



Codes of Conduct under GDPR

Overview on benefits and impacts of Codes of Conduct alongside a list of current Codes of Conduct



Changelog

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Herausgeber

Selbstregulierung Informationswirtschaft e.V.
Großbeerenstraße 88
10963 Berlin
<https://sriw.de>

+49 (0)30 30878099-0
info@sriw.de

Amtsgericht Berlin Charlottenburg
Registernummer: VR 30983 B
USt-Nummer: DE301407624
Deutsche Bank AG
IBAN: DE33 1007 0000 0550 0590 00

Vorstandsvorsitz
Jörn Wittmann

Geschäftsführer
Frank Ingenieth



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1 Disclaimer

The information has been created with best efforts. However, no guarantee can be provided for its accuracy. Therefore, there is always a reference to authorities' websites, registers and copies of each Code of Conduct.

If you have any additional information which is deemed helpful to this document or whenever you recognize inaccurate information, please, reach out so that we can take your remarks into consideration in any updated version of this document.

2 Introduction

Since GDPR (General Data Protection Regulation), Codes of Conduct (CoC) are experiencing an improved degree of recognition. Known in industries and different legal frameworks ever since, Codes of Conduct were rather an exception under the Data Protection Directive.

A significantly improved legal framework, determining key aspects such as material requirements and formal procedures to receive authorities' approval, as well as legally defined positive incentives when complying with approved Codes of Conduct results in a broader adoption of national and transnational Codes of Conduct under GDPR.

Selbstregulierung Informationswirtschaft (SRIW) has been at the very top of the development of Codes of Conduct since the very beginning of this tool in the sphere of data protection. Having been involved in one of only two approved Codes of Conduct under the Directive, SRIW – by means of its subsidiary SCOPE Europe – has also been involved in making the very first effective transnational Code of Conduct under GDPR a success.

As deeply involved in the development and monitoring of Codes of Conduct, SRIW and its ecosystem has a unique expert's knowledge. Nonetheless, even as experts it becomes challenging to navigate across several registers of officially approved Codes of Conduct.¹ Additionally, even where registers exist, they may not be accurate at all times. Therefore, SRIW is publishing this document, facilitating interested parties to gain an overview of the existing Codes of Conduct.

¹ Article 40.6 GDPR requires transparent communication by CompSA on any approved Codes of Conduct, supported by the EDPB, see Article 40.11 GDPR. This requirements is confirmed by [EDPB Guidelines 1/2019](#), Recital 47.

3 What are Codes of Conduct

Codes of Conduct are stakeholder-driven initiatives, particularizing GDPR's requirements. In this realm, they form voluntary accountability mechanisms by which categories of controllers or processors can specify the application of GDPR eventually contributing to its proper application.²

Only legally effective Codes of Conduct will provide the benefits and incentives as provided by GDPR, see 4. To become legally effective two requirements must be met:

- The Code must be approved by the competent supervisory authority (CompSA)
- The Code must be monitored by an independent monitoring body which is accredited by the CompSA³

It remains within the powers of Code-Owners, i.e., the category of controllers or processors developing and maintaining the Code, to determine the scope of their Code of Conduct. A suitable scoping is key for trusted and effective Codes of Conduct: as clarity in scope prevents market confusion, eases the communication of benefits of adherence, and eventually facilitates the project's roadmap and negotiations.

Scoping relates to several dimensions, such as territorial scope, material scope, eligibility, and target of evaluation. Territorially, Codes of Conduct address one distinct Member State ("**national Code of Conduct**"), see 5.2, or a multitude of Member States ("**transnational Code of Conduct**"), see 5.1. Because the procedures for approval of a transnational Code of Conduct are identical for two or more Member States, in practice, as of today, all transnational Codes of Conduct do apply EU-wide. Materially, the scope refers to individual requirements of GDPR, which will be particularized. In this vein, there is no obligation to always address all GDPR-requirements at once. Code-Owners may decide to limit the material scope to those requirements of GDPR need sector-specific clarification or guidance for operationalization the most.

² See Article 40 GDPR.

³ For completeness: to the extent public bodies will adhere to the Code of Conduct, an accredited private Monitoring Body is not required, Article 41.6 GDPR.

4 How to benefit from Codes of Conduct

Codes of Conduct may provide several benefits. Foremost, Codes of Conduct provide legal incentives in several ways. Additionally, adherence to an approved Code of Conduct amplifies a sector's positioning as legally compliant and supportive towards data subject interests.

4.1 Legal Incentives

The development of a Code of Conduct fosters standardized GDPR-compliant good practices, whilst remaining flexible and innovation friendly. To this extent, GDPR refers to Codes of Conduct distinctively.

- Codes of Conduct serve the processor to demonstrate sufficient guarantees in accordance with the requirements of the GDPR (Article 28.5 GDPR)
- Codes of Conduct demonstrate integration of requirements for the security of processing (Article 32.3 GDPR)
- Codes of Conduct shall (positively) impact authoritative actions, including administrative fines, in case of breaches of GDPR (Article 83.2 lit j GDPR)
- Codes of Conduct may act as a crucial factor within Data Protection Impact Assessments (Article 35 GDPR)
- Codes of Conduct demonstrate accountability by the controller (Article 24.3 GDPR)
- Codes of Conduct may act as a safeguard in the context of Third Country transfers (Article 45.3, Article 46.2 lit e GDPR)
- Codes of Conduct facilitate conformance with transparency obligations

4.2 When do those benefits apply?

Codes of Conduct provide one or any of the above benefits, if they are legally effective. Codes of Conduct are legally, if they are approved and monitored by an accredited monitoring body (see 3).

4.3 Steps to enhance trust in a Code of Conduct

It is strongly recommended to verify any public claims in this respect. This may include, for example,

- verify if the Code of Conduct is listed in the register of the CompSA
- verify if there is an accredited Monitoring Body
- verify if the officially listed version is identical to the version you were presented
- verify if the Code of Conduct was approved entirely, or if certain provisions were excluded from the approval decision

4.4 Public Perception and Impact

Codes of Conduct shall positively affect compliance and public perception. A key element for Codes of Conduct therefor is transparency and accessibility. This includes due processes to identify non-conformity, including available mechanisms to file complaints.

