

Tórshavn Declaration

On 21-22 May 2025, the Nordic Data Protection Authorities from Denmark, the Faroe Islands, Finland, Iceland, Norway, Sweden and Åland met in Tórshavn for their annual Nordic Data Protection Meeting.

Following insightful discussions regarding complaints handling and the exploration of shared challenges, the Nordic DPAs agreed to further strengthen the cooperation initiated at the Nordic Meeting in Helsinki in 2022. This includes collaboration on how to handle and investigate an increasing number of complaints diligently and efficiently, while continuing to fulfil the DPAs' various other obligations. The Nordic DPAs welcome the developments taking place in Finland to extend the use of administrative fines towards the public sector. The Nordic DPAs call for similar developments in the Faroe Islands and Åland.

The Nordic DPAs discussed the possibility of developing specific guidelines related to security and technical implementation across the Nordic countries and agreed to continue exploring whether such guidelines could be applied across national borders. The DPAs also expressed an intention to initiate collaborating with relevant authorities to establish joint guidelines for compliance with applicable IT-security regulations, standards and practices. Furthermore, the Nordic DPAs will continue their cooperation in developing common objective criteria for assessing data breaches, with the aim of ensuring a consistent and coherent approach.

The Nordic countries are at different stages of implementing the EU's digital package. The Nordic DPAs are committed to striving for a well-functioning and efficient collaboration in the digital landscape. It is important that the DPAs are given a clear mandate and sufficient resources to take part in partnerships as well as sufficient resources to be able to carry out new, as well as existing, tasks stemming from the digital package. This is especially important since many of the DPAs experience obstacles in carrying out current tasks and caseload.

The Nordic DPAs shared information and exchanged experiences on case handling, certification and codes of conduct, new technologies and sandboxes as well as cloud solutions. The DPAs underscored the importance of ensuring that data processing agreements with cloud service providers comply with the GDPR.

Among other points, the Nordic DPAs agreed on the following:

- To continue their close cooperation in pursuit of the shared ambition to strengthen the protection of children's personal data.
- To exchange knowledge and experiences regarding AI tools used for law enforcement purposes, in order to ensure the compliant yet effective use of personal data in that context. The DPAs agreed to strengthen collaboration in this area, as new tools are continually being developed and adopted by law enforcement authorities.
- To continue to work together to identify and promote best practices in relation to cross-border case handling and to prepare for the upcoming Regulation on Procedural Rules.

- To establish a common baseline for data security, as the Nordic DPAs face similar challenges in cases involving hacking and related data security issues.
- To share more information and experiences on certification and codes of conduct since this is not widely used in the Nordic countries. The Nordic DPAs also decided to look at our already developed guidance material to see if it can be further improved, and among others highlight the benefits of certification and codes of conduct.
- To share information on compliant communication tools in relation to guidance material as well as creating a network for the DPAs' communication employees.

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