



Weinhold Legal

Digital Legal Update

SUMMER 2026

Below, we bring you the latest updates from the digital sector. Should you have any questions regarding the matters outlined below, please do not hesitate to contact us.

Contents

- ▶ [Implementing regulations to the Critical Infrastructure Act](#)
- ▶ [GDPR updates](#)
- ▶ [Digital Omnibus: changes to the AI Act](#)
- ▶ [EUDR: new supporting documents and proposed amendments to the list of products](#)
- ▶ [The EU has adopted its 20th sanctions package against Russia](#)
- ▶ [PPWR: new EU Packaging Regulation](#)
- ▶ [New EU Anti-Corruption Directive](#)

Implementing regulations to the Critical Infrastructure Act

The new Critical Infrastructure Act has already been effective since 19 August 2025, but its practical application is still being hampered by the absence of implementing regulations. The key regulation is, in particular, the Government Regulation that is to determine the essential services and significance criteria — i.e. to define which entities will actually fall within the new regime.

Given that the transitional provision of the Critical Infrastructure Act, under which existing critical infrastructure entities fulfil their obligations pursuant to the previous legal framework, will expire on 17 July 2026, it is necessary to adopt the implementing regulations as soon as possible.

The following are currently in the legislative process:

1. **Government Regulation on essential services and significance criteria;** and
2. **Decree on the Critical Infrastructure Portal**

By contrast, the **Decree on the resilience plan, risk assessment, measures to ensure the resilience of critical infrastructure entities and incident reporting** has already been published in the Collection of Laws under No. 122/2026. It will become effective on **1 August 2026**.

Our previous summaries of the new Critical Infrastructure Act are available [here](#) and [here](#).

GDPR updates

EDPB adopted guidelines on the processing of personal data for scientific research for public consultation

In April 2026, the EDPB adopted Guidelines 1/2026 on the processing of personal data for scientific research for public consultation. The public consultation ran from 16 April to 25 June 2026, and the final version of the guidelines can be expected only after the comments have been assessed. The guidelines address, among other things, the definition of scientific research and the compatibility of further processing of personal data for research purposes. They also deal with the choice of an appropriate legal basis and the requirements for consent to the processing of personal data in a research context. They further address the allocation of roles between controllers and processors, the exercise of data subjects' rights and appropriate safeguards. These safeguards include, in particular, anonymisation and pseudonymisation.



Weinhold Legal

Digital Legal Update

SUMMER 2026

EDPB adopted a Data Protection Impact Assessment template for public consultation

On 14 April 2026, the EDPB adopted a Data Protection Impact Assessment template, the so-called DPIA Template, for public consultation. The template is not mandatory. However, it is intended to contribute to the harmonisation and better structuring of DPIAs across the EU. Once the consultation has been assessed, it should serve as a basic template with which national templates of supervisory authorities will be compatible. The public consultation ran until 9 June 2026.

EDPB adopted a common personal data breach notification template for public consultation

On 10 June 2026, the EDPB adopted a common template for notifying personal data breaches under Article 33 GDPR for public consultation. The aim is to harmonise and simplify the notification of security incidents to supervisory authorities across the EU. The template contains pre-prepared options and explanations for completing it. The public consultation runs until 5 August 2026.

The Czech Data Protection Authority and biometric identification at stadiums: a security purpose alone is not sufficient

On 20 May 2026, the Czech Data Protection Authority published its opinion on the use of camera systems with elements of biometric identification at football stadiums. The situation addressed concerned the use of technologies that would make it possible to identify undesirable persons and prevent them from entering a stadium. In this context, the Czech Data Protection Authority distinguished between ordinary camera recordings, which are assessed under Article 6 GDPR, and biometric identification, which involves the processing of a special category of personal data under

Article 9 GDPR.

The main conclusion of the Czech Data Protection Authority is that a general reference to security, protection of property or prevention of unlawful conduct is not sufficient for the deployment of biometric identification. Such processing requires an appropriate legal basis under Article 9(2) GDPR. This basis must be sufficiently specific, proportionate to the objective pursued and must include safeguards to protect the rights of the persons concerned.

CJEU on the use of evidence obtained in breach of GDPR

In its judgment of 18 June 2026 in Case C-484/24, NTH Haustechnik, the CJEU dealt with the question of whether a national court may, in civil or employment-law proceedings, use evidence containing personal data if such data may have been obtained unlawfully by one of the parties. The dispute concerned a former employee against whom the employer brought a claim for damages in connection with the alleged sale of company property via a private account on the eBay platform. The employer obtained the information by accessing her private account, while the referring court did not rule out that the acquisition of the data may have been in breach of GDPR.

