

Comments of a Polish citizen on the Guidelines on DPOs

The GDPR and the "Guidelines on Data Protection Officers" adopted on 13 December 2016 by the WP29 didn't confirm explicitly, that based on the GDPR one person could work as a DPO in more than one organization (which are unrelated to each other) .

If the article 37(2) of the GDPR introduces only as an exception the possibility to establish one DPO by the "group of undertakings" (provided that a DPO is easily accessible for each and every one of institution), does it mean, that the GDPR introduces a rule, that means, that one person could be set up as a DPO only in one institution?

If (after the adoption of the GDPR) it will be allowed for the same person to be set up as DPO in more than one organization (that are unrelated to each other), is WP29 able to indicate the limit of the institution for which the same person may be set up as a DPO. If not, will at least the criteria, that will have to be fulfilled when one person will be set up as a DPO in more than one (unrelated) institution/organizations/companies (eg. in relation to specific sectors or industries) be define?