

Cédric Burton

PARTNER

Data, Privacy, and
Cybersecurity
Brussels

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FOCUS AREAS

Artificial Intelligence and
Machine Learning
Blockchain and
Cryptocurrency
Data Storage and Cloud
Data, Privacy, and
Cybersecurity
Electronic Gaming
Fintech
Internet

HIGHLIGHTS

- **Comprehensive Global Privacy and Cybersecurity Practice**
Cédric covers all facets of data protection law globally, including counseling clients of all sizes, regulatory investigations, litigation, transactional privacy, and thought leadership in Europe and beyond.
- **Focus on Real Life Risks and Market Practices**
Clients praise Cédric for his pragmatic approach and describe him as a lawyer who is "sensitive to political issues and honest in his perception of risk." (*Chambers Europe*)
- **Represents Companies in High-Stakes Incidents and Complex Regulatory Matters**
Clients turn to Cédric for his strategic direction in data breach responses, regulatory investigations, and litigation.
- **A Recognized Practitioner**
Cédric is listed in *Chambers*, *Legal 500*, and *BTI Consulting*, and was selected for inclusion in *Law360's* 2019 list of "Top Attorneys Under 40" in the cybersecurity and privacy category.

EXPERIENCE

Cédric Burton co-chairs Wilson Sonsini's global privacy and cybersecurity practice, is the managing partner of the firm's Brussels office, and is a previous member of the firm's board of directors. He also leads the EU data regulatory practice.

Cédric has nearly 20 years of experience assisting technology clients on all matters related to privacy and data protection and cyber security. He helps clients navigate data protection regulations, balancing their business needs and market practice with legal requirements and regulators' enforcement priorities. By doing this, Cédric helps clients innovate and grow while mitigating the risks related to data protection law. Over the years, Cédric has developed a unique expertise, representing companies in high-stakes and complex regulatory investigations in Europe and throughout the world.

He regularly advises clients on:

- Complying with all requirements of the General Data Protection Regulation (GDPR);
- Creating and implementing global compliance programs;
- Defining international data transfers' strategy;
- Planning for and managing data breaches and cyber security incidents;
- Advising on data protection issues in the context of mergers, acquisitions, and other commercial transactions;

- Negotiation of data processing agreements; and
- Multijurisdictional regulatory investigations, including coordinating litigation before national courts and the European Court of Justice.

Cédric also advises companies on the upcoming new EU data regulations that are part of the EU's digital strategy and that will significantly impact technology companies in Europe, including the:

- Data Act (DA);
- Artificial Intelligence Act (AI Act);
- Data protection issues related to the Digital Market Act (DMA) and the Digital Service Act (DSA);
- Network Information Security Directive 2 (NIS2);
- Data Governance Act (DGA);
- Data protection aspects of Payment Service Directive 2 (PSD2); and
- E-Privacy Regulation.

In particular, Cédric focuses on data protection issues related to these (upcoming) acts, their overlap with the GDPR, and how companies can build a compliance program that meets these seemingly diverging requirements.

Cédric has authored many articles relating to privacy and data protection law and regularly speaks on data protection-related topics. All major legal directories consistently recognize him as a leader in EU data protection and cybersecurity, including *Who's Who Legal* Thought Leaders, *Chambers Europe*, *Legal 500*, *BTI Consulting*, and *Law360*.

Earlier in his career, Cédric was an associate in the Brussels office of Hunton & Williams. Before that, he worked as a research fellow in privacy and data protection law at the Research Center on IT and Law (CRID) of the University of Namur (Belgium), as well as the Center on Law and Information Policy (CLIP) at Fordham University (New York). Cédric is fluent in French and English.