To assess the individual benefits, you may want to balance the following elements:

- Is there an easily accessible list of adherent companies/services?
- Does the listing as adherent company/service require initial assessments and checks?
- Does the listing as adherent company/service require recurring assessments, and in which frequency?
- Can you easily access the Code and general provisions of the conformity assessment programme?
- Can you easily access the complaints procedures and related forms?
- Can you easily determine whether assessments will be concluded independently and equally.
- Does the Code of Conduct confuse adherence with certifications, because the latter is distinct legal term under Article 42 GDPR with different requirements.

5 Approved Codes of Conduct

Following, we have listed all approved Codes of Conduct that could be identified via official website by the data protection supervisory authorities.

For each Code of Conduct, there is a short explanation and a standardized table with relevant information. The table was designed against our experience and knowledge of the official requirements for approval (Article 40) and accreditation (Article 41 GDPR). Unfortunately, not all information was easily available. This might be a consequence of diverse national requirements or the obstacles that come along with navigating websites supported by translation services. Please note the disclaimer, see 1.

The following section is divided into two main sub-sections:

- transnational Codes of Conduct (see 5.1)
- national Codes of Conduct (see 5.2)

The Section for national Codes of Conduct is further divided into subsection per each Member State.

The order of sections and Codes of Conduct always follows the alphabetical order of Member States of the CompSA.

5.1 Transnational Codes of Conduct⁴

5.1.1 Code of Conduct for Cloud Service Providers (“EU Cloud Code of Conduct”)

The EU Cloud CoC establishes good practices for cloud service providers (CSP), thus strengthening the protection of personal data processed in this sector. It concretizes the requirements of Article 28 GDPR and other relevant articles, to facilitate their application in the cloud market, covering any services type, including but not limited to IaaS, PaaS and SaaS. This code of conduct is designed to be accessible to SMEs active in the cloud sector.

[Download Code](#)

CompSA	Belgian Data Protection Authority (APD)		version / publication date	2.11 / December, 2020
Member State	BE	Language	EN	Website Code (if a dedicated website exists)
				EU Cloud - Code of Conduct
Code-Owners	General Assembly EU Cloud CoC, Secretariat SCOPE Europe		Register CompSA	Covered by EDPB’s register for Codes of Conduct, amendments and extensions
Website Code-Owners	EU Cloud CoC		Approval Decision by the CompSA	Decision n° 05/2021
Contact Code-Owners	Contact			
Monitoring Body	SCOPE Europe		Accreditation Decision of the Monitoring Body	Decision n° 06/2021
Public Register	Public Register			

⁴ Ordered alphabetically by Member State of the Competent Supervisory Authority.

5.1.2 Code of Conduct for Cloud Infrastructure Service Providers

This Code of Conduct (Code) focusses on IaaS providers. IaaS providers are referred to in this Code as Cloud Infrastructure Services Providers (CISPs). The purpose of the Code is to help CISPs to ensure compliance with GDPR and guide customers in assessing whether cloud infrastructure services are suitable for the processing of personal data that the customer wishes to perform.

A provider of Infrastructure-as-a-Service (IaaS) only provides virtualised hardware or computing infrastructure. Its customers have the flexibility to choose how to use that infrastructure.

[Download Code](#)

CompSA	National Commission on Informatics and Liberty (CNIL)		version/publication date	9 February 2021
Member State	FR	Language	EN	Website Code (if a dedicated website exists)
Code-Owners	Cloud Infrastructure Services Providers in Europe (CISPE)		Register CompSA	Register of Approved Codes of Conduct (CNIL)
Website Code-Owners	CISPE		Approval Decision	Délibération 2021-065 du 3 juin 2021 - Légifrance
Contact Code-Owners	info@cispe.cloud			
Monitoring Body	Bureau Veritas EY CertifyPoint Laboratoire national de métrologie et d'essais (LNE)		Accreditation Decision	Bureau Veritas EY CertifyPoint Laboratoire national de métrologie et d'essais (LNE)
Public Register	Public Register			

5.1.3 Code of Conduct for Service Providers in Clinical Research

The EUCROF GDPR Code of Conduct applies to clinical research service providers (CROs) acting as data processors for data protection. CROs adhering to the Code can earn a Compliance Mark, ensuring compliance with GDPR requirements. It consists of two main documents, and additional tools are available to assist with its implementation.

[Download Code](#)

[Download Attachment](#)

CompSA	National Commission on Informatics and Liberty (CNIL)		version/publication date	Sept 12, 2024 Version 1 Draft 14
Member State	FR	Language	EN	Website Code (if a dedicated website exists) EUCROF - Code of Conduct
Code-Owners	European Clinical Research Organisations Federation (EUCROF)		Register CompSA	Register of Approved Codes of Conduct (CNIL)
Website Code-Owners	EUCROF		Approval Decision	Délibération n° 2024-064
Contact Code-Owners	info@eucrof.eu			
Monitoring Body	pending ⁵		Accreditation Decision	pending ⁶
Public Register	Public Register			

⁵ Status: Jan 27th, 2025.

⁶ Status: Jan 27th, 2025.

5.2 National Codes of Conduct⁷

5.2.1 Austria

5.2.1.1 Code of Conduct for Internet Service Providers (ISP)

The code of conduct aligns industry-specific requirements with GDPR, such as those from the Telecommunications Act 2021 ([TKG 2021](#)).

[Download Code](#)

CompSA	Austrian Data Protection Authority (DSB)		Version / Approval date	V. 23.12.2024 approved Jan 20 th . 2025
Member State	AT	Language	DE	Website Code (if a dedicated website exists) ISPA Code of Conduct
Code-Owners	Internet Service Providers Austria (ISPA)		Register CompSA	Register of Approved Codes of Conduct (DSB)
Website Code-Owners	ISPA		Approval Decision by the CompSA	2024-0.942.714 ⁸
Contact Code-Owners	office@ispa.at			
Monitoring Body	Internet Service Providers Austria (ISPA)		Accreditation Decision of Monitoring Bodies by the CompSA	2020-0.326.710 ⁹
Public Register	Public Register			

⁷ Ordered alphabetically by Member State of the Competent Supervisory Authority.

