



# Privacy First Foundation

## Annual report 2023

June 30, 2024

**your choice**  
**in a free society**

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# 1. Foreword

Before you is Privacy First Foundation's 2023 annual report. In it, we like to look back, but also a little ahead. After all, the social challenges Privacy First deals with are great. Our work has never been easy; the force field in which we operate is too large, too complex and too dynamic for that. For more than 15 years, Privacy First has worked continuously, often like David vs Goliath, to better embed the right to privacy in legislation and technology. Sometimes with setbacks, but often with success. In recent years, we noted these milestones, among others:

- Road pricing via "spy boxes" in cars on hold since 2009.
- Electronic Patient Record (EHR) unanimously rejected by the Dutch Senate in 2011.
- Abolition of fingerprint storage under the Dutch Passport Act in 2011, partly due to pressure from our Passport Trial.
- Due to a lawsuit by Privacy First, motorists have not been required to enter their license plates when parking their cars since 2015.
- In 2015, telecom data retention was abolished in the Netherlands due to a lawsuit by Privacy First in coalition with several other organisations.
- Our referendum campaign contributed to the Dutch population voting against the 'Dagnet Act' in 2018.
- Thanks in part to quiet diplomacy by Privacy First, the Investigatory Powers Commission (TIB) was set up in 2018 to rein in Dutch secret services.
- Since 2018, Privacy First in cooperation with ECP has organized the Dutch Privacy Awards annually during our National Privacy Conference.
- Due to the coalition case with the Dutch Civil Rights Platform against the System Risk Indication (SyRI), SyRI was abolished in 2020 and this judgment has since been considered an international "leading case" on risk profiling of citizens.
- Together with former winners and nominees of our Dutch Privacy Awards, Privacy First established the Privacy Coalition in 2022 to promote privacy-friendly services and products.

None of this would have happened without the support of people like you. Privacy First thanks you deeply for your invaluable contributions and commitment over the past years. Together, we made a difference and will gladly continue to make a difference!

## 2. Vision and policy

Privacy First was established in 2008 as an independent foundation to preserve and promote everyone's right to privacy. Privacy is a universal human right and the basis of our free democracy under the rule of law. Privacy First works hard to protect and promote the right to privacy as much as possible. As a Dutch Public Benefit Institution (ANBI), Privacy First does this in the public interest, either for the entire population or for vulnerable groups. In doing so, Privacy First maintains a broad, principled orientation towards privacy, both as a basis for our free, open society and for everyone's free individual development. Besides privacy, the right to privacy includes the protection of personal data, confidential communications, the right to the home and the right to physical integrity. Moreover, privacy is a precondition for the exercise of numerous other fundamental rights and freedoms.

Our field of vision and activities traditionally extend to both the digital and analogue domains. However, these worlds are becoming increasingly integrated, making the classic 'analogue space' smaller and smaller. Developments in the digital domain are happening at lightning speed. In order to steer this in the right direction, Privacy First has for years been advocating privacy by default and privacy by design: building privacy into technology, in addition to good legislation with solid privacy safeguards. The arrival of the European privacy law GDPR has given us a tailwind in this regard. At the same time, Privacy First always operates in a force field that constantly threatens privacy. Of all human rights, the right to privacy is under the most pressure at this time. Protecting this right is therefore more necessary than ever.

Standing policy of Privacy First is to focus our attention primarily on (imminent) privacy breaches that can affect large groups of people at the same time. In our selection of topics, we are guided by 1) the scale, 2) the severity and 3) the impact and consequences of a given breach. Massive, serious privacy violations are first investigated and publicly named by Privacy First. Privacy First then seeks to remedy the relevant breach through quiet diplomacy and political lobbying, followed by a public campaign, legal action or – as a last resort – litigation. In line with these criteria, Privacy First's focus in the coming years is mainly on mass surveillance, medical privacy, financial privacy, children & privacy (especially in education) and the Internet of Things.

Below, we explain our main activities from 2023, sometimes in the context of previous developments and with a look ahead to 2024. For all of Privacy First's current activities, please refer to our website.

