



EDPB remarks on step-by-step approach to calculate GDPR fines.

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1 the calculation of a fine is no mere mathematical exercise.

2 the circumstances of the specific case are the determining factors leading to the final amount of the fine, which can – in all cases – vary between any minimum amount and the legal maximum.

3 the EDPB emphasises that supervisory authorities are not obliged to follow all steps in this step-by-step approach if they are not applicable in a given case.

4 supervisory authorities remain subject to all procedural obligations under national and EU law, including the duty to state reasons for their decisions and their obligations under the one stop shop mechanism.

5 supervisory authorities are required to provide sufficient reasoning for their findings in accordance with national and EU law.

6 these Guidelines should not be interpreted as requiring the supervisory authority to state the exact starting amount of the fine or quantify the precise impact of each aggravating or mitigating circumstance.

7 mere reference to these Guidelines cannot replace the reasoning to be provided in a specific case to calculate a fine.

8 in certain circumstances the supervisory authority may consider that certain infringements can be punished with a fine of a predetermined, -fixed amount.