⁸ The approval decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

⁹ The accreditation decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

5.2.1.2 Code of Conduct for network operators in the context of smart meters

The Code of Conduct applies to network operators and governs the processing of personal data in the context of [Sections 83 et. seq EIWOG 2010](#). This includes the collection, storage, transmission and archiving of data.

[Download Code](#)

CompSA	Austrian Data Protection Authority (DSB)		Version / Approval date	October 21, 2021
Member State	AT	Language	DE	Website Code (if a dedicated website exists)
Code-Owners	Association of Austrian Electricity Companies (VÖEW) Austrian E-Economy Association		Register CompSA	Register of Approved Codes of Conduct (DSB)
Website Code-Owners	VÖEW Austrian E-Economy Association		Approval Decision by the CompSA	D196.016, 2021-0.541.263 ¹⁰
Contact Code-Owners	info@oesterreichsenergie.at			
Monitoring Body	Austrian E-Economy Service Company		Accreditation Decision of Monitoring Bodies by the CompSA	2020- 0.563.534 ¹¹
Public Register	Public Register (Web-Excel)			

¹⁰ The approval decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

¹¹ The accreditation decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

5.2.1.3 Code of Conduct on data protection of private educational institutions

This Code of Conduct clarifies the role of privately owned and operated educational facilities when processing personal data. This includes, how data subject rights are to be exercised, transparency obligations are to be fulfilled, measures regarding Art. 24, 25 and 32 GDPR and related risk analyses.

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CompSA	Austrian Data Protection Authority (DSB)		Version / Approval date	November 5, 2019 <i>Note: The approval did not cover the entire Code, but excluded section 10.2 and 10.3.</i>
Member State	AT	Language	DE	Website Code (if a dedicated website exists)
Code-Owners	Professional Association of Employers of Private Educational Institutions (BABE)		Register CompSA	Register of Approved Codes of Conduct (DSB)
Website Code-Owners	BABE		Approval Decision by the CompSA	DSB-D196.006/0005-DSB/2019 ¹²
Contact Code-Owners	office@babe.or.at			
Monitoring Body	Lawvision Information Systems GmbH		Accreditation Decision of Monitoring Bodies by the CompSA	2020-0.605.768 ¹³
Public Register	Public Register			

¹² The approval decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

¹³ The accreditation decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

5.2.1.4 Code of Conduct for address publishers and direct marketing companies

The Code of Conduct specifies how GDPR, the Austrian [DSG \(Data Protection Act\)](#) and [Section 151 of the Trade Regulations 1994](#) are to be implemented in the address publishers' and direct marketing companies' business. The Code of Conduct clarifies how the principles of lawfulness, fairness and transparency are applied and guidelines on how to determine controllership.

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CompSA	Austrian Data Protection Authority (DSB)		Version / Approval date	August 7, 2020
Member State	AT	Language	DE	Website Code (if a dedicated website exists)
Code-Owners	WKÖ Advertising and Market Communications Association Dialog Marketing Association Austria (DMVÖ) Marketing Club Austria Fundraising Association Austria Austrian Marketing Society		Register CompSA	Register of Approved Codes of Conduct (DSB)
Website Code-Owners	Group consisting of WKÖ DMVÖ Marketing Club Austria Fundraising Association Austria Austrian Marketing Society		Approval Decision by the CompSA	2020-0.467.339 ¹⁴
Contact Code-Owners	Please refer to the individual contact option per individual member of code-owners.			
Monitoring Body	Austrian Standards plus GmbH		Accreditation Decision of Monitoring Bodies by the CompSA	2020-0.481.809 ¹⁵
Public Register				

¹⁴ The approval decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

¹⁵ The accreditation decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

5.2.1.5 Code of Conduct for Accounting Professions (Accountants, Bookkeepers, Payroll Accountants)

The Code of Conduct for accounting professions in accordance with the [BiBuG](#) regulates the specifics on data processing in the context of professional accounting services, addressing several elements such as technical and organisational measures, retention periods, and legal grounds. For such matters the Code of Conduct establish references between GDPR and applicable national *leges speciales*.

[Download Code](#)

CompSA	Austrian Data Protection Authority (DSB)		Version / Approval date	November 6, 2020
Member State	AT	Language	DE	Website Code (if a dedicated website exists)
Code-Owners	UBIT Professional Association of the WKÖ		Register CompSA	Register of Approved Codes of Conduct (DSB)
Website Code-Owners	UBIT - WKÖ		Approval Decision by the CompSA	2020-0.727.412 ¹⁶
Contact Code-Owners	Contact			
Monitoring Body	DSGVO Data Protection Ziviltechniker GmbH IDR Datenschutz-Compliance eG Austrian Standards		Accreditation Decision of Monitoring Bodies by the CompSA	2020-0.575.752 (DPZ) ¹⁷ , 2020-0.712.057 (Austrian Standards) ¹⁸ , 2020-0.780.391 (IDR) ¹⁹
Public Register	Public Register (Austrian Standards) Public Register (IDR) Public Register (DPZ)			

¹⁶ The approval decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

¹⁷ The accreditation decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

¹⁸ The accreditation decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

¹⁹ The accreditation decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

5.2.1.6 Code of Conduct for insurance brokers and advisors in insurance matters

The Code of Conduct for insurance brokers specifies the application of the GDPR and the Austrian [DSG \(Data Protection Act\)](#). The Code of Conduct addresses any processing activity in the realms of acting as insurance broker, while establishing references between GDPR and applicable national *leges speciales*.