## 3. Projects and events

### 3.1 Dutch Privacy Awards & National Privacy Conference

On 24 January 2024, ECP and Privacy First jointly organised our annual National Privacy Conference for the seventh consecutive time. This is now the annual Dutch privacy event around European Privacy Day. Our goal of this event is to build a privacy-friendly information society together with business, government and science. The conference theme this time was 'privacy in education'. As usual, interest was high: almost two hundred professionals attended the conference location (*De Glazen Zaal* in The Hague). Speakers at the conference included, consecutively, Marjolijn Bonthuis (deputy director ECP), Paul Korremans and Sander Klous (Privacy First board members), Katja Mur (board member of the Dutch Data Protection Authority), Sjoera Nas (senior privacy advisor, Privacy Company), José van Dijck (university professor of media and digital society, Utrecht University), Larissa Zegveld (chairman Forum Standaardisatie), Sabrina van Miltenburg (programme manager digital and safe education, Kennisnet Foundation) and Jaap van der Wel (Dutch Privacy Awards jury chairman). Chairman of the day was presenter Tom Jessen (RTL, BNR).



*From left to right: Sander Klous, Paul Korremans and Tom Jessen during the National Privacy Conference, 24 January 2024.*

As a concluding part of the conference, Privacy First presented our annual Dutch Privacy Awards. During the summer and autumn of 2023, Privacy First received numerous high-quality submissions for these Awards. Reviews and discussions with all entrants by our independent Awards jury took place during the winter of 2023. The nominees were BlueGen.ai (synthetic data as an alternative to personal data), Databoss (card game by Inventive Games for privacy awareness), DIVD (Dutch Institute for Vulnerability Disclosure), Linksight (data collaboration with privacy by design), Oasis Now (privacy-friendly clinical trials), Privacy Simulation (game by ICTRecht about data breaches and crisis situations), Proofme ID (platform for digital identification and transactions), Publiek Vervoer Groningen Drenthe (privacy-friendly analysis of travel behaviour) and Jet-Stream (streaming service with anonymised data for contextualised advertisements).



During the conference, all nominees presented their projects to the audience through Award video pitches.

Privacy Simulation, Jet-Stream and Public Transport Groningen Drenthe were then declared winners by the jury. In addition, the Incentive

Award went to Oasys Now.

The jury of the 2023 Dutch Privacy Awards consisted of the following experts:

- Jaap van der Wel (jury chairman)
- Mabel de Vries
- Erik Bruinsma
- Magdalena Magala
- Mathieu Paapst
- Rion Rijker
- Sanne van de Velde
- Koen Versmissen
- Walter van Wijk.

The 2023-2024 Dutch Privacy Awards were co-sponsored by Molenaar & Plasman Solutions. The conference can largely be looked back at <https://vimeo.com/914788414>. In early 2024, our Privacy Awards website was completely revamped and has since included an overview of all winners and nominees since 2018: see <https://privacyfirst.nl/en/privacyawards/>.

In early 2025, Privacy First and ECP will again organise this inspiring event. Would your organisation like to become a (media) partner or sponsor? Then get in touch with Privacy First!



## 3.2 Privacy Coalition

In 2022, Privacy First launched the [Privacy Coalition](#) together with a group of winners and nominees of the Dutch Privacy Awards. The main goal of the Privacy Coalition is to create more social awareness about digital privacy and develop privacy-friendly alternatives. To this end, the Privacy Coalition drafted a manifesto that has now been signed by a large number of companies and organisations. In 2023, among other things, the Privacy Coalition



sent a letter to the Dutch Senate to approve the Digital Government Act (Wdo). The Wdo can provide an incentive for privacy-friendly services and more privacy-friendly government procurement policies. Partly at Privacy First's earlier insistence, this law includes a ban on data trading and requirements of *privacy by design* and *open source*. After the 2023 elections, the Privacy Coalition also sent a parallel letter to the cabinet *informatie* and the House of Representatives' Standing Committee on Digital Affairs. In 2024, among other things, the Privacy Coalition hopes to organise a technical briefing for the Dutch Lower House on alternatives to Big Tech.



