

Council of the EU (ECO)

Transparency Unit (COMM) – your ref: SGS 24/004664

European Commission (COM)

Michael McGrath – Commissioner

TAXUD. D2; JUST-C1 and C3

European Data Protection Board (EDPB)

Ms Anu Talus – Chair

European Ombudsman (EO)

Teresa Anjinho – Ref. 2193/2025/MIG and 2137/2026

European Parliament -PETI

Dolors Montserrat – Vice-Chair –Ref. 1088/2016

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5 October 2026

GDPR Transparency Debate | Danish State Hack requires urgent action

For almost a decade, we have been raising awareness in relation to the disproportionate data protection and data security implications of several systems of bulk processing of information, including Automatic Exchange of Information and central BO-Registers. In response, the EU has refused to release internal documents and ignored calls for an active dialogue¹.

Today, the Danish government **confirmed** that the personal data of 8.8 million registered citizens has been stolen by hackers who used the credentials of a Danish company with a "legitimate interest" to access the relevant register. Concerns about the risk of abuses of legitimate interest access were previously raised by the President of the **Law Society** in Luxembourg.

The Danish State Hack comes hot on the heels of the theft of the entire database of an EEA Member State, the Hacking of the French Tax System, the French Interior Ministry, the French Ministry of Economy and Finance, a Lithuanian registry, the Berlin State Hack, the FBI and the hacking of the Italian government's secure email system that enabled criminals to pose as government officials and trick Revolut to hand over the files of hundreds of customers to hackers, as discussed in our recent correspondence.

It is time for the EU to address the systemic deficiencies of systems designed over a decade ago, by (1) **releasing** internal documents that show the extent of internal data protection concerns, (2) starting an urgent active dialogue with data protection authorities, **EU FATCA Petitioners** and **data protection campaigners**; and (3) considering a **moratorium** on the introduction of "legitimate interest" mechanisms to access central BO registers.

Filippo Nosedà

Partner

Ministry of Science, Higher
Education and Digital Affairs**Serious hack of Danish
Central Population
Register (8.8m citizens)**

5 October 2026

The Central Population Register (CPR) has identified a serious security incident.

By **misusing a Danish company's** ability to access and search the CPR register based on a **legitimate interest** under section 38 of the CPR Act, unauthorised parties have gained access to names, addresses, identity numbers, etc., of **approximately 8.8 million citizens**.

The Minister for Research, Education and Digitalisation said: "*This is an **extremely serious incident**.*"

¹ See our letters dated **5 August 2025**, **6 August 2026**, **14 August 2026**, **28 August 2026**, **7 September 2026**, **24 September 2026**; and **28 September 2026**; see also EO complaint dated **11 September 2026**.