit/Planavimo-dokumentai
Luxembourg	https://cnpd.public.lu/dam-assets/fr/publications/rapports/cnpd/rapport-annual-%2B-annexes-2017-CNPD-BD.pdf	https://budget.public.lu/dam-assets/lb/budget2019/links-dokumenter/budget-2019-volume1.pdf	https://budget.public.lu/dam-assets/lb/budget2019/links-dokumenter/budget-2019-volume1.pdf	https://budget.public.lu/dam-assets/lb/budget2019/links-dokumenter/budget-2019-volume1.pdf
Malta	https://mfin.gov.mt/en/The-Budget/Pages/The-Budget-2016.aspx	https://mfin.gov.mt/en/The-Budget/Pages/The-Budget-2017.aspx	https://mfin.gov.mt/en/The-Budget/Pages/The-Budget-2018.aspx	https://mfin.gov.mt/en/The-Budget/Pages/The-Budget-2019-G5J3D1.aspx

DPA Budgets

Sources of budget data (5/7)

Country	2016	2017	2018	2019
The Netherlands	https://www.autoriteitpersoonsgegevens.nl/sites/default/files/atoms/files/ap_jaarverslag_2016.pdf	https://www.autoriteitpersoonsgegevens.nl/sites/default/files/atoms/files/ap_jaarverslag_2017.pdf	https://autoriteitpersoonsgegevens.nl/sites/default/files/atoms/files/ap_bijlage_2018.pdf	https://www.rijksoverheid.nl/documenten/kamerstukken/2017/12/13/memorie-van-toelichting-uitvoeringswet-algemene-verordening-gegevensbescherming
Poland	https://www.giodo.gov.pl/data/filemanager_pl/sprawozdaniaroczne/2016.pdf	https://www.giodo.gov.pl/data/filemanager_pl/sprawozdaniaroczne/2017.pdf	https://www.gov.pl/web/finanse/ustawa-2018	https://www.gov.pl/web/finanse/ustawa-2019
Portugal	https://www.cnpd.pt/bin/cnPD/planos/PLANO_ACTIVIDADES_2016.pdf	https://www.cnpd.pt/bin/cnPD/planos/PLANO_ACTIVIDADES_2017.pdf	N/A	N/A
Romania	https://www.dataprotection.ro/?page=Rapoarte%20anuale&lang=ro	https://www.dataprotection.ro/?page=Rapoarte%20anuale&lang=ro	N/A	N/A

DPA Budgets

Sources of budget data (6/7)

Country	2016	2017	2018	2019
Slovakia	https://dataprotection.gov.sk/uouu/sites/default/files/vyrocna_sprava_2015_2016_1_08_2017_fin.pdf	https://dataprotection.gov.sk/uouu/sites/default/files/sprava_o_stave_ochrany_ou_od_1_januara_2017_do_24_maja_2018.pdf	https://dataprotection.gov.sk/uouu/sites/default/files/sprava_o_stave_ochrany_ou_od_1_januara_2017_do_24_maja_2018.pdf	N/A
Slovenia	https://www.ip-rs.si/fileadmin/user_upload/Pdf/porocila/Letno_porocilo_2016_web.pdf	https://www.ip-rs.si/fileadmin/user_upload/Pdf/porocila/Letno_porocilo_2017_koncna.pdf	N/A	N/A
Spain	https://www.aepd.es/agencia/transparencia/common/gestion-presupuestaria/2016/cuentas-y-auditoria-2016.pdf	https://www.aepd.es/agencia/transparencia/common/gestion-presupuestaria/2017/subconceptos-cuarto-trimestre-2017.pdf	https://www.aepd.es/agencia/transparencia/common/gestion-presupuestaria/2018/presupuestos-2018.pdf	http://www.sepg.pap.hacienda.gob.es/Presup/PGE2019Proyecto/MaestroTomos/PGE-ROM/doc/L_19_A_2.PDF
Sweden	https://www.datainspektionen.se/globalassets/dokument/arsredovisningar/datainspektionen-arsredovisning-2017.pdf	https://www.datainspektionen.se/globalassets/dokument/arsredovisningar/datainspektionen-arsredovisning-2017.pdf	https://www.datainspektionen.se/globalassets/dokument/arsredovisningar/datainspektionen-arsredovisning-2018.pdf	https://www.esv.se/statsliggaren/regleringsbrev/?RBID=19501

DPA Budgets

Sources of budget data (7/7)

Country	2016	2017	2018	2019
United Kingdom	https://ico.org.uk/media/2013452/ext-management-budget-report-201612.pdf	https://ico.org.uk/media/about-the-ico/documents/2258277/ext-management-budget-report-201712.pdf	https://ico.org.uk/media/about-the-ico/documents/management-accounts/2614776/management-accounts-201812.pdf	https://ico.org.uk/media/about-the-ico/documents/management-accounts/2614777/management-accounts-201901.pdf

Appendix

Eurostat sources

Type of Information	Source	Link
Central Government Spending data	Eurostat, Government revenue, expenditure and main aggregates (Table 10a)	https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=gov_10a_main&lang=en
Definition of Central Government	Eurostat Glossary	https://ec.europa.eu/eurostat/statistics-explained/index.php/Glossary:Central_government
Labor cost levels (Services of the business economy)	Eurostat, Labor cost levels by NACE Rev.2 activity	https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=lc_lci_lev
Definition of Business Economy	Eurostat Glossary	https://ec.europa.eu/eurostat/statistics-explained/index.php/Glossary:Business_economy

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