Several organisations have now offered to facilitate the Privacy Coalition. Would you and your company or organisation like to support the Privacy Coalition's manifesto? [Sign up!](#)

### 3.3 PrivacyWijzer – Internet of Things

In late 2022, Privacy First launched 'PrivacyWijzer' (Privacy Guide), a new multi-year project on the privacy aspects of the Internet of Things. In this "Internet of Things", everything is connected, but is that wise? During 2023, in particular, we investigated the car ("connected car") as a data machine and the impact it may have on everyone's privacy. A series of in-depth articles about this appeared on our website in 2023, some of which generated media attention, enabling Privacy First to reach the wider public. We intend to continue this research in 2024 to cover 'wearables', 'smart home' (e.g. refrigerators, toys) and 'smart cities' (e.g. smart lampposts). With the results, we will actively approach policymakers and politicians. Find out more about this project on <https://privacyfirst.nl/en/privacy-guide/>.



### 3.4 Public debates

Privacy First has been organising periodic critical public debates on topical issues for years. In 2023, we organised a New Year reception with several presentations and public debates on 'the future of privacy' (May 2023, also marking our 15th anniversary), 'privacy in Europe' (September 2023) and the Internet of Things (December 2023). Speakers included. Daniël de Jongh (Privacy First), author Adriaan Bos, Guido Visman (University of Groningen), Arda Gerkens (senator of the Upper House), Marie-José Hoefmans (Schluss), Freek Bomhof (TNO), Tijmen Wisman (Civil Rights Platform), Jan Smits (Eindhoven University of Technology), Eliëtte Vaal (The Data Lawyers), Jona Walk (De Vierde Golf), Ruben Brave (Internet Society Netherlands), Sander Klous (University of Amsterdam), Vivien Butot (Erasmus University), Jurjen Lengkeek (IoT Academy) and Hein Wils (Responsible Sensing Lab). Would you like to stay informed about our public debates? Then sign up for our newsletter via our website!





Flyer public debate "Privacy of the future" 16 May 2023 led by moderator Tom Jessen.

### 3.5 External projects

Privacy First has regularly been asked for advice by organisations and governments in recent years. When the intentions of the organisation concerned are in line with Privacy First's mission, we are happy to contribute. Through our critical involvement in such projects, Privacy First seeks – in the public interest – to positively influence certain social developments and to have privacy safeguarded not only "from the outside" but also "from the inside". In 2023, Privacy First was involved in the following external projects:

1. **Coalition project with Tilburg University:** multi-year project (2020–2024) serving privacy-friendly Blockchain applications for the Dutch national government. Partners include NWO, various ministries, VNG, CJIB, ECP, companies and agencies. Privacy First provides critical input during the project and will organise a public event.
2. **National Police Ethical Focus Group:** since the end of 2021, the director of Privacy First has been appointed by the chief of police as a member of this new National Police Ethical Focus Group. Other external members include those from universities and research institutes.
3. During 2023, Privacy First was consulted by the Dutch **Ministry of Transport** on plans around the possible future introduction of 'Pay by Use' (road pricing).
4. Since early 2024, Privacy First has been actively involved in the development of a **new consortium on 'smart doorbells'**, in which this issue and solutions will be investigated.

Besides Privacy First, several municipalities and agencies are participating in this project.

### **3.6 Other activities**

Privacy First had meetings in 2023 with, among others. The Privacy Collective, Dutch Ministry of Infrastructure and Water Management, Take Back Your Privacy Foundation, 180 Degrees Consulting, SpeakUp, CMS, CryptoCanal, De Vierde Golf, Dutch Data Protection Authority, Ministry of the Interior, Ministry of Justice and Security, National Police, Ministry of Health, Welfare and Sport, Ministry of Finance, Digital Freedom Fund, ECP, Kennedy Van der Laan Attorneys, EDRI, Bits of Freedom, PILP (NJCM), Civil Rights Platform, Human Rights in Finance, AMS Institute, AON, Institute for Information Law (IViR), Boekx Attorneys, TikTok, SIDN Fund, De Nieuwe Gevers, Molenaar & Plasman Solutions, PONT Data & Privacy and PrivSec Amsterdam.