CREDENTIALS

Education

- LL.M., Intellectual Property and Information Technology Law, Fordham University School of Law, 2007
- LL.M., IT Laws and Management, University of Namur, Belgium, 2005
Magna Cum Laude; Recipient, "Best Interdisciplinary Student Award," 2005; Recipient, "Best Brief Prize" as winner of International Moot Cyber-Tribunal Contest, 2005
- J.D., University of Liège, Belgium, 2004
Cum Laude

Associations and Memberships

- *Law360's* 2022 Cybersecurity & Privacy Editorial Advisory Board
- International Association of Privacy Professionals (IAPP), 2007-present
- International Association of Privacy Professional (IAPP) European Advisory Board, 2015- 2017

Honors

- Selected for inclusion in the 2024-2026 editions of the Lawdragon's *500 Leading Global Cyber Lawyers* guide
- Selected for inclusion in the 2024 edition of the *Global Data Review 100*
- Recognized in the 2018-2026 editions of *Chambers Europe* for TMT: Data Protection - Belgium
- Recognized as a leading individual and in Tier 1 in privacy and data protection law by *Legal 500*, 2018–2024
- Listed in the *Who's Who Legal* Thought Leaders, 2019-2022
- Recognized among the leading "Privacy and Data Security Lawyers" in Belgium by *Best Lawyers*, 2019-2022
- Selected for inclusion in *Law360's* 2019 list of "Top Attorneys Under 40" in the cybersecurity and privacy category
- Selected for inclusion in 2014-2015 of *The Legal 500 Europe*, Belgium, Privacy & Data Protection
- Selected for inclusion in *The Who's Who Legal Telecommunications Media & Technology*, Information Technology, 2014-2015
- Recognized as a "leading talent" in privacy and data protection law in *The International Who's Who of Information Technology Lawyers*, 2013
- Recognized as a leader in his field and ranked as an "Associate to Watch" in the 2012 and 2013 editions of *Chambers Europe* – TMT, Information Technology, Belgium

Admissions

- Brussels Bar

MATTERS

Select Regulatory Investigations Matters

- Represented a social network on investigations by EU supervisory authorities in various countries, including Germany, Italy, the Netherlands, France, and Denmark, and a European Data Protection Board task force
- Represents a payment provider before the Belgian and German supervisory authorities in an investigation following a personal data breach
- Advised a social network in relation to article 66 GDPR proceedings
- Represents a service provider in a supervisory authority inquiry related to fraud products and services
- Represents a leading social network on a CNIL investigation regarding cookies compliance
- Represents an audio streaming company before supervisory authorities regarding cookies compliance
- Advises an online social platform on responding to ICO inquiries related to a data breach and its compliance with the age-appropriate design requirements
- Represented a car manufacturer in relation to an investigation into its data location practices
- Represented a drone manufacturer in relation to inquiries from EU data protection authorities
- Advised a large public multinational company on an investigation by the Spanish supervisory authority

Select Counseling Matters

- Acts as lead global privacy counsel for a leading payment service provider, including advising on its strategy for GDPR compliance and compliance with upcoming data protection legislations globally, on Binding Corporate Rules' approval in the EU and the EU, de-identification practices, data analytics legal requirements, and privacy by design of its new products and services
- Advises a leading global technology company on strategic data protection and privacy issues arising out of the new data-related rules in the EU, such as the Digital Markets Act, the Digital Services Act, and the reform of consumer protection laws
- Advises hundreds of companies on GDPR compliance and data transfer strategies, including implementation of standard contractual clauses, binding corporate rules, and Safe Harbor and Privacy Shield certifications before their invalidation by the CJEU
- Advises an e-commerce company on strategic data protection and privacy issues, including risks/benefits of data localization and GDPR's data transfer rules, the upcoming EU-U.S. Transatlantic Data Privacy Framework and the data protection impact of the Digital Markets Act
- Advises a SaaS company that provides self-optimizing and smart WiFi services on GDPR compliance, including drafting its privacy policy, review of user registration flow, preparing and negotiating data processing agreements, assisting with the creation and implementation of various policies and procedures, advising on data transfers restrictions and the implementation of data transfer agreements, advising on the use of cookies and similar technologies
- Acts as lead privacy counsel for a leading provider of services in charge of executing financial transactions and payments between banks worldwide
- Advises a leading social network on various strategic aspects of its data protection compliance program, including cookie rules, data transfers, accountability obligations, and the one-stop-shop
- Advises a SaaS company on its rollout of a smart security camera under GDPR, U.S. law, and local laws in Belgium, German, the UK, Canada, and the Netherlands
- Advises a multinational beverage corporation on all EU data privacy-related issues, including incident response management, Data Protection Officer duties and responsibilities, data subject rights' fulfillment and complaints' mechanisms, and cooperation with supervisory authorities
- Advised a leading electric car manufacturer on its GDPR compliance program, including its privacy policy, accountability requirements, pseudonymization, and anonymization practices
- Advises a leading audio media service company on GDPR compliance, including privacy policy, data processing agreements, the implementation of the e-privacy directive and the cookies rules, data retention, data anonymization, international data transfers, and incident responses
- Advises an electronic car manufacturer on its GDPR compliance program, including on a data transfer strategy, data processing agreements, marketing requirements, handling individuals' rights, and complying with notice and consent obligations
- Advises an online marketplace on its GDPR compliance program, including data transfer issues, replying to individuals' requests to exercise their rights, incident responses, and accountability obligations.

