NORTHERN IRELAND HUMAN RIGHTS COMMISSION

Submission to Committee for Health on the Adult Protection Bill

September 2025

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1.0 Introduction

1.1 The Northern Ireland Human Rights Commission (NIHRC), pursuant to sections 69(1), 69(3) and 69(4) of the Northern Ireland (NI) Act 1998, reviews the adequacy and effectiveness of law and practice relating to the protection of human rights in NI. The NIHRC is also required under section 78A(1), 78A(5) and 78A(6) to monitor the implementation of Article 2(1) of the Windsor Framework[1]. Windsor Framework Article 2 is given effect in UK law by section 7A of the EU (Withdrawal) Act 2018.

1.2 In accordance with these functions, the following evidence is submitted to the Committee for Health on the Adult Protection Bill (the Bill) and refers to the version of the Bill as introduced to the NI Assembly on 17 June 2025 (Bill 16/22-27). The NIHRC welcomes this opportunity to provide evidence to the Committee for Health on proposals to strength and underpin the adult protection process.

1.3 In 2021, the NIHRC responded to the Department of Health's public consultation on legislative options for the current Bill.[2] The NIHRC broadly welcomes the proposed reforms, including new duties, powers and offences aimed at facilitating the identification of an adult at risk and ensuring their protection. The NIHRC encourages the Committee to review its previous submission for a detailed overview of its advice on the range of legislative proposals. To avoid duplication, the current submission focuses on new developments and outstanding concerns that may require further consideration to align more closely with international human rights standards. This submission also outlines the relevance of Windsor Framework Article 2 that may require further consideration of relevant EU law standards.

[1] The Windsor Framework was formerly known as the Protocol on Ireland/Northern Ireland to the UK-EU Withdrawal Agreement and all references to the Protocol in this document have been updated to reflect this change. *See* Decision No 1/2023 of the Joint Committee established by the Agreement on the Withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community of 24 March 2023 laying down arrangements relating to the Windsor Framework.
[2] NI Human Rights Commission, 'Submission on legislative options to inform the development of an Adult Protection Bill in NI' (NIHRC, 2021).

2.0 Part 1: Protection of Adults at Risk of Harm

Clause 1: Principles for performing functions under Part 1

2.1 Clause 1 of the Bill outlines the principles that a health and social care worker must have regard to when performing functions under Part 1 of the Bill. The Explanatory Memorandum summarises the principles as, "namely, prevention, autonomy, empowerment, dignity, proportionality, partnership and accountability".

2.2 In its 2021 response, the NIHRC welcomed the proposed principles, noting their alignment with human rights discourse on dignity, which is a core tenet recognised in all international human treaties.[3] In the context of the ECHR, the ECtHR has recognised that "the very essence of the Convention is respect for human dignity and human freedom".[4] In addition, the principles reflect human rights obligations under the European Convention on Human Rights (ECHR), particularly in relation to a person's right to private life under Article 8.[5] The European Court of Human Rights (ECtHR) advises that private life covers the physical and psychological integrity of a person[6] and that personal autonomy is an important principle underlying the interpretation of Article 8.[7]

2.3 It is foreseeable that the proposed powers and duties of the Bill could lead to interventions that interfere with a person's autonomy and capacity to make their own decisions. Limitations on Article 8 ECHR may only be allowed where the authority can show that its action is lawful, proportionate and necessary for the protection of one of the objectives set out under paragraph 2 of Article 8. Action is 'proportionate' when it is appropriate for the specific situation and no more than necessary to address the problem concerned. Therefore, the NIHRC is encouraged by the provision for ensuring that a trust or social worker only intervenes if the

[3] Article 1, Universal Declaration of Human Rights 1948; Article 3(a), UN Convention on the Rights of Persons with Disabilities 2006; CRPD/C/GBR/CO/1, 'UN CRPD Committee Concluding Observations on the Initial Report of the UK of Great Britain and NI', 29 August 2017, at para 39.
[4] Christine Goodwin v The United Kingdom (2002) ECHR 588, at para 90.
[5] NI Human Rights Commission, 'Submission on legislative options to inform the development of an Adult Protection Bill in NI' (NIHRC, 2021), at para 2.1 - 3.8.
[6] Pretty v The United Kingdom (2002) ECHR 427, at para 61.
[7] Pretty v The United Kingdom (2002) ECHR 427, at para 61 – 62.