Privacy First staff and board members are regularly requested as speakers at public events of government, industry and academia. In addition, Privacy First continuously conducts quiet diplomacy in our broad field of activity.

## **4. Political lobby**

### **4.1 Medical privacy**

Inadequate medical privacy has been a major problem for years. The solution advocated by Privacy First offers the best privacy, security and efficiency at low cost, in addition to significantly improving people's autonomy. Partly at Privacy First's instigation, the new Electronic Data Exchange in Healthcare Act (WEGIZ) was therefore passed by the Dutch Senate in April 2023. With this, the Netherlands is heading towards the best conceivable solution for healthcare communication, without the need for a risky and insecure national system. However, this potential shift from the status quo is also leading to strong opposition from large existing stakeholders, including health insurers.

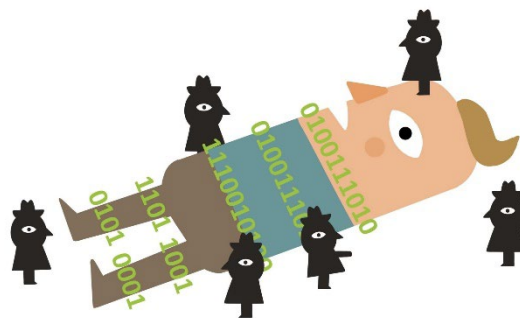
In 2023, Privacy First also helped write two standards (NEN/ISO) on medical data exchange. This allowed us to expand our network and reach among IT vendors, healthcare professionals, patient organisations and the Ministry of Health. This also enabled us to set up a working group with patient organisations to align interests and join forces. The proposal for a European Health Data Space (EHDS) posed major new challenges, but also enabled us to strengthen our position as an independent knowledge leader on medical privacy. A law firm has offered to help us pro bono in exploring a possible lawsuit against the EHDS in 2024.

### **4.2 Financial privacy**

In the financial world, Privacy First's main concern is the move towards total surveillance of innocent citizens through banks and other financial institutions. In this context, our main goal in 2023 was to get a new Dutch government bill on money laundering off the table. Under this bill, a joint database would be developed in which all financial transactions of all Dutch citizens would be continuously analysed to detect financial crime. This bill was therefore dubbed the "banking dragnet" by Privacy First; this designation has since been used by the Data Protection Authority and other critical professionals, journalists and politicians, creating the right frame for critical debate. After Privacy First sent a scathing analysis of this bill to the House of Representatives, this led to a critical television report with Privacy First on the bill in February 2023, which triggered more critical media on the subject throughout 2023 and eventually led to this bill being shelved ("declared controversial") by the Dutch House of Representatives before the November 2023 elections. Since then, Privacy First has been closely monitoring whether this bill resurfaces, possibly through new anti-money laundering regulations from the European Union.

### 4.3 Mass surveillance

Working with our coalition that won the landmark court case against the Systemic Risk Indication (SyRI) in 2020, Privacy First together with the Civil Rights Protection Platform closely followed the similar Collaborative Data Processing bill (WGS) in recent years. After all, as with SyRI, under this data linkage bill there will be mass risk profiling of citizens. According to the SyRI coalition, the WGS is on a collision course with the rule of law and the Dutch cabinet and parliament refuse to learn lessons from the Dutch childcare benefits scandal. In recent years, the SyRI coalition has therefore repeatedly called on the Senate and House of Representatives to reject this bill and also held critical discussions with MPs to this end. Nevertheless, recently the Senate unfortunately passed the WGS. Since then, the SyRI coalition has been orientating itself towards a possible lawsuit to render the WGS inoperative for flagrant violation of European privacy law.



### 4.4 Biometrics

During 2009–2011, there was massive public opposition in the Netherlands to a planned national biometric database containing the data (fingerprints and facial scans) of all Dutch citizens. Partly due to pressure from a large-scale lawsuit by Privacy First, the development of that database was halted in early 2011. However, policymakers now seem intent on reintroducing such a central database. Through quiet diplomacy and political lobbying, Privacy First is trying to prevent this and push for privacy-friendly, decentralised solutions. Should the database in question still be introduced, Privacy First and our allies will not hesitate to challenge this again in court.



