Mr Michael McGrath
EU Commissioner for Democracy, Justice,
the Rule of Law and Consumer Protection

Mr António Costa
President of the European Council

Mr Wojciech Wiewiórowski
European Data Protection Supervisor (EDPS)

Ms Anu Talus - Chair
European Data Protection Board (EDPB)

Ms Teresa Anjinho
European Ombudsman

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7 September 2026

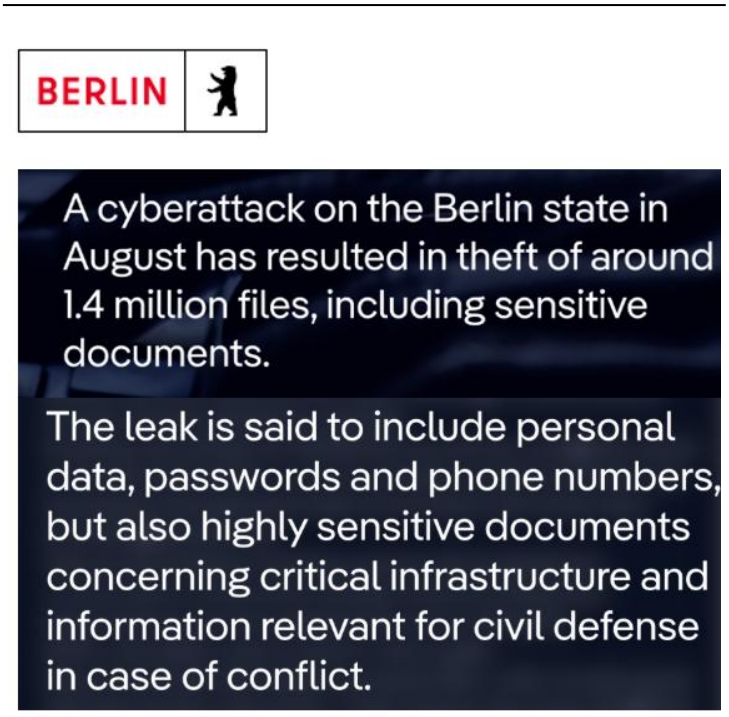
Dear Commissioner, President, Supervisor, Chair and Ombudsman

EU bulk processing of information in the age of AI and cyber-attacks – 4th Addendum

Several serious cyber-attacks against central registers in EU Member States, the French Tax System and warnings from the ECB Chair and the FSB Chair in this letter to the G-20 about the serious threats to global financial stability posed by AI models have led us to write to you repeatedly asking for a temporary suspension of Beneficial Ownership/AEOI systems introduced under EU law and a thorough review of the relevant IT safeguards (see our letters dated 5 August 2026, 6 August , 14 August and 28 August 2026). Since then, there have been additional relevant developments, notably

A CJEU judgment confirming the need to keep personal data on central registers private and subject to safeguards to prevent abuses (C-798/24); and

A serious cyber-attack against the government of Berlin involving 5.79 terabytes (which is the equivalent of 40.4 million pages of digital documents or PDFs), see e.g. here and here.



Incredibly, but perhaps unsurprisingly, we have not received any response, let alone acknowledgment, showing EU institutions unwilling or unable to enforce basic data protection and data security rights guaranteed by the EU Charter and the GDPR.

We do hope that the seriousness of the situation will cause a rethink and lead to a positive engagement with data protection campaigners.

Filippo Noseda
Partner