intervention is "of the range of options likely to fulfil the object of the intervention, the least restrictive to the adult's freedom".[8]

2.4 The failure to protect adults in health and social care settings could potentially engage Articles 2 and 3 of the ECHR depending on the severity and frequency of neglect.[9] Article 2 of the ECHR enshrines the right to life, while Article 3 of the ECHR prohibits in absolute terms torture or inhuman or degrading treatment or punishment. Combined with Article 1 of the ECHR, these articles impose positive obligations on States to protect the right to life of individuals within their jurisdiction, and ensure that they are not subject to torture, inhuman, degrading treatment or punishment. The ECtHR has held that the State must take measures to prevent breaches and "provide effective protection, in particular, of children and other vulnerable persons and include reasonable steps to prevent ill-treatment of which the authorities had or ought to have had knowledge".[10]

2.5 Therefore, the NIHRC welcomes that Clause 1 highlights "the importance of ensuring that the adult is as safe as possible and that suspected harm is subject to investigation as quickly as possible".[11] However, the NIHRC reiterates its concerns about the lack of explicit reference to human rights in the Bill's provisions. The UK-wide Human Rights Act 1998 incorporated the ECHR into domestic law. Section 6 of the 1998 Act makes it unlawful for a public authority, including health and social care trusts, to act in a way which is incompatible with the ECHR. Private bodies can also be considered public authorities if they carry out public functions, such as care homes.[12] The NIHRC considers that expressly anchoring the Bill within the national human rights framework would place the Department of Health in a stronger position to ensure all statutory actors comply with their corresponding obligations when performing functions of adult protection.

[8] Clause 1(a)(ii), Adult Protection Bill.
[9] NI Human Rights Commission, 'Submission on legislative options to inform the development of an Adult Protection Bill in NI' (NIHRC, 2021), at para 4.7 - 4.11.
[10] Z v United Kingdom (2001) ECHR 333, at para 73.
[11] Clause 1(e), Adult Protection Bill.
[12] Section 6(3), Human Rights Act 1998.

2.6 Explicit reference to human rights in legislation would ensure that the underpinning policy framework adequately explores how practitioners should embed human rights standards and principles in all aspects of service planning, policy and practice. In turn, this will ensure that people exercising functions under the regulatory framework receive effective training on the practical application of their statutory human rights obligations. The NIHRC considers this approach would empower health and social care workers and other care providers with the knowledge required to embed human rights standards and principles within their decision-making.

2.7 This is consistent with recommendations from the Independent Review of Dunmurry Manor which stated that "advancing residents' human rights should be made explicit" in safeguarding procedures.[13] Further, the Commissioner for Older People for NI previously advised that "human rights should be an essential component of practitioner dialogue" and "all staff in care settings, commissioners of care, social care workers, and regulators must receive training on the implications of human rights for their work".[14]

2.8 The NIHRC recommends that the Committee brings forward an amendment to clause 1 of the Bill to include a reference to the human rights obligations of those exercising functions provided for in the Bill.

2.9 The NIHRC recommends that adequate resources are allocated to ensure that people with powers and duties under the Bill are trained so that they understand the human rights implications of their work and operate consistently within a human rights-based approach.

3.0 Part 2: Adult Protection Board

3.1 Clauses 30 to 37 make provision for the establishment of the Adult Protection Board for NI and outline its key objectives, functions and

[13] Department of Health, 'Independent Whole Systems Review into Safeguarding and Care at Dunmurry Manor Care Home – Evidence Paper: 1 Adult Safeguarding within a Human Rights Based Framework in NI' (DoH, 2020), at para 30.
[14] Commissioner for Older People for Northern Ireland 'Home Truths', June 2018, at 30.

governance arrangements. The core functions of the Adult Protection Board for NI (the Board) include developing and publishing a strategic plan for the protection of adults at risk, publishing an annual report, and undertaking serious case reviews. The Explanatory and Financial Memorandum advises that,

> Serious case reviews are multi-agency reviews that look into the circumstances surrounding [the] death of, or serious harm to, an adult at risk. Their purpose is to establish whether there are lessons to be learned from a case about the way in which agencies and professionals work together; and to action change as a result.