In the field of biometrics, Privacy First has also opposed any move towards mass public facial recognition for years. Privacy First has since joined the European Digital Rights (EDRi) coalition, which is critically monitoring this at European level, especially in the context of the

new European artificial intelligence (AI Act) legislation. Privacy First expects to become more active in this in the coming years.

## **4.5 Other topics**

During 2023, Privacy First's critical political lobbying activities included the European Health Data Space (EHDS) planned from Brussels. Also in 2023, Privacy First participated in consultations on the European draft Open Finance Directive (FiDA), draft legislation on the Ultimate Beneficial Owner (UBO) Register, the draft Credit Registration System Act, draft policy of the Dutch Central Bank (DNB) for the financial sector regarding money laundering and the planned European Central Bank Digital Currency (CBDC, digital euro). In addition, Privacy First was involved in critical joint lobbying on the new Cyber Act (secret services) and we were participants in a roundtable discussion with TikTok. At the request of the Dutch Rule of Law Commission, Privacy First also sent a comprehensive letter with various advice to this commission. Moreover, in the run-up to the November 2023 Dutch elections, Privacy First published a 'Privacy Kieswijzer' (election guide) with an analysis of the election manifestos of various political parties.

## 5. Lawsuits

As a civil society organisation, Privacy First is about operating as effectively as possible with the limited resources we have. Therefore, when quiet diplomacy, political lobbying and campaigns prove insufficiently effective, Privacy First takes principled legal action against legislation and policies that lead to large-scale privacy violations. In recent years, Privacy First successfully did so against the central storage of everyone's fingerprints under the Dutch Passport Act, the storage of everyone's telecommunications data under the Telecommunications Data Retention Act and massive risk profiling of citizens by the System Risk Indication (SyRI). Privacy First preferably pursues such cases in coalition and through pro bono support (or external sponsorship) by capable law firms.



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### 5.1 ANPR: Automatic Number Plate Recognition

#### Lawsuit against mass surveillance by ANPR cameras

In early 2019, the ANPR Act (Article 126 jj Sv.) came into force in the Netherlands. Under this Act, ANPR cameras above motorways are used to continuously store the license plates and locations of millions of cars (i.e. everyone's travel movements) for 4 weeks in a central police database for, among other things, criminal investigation purposes. This is totally unnecessary, disproportionate and also ineffective, several studies have shown in recent years. Supervision is lacking and the system can be easily abused. The current ANPR Act



therefore constitutes a massive privacy violation and has no place in a free democracy under the rule of law. Since late 2021, Privacy First has been pursuing a lawsuit against the Dutch government to have the ANPR Act rendered inoperative due to violation of European privacy law. Through Pro Bono Connect, Privacy First has engaged law firm CMS to conduct this lawsuit (summary proceedings and proceedings on the merits) for us. This case is also supported by the Digital Freedom Fund.

Partly due to pressure from this court case, the National Police implemented "privacy by design" in the sense that car windshields will now be automatically blinded in ANPR camera images, preventing passengers from being visible. Our ANPR case has also received a lot of media attention in recent years, raising critical awareness about mass surveillance.

In early 2024, the District Court of The Hague declared Privacy First admissible in the proceedings on the merits. This interlocutory judgment may set important precedents for similar cases, especially now that from the perspective of Dutch politics, the possibilities for interest groups to file lawsuits seem to become increasingly limited. On substance, however, the court subsequently ruled against Privacy First. Privacy First decided to appeal this judgment. Given the European case law on the matter, Privacy First considers the chances of a successful court case very high.



