



## Privacy in Bavaria

News for the Bavarian public sector

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**The Bavarian Data Protection Commissioner, Data protection in AI projects of the Bavarian public administration** [Datenschutz bei KI-Projekten in der bayerischen Verwaltung] • Guidelines; **Integration of a RAG subsystem within an AI system using a language model** [Anbindung eines RAG-Subsystems an ein KI-System mit Sprachmodell] • AI in a nutshell 1; **AI-powered translation tools** [KI-basierte Sprachübersetzungstools] • AI in a nutshell 2; **Using an LLM-powered chatbot** [Einsatz eines LLM-gestützten Chatbots] • AI in a nutshell 3.

<https://www.datenschutz-bayern.de/ki>

**The Bavarian Data Protection Commissioner, Data Protection and the Health Data Use Act** [Datenschutz und Gesundheitsdatennutzungsgesetz] • Guidelines.

[https://www.datenschutz-bayern.de/infothek/OH\\_GDNG.pdf](https://www.datenschutz-bayern.de/infothek/OH_GDNG.pdf)

**The Bavarian Data Protection Commissioner, Redacting documents successfully**

Information note 66.

<https://www.datenschutz-bayern.de/infothek/aki66.pdf>

**EDPB, Annual Report 2025**

[https://www.edpb.europa.eu/our-work-tools/our-documents/annual-report/edpb-annual-report-2025\\_en](https://www.edpb.europa.eu/our-work-tools/our-documents/annual-report/edpb-annual-report-2025_en)

**EDPB, Work Programme 2026–2027**

[https://www.edpb.europa.eu/system/files/2026-02/edpb\\_work-programme\\_2026-2027\\_en.pdf](https://www.edpb.europa.eu/system/files/2026-02/edpb_work-programme_2026-2027_en.pdf)

**European Court of Justice, judgement of 19 March 2026, C-526/24**

Excessive character of (initial) requests for access under Art. 12 (5) GDPR in case of abusive intent (here: claim for damages); on the requirements of Art. 82 (1) GDPR.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62024CJ0526>

**European Court of Justice, judgement of 15 January 2026, C-129/24**

“Applicant” as defined in Directive 2003/4/EC; under Union law, identification of a person by their real name and/or current physical address is not required; possibility of corresponding national regulations in accordance with the principles of equivalence and effectiveness.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62024CJ0129>

**Düsseldorf Administrative Court, judgement of 28 January 2026, 29 K 9469/23**

Art. 15(3) GDPR: On the permissibility of redacting employees' names.

[https://nrwe.justiz.nrw.de/ovgs/vg\\_duesseldorf/j2026/29\\_K\\_9469\\_23\\_Urteil\\_20260128.html](https://nrwe.justiz.nrw.de/ovgs/vg_duesseldorf/j2026/29_K_9469_23_Urteil_20260128.html)

**Stuttgart Higher Regional Court, judgement of 25 February 2026, 4 U 342/25**

Right of access under Art. 15 GDPR vis-à-vis a court-appointed expert, particularly issues of responsibility and the restrictions under Art. 23 GDPR imposed by civil procedure law.

<https://www.landesrecht-bw.de/bsbw/document/NJRE001636951>

**Munich Higher Regional Court, order of 18 February 2026, 34 Wx 36/26 e**

No legitimate interest in accessing the land register under section 12 (1) 1 Land Register Code [Grundbuchordnung] if a prospective buyer intends to use it to first ascertain the proprietor's identity.

<https://www.gesetze-bayern.de/Content/Document/Y-300-Z-BECKRS-B-2026-N-1941>

**The Bavarian Data Protection Commissioner**

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