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CompSA	Austrian Data Protection Authority (DSB)		Version / Approval date	<i>August 31, 2021</i>
Member State	AT	Language	DE	Website Code (if a dedicated website exists)
Code-Owners	Professional Association of Insurance Brokers and Consultants in Insurance Matters of the WKÖ		Register CompSA	Register of Approved Codes of Conduct (DSB)
Website Code-Owners	WKÖ		Approval Decision by the CompSA	2021-0.587.189 ²⁰
Contact Code-Owners	Contact			
Monitoring Body	IDR Datenschutz-Compliance eG Austrian Standards		Accreditation Decision of Monitoring Bodies by the CompSA	2022-0.416.762 (Austrian Standards) ²¹ , 2022-0.339.571 (IDR) ²²
Public Register	Public Register (IDR) Public Register (Austrian Standards)			

²⁰ The approval decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

²¹ The accreditation decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

²² The accreditation decision is not publicly available but referenced in the Register of the CompSA. To access the document, you may have to reach out to the CompSA individually.

5.2.2 Belgium

5.2.2.1 Code of Conduct of the National Chamber of Notaries

The Code of Conduct for Belgian notaries governs the mandatory appointment of a data protection officer, the measures to be adopted to ensure the security of the processing of personal data, the measures to be adopted by the notary with regard to his or her employees, data subject rights.

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CompSA	Belgian Data Protection Authority (APD)		Version / Approval date	May 24, 2021	
Member State	BE	Language	FR	Website Code (if a dedicated website exists)	brunot - Code of Conduct
Code-Owners	National Chamber of Notaries (brunot)		Register CompSA	Covered by EDPB's register for Codes of Conduct, amendments and extensions	
Website Code-Owners	brunot		Approval Decision by the CompSA	Decision n° 04/2021	
Contact Code-Owners	info@notarbrussels.be				
Monitoring Body	not applicable ²³		Accreditation Decision of Monitoring Bodies by the CompSA		
Public Register					

²³ Notaries (in Belgium) are public bodies. In this case, there is no requirement for a private Monitoring Body, Article 41.6 GDPR.

5.2.3 Germany

5.2.3.1 Code of Conduct for Notaries

This Code of Conduct stipulates technical and organizational measures to improve the security of electronic data processing by notaries, including specifications for encryption, access control and secure data storage. Deviations are permitted if there is an objective justification and if data protection is still guaranteed.

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CompSA	The Federal Commissioner for Data Protection and Freedom of Information (BfDI)		Version / Approval date	May 5, 2022
Member State	DE	Language	DE	Website Code (if a dedicated website exists)
Code-Owners	Federal Notary Chamber (bnotk)		Register CompSA	Register of Approved Codes of Conduct (BfDI) ²⁴
Website Code-Owners	bnotk		Approval Decision by the CompSA	Approval Decision - BfDI ²⁵
Contact Code-Owners	Contact			
Monitoring Body	not applicable ²⁶		Accreditation Decision of Monitoring Bodies by the CompSA	
Public Register	not available			

²⁴ As there seems only approved Code of Conduct so far, the website appears like a dedicated page for this specific, even though the URL may indicate differently.

²⁵ The approval decision is not publicly available, neither a case number. The press release by the CompSA appears the closest match. To access the official documents, you may have to reach out to the CompSA individually.

²⁶ Notaries (in Germany) are public bodies. In this case, there is no requirement for a private Monitoring Body, Article 41.6 GDPR.

5.2.3.2 Code of Conduct regarding retention periods by (credit) scoring agencies

The Code of Conduct clarifies the retention periods of personal data processed by (credit) scoring agencies.

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CompSA	Hessian Data Protection (HBDI)		Version / Approval date	August 11, 2020 Version from May 25, 2024
Member State	DE	Language	DE	Website Code (if a dedicated website exists) DW - Code of Conduct
Code-Owners	Association "Die Wirtschaftsauskunfteien e.V." (DW)		Register CompSA	Register of approved Codes of Conduct (HBDI)
Website Code-Owners	DW		Approval Decision by the CompSA	75.59:CoC-ro/tr
Contact Code-Owners	Geschaeftsleitung@die-wirtschaftsauskunfteien.de			
Monitoring Body	Data Protection Compliance Organization (TIGGES DCO)		Accreditation Decision of Monitoring Bodies by the CompSA	
Public Register	Public Register ²⁷			

²⁷ Note: There seems no Public Register in the common understanding. However, complaints can be submitted by selecting the adherent company concerned. Consequently, the list of options available within the Complaint's Form was considered the closest possible match of a Public Register.

5.2.3.3 Code of Conduct "Trusted Data Processor"

The Code of Conduct defines generically requirements in accordance with Article 28 GDPR.

[Download Code](#)

CompSA	Baden-Württembergs Commissioner for Data Protection (LfDI BW)		Version / Approval date	<i>June 9, 2022</i> <i>Version 1.0</i>
Member State	DE	Language	DE	Website Code (if a dedicated website exists)
Code-Owners	Association for the Promotion of Rules of Conduct (VfV) e.V. Society for Data Protection and Data Security e.V. (GDD) Professional Association of Data Protection Officers in Germany (BvD) e.V.		Register CompSA	
Website Code-Owners	GDD BvD		Approval Decision by the CompSA	Approval Decision ²⁸
Contact Code-Owners	info@gdd.de bvd-gs@bvdnet.de			
Monitoring Body	Data Protection Certification Company (DSZ)		Accreditation Decision of Monitoring Bodies by the CompSA	Accreditation decision
Public Register	Public Register			

²⁸ The approval decision is not publicly available, neither a case number. The press release by the CompSA appears the closest match. To access the official documents, you may have to reach out to the CompSA individually.

5.2.4 Italy

5.2.4.1 Code of Conduct for the processing of personal data for commercial information purposes

The Code of Conduct the guarantees and appropriate methods of processing personal data which must in the context of commercial information purposes. This refers to certainty and transparency in commercial relations, as well as adequate awareness of processing activities, adequate sharing of commercial and economic information, and the quality, relevance, accuracy and up-to-dateness of the personal data processed.