Select Transactions

Advised on the data protection aspects of the following transactions:

- Mastercard's acquisition of several companies, including Dynamic Yield, Aiaa, Ciphertrace, Finicity, Ekata, RiskRecon, and SessionM
- Aurora on its acquisition of Uber ATG
- WaveOptics on its sale to Snap

INSIGHTS

Select Publications

- Co-author, "EU-U.S. Data Transfer Ruling Offers Reassurance to Companies," *Law360*, October 7, 2025
- Co-author, "EDPB Issues First Guidelines on the Interplay Between the Digital Services Act and the GDPR," Wilson Sonsini Alert, September 22, 2025
- Co-author, "EU Court Upholds the Validity of the EU-U.S. Data Privacy Framework," Wilson Sonsini Alert, September 3, 2025
- Co-author, "EU Reaches a Deal on Rules for Swifter Cross-Border GDPR Enforcement," Wilson Sonsini Alert, June 17, 2025
- Co-author, "Regulators Target AI As Evolving Technology Threatens Fair Competition in Digital Economy," GCR - Data & Antitrust Guide; Second Edition, May 30, 2025
- Co-author, "Ransomware Attacks: UK Government Proposes Ransom Payment Ban and Mandatory Notification Requirements," Wilson Sonsini Alert, January 24, 2025
- Co-author, "DORA: New EU Cybersecurity Requirements for the Financial Sector Enter into Force," Wilson Sonsini Alert, January 17, 2025
- Co-author, "Increased Focus on the Protection of Minors and Age Verification in the EU and the UK," Wilson Sonsini Alert, January 9, 2025
- Co-author, "EU Court Awards Damages for Breach of EU Data Transfer Rules," Wilson Sonsini Alert, January 9, 2025
- Co-author, "EU Privacy Regulators Confirm That Legitimate Interest Is a Valid Legal Basis for AI Model Training and Deployment," Wilson Sonsini Alert, December 20, 2024
- Co-author, "New EU Cybersecurity Obligations for Connected Devices: What You Need to Know," *The WSGR Data Advisor*, October 31, 2024
- Co-author, "Regulators in Europe Signal Increased Scrutiny of Online Platforms," Wilson Sonsini Alert, October 21, 2024
- Co-author, "EU Agencies to Develop Guidance on the Interplay Between the DMA and GDPR," Wilson Sonsini Alert, October 2, 2024
- Co-author, "Cybersecurity: A Critical Element in Your 2025 Business Forecast," Wilson Sonsini Alert, September 30, 2024
- Co-author with T. Evans and H. Watson, "Making the Internet Safe for Children: Ofcom's Latest Consultation," *PLC Magazine*, June 3, 2024
- Co-author, "French Data Protection Authority Publishes Recommendations on the Development of AI Systems: Seven Takeaways," Wilson Sonsini Alert, April 23, 2024
- Co-author, "EU Court of Justice Landmark Ruling on Digital Advertising and GDPR Compliance," Wilson Sonsini Alert, March 20, 2024
- Co-author, "10 Privacy Predictions in the EU for 2024," Wilson Sonsini Alert, January 17, 2024
- Co-author, "EU Lawmakers Reach Political Agreement on the AI Act," Wilson Sonsini Alert, December 11, 2023
- Co-author, "Flagship Online Safety Bill Moves Closer to Enactment in the UK: Who Will Be in Scope and What Will It Require?" Wilson Sonsini Alert, October 10, 2023
- Co-author, "UK-U.S. Data Bridge Commencement Date Announced," Wilson Sonsini Alert, September 22, 2023
- Co-author, "EU and U.S. Finalize Data Privacy Framework: Here's How to Get Certified," Wilson Sonsini Alert, July 10, 2023
- Co-author, "EU Privacy Regulators Coordinate to Assess Compliance with the GDPR Rules on Data Protection Officers," Wilson Sonsini Alert, March 17, 2023
- Co-author, "CJEU Finds That Companies Must Provide Individuals with the Identity of Data Recipients When Responding to Data Access Requests," Wilson Sonsini Alert, January 27, 2023
- Co-author, "European Union Adopts Flagship Digital Services Act," Wilson Sonsini Alert, October 31, 2022
- Co-author, "Formal Publication of the DMA and Timelines for Compliance," Wilson Sonsini Alert, October 13, 2022
- Co-author, "EU to Open San Francisco Office to Advance Its Digital Regulation Agenda," *The WSGR Data Advisor*, April 27, 2022
- Co-author, "EU Reaches Political Agreement on Additional New Rules for Digital Platforms in the Digital Services Act," *The WSGR Data Advisor*, April 26, 2022