## **5.2 Citizens v. Plasterk case**

### **Lawsuit over international data sharing by secret services**

Back in 2013, Privacy First, together with other organisations and citizens, conducted the lawsuit 'Citizens against (Minister) Plasterk'. This case against the Dutch government was prompted by Edward Snowden's revelations about the practices of (foreign) intelligence services, including the American NSA and British GCHQ. Our coalition demanded that the Netherlands stops using foreign intelligence not obtained in accordance with Dutch law. Our lawyers at Bureau Brandeis conducted this case pro bono. The affiliated organisations were Privacy First, the Dutch Association of Criminal Lawyers (NVSA), the Dutch Association of Journalists (NVJ) and Internet Society Netherlands. Partly under pressure from this lawsuit, the Dutch Intelligence and Security Services Act (Wiv) was positively amended. However, after disappointing rulings by both the District Court and the Court of Appeal of The Hague, the Dutch Supreme Court also dismissed the case in 2018. Our lawyers therefore continued the case at the European Court of Human Rights in Strasbourg in 2019, in parallel with similar British and Swedish court cases. However, after years of silence from

Strasbourg, our lawyers received notice in July 2023 that the Court had declared our case inadmissible without any explanation. A statement of reasons for this decision is missing. After nearly 10 years of litigation on this issue, this is extremely disappointing. This also raises the question: is the Strasbourg Court still as critical and principled as it used to be, or are citizens and organisations now better off going to another (national Constitutional or European) Court in this type of case?

### **5.3 Lawsuits by other organisations and citizens**

Privacy First also occasionally supports lawsuits by other organisations and individual citizens, provided such cases are of such a nature that our support is indispensable, in the interests of positive precedent-setting, social impact, awareness-raising and influencing legislation and policy. A good example are the lawsuits filed by Dutch privacy activist Michiel Jonker to introduce a municipal anonymous waste card with privacy by design, anonymous public transport travel and the right to cash payment. Other individual lawsuits Privacy First was involved in in 2022 relate to child benefits (against the Dutch Social Insurance Bank), to the virtually unregulated 'Person-centred Approach' (PGA, against the municipality of Amsterdam) and to compulsory license plate parking (municipality of Wageningen). Privacy First also supported a legal action by the Human Rights in Finance foundation against a European crypto regulation (financial privacy) in 2023, The Privacy Collective's mass claim against Oracle & Salesforce (illegal data trading) and the lawsuit by a coalition of, among others, the Civil Rights Platform, psychiatrists, psychologists and clients in the GGZ against the Dutch Healthcare Authority (medical privacy and professional secrecy). In all these cases, Privacy First provides advice and we can file so-called *amicus curiae* letters. These lawsuits also often lead to media publications and critical questions at the municipal or national level.

## 6. Claims Foundation CUIC

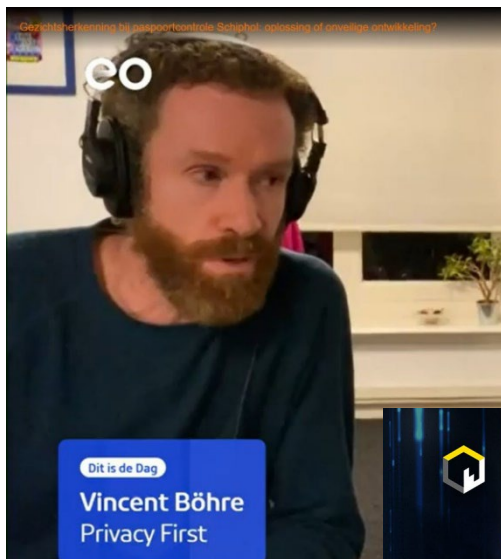
Privacy First has teamed up with Austrian NOYB (the organisation of privacy activist Max Schrems) to set up the new mass claims organisation CUIC in 2022. CUIC stands for Consumers United in Court, also pronounceable as 'CU in Court' (see you in court). CUIC's mission is to protect consumers' privacy, mainly by conducting strategic class action lawsuits against organisations that make a lot of money by unlawfully using personal data. To this end, CUIC litigates under the new Settlement of mass damages in collective action Act (Wamca), joining forces with consumers. CUIC's first case will be against tech company Avast (now part of Norton), which for years unlawfully collected and resold the online behaviour of millions of people. In March 2024, CUIC filed its subpoena against Avast to that effect. For more information on CUIC and this lawsuit, visit <https://cuic.eu/>.