[Download Code](#)

CompSA	Personal Data Protection Authority (GPDP)		Version / Approval date	<i>April 29, 2021</i>	
Member State	IT	Language	IT	Website Code (if a dedicated website exists)	ANCIC - Code of Conduct
Code-Owners	National Association of Business Information and Credit Management Companies (ANCIC)		Register CompSA	Register of approved Codes of Conduct (GPDP)	
Website Code-Owners	ANCIC		Approval Decision by the CompSA	Decision [9586215]	
Contact Code-Owners	ancic@confcommercio.it				
Monitoring Body	Monitoring body (ODM)		Accreditation Decision of Monitoring Bodies by the CompSA	Decision [9565426]	
Public Register	Public Register				

5.2.4.2 Code of Conduct for credit information systems on consumer credit, reliability and punctuality in payments

The Code of Conduct concerns the processing of personal data in a Credit Information System (SIC). It establishes that personal data must be processed exclusively to assess credit risk, reliability and in-time payments. The Code of Conduct addresses adequate categories of personal data as well as retention periods. The Code prevents processing of special categories of personal data or data relating to criminal convictions.

[Download Code](#)

CompSA	Personal Data Protection Authority (GPDP)		Version / Approval date	October 6, 2022
Member State	IT	Language	IT	Website Code (if a dedicated website exists)
Code-Owners	Associazione Italiana Società di Riferenza Creditizi (AISReC) Credit Protection Consortium (CTC) Italian Leasing Association (ASSILEA)		Register CompSA	Register of approved Codes of Conduct (GPDP)
Website Code-Owners	AISReC CTC ASSILEA		Approval Decision by the CompSA	Decision [9818201]
Contact Code-Owners	info@aisrec.it info@assilea.it			
Monitoring Body	Monitoring Body (ODM)		Accreditation Decision of Monitoring Bodies by the CompSA	Decision [9818201]
Public Register	Public Register			

5.2.4.3 Code of Conduct for the use of health data for teaching and scientific publishing

The Code of Conduct governs the processing of personal data, including special categories of personal data such as health data, for educational purposes and scientific publications by healthcare professionals, which are part of the Health Authority in Venice. The Code of Conduct balances the interests of the parties involved.

[Download Code](#)

CompSA	Personal Data Protection Authority (GPDP)		Version / Approval date	January 14, 2021
Member State	IT	Language	IT	Website Code (if a dedicated website exists)
Code-Owners	Health Authority ULSS 9 Scaligera of the Veneto Region Veneto Region		Register CompSA	Register of approved Codes of Conduct (GPDP)
Website Code-Owners	ULSS9 Veneto Region		Approval Decision by the CompSA	Decision [9535354]
Contact Code-Owners	segreteriaorganizzativa@aulss9.veneto.it			
Monitoring Body	not applicable ²⁹		Accreditation Decision of Monitoring Bodies by the CompSA	
Public Register				

²⁹ The Code relates to the Health Authority in Venice, which apparently is a public body. In this case, there is no requirement for a private Monitoring Body, Article 41.6 GDPR.

5.2.4.4 Code of Conduct for the APL Sector

The Code of Conduct applies to the APL Sector, where APL refers to *Employment Agencies* authorised by the *National Agency for Active Labor Policies* (ANPAL). The Code of Conduct defines good practices for the processing of personal data in the context of intermediation, research and selection of personnel, protecting candidates against possible discrimination. It clarifies that participating agencies may only process data necessary for the establishment of the employment relationship and must not investigate special categories of personal data or other sensitive data that likely results in discrimination against. Likewise, it stipulates how agencies may or must not use or share additional sources of information, such as social media profiles, professional references disciplinary offenses or legal proceedings. The Code of Conduct also governs the suitability of automated decisions.

[Download Code](#)

CompSA	Personal Data Protection Authority (GPDP)		Version / Approval date	<i>January 11, 2024</i>
Member State	IT	Language	IT	Website Code (if a dedicated website exists)
Code-Owners	ASSOLAVORO		Register CompSA	Register of approved Codes of Conduct (GPDP)
Website Code-Owners	Assolavoro: Associazione Nazionale di Categoria Agenzie per il Lavoro		Approval Decision by the CompSA	Decision [9983415]
Contact Code-Owners	assolavoro@assolavoro.eu			
Monitoring Body	Monitoring body (ODM)		Accreditation Decision of Monitoring Bodies by the CompSA	Decision [9983415]
Public Register				

5.2.4.5 Code of Conduct for Telemarketing and Teleselling Activities

The Code of Conduct governs accuracy and lawfulness of processing personal data, addressing the entire processing cycle. Alongside data protection requirements, the Code of Conduct incorporates provision against illegitimate and abusive calls.

[Download Code](#)

CompSA	Personal Data Protection Authority (GPDP)		Version / Approval date	March 7, 2024
Member State	IT	Language	IT	Website Code (if a dedicated website exists)
Code-Owners	National Federation of Professional Services for Businesses (ASSEPRIM) National Association of Contact Center Outsourcing (ASSOCALL) National Association of Business Process Outsourcer (ASSOCONTACT) ASSO Telecommunications (ASSTEL) (CONFCOMMERCIO) Data & Marketing Association Italia (DMA) Business Consumer Observatory (OIC)		Register CompSA	Register of approved Codes of Conduct (GPDP)
Website Code-Owners	ASSEPRIM ASSOCALL ASSOCONTACT ASSTEL CONFCOMMERCIO DMA OIC		Approval Decision by the concerned DPA	Decision [9993808]
Contact Code-Owners	Please refer to the individual contact option per individual member of code-owners.			
Monitoring Body	Monitoring Body (ODM)		Accreditation Decision of Monitoring Bodies by the concerned DPA	Decision [9993808]
Public Register	Public Register			

5.2.4.6 Code of Conduct for companies developing and producing management software

The Code of Conduct governs processing of personal data by software intended for businesses, associations, professionals and public administrations to fulfil tax, social security, welfare and management obligations. The Code of Conduct provides for compliant use of such software.

[Download Code](#)

CompSA	Personal Data Protection Authority (GPDP)		Version / Approval date	October 17, 2024	
Member State	IT	Language	IT	Website Code (if a dedicated website exists)	ASSOSOFTWARE - Code of Conduct
Code-Owners	Italian Association of Software Producers (ASSOSOFTWARE)		Register CompSA	Register of approved Codes of Conduct (GPDP)	
Website Code-Owners	ASSOSOFTWARE		Approval Decision by the concerned DPA	Decision [10075998]	
Contact Code-Owners	info@assosoftware.it				
Monitoring Body	Website under construction		Accreditation Decision of Monitoring Bodies by the concerned DPA	Decision [10075998]	
Public Register					

5.2.5 The Netherlands

5.2.5.1 Code of Conduct for Smart Grid Management

This Code of Conduct applies to the processing of personal data by grid operators. It interlinks GDPR with the Electricity Act 1998 and the Gas Act. The Code of Conduct addresses the processing of metering data for grid management purposes and the corresponding obligations under GDPR particularly regarding the legal basis for processing and transparency obligations towards data subjects.

