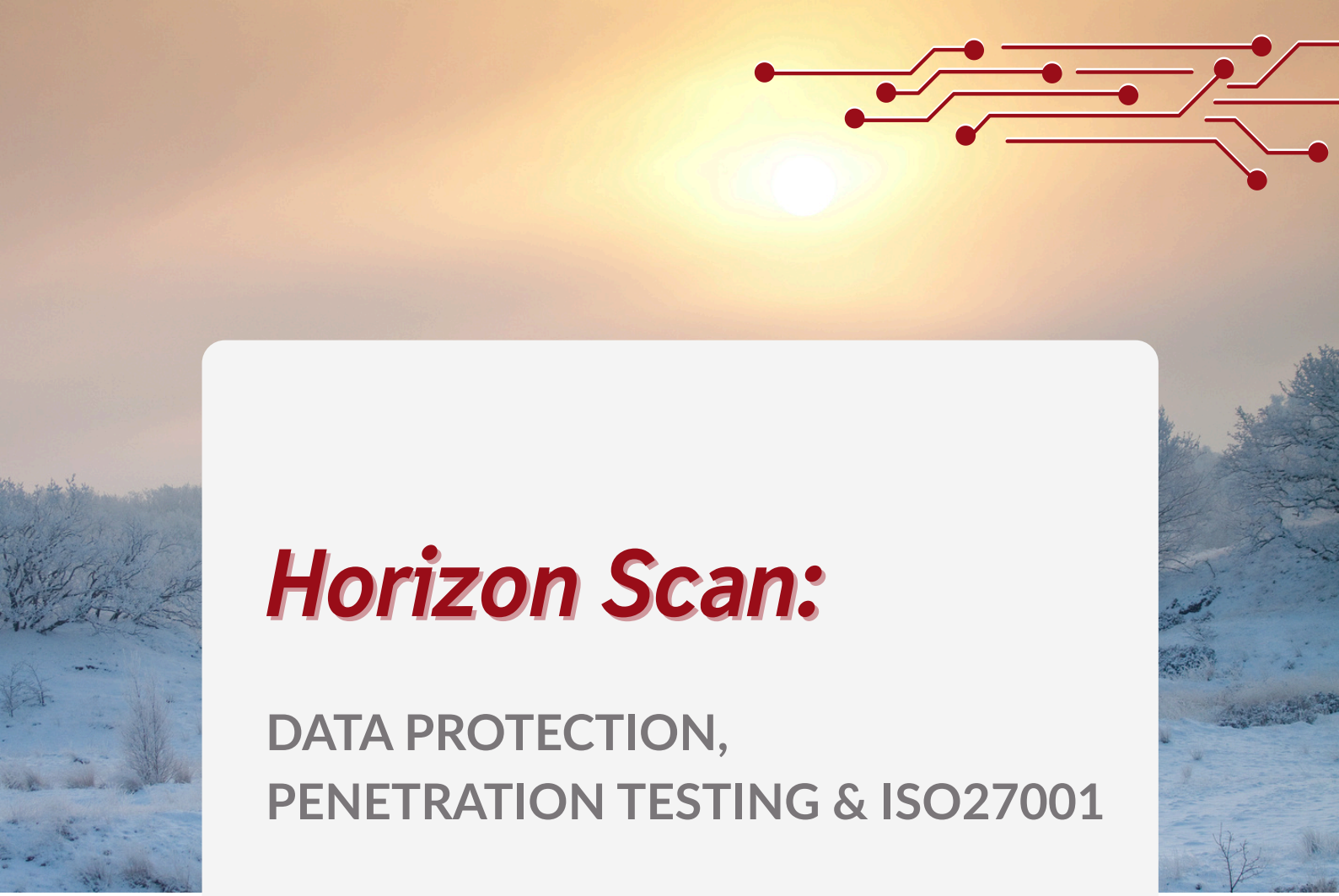

Horizon Scan:

DATA PROTECTION, PENETRATION TESTING & ISO27001

What's changing or coming up in the world of Data Protection, Pentesting and ISO27001?

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Contact

Phone +44 (0) 1789 608708.
Website www.istormsolutions.co.uk
Email info@istormsolutions.co.uk

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Data Protection

Data (Use and Access) Act 2025 (DUAA): Introduces reforms to the UK GDPR and Data Protection Act 2018, including changes to automated decision-making, children's data protection, and international transfers.

Legitimate Interests & Subject Access: Simplifies compliance by expanding recognised legitimate interests and streamlining subject access requests, reducing burdens.

EU GDPR

Digital Omnibus Package (Nov 2025): Proposed amendments to GDPR to reduce administrative burdens, harmonise overlapping rules, and simplify compliance for businesses.

AI & Data Use: Expanded allowances for anonymised/pseudonymised data in AI training, plus reduced consent requirements for non-risk cookies to tackle "cookie banner fatigue".

General Data Protection (UK/EU)

UK-EU Adequacy Alignment:DUAA reforms aim to preserve the UK's EU adequacy status, ensuring seamless cross-border data flows. Meanwhile, EU updates integrate GDPR with the Data Act, ePrivacy, and AI Act, creating a more unified digital regulatory framework.

Penetration Testing

DORA (Digital Operational Resilience Act): EU regulation now mandates Threat-Led Penetration Testing (TLPT) for financial entities, with detailed RTS (Regulatory Technical Standards) published in 2025.

Scope & Frequency: TLPT requirements specify methodology, remediation, and supervisory cooperation, with clear rules on internal vs external testers and recommended testing cycles.

ISO/IEC27001

ISO/IEC 27001:2022 Transition Deadline: Organisations must transition from ISO 27001:2013 to ISO 27001:2022 by 31 October 2025. **Key Updates:** Revised controls emphasise cloud security, supply chain risk, and continuous improvement in ISMS, reflecting modern cyber threats.

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