## 7. Communication

### 7.1 Mass media

On average, Privacy First appeared in the media several times a week in 2023. Besides requests for interviews, Privacy First is regularly approached by journalists for background information and research tips, sometimes also by foreign media.



*Interview with Vincent Böhre (Privacy First director) for Dutch Radio 1, 1 November 2023*



*Interview with Marc Smits (Privacy First board member) at Bickbx Today, 11 December 2023*



*Interview with Guido Visman (Privacy First board member) at Hart van Nederland, 25 March 2023. © SBS6*

## 7.2 Internet

Privacy First's website <https://www.privacyfirst.nl> is our primary news and opinion channel. In early 2023, our website has been completely revamped and Privacy First also had a new corporate identity and logo. This integrated our former English-language website <https://www.privacyfirst.eu>, as well as our website <https://privacyawards.nl> (Dutch Privacy Awards) and our project PrivacyWijzer (on the Internet of Things). In addition, Privacy First manages our campaign websites <https://specifieketoestemming.nl> (medical privacy) and <https://psd2meniet.nl> (PSD2). In recent years, Privacy First's websites were partly sponsored by privacy-friendly provider Greenhost. On social media, Privacy First has traditionally been mainly active on [Twitter](#) (now X) and [LinkedIn](#), also with its own LinkedIn group for privacy professionals. In addition, you can find us at the privacy-friendly platform [Quodari](#). Both our Twitter and LinkedIn followings have been growing steadily for years. Would you like to keep up to date with all the developments around Privacy First? Then sign up for our newsletters at [www.privacyfirst.nl](https://www.privacyfirst.nl) !



*Privacy First New Year's greeting*

## 8. Organisation

Privacy First is an independent, ANBI-accredited foundation made up largely of volunteers. Our paid staff in 2023 were our director and legal advisor Vincent Böhre (0.75 FTE on average, temporarily 'remote'), our temporary director Godaya Komen (0.8 FTE), our researcher Daniël de Jongh (0.6 FTE) and our management assistant Karin van der Stoop (0.5 FTE). In addition, Privacy First works mainly with professional volunteers and external experts in various fields. Privacy First's goal in 2024 is our further development towards a compact, flexible organisation with more permanent staff.

The board of Privacy First consisted of the following people in 2023:

- Paul Korremans (chairman)
- Haykush Hakobyan (secretary)
- Guido Visman (treasurer)
- Wilmar Hendriks (general board member; also board chairman of CUIC)
- Marc Smits (general board member)
- Sander Klous (general board member)
- Jacqueline Stokman (general board member).

In early 2024, Paul Korremans and Guido Visman stepped down from the board. Since then, Sander Klous has been our chairman, Ineke Sleutel our treasurer and Marc Smits our policy advisor (0.8 FTE).

Our board meetings took place monthly on average in 2023.

Privacy First's Advisory Board in 2023 consisted of the following individuals, in their personal capacity:

- Prof Hans Franken (emeritus professor of information law, Leiden University)
- Quirine Eijkman (lecturer Access to Law, Utrecht University of Applied Sciences)
- Paul Francissen (director Publicroam & independent consultant digital social innovation, Envolv)
- Paul Sloomaker (vice-president Monitoring & Reporting, KPN)
- Eliëtte Vaal (ICT & privacy lawyer, The Data Lawyers).

Our Advisory Board meets with our board twice a year and also provides unsolicited advice.





Privacy First's group of volunteers consists mainly of professionals who structurally support Privacy First, both substantively (various privacy themes), organisationally (ICT, PR, translations etc) and legally (research and advice). In addition, Privacy First has an extensive network of experts from all corners of society, ranging from scientists, lawyers and ICT professionals to journalists, politicians and civil servants.