[Download Code](#)

CompSA	Dutch Data Protection Authority (Autoriteit Persoonsgegevens)		Version / Approval date	<i>April 19, 2022</i>	
Member State	NL	Language	Dutch	Website Code (if a dedicated website exists)	Netbeheer Nederland - Code of Conduct
Code-Owners	Netbeheer Nederland		Register CompSA	Register of approved Codes of Conduct (Dutch DPA)	
Website Code-Owners	Netbeheer Nederland		Approval Decision by the concerned DPA	Staatscourant - z2021-00382	
Contact Code-Owners	secretariaat@netbeheernederland.nl				
Monitoring Body	Netbeheer Nederland v		Accreditation Decision of Monitoring Bodies by the concerned DPA	Staatscourant - z2021-00382	
Public Register					

5.2.5.2 Code of Conduct - Data Pro Code

The Data Pro Code applies to data processing activities by data processors. Essential elements are the obligatory completion of the Data Pro Statement, where data processors explain how they comply with GDPR and Standard Clauses. The Data Pro Statement, along with Standard Clauses for processing, forms a processor agreement.

[Download Code](#)

CompSA	Dutch Data Protection Authority (Autoriteit Persoonsgegevens)		Version / Approval date	<i>April 2019 (NL)</i>
Member State	NL	Language	Dutch	Website Code (if a dedicated website exists)
Code-Owners	NLdigital		Register CompSA	Register of approved Codes of Conduct (Dutch DPA)
Website Code-Owners	NL digital		Approval Decision by the concerned DPA	Decision - z2018-11482
Contact Code-Owners	info@nldigital.nl			
Monitoring Body	SCOPE Europe srl		Accreditation Decision of Monitoring Bodies by the concerned DPA	Decision - z2018-11482
Public Register	Public Register			

5.2.5.3 Code of Conduct regarding access policies of ISPS companies

The Code of Conduct governs the processing of personal data by International Ship and Port Facility Security (ISPS) companies. It ensures compliance with the GDPR and provides measurable rules to demonstrate compliance. Port security firms play a crucial role in implementing access policies for ISPS companies. Authorities such as mayors and port authorities oversee ISPS compliance, while customs and police have interests in secure access policies. The Code of Conduct ultimately aims to protect personal data and enhance overall security within port facilities by interlinking different and highly regulated applicable legal requirements.

[Download Code](#)

CompSA	Dutch Data Protection Authority (Autoriteit Persoonsgegevens)		Version / Approval date
Member State	NL	Language	Dutch
Code-Owners	Port Privacy B.V.		Register CompSA
Website Code-Owners	Port Privacy		Approval Decision by the concerned DPA
Contact Code-Owners	info@portprivacy.com		Register of approved Codes of Conduct (Dutch DPA)
Monitoring Body	pending ³⁰		Staatscourant - z2019-21352
Public Register			Accreditation Decision of Monitoring Bodies by the concerned DPA
			pending ³¹

³⁰ Status: Jan 27th, 2025.

³¹ Status: Jan 27th, 2025.

5.2.6 Poland

5.2.6.1 Code of Conduct for the Healthcare Sector

The Code of Conduct outlines key principles and regulations for processing personal data in the healthcare sector, emphasizing the responsibilities of healthcare providers in ensuring data security and protecting patient rights in compliance with GDPR. It covers the legal basis for processing patients' personal data, including cases that require or do not require patient's consent. Specific guidelines are provided for the storage, access, and sharing of medical records while maintaining confidentiality. This comes along with good practices for technical and organisational measures and emergency disclosures.

[Download Code](#)

CompSA	Polish Personal Data Protection Office (UODO)		Version / Approval date	<i>December 11, 2023</i>
Member State	PL	Language	PL	Website Code (if a dedicated website exists)
Code-Owners	Polish Federation of Hospitals (PFSz)		Register CompSA	Register of approved Codes of Conduct (UODO)
Website Code-Owners	PFSz		Approval Decision by the concerned DPA	Approval Decision - UODU ³²
Contact Code-Owners	Contact			
Monitoring Body	Global Organization of Independent Professional Services Companies (KPMG)		Accreditation Decision of Monitoring Bodies by the concerned DPA	Accreditation decision - UODU ³³
Public Register				

³² The approval decision is not publicly available, neither a case number. The press release by the CompSA appears the closest match. To access the official documents, you may have to reach out to the CompSA individually.

³³ The accreditation decision is not publicly available, neither a case number. The press release by the CompSA appears the closest match. To access the official documents, you may have to reach out to the CompSA individually. Additionally, UODO maintains a [Public Register of accredited Monitoring Bodies](#).

5.2.6.2 Code of Conduct concerning the Protection of Personal Data Processed in Small Medical Facilities

The Code of Conduct establishes guidelines for protecting personal data within the healthcare sector. It defines the roles and responsibilities of data controllers and processors to ensure accountability and transparency in all processing activities.

[Download Code](#)

CompSA	Polish Personal Data Protection Office (UODO)		Version / Approval date	December 14, 2022	
Member State	PL	Language	PL	Website Code (if a dedicated website exists)	Jamano – Code of Conduct
Code-Owners	Federation of the Healthcare Employers' Unions Zielona Góra Agreement (FZPOZ)		Register CompSA	Register of approved Codes of Conduct (UODO)	
Website Code-Owners	FZPOZ		Approval Decision by the concerned DPA	Approval Decision - UODO ³⁴	
Contact Code-Owners	biuro.pz@op.pl				
Monitoring Body	Comprehensive Services Provider in the field of Legal Advice and Business Support (Jamano)		Accreditation Decision of Monitoring Bodies by the concerned DPA	Accreditation decision - UODO ³⁵	
Public Register					

³⁴ The approval decision is not publicly available, neither a case number. The press release by the CompSA appears the closest match. To access the official documents, you may have to reach out to the CompSA individually.