3.2 The ECtHR has underlined that the obligation to protect the right to life under Article 2 of the ECHR, requires an effective official investigation where an individual has sustained life-threatening injuries, died or has disappeared in violent or suspicious circumstances, irrespective of whether those allegedly responsible are State agents or private persons or are unknown or self-inflicted. The essential purpose of an investigation under Article 2 of the ECHR is to secure the effective implementation of the domestic laws safeguarding the right to life and, in those cases involving State agents or bodies, to ensure their accountability for deaths occurring under their responsibility.[15] For an investigation of this nature to be effective under Article 2 of the ECHR, it must be independent, prompt with reasonable expedition, and there must be public scrutiny with the participation of the next-of-kin.[16]

3.3 The NIHRC notes with caution that the Bill does not provide sufficient detail on the procedures for carrying out serious case reviews. Given their central role in identifying systematic failings and preventing recurrence, the NIHRC considers that critical procedural safeguards should be embedded within the legislative framework to ensure consistent application of ECHR Article 2.

3.4 The NIHRC recommends that Part 2 of the Bill sets out minimum procedural standards for serious case reviews,

[15] Hugh Jordan v United Kingdom (2001) ECHR 327, at para 105.
[16] Ibid, at paras 105 – 109.

including requirements for independence, timeliness, public scrutiny, and involvement of the next-of-kin, in accordance with Article 2 of the ECHR.

4.0 Part 4: Regulation of CCTV Systems

4.1 Clauses 43 to 47 make provision for the development and monitoring of regulations relating to the installation and use of CCTV systems for the purpose of safeguarding adults at risk who reside in, or access services in, prescribed premises. Clause 43 sets out the premises to which these provisions apply, including day care settings, nursing homes, residential care homes and mental health units.

4.2 The NIHRC acknowledges that these proposals have emerged in the context of recent incidents of abusive and neglectful care in care homes and hospitals in NI. As examined above, where an individual's absolute right to be free from torture, inhuman, degrading treatment or punishment (Article 3 ECHR) is under threat, the State must take positive actions to prevent any such treatment from taking place. The use of CCTV surveillance may act as a deterrent to this type of behaviour and provide assurance to relatives that abuse will not go unreported again.

4.3 However, the NIHRC advises that previous incidents of abuse should not be used as a blanket justification for the introduction of potentially arbitrary measures. The installation and use of any CCTV camera in a health and social care setting must be assessed on a case-by-case basis and appropriately mitigated to ensure it does not breach any other ECHR rights. Any use of surveillance technology by the State could be a significant intrusion into a person's right to private and family life under ECHR Article 8 unless carefully managed within a rights-respecting framework.

4.4 Article 8 is a qualified right, meaning limitations are allowed if they are lawful, proportionate, and necessary for the protection of one of the objectives set out in the text of Article 8(2). Namely, in the interests of national security, public safety or the economic wellbeing of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights

and freedoms of others.

4.5 In order to determine whether a particular infringement of Article 8 ECHR is necessary in a democratic society, the courts may balance the interests of the State against the rights of the individual. The ECtHR has clarified that "necessary" does not have the flexibility of such expressions as "useful", "reasonable", or "desirable", but implies the existence of a "pressing social need" for the interference in question.[17] Even where there is a legitimate reason for imposing a restriction, the restriction must be the least restrictive option available.[18] Therefore, statutory actors, including those working in private organisations performing a public function, must consider all possible alternatives before determining that surveillance measures are necessary.

4.6 The NIHRC considers that EU data protection law falls in scope of Windsor Framework Article 2.[19] This is set out in more detail in the appendix. The installation and use of CCTV systems constitutes processing of personal data within the meaning of the EU General Data Protection Regulation. Personal data must be processed lawfully, transparently, and data processing must be limited to what is necessary in relation to the purpose for which it is collected (purpose limitation).[20] There must be a lawful basis for the processing of personal data, such as the processing being necessary for the performance of a task carried out for the public interest.[21]

4.7 The protection of adults at risk would likely constitute a lawful basis for processing of data. However, installing and operating CCTV systems should include an individual assessment of the necessity of the processing of personal data to ensure data processing is limited to what is strictly necessary.[22] Carrying out and publishing analysis of how the Bill respects the data protection principles enshrined in

[17] The Sunday Times v United Kingdom (1979) 2 ECHR 245.