The CJEU held that GDPR does not, in itself, prevent a national court from using evidence containing personal data merely because the data had previously been obtained in breach of the right to privacy or personal data protection. There is therefore no automatic prohibition on using such evidence. However, the court must have its own legal basis for processing the data and must comply with the principle of data minimisation. Before disclosing the data to the parties or to third parties, it must verify whether the data are limited to what is necessary and, where appropriate, adopt



Weinhold Legal

Digital Legal Update

SUMMER 2026

measures to reduce the interference with the rights of the persons concerned, such as anonymisation or pseudonymisation. The CJEU also emphasised that Article 17(3)(e) GDPR, i.e. the exception from the right to erasure for the establishment, exercise or defence of legal claims, is not an independent legal basis for the processing of personal data.

Proposed GDPR amendments under the Digital Omnibus

Unlike the part of the Digital Omnibus concerning the AI Act, which is discussed below and is already awaiting publication in the Official Journal of the EU, **the GDPR-related amendments have not yet been adopted**. They remain a legislative proposal of the European Commission, which is being discussed under the ordinary legislative procedure under number 2025/0360(COD).

The Digital Omnibus significantly affects GDPR. The European Commission's proposal provides for targeted amendments intended to simplify compliance with certain personal data protection obligations and to better align them with other digital regulation. This concerns, in particular, the definition of personal data and pseudonymised data, the use of personal data in the development and operation of AI systems, cookie rules, data protection impact assessments and personal data breach notifications. As regards incidents, the proposal aims in particular to raise the threshold for notification to supervisory authorities so that only cases likely to result in a high risk would be notified, and to extend the notification deadline from 72 to 96 hours.

From the personal data protection perspective, however, the proposal is controversial. While the EDPB and EDPS support the simplification of the administrative burden and greater harmonisation, they also strongly criticise,

in particular, the proposed changes to the definition of personal data and the regime for pseudonymisation. According to the EDPB and EDPS, these changes could disproportionately narrow the material scope of GDPR and weaken the level of protection afforded to data subjects. At this stage, therefore, this is not an effective change to the rules, but a legislative proposal whose further development should be monitored, especially in projects involving AI, data sharing, anonymisation/pseudonymisation, cookies and incident reporting.

Digital Omnibus: changes to the AI Act

The Council of the EU has approved a new regulation under the Digital Omnibus package, which aims to simplify certain rules under the AI Act. Publication in the Official Journal of the EU is now awaited. The Regulation will enter into force on the third day following its publication.

Specific changes:

1. Postponement of the rules for high-risk AI systems

The rules for high-risk AI systems were originally scheduled to apply from 2 August 2026. Newly, they will apply only from:

- 2 December 2027 for stand-alone high-risk AI systems;
- 2 August 2028 for high-risk AI systems embedded in products.

2. New prohibitions of AI practices

From 2 December 2026, AI systems that create sexual or intimate content without consent, including so-called "nudification" tools, are to be prohibited.



Weinhold Legal

Digital Legal Update

SUMMER 2026

3. Regulatory sandboxes

The deadline for establishing national regulatory sandboxes for AI is postponed until 2 August 2027.

4. Transparency of AI-generated content

The new deadline for introducing measures ensuring the transparency of AI-generated content is set at 2 December 2026.

EUDR: new supporting documents and proposed amendments to the list of products

In May 2026, the European Commission published a new package of documents relating to the implementation of the EUDR, which includes:

- a report assessing the simplifications introduced so far,
- updated interpretative materials, including FAQs; and
- a draft delegated regulation amending the list of relevant products subject to the EUDR. Certain products should be excluded from the scope of the EUDR, such as leather, while others should be added, such as instant coffee.

At the same time, the Commission continues to adjust the EUDR information system, which is intended to be used for submitting due diligence statements and simplified statements.

Importantly, the application of the EUDR remains unchanged. The obligations will generally apply:

- from **30 December 2026** for large and medium-

sized enterprises;

- from **30 June 2027** for micro and small enterprises.

The EU has adopted its 20th sanctions package against Russia

On 23 April 2026, the European Union adopted its 20th package of sanctions against Russia. The new package targets in particular revenues from the energy sector, trade and financial services, including crypto-assets.