³⁵ The accreditation decision is not publicly available, neither a case number. The press release by the CompSA appears the closest match. To access the official documents, you may have to reach out to the CompSA individually. Additionally, UODO maintains a [Public Register of accredited Monitoring Bodies](#).

5.2.7 Slovakia

5.2.7.1 Code of Conduct for Processing of Personal Data by Lawyers

The Code of Conduct outlines principles for the processing of personal data by lawyers. It emphasizes that lawyers, acting as data controllers, must ensure compliance with GDPR when processing clients' personal data, including obtaining consent where necessary. Special provisions are made for data processing related to legal obligations, such as representing clients in court. Additionally, the document recognizes the role of lawyers in preventing and reporting illegal activities, which also involves processing personal data and advises law firms to establish clear internal policies for data processing to ensure that all employees comply with privacy standards.

[Download Code](#)

[Download Code \(English Version\)](#)

CompSA	Slovak Office for Personal Data Protection (Úrad na ochranu osobných údajov)		Version / Approval date	<i>December 4, 2018</i>
Member State	SK	Language	SK	Website Code (if a dedicated website exists)
Code-Owners	The Slovak Bar Association (SAK)		Register CompSA	Register of approved Codes of Conduct (SOPDP)
Website Code-Owners	SAK		Approval Decision by the concerned DPA	Decision No 00676/2018-Os-9 ³⁶
Contact Code-Owners	office@sak.sk			
Monitoring Body	SAK		Accreditation Decision of Monitoring Bodies by the concerned DPA	Decision No 00676/2018-Os-9 ³⁷
Public Register				

³⁶ The approval decision is not publicly available, neither a case number. The press release by the CompSA appears the closest match. To access the official documents, you may have to reach out to the CompSA individually.

³⁷ The accreditation decision is not publicly available, neither a case number. The press release by the CompSA appears the closest match. To access the official documents, you may have to reach out to the CompSA individually.

5.2.8 Spain – Spain

5.2.8.1 Code of Conduct for data processing in advertising activities

The Code of Conduct governs the processing of personal data for advertising purposes, including commercial communications, promotions, the use of cookies for behavioural advertising, and profiling for advertising. It also establishes procedures for resolving data protection disputes between entities and data subjects by means of arbitration.

[Download Code](#)

[Download Code \(English Version\)](#)

CompSA	Spanish Data Protection Agency (AEPD)		Version / Approval date	<i>Version of October 10, 2023 / October 09, 2020</i>
Member State	ES	Language	ES	Website Code (if a dedicated website exists)
Code-Owners	Association for the Self-Regulation of Commercial Communication (AUTOCONTROL)		Register CompSA	Register of approved Codes of Conduct (AEPD)
Website Code-Owners	AUTOCONTROL		Approval Decision by the concerned DPA	Decision N° CC/0004/2018 Modified Approval Decision N° CC/0004/2018 of the 10 October, 2023
Contact Code-Owners	autocontrol@autocontrol.es			
Monitoring Body	Jurado de la Publicidad de AUTOCONTROL ³⁸		Accreditation Decision of Monitoring Bodies by the concerned DPA	Decision N° CC/0004/2018
Public Register	Public Register			

³⁸ Click [here](#) for further information

5.2.8.2 Code of Conduct regarding Clinical Trials and Other Clinical Research and Pharmacovigilance Activities

This Code of Conduct addresses marketing authorisation holders, their representatives, and other clinical study sponsors regarding the processing of personal data of clinical trial subjects, patients, and healthcare professionals. It applies to activities related to clinical research and pharmacovigilance obligations as defined by relevant laws and regulations (*leges speciales*).

[Download Code](#)

[Download Code \(English Version\)](#)

CompSA	Spanish Data Protection Agency (AEPD)		Version / Approval date	<i>February 10, 2022</i>	
Member State	ES	Language	ES	Website Code (if a dedicated website exists)	Farmaindustria - Code of Conduct
Code-Owners	Farmaindustria		Register CompSA	Register of approved Codes of Conduct (AEPD)	
Website Code-Owners	Farmaindustria		Approval Decision by the concerned DPA	Decision N° CC/0007/2019	
Contact Code-Owners	prensa@farmaindustria.es				
Monitoring Body	Governing Body (OGCC)		Accreditation Decision of Monitoring Bodies by the concerned DPA	Decision N° CC/0007/2019	
Public Register	Public Register				

5.2.8.3 Code of Conduct regarding common information systems of the insurance industry

The Code of Conduct governs the operation of three Information Systems: The Historical Information System for Automobile Insurance (SIHSA); the Total Loss, Theft and Fire Vehicle Information System (SIAPTRI); and the Fraud Prevention Information System in Various Branches of Insurance (SIPFSRD). It interlinks GDPR, the Organic Law on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD) and the Law 20/2015, of July 14, on the regulation, supervision and solvency of insurance and reinsurance entities (LOSSEAR) in the management of these systems.

[Download Code](#)

CompSA	Spanish Data Protection Agency (AEPD)		Version / Approval date	<i>June 29, 2022</i>	
Member State	ES	Language	ES	Website Code (if a dedicated website exists)	UNESPA - Code of Conduct
Code-Owners	Spanish Union of Insurance Entities (UNESPA)		Register CompSA	Register of approved Codes of Conduct (AEPD)	
Website Code-Owners	UNESPA		Approval Decision by the concerned DPA	Decision N° CC/0012/2019	
Contact Code-Owners	comunicacion@unespa.es				
Monitoring Body	Control Body (OCCC)		Accreditation Decision of Monitoring Bodies by the concerned DPA	Decision N° CC/0012/2019	
Public Register	Public Register				

5.2.8.4 Code of Conduct for the resolution of data protection disputes in the electronic communications industry

The Code of Conduct addresses arbitration procedures regarding disputes between member entities and interested parties in relation to the processing of personal data. This procedure applies to claims regarding the processing of personal data, such as the lack of legitimacy in improper billing after a service interruption or the non-compliance with data subject rights such as access, rectification or deletion of data. It also includes cases of inaccuracy in unrectified data, improper transfer of debts, and processing of data without authorization, as well as the improper inclusion of data in credit systems, improper queries in these systems, and deletion of data of deceased persons.