[18] Huang v Secretary of State [2007] 2 AC 167 at [19]; Kurnaz v Turkey (Application no. 36672/97) at [56].

[19] NI Human Rights Commission, 'Briefing on the Data (Use and Access) Bill [HL]' (NIHRC, 2025).

[20] Article 5, Regulation 2016/679/EU, 'Regulation of the European Parliament and Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data', 27 April 2016.

[21] Article 6, Regulation 2016/679/EU, 'Regulation of the European Parliament and Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data', 27 April 2016.

[22] Article 5(1)(c), Regulation 2016/679/EU, 'Regulation of the European Parliament and Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data', 27 April 2016.

the EU General Data Protection Regulation would assist compliance with the non-diminution commitment in Windsor Framework Article 2.

4.8 Since the operation of CCTV systems might result in recordings being produced and stored, to ensure compliance with the standards on access to information established by the EU General Data Protection Regulation, individuals should be provided with clear, concise and accessible information about where their personal data is being stored and for how long their personal data is going to be stored.[23]

4.9 Clause 44 of the Bill sets out what the regulations relating to the installation and use of CCTV may make provision for. This includes pre-installation assessments, limiting the areas CCTV may be installed, the need to inform and seek consent from inhabitants of the premises, the processing, access to, and disclosure of the collected information. The NIHRC welcomes the inclusion of these governance arrangements and procedural safeguards that support individualised assessments of the installation and use of a CCTV system on a particular premises.

4.10 However, the NIHRC is disappointed that Part 4 of the Bill does not expressly incorporate human rights considerations into this governance framework, including the relevance of Windsor Framework Article 2. The pre-installation assessment presents a critical opportunity to ensure human rights impact assessments are conducted in relation to the use of CCTV on a particular premises. This should demonstrate the necessity of this measure to address the problem identified, including careful consideration of all possible alternatives. For example, where an establishment is concerned about the level of care provided by staff, it would have to demonstrate how installing CCTV surveillance is necessary to improve care provision as opposed to other less intrusive measures such as staff training, guidance and supervision.

4.11 To ensure compliance with the ECHR and Windsor Framework Article 2, the NIHRC considers that each establishment should

[23] Articles 13 and 14, Regulation 2016/679/EU, 'Regulation of the European Parliament and Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data', 27 April 2016.

clearly demonstrate four things before installing CCTV systems on their premises: (1) evidence of the specific problem that the introduction of CCTV aims to address, (2) evidence that the use of CCTV is likely to succeed in addressing the problem identified, (3) how the introduction of CCTV might impact individuals in different and/or unintended ways, and (4) how unintended consequences will be appropriately mitigated.

4.12 In certain circumstances, the improper use of surveillance measures could potentially engage Article 3 ECHR. In deciding if treatment reaches the 'threshold' of being inhuman or degrading, the ECtHR has stated "it depends on all the circumstances of the case, such as the nature and context of the treatment or punishment, the manner and method of its execution, its duration, its physical or mental effects and, in some instances, the sex, age and state of health of the victim".[24] In other words, in assessing whether treatment comes within Article 3 it is the impact of the treatment on the individual concerned which is measured. For example, the ECtHR has held that "degrading treatment" may well include situations where a person is humiliated in his or her own eyes, even if not in the eyes of others.[25]

4.13 Depending on the location of the CCTV cameras, it is foreseeable that highly sensitive circumstances will be recorded (e.g. persons in severe emotional distress, private family interactions, discussion of private medical information, persons in a state of undress etc). Consideration would need to be given to the impact of these intrusions on the different individuals that are likely to be affected. The British Institute of Human Rights advises that what might be comforting to some individuals could cause feelings of worthlessness and humiliation in others.[26]

4.14 Therefore, even where a CCTV camera has undergone a pre-installation assessment, it is important that each use of that camera is subject to procedural safeguards to ensure it does not interfere with ECHR Article 3 at any point. The NIHRC notes that Clause 44

[24] Soering v UK (1989) ECHR at para 100. See also: Ireland v. the United Kingdom, 18 January 1978, Series A no. 25.
[25] *Costello-Roberts v UK (25 March 1993) Application No 13134/8.*
[26] The British Institute of Human Rights, 'Restraint Reduction Network: Surveillance - A restrictive practice and human rights issue' (BIHR, 2021).

does not require the supporting policy framework to include regular internal monitoring and review procedures for the use of CCTV systems. Ongoing monitoring and review of the operation of CCTV systems would ensure such measures remain lawful, necessary and proportionate over time, and do not evolve into arbitrary or excessive surveillance. Continuous monitoring also provides an opportunity to identify unintended negative consequences at an early stage and to implement remedial measures when required.

