

To: CRABIT Emmanuel (JUST); TALKO Wojtek (CAB-JOUROVA)

Cc: [REDACTED]

Subject: Flash - meeting with COMECE data protection expert meeting (21 May 2019)

At the request of COMECE (Commission of the Episcopates of the European Union), JUST.C3 [REDACTED] participated today (21 May) to a meeting with their data protection experts. JUST.C3 provided an overview on the state-of-play one year after entering into application of the GDPR. Data protection experts of COMECE subsequently asked a list of questions on specific data protection issues. In particular, they asked for the reasons and background of the provision of existing data protection rules by churches (Article 91 GDPR), on the reconciliation of freedom of religion with the right to data protection, the exercise of the right to be forgotten in the specific church context (e.g. as regards baptism registers), and the objective to reach a harmonised standard of respect to the status of churches across Member States.

While we could provide some elements of response, we stressed the importance for COMECE members to speak to their respective DPAs. COMECE was grateful for this exchange of views and Commission's openness to maintain bilateral contacts.