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CompSA	Spanish Data Protection Agency (AEPD)		Version / Approval date	October 17, 2024
Member State	ES	Language	ES	Website Code (if a dedicated website exists)
Code-Owners	Grupo Orange Grupo Telefónica Grupo Vodafone Grupo Más Móvil		Register CompSA	Register of approved Codes of Conduct (AEPD)
Website Code-Owners	Orange Telefónica Vodafone Más Móvil		Approval Decision by the concerned DPA	Decision N° CC/0001/2024
Contact Code-Owners	Please refer to the individual contact option per individual member of code-owners.			
Monitoring Body	Jurado de la Publicidad de AUTOCONTROL ³⁹		Accreditation Decision of Monitoring Bodies by the concerned DPA	Decision N° CC/0001/2024
Public Register	not available			

³⁹ Click [here](#) for further information

5.2.9 Spain – Catalonia

5.2.9.1 Code of Conduct for the processing of personal data in the field of social care

The Code of Conduct establishes a common framework for applying data protection in the field of social care. It defines measures and guidelines for data controllers and processors in the provision of social care services. It includes telecare, home help, day, night or residential services, guardianship, curatorship, and social or labour integration. It also covers scientific or technical entities that carry out research, training, studies and evaluations related to current and future social care needs. It applies to providers of auxiliary services, such as logistics, information storage or technical support, when they process personal data on a delegated basis.

[Download Code](#)

CompSA	Catalan Data Protection Authority (APDCAT)		Version / Approval date	December 12, 2022	
Member State	ES	Language	CAT	Website Code (if a dedicated website exists)	CSC – Code of Conduct
Code-Owners	Health and Social Consortium of Catalonia (CSC)		Register CompSA	Register of approved Codes of Conduct (APDCAT)	
Website Code-Owners	CSC		Approval Decision by the concerned DPA	CC 1/2021 quater	
Contact Code-Owners	consorci@consorci.org				
Monitoring Body	Monitoring Body - CSC		Accreditation Decision of Monitoring Bodies by the concerned DPA	CC 1/2021 quater	
Public Register					

5.2.9.2 Code of Conduct for the processing of personal data in healthcare

The Code of Conduct establishes a common framework for the protection of personal data in healthcare. Its application covers healthcare, medical and health research activities. Eligible entities to adhere include hospitals, primary care centres, diagnostic services, occupational health services and scientific or technical service providers. It also extends to auxiliary entities that offer logistical, technological or information storage services for the Catalan healthcare system.

[Download Code](#)

[Download Code \(Spanish Version\)](#)

CompSA	Catalan Data Protection Authority (APDCAT)		Version / Approval date	<i>December 22, 2020</i>	
Member State	ES	Language	CAT	Website Code (if a dedicated website exists)	CSC – Code of Conduct
Code-Owners	Health and Social Consortium of Catalonia (CSC)		Register CompSA	Register of approved Codes of Conduct (APDCAT)	
Website Code-Owners	(CSC)		Approval Decision by the concerned DPA	Decision CC 1/2020	
Contact Code-Owners	consorci@consorci.org				
Monitoring Body	Monitoring Body - CSC		Accreditation Decision of Monitoring Bodies by the concerned DPA	Decision CC 1/2020	
Public Register					



5.3 Supervisory Authorities with neither national nor transnational Codes of Conduct

5.3.1.1 Bulgaria

No Codes of Conduct

5.3.1.2 Croatia

No Codes of Conduct

5.3.1.3 Cyprus

No Codes of Conduct

5.3.1.4 Czech Republic

No Codes of Conduct

5.3.1.5 Denmark

No Codes of Conduct

5.3.1.6 Estonia

No Codes of Conduct

5.3.1.7 Finland

No Codes of Conduct

5.3.1.8 Greece

No codes of Conduct

5.3.1.9 Hungary

No codes of Conduct

5.3.1.10 Ireland

No codes of Conduct

5.3.1.11 Latvia

No codes of Conduct

5.3.1.12 Lithuania

No codes of Conduct

5.3.1.13 Luxemburg

No codes of Conduct

5.3.1.14 Malta

No codes of Conduct

5.3.1.15 Portugal

Status unclear

5.3.1.16 Romania

No codes of Conduct

5.3.1.17 Slovenia

No codes of Conduct

5.3.1.18 Sweden

No codes of Conduct

6 About Selbstregulierung Informationswirtschaft and its ecosystem

Selbstregulierung Informationswirtschaft e.V. (SRIW)⁴⁰ is a non-profit association with European focus.

Ever since its establishment in 2011 and as the primary of a pan-European ecosystem, SRIW assembled first-hand experiences in the establishment of trusted self- and co-regulatory instruments in the information economy. Additionally, the association benefits from its independent subsidiaries across Europe and its diverse and constantly growing membership.

The everyday business of the association centres on harmonising industry practices with social demands and political requirements. The mechanism considered fit for purpose is balanced and monitored self- and co-regulatory frameworks facilitating effective data and consumer protection. SRIW strives to collect and amplify valuable experiences to improve the necessary and independent structures required for the development, approval and monitoring of Codes of Conduct. By actively connecting experts and bringing together interested stakeholders, SRIW serves as a forum for exchange and discussions, providing the impetus for kicking-off frontrunner initiatives.

The ecosystem includes SCOPE Europe srl⁴¹, most probably Europe's leading independent Monitoring Body. SRIW's subsidiary became known in supporting the first officially approved transnational Code of Conduct, i.e. EU Data Protection Code of Conduct for Cloud Service Providers, and becoming the first ever accredited transnational Monitoring Body as well as the first Monitoring Body which was accredited by more than one data protection supervisory authority and for more than one Code of Conduct.

⁴⁰ <https://sriw.de>

⁴¹ <https://scope-europe.eu>



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