



FIZnews

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EDPB Guidelines on the Processing of Personal Data for Scientific Research: FIZ Karlsruhe Supports International Response

Karlsruhe, July 22, 2026 — On 15 April 2026, the European Data Protection Board (EDPB) published its Guidelines on the processing of personal data for scientific research purposes. The aim of the Guidelines is to explain and clarify the application of the research privilege under the General Data Protection Regulation (GDPR) in the context of today's diverse and complex research landscape.

The Guidelines focus exclusively on the provisions of the GDPR. National legislation through which Member States may supplement or specify the GDPR's research provisions – such as Section 27 of the German Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG) – is not addressed.

As part of a public consultation, stakeholders were invited to submit comments on the Guidelines between 16 April and 25 June 2026. An international group of researchers from the COST Action Improving Neuroimaging Data for Sharing took this opportunity to provide a joint response.

In their submission, the researchers highlight the wide variety of data processing scenarios across different scientific disciplines. They recommend that the Guidelines clearly distinguish between mandatory legal requirements, recommended best practices, and specific safeguards applicable to individual research scenarios. They also call for avoiding unnecessary duplication of data protection assessments. Furthermore, they express concern that the criteria



proposed by the EDPB for determining what constitutes scientific research under data protection law could interfere with the fundamental freedom of science and research.

The response was supported through digital endorsements by numerous researchers from several EU Member States. Among the signatories is our FIZ Karlsruhe colleague Patrick Brunner.

The EDPB Guidelines are available in English: (https://www.edpb.europa.eu/public-consultations/guidelines-12026-on-processing-of-personal-data-for-scientific-research_en?page=3). The statement from the COST Action 'Improving Neuroimaging Data for Sharing' is also publicly available (https://www.edpb.europa.eu/system/files/consultation_feedback/1495/feedback_1495_edpb_guidelines_1_2026_consultation_response.pdf).

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