## 9. Finances

Privacy First depends largely on individual donations and support from funds and law firms for its work. In recent years, Privacy First has been able to secure several funds to develop new projects and strengthen and sustain our organisation and activities, including Stichting Goeie Grutten in support of our PrivacyWijzer project (Internet of Things) and the Digital Freedom Fund in support of our lawsuit against the ANPR Act. However, Privacy First prefers institutional support ("core funding") rather than project support. With the exception of the national referendum against the 'Dragnet Act' (2018), Privacy First has never accepted government funding to date; this is to ensure our critical independence.

Besides financial support from individual donors and funds, Privacy First is also open to corporate sponsorship, provided Privacy First can continue to operate freely and independently. For example, Privacy First has been supported by Voys Telecom since 2017. Our annual National Privacy Conference is sponsored by ECP and our Dutch Privacy Awards have been sponsored by Molenaar & Plasman Solutions since 2022. Would your organisation also like to sponsor Privacy First? Then get in touch with us!

Privacy First's established policy is to spend all income as much as possible on substantively relevant issues and to keep operational costs as low as possible. To this end, our communication (including by phone) is largely via the internet. Supporting activities are partly carried out by professional volunteers. We share our office at Nieuwe Herengracht in Amsterdam with claims foundation CUIC. Privacy First events are preferably organised at externally sponsored locations. The litigation documents in our lawsuits are supported by Privacy First through its own factual and legal research. Privacy First's policy is also to preferably conduct large-scale lawsuits in coalition through the Public Interest Litigation Project (PILP) or through Pro Bono Connect, or through external sponsorship. This is to spread the costs and financial risks and increase the chances of legal success. In this way, every donated euro benefits the privacy of every Dutch citizen as effectively as possible.

Below is our preliminary annual financial statement 2023. This does not include sponsorship of litigation by law firms or external partners.

Annual overview		2023	2022
<b>Revenues:</b>			
Donations and funds	€	221.771	€ 288.907
<b>Expenditures:</b>			
Personnel costs	€	152.783	€ 100.827
Legal costs	€	-	€ -
Political lobbying	€	-	€ -
Housing	€	9.990	€ 10.952
Public activities	€	8.478	€ 4.507
Campaign costs	€	-	€ -
Insurance costs	€	200	€ -
Travel costs	€	44	€ 2.257
Websites incl. development	€	25.045	€ 33.776
Corporate identity development	€	-	€ 9.966
Automation costs	€	7.521	€ 11.133
Office costs	€	4.082	€ 2.052
Representation expenses	€	1.321	€ 1.721
Other costs	€	579	€ 1.751
Unforeseen	€	2.892	€ 1.210

## 10. Outlook 2024 and beyond

For the coming years, Privacy First aims for a society in which:

- politicians, citizens, entrepreneurs and civil servants are aware the value of our fundamental rights and personal autonomy;
- people themselves have authority over their own lives, the data resulting from them (data sovereignty) and can move around anonymously;
- this is enshrined in legislation, but especially in the design of technology;
- and we can share data responsibly for personal, social or economic purposes.

### **Strong international network**

Legislation from Brussels has a huge impact on our society. For each theme, we build coalitions or join existing ones. This gives us more clout. We share the workload, become faster, smarter and more effective.

### **Privacy knowledge leader**

Over the past few years, we have built notoriety. Media know how to find us. We have a network in politics. We are expanding this further. We do this strategically, thoughtfully and opportunistically. We link Dutch issues as much as possible to matters in the Brussels pipeline.

### **Rejuvenation and broadening**

Young people think privacy is important, but they are still too rare in our constituency and there are still people who think they have "nothing to hide". We are rejuvenating and broadening our constituency, outside our comfort zone, with targeted projects, in multiple segments.

For more information on our current ideas, plans and possible projects until 2030, funds and corporate donors are welcome to [contact](#) Privacy First!

Would you like to support Privacy First? Then please transfer a donation to account number (IBAN) NL95ABNA0495527521 (BIC: ABNANL2A) in the name of *Stichting Privacy First* in Amsterdam, the Netherlands, or support us through the [donation page](#) on our website. The Privacy First Foundation is recognised by the Dutch Tax and Customs Administration as an Institution for General Benefit (ANBI). Your donations are therefore tax-deductible.





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