4.15 In addition, there should be individual assessments on the lawfulness, proportionality and necessity of personal data processing, as well as on the measures put in place to ensure personal data is not stored in a manner incompatible with the principles enshrined in the EU General Data Protection Regulation.

4.16 The NIHRC recommends that the Committee amend Part 4 of the Bill to include an explicit reference to the European Convention on Human Rights and the EU General Data Protection Regulation in relation to the development and monitoring of regulations for the installation and use of CCTV systems in prescribed premises. This should include a requirement that a human rights impact assessment and analysis of compliance with Windsor Framework Article 2 be conducted before determining whether a CCTV system is installed.

4.17 The NIHRC recommends that the Committee amend Clause 44 of the Bill to require that the regulations relating to the installation and use of CCTV in prescribed premises contain procedures for regular monitoring and review. This should take account of the relevant data protection standards laid out in EU General Data Protection Regulation and include periodic reassessment of the necessity and proportionality of surveillance measures, and the continued evaluation of the impact of CCTV on residents, staff and visitors.

4.18 The NIHRC welcomes the provisions in Clauses 45-47 which confer robust external monitoring and enforcement powers on RQIA. This includes access to CCTV equipment, records, interviews and even seizure of materials. However, the lack of explicit incorporation of human rights standards and principles, including those standards

derived from relevant EU law, such as EU General Data Protection Regulation, into Part 4 of the Bill means there is no express requirement for RQIA to check that CCTV use remains necessary and proportionate over time. The NIHRC considers that embedding these safeguards in legislation would ensure that monitoring is consistently grounded in the State's broader human rights obligations.

4.19 The NIHRC recommends that Clauses 45-47 of the Bill require RQIA to consider the necessity and proportionality of CCTV systems when exercising its monitoring and enforcement functions under Part 4.

Appendix: Windsor Framework Article 2

The NIHRC considers that EU data protection law falls in scope of Windsor Framework Article 2.[27] Windsor Framework Article 2 requires the UK Government to ensure that no diminution of the rights, safeguards and equality protections covered by the relevant part of the Belfast (Good Friday) Agreement 1998 occurs as a result of the UK's withdrawal from the EU.[28] Therefore, to the extent that an EU measure underpins the rights, safeguards and equality of opportunity protections covered by the relevant chapter of the 1998 Agreement, it falls within the scope of the Article 2 commitment and continues to set minimum standards in NI. In most cases, the relevant EU law will be that which was binding on the UK on 31 December 2020.[29]

The NI Court of Appeal held that the relevant chapter of the Belfast (Good Friday) Agreement consists of a "broad suite of rights" and extends "further than those rights specifically listed".[30] The Court further held that the rights in question, victims' rights, fall within 'civil rights', are

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[27] NI Human Rights Commission, 'Briefing on the Data (Use and Access) Bill [HL]' (NIHRC, 2025). see also Equality Commission NI and NI Human Rights Commission, 'Annual Report of the NI Human Rights Commission and the Equality Commission for NI on the Implementation of Article 2 of the Windsor Framework 2024–2025' (ECNI and NIHRC, 2025).

[28] In *Society for the Protection of the Unborn Child Pro-Life Ltd v Secretary of State for NI* [2023] NICA 35 at para 54 the Court of Appeal set out a six-part test. The Court of Appeal in *In the Matter of an Application by Martina Dillon and others* [2024] NICA 59, at para 90-96, noted that this test was an "aid and not a binding or rigid code". See also NI Human Rights Commission and Equality Commission for NI, 'Working Paper on the Scope of Article 2 of the Ireland/Northern Ireland Protocol' (NIHRC and ECNI, 2022), para 6.18.

