

**Introduction:** The European Commission has proposed an omnibus amendment to the GDPR aimed at clarifying rules, strengthening cross-border enforcement, and improving consistency across EU regulators.

These changes respond to evidence of fragmented enforcement, inconsistent interpretations of legal bases, and challenges in coordinating large cross-border investigations.

**Current Status:** Proposal was published November 19, 2025. The EU's legislative process is typically quite lengthy, and it often takes many months or even years until the EU institutions agree on a final text.

IAB Europe is co-hosting a roundtable with regulators to discuss industry perspective on the omnibus.

## Key Updates Impacting Online Advertising (and potentially the Canadian market)

- **Legal bases clarified:** Consent (including refusal/withdrawal), **legitimate interest**, and processing for fraud detection, security, and service improvement analytics.
- **Reducing consent fatigue:** Stronger obligations against dark patterns, complex notices, and unclear explanations of data use.
- **Simplified compliance:** Streamlined record-keeping requirements for smaller businesses.
- **AI and data rights:** Data used to train AI must comply with GDPR rights (access, correction, objection) and rules for AI-driven processing.
- Simplified use of Standard Contractual Clauses (STCs) and clearer rules on Transfer Impact Assessments (TIAs) to reduce duplication and improve predictability for international companies.
- New rules with clearer deadlines for cooperation between Data Protection Authorities (DPAs).
- Clarifications from enforcement and court decisions now written directly into regulation.

## Digital Media Implications

- These reforms could serve as a signal for Canadian legislative developments post-C-27.
- Transparency and legal bases may directly affect how signals, IDs, analytics, and targeting are justified.

- Brands with EU operations will need to adjust data flows, vendor contracts, and consent governance.
- Compliance guidance must be updated, with potential impacts on TCF Europe, TCF Canada alignment, and Global Privacy Platform.

### **Suggested Actions**

- Audit consent and legitimate interest practices against clarified rules.
- Review vendor contracts and international data transfer mechanisms.
- Monitor updates to TCF and Global Privacy Platform standards.
- Prepare compliance guidance for multinational clients with EU operations.

IAB Canada will continue to track EU negotiations, coordinate with IAB Europe, and provide members with timely guidance on how these reforms may affect Canadian operations and global advertising standards. If you would like to learn more about the EU Omnibus Amendment, please click the following [link](#).

If you would like to discuss this further or any other topics, please reach out to us at [policy@iabcanada.com](mailto:policy@iabcanada.com).