The main measures include, in particular:

1. **expanding the sanctions lists** by adding 120 further individual listings, covering both legal and natural persons;
2. **restricting Russian revenues from the energy sector by**
 - extending the ban on access to ports and the ban on providing selected services related to maritime transport to additional vessels, including tankers from non-EU countries that are part of the shadow fleet circumventing the oil price cap mechanism and supporting Russia's energy sector, or transporting military equipment for Russia or stolen Ukrainian grain;
 - introducing mandatory due diligence in connection with the sale of tankers in order to prevent the expansion of Russia's shadow fleet;



Weinhold Legal

Digital Legal Update

SUMMER 2026

3. restricting financial services and crypto-assets by

- prohibiting transactions with 20 Russian banks and four financial institutions in third countries;
 - prohibiting transactions in cryptocurrencies, including, for example, RUBx, and prohibiting support for the development of the digital rouble;
4. stricter export restrictions against 60 new entities, some of which are located outside Russia, for example in China, Türkiye or the United Arab Emirates;
5. a ban on the export of any computer numerical control machinery or radios to Kyrgyzstan;
6. a further expansion of export bans, including to laboratory glassware, lubricants, chemicals, steel products, industrial tractors and other goods.

At the same time, the European Union is preparing another, more extensive, 21st package of sanctions.

PPWR: new EU Packaging Regulation

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 **on packaging and packaging waste** ("PPWR") has already entered into force, but will generally apply from **12 August 2026**. Individual obligations will, however, phase in gradually.

The PPWR will affect practically all companies that place packaging or packaged products on the EU market. This will typically include packaging manufacturers, manufacturers

of packaged products, companies selling products under their own brand, importers, distributors and e-shops. In addition, a number of companies may have several roles at the same time.

What should companies gradually do?

1. Map packaging

Prepare an overview of all packaging used, broken down by material, type, supplier and purpose of use.

2. Request data from suppliers

Obtain information on the composition of packaging, recyclability, recycled content and, in the case of packaging intended to come into contact with food, also on PFAS.

3. Prepare documentation

Set up technical documentation and supporting materials to demonstrate compliance with the PPWR.

4. Reporting

Verify registrations, reporting obligations and responsibility for packaging in individual Member States.

5. Review contracts

Amend contracts with suppliers, distributors and logistics partners so that it is clear who is responsible for data, documentation and compliance of packaging with the PPWR.

The Commission is also required to adopt, by 12 August 2026, an implementing regulation on harmonised labels and digital marking of packaging, including a methodology for identifying material composition.



Weinhold Legal

Digital

Legal Update

SUMMER 2026

New EU Anti-Corruption Directive

On 29 April 2026, the new Directive No. 2026/1021 on combating corruption was adopted. Member States must transpose it into national law by 1 June 2028.

The Directive introduces a common minimum framework for defining corruption offences across the EU. It covers, in particular, bribery in both the public and private sectors, misappropriation, trading in influence, obstruction of justice, enrichment from corruption offences and concealment of proceeds of corruption.

For companies, the **tightening** of liability of legal persons is particularly important. Liability will not be based solely on the conduct of members of management or persons authorised to act on behalf of the company. The Directive also covers situations where the commission of a corruption offence was made possible by a lack of supervision or control by persons in leading positions.

Sanctions may be significant. For the most serious offences, Member States must make it possible to impose a fine of up to 5% of the worldwide turnover of the legal person or EUR 40 million.

At the same time, the Directive expressly provides that effective internal controls, ethical rules and **compliance programmes** may be taken into account as a mitigating circumstance when sanctioning legal persons. The same applies to the prompt voluntary reporting of the offence to the competent authorities and the adoption of remedial measures.

The information contained in this bulletin is presented based on our best beliefs and knowledge at the time this text was sent to press. However, specific information relating to the topics covered in this bulletin should be consulted before any decisions are made based on it. The information contained in this bulletin should not be construed as an exhaustive description of the relevant issues and all possible consequences, and should not be relied upon in any decision-making process or considered a substitute for specific legal advice relevant to the particular circumstances. Weinhold Legal, s.r.o. law firm and any lawyer listed as the author of this information are not liable for any damage that may arise from reliance on the information published here. We would also like to note that there may be different legal opinions on some of the issues discussed in this bulletin due to the ambiguity of the relevant provisions, and that in the future, an interpretation other than the one we have presented may prevail.

For further information, please contact the partner/manager with whom you are usually in contact.

Automatic extraction of texts and data, as well as reproduction or extraction of their content for the purposes of automated analysis from this information material, is permitted within the meaning of Article 4 of Directive 2019/ 790/EU and Section 39c of Act No. 121/2000 Coll., the Copyright Act, is permitted if the authorship of Weinhold Legal, s.r.o. law firm is indicated, together with a reference to the location of such text and data.



Martin Lukáš
Partner
martin.lukas@weinholdlegal.com



Tereza Hošková
Vedoucí advokátka
tereza.hoskova@weinholdlegal.com



Nikola Faltová
Advokátka
nikola.faltova@weinholdlegal.com



Jana Duchoňová
Advokátka
jana.duchonova@weinholdlegal.com