[29] In addition to the 'no diminution' commitment, the UK Government is required to "keep pace" with any enhancement to rights made by the EU to legislation listed in the Annexes to the Windsor Framework, including the six EU Equality Directives listed in Annex 1 (Article 13, Windsor Framework).

[30] *In the Matter of an Application by Martina Dillon and others* [2024] NICA 59, at para 115. This decision is currently subject to appeal.

given effect by Articles 2, 3, 6 and 14 of the ECHR and underpinned by EU Victims Directive.[31] This appears consistent with published analysis by the NIHRC and the Equality Commission for NI, that, read in the context of the additional pledges on rights within this chapter, the commitment of the Belfast (Good Friday) Agreement signatories to the range of rights referenced within the chapter must be understood as embracing, as a minimum, those rights set out in the ECHR.[32]

The ECtHR has acknowledged that the right to respect for private and family life, home and correspondence, as guaranteed by Article 8 of the ECHR, also includes the protection of personal data.[33] The Court of Appeal in NI has confirmed that relevant underpinning EU law should be interpreted in accordance with the EU Charter and general principles of EU law.[34] The Court of Justice of the European Union (CJEU) has similarly ruled in multiple cases that the right to data protection is a fundamental right closely connected with the right to respect for private and family life enshrined in Article 7 of the EU Charter of Fundamental Rights, which corresponds to Article 8 of the ECHR.[35]

Data protection is given effect across several EU measures,[36] including the EU General Data Protection Regulation, which is clear that "the protection of natural persons in relation to the processing of personal data is a fundamental right".[37] The EU General Data Protection Regulation sets minimum standards for the protection of data rights, lays down rules for the lawful processing of personal data and special categories of personal

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[31] *In the Matter of an Application by Martina Dillon and others* [2024] NICA 59, at paras 117, 121 and 126.
[32] NI Human Rights Commission and Equality Commission for NI, 'Working Paper: The Scope of Article 2(1) of the Ireland/Northern Ireland Protocol' (NIHRC and ECNI, 2022).
[33] *Satakunnan Markkinapörssi Oy and Satamedia Oy v Finland* (2015) ECHR 713, at para 137.
[34] *In the Matter of an Application by Martina Dillon and Others for Judicial Review* [2024] NICA 59, at para 126.
[35] Court of Justice of the European Union , 'Fact Sheet: Protection of personal data' (CJEU, July 2024).
[36] Directive 2016/680/EU, 'Regulation of the of the European Parliament and of the Council on the Protection of Natural Persons with Regard to the Processing of Personal Data by Competent Authorities for the Purposes of the Prevention, Investigation, Detection or Prosecution of Criminal Offences or the Execution of Criminal Penalties, and on the Free Movement of Such Data', 27 April 2016; Directive 2009/136/EC, 'Directive of the European Parliament and of the Council Amending Directive 2002/22/EC on Universal Service and Users' Rights Relating to Electronic Communications Networks and Services, Directive 2002/58/EC, Concerning the Processing of Personal Data and the Protection of Privacy in the Electronic Communications Sector and Regulation (EC) 2006/2004 on Cooperation between National Authorities Responsible for the Enforcement of Consumer Protection Laws', 25 November 2009; Regulation 2018/1725/EU, 'Regulation of the of the European Parliament and of the Council on the Protection of Natural Persons with Regard to the Processing of Personal Data by the EU Institutions, Bodies, Offices and Agencies and on the Free Movement of Such Data', 23 October 2018.
[37] Recital 1, Regulation 2016/679/EU, 'EU Parliament and Council Regulation on the Protection of Natural Persons with Regard to the Processing of Personal Data and on the Free Movement of Such Data', 27 April 2016.

data[38] and contains important rights for individuals, including the right to information, rectification and erasure.[39]

[38] Articles 5, 6 and 9, Regulation 2016/679/EU, 'EU Parliament and Council Regulation on the Protection of Natural Persons with Regard to the Processing of Personal Data and on the Free Movement of Such Data', 27 April 2016.
[39] Articles 13-17, Regulation 2016/679/EU, 'EU Parliament and Council Regulation on the Protection of Natural Persons with Regard to the Processing of Personal Data and on the Free Movement of Such Data', 27 April 2016.

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