- Contributor, "Accountability to Data Subjects and Regulators," *The Guide to Data as a Critical Asset, Global Data Review*, 2022
- Co-author, "EU Adopts New Rules to Significantly Limit the Power of Tech Platforms," *The WSGR Data Advisor*, March 30, 2022
- Co-author, "Political Agreement on a New Framework for EU-U.S. Personal Data Transfers," *The WSGR Data Advisor*, March 29, 2022
- Co-author, "EU Parliament and Council Take Next Steps to Advance Major New Rules for Digital Platforms," *The WSGR Data Advisor*, February 25, 2022
- Co-author with L. Brodahl, C. Evrard, and A. Lépine, "Belgian DPA Finds That IAB Europe's Cookie Consent Framework Violates the GDPR," *Wilson Sonsini Alert*, February 8, 2022
- Co-author, "European Court of Justice Finds That 'Inbox Advertising' Is Direct Marketing," *The WSGR Data Advisor*, December 6, 2021
- Co-author with L. De Boel, J. Dhont, and R. Fol, "EU Regulators Define Data Transfers," *Wilson Sonsini Alert*, November 23, 2021
- Co-author, "European Commission Proposes New Rules for Digital Platforms," *Wilson Sonsini Alert*, January 12, 2021
- Co-author, "EU Commission Publishes Proposal for e-Privacy Regulation: The Top Nine Key Points You Need to Know," *WSGR Alert*, January 10, 2017
- Co-author, "EU Commission Publishes EU-U.S. Privacy Shield," *WSGR Alert*, February 2016
- Co-author, "EU Data Protection Authorities Issue Statement Following Agreement on EU-U.S. Privacy Shield," *WSGR Alert*, February 2016
- Co-author, "EU and U.S. Reach a Political Agreement on Transatlantic Data Transfer Deal," *WSGR Alert*, February 2016
- Co-author, "Profile: European Union," *Bloomberg BNA, Privacy & Security Law Report*, February 2016
- Co-author, "The Final European Union General Data Protection Regulation," *Bloomberg BNA, Privacy & Security Law Report*, January 2016
- Co-author, "Political Agreement Reached for New EU Data Protection Regulation—Official Adoption Around the Corner," *WSGR Alert*, December 2015
- Co-author, "What's Next for U.S.-EU Data Transfers? An Analysis of Recent Developments Following *Schrems*," *The WSGR Data Advisor*, November 2015
- Co-author, "Landmark Decision Clarifies Territorial Scope of Application of National Data Protection Laws in the EU," *The WSGR Data Advisor*, November 2015
- Author, "EU Data Protection Authorities Issue Statement Following *Schrems* Decision," *WSGR Alert*, October 2015
- Co-author, "EU's Highest Court Declares Safe Harbor Invalid," *WSGR Alert*, October 2015
- Co-author, "Advocate General Advises EU's Highest Court to Deem Safe Harbor Invalid and to Allow EU Data Protection Authorities to Suspend Data Transfers to the U.S.," *WSGR Alert*, September 2015
- Co-author, "Personal Data, Anonymization, and Pseudonymization in the EU," *The WSGR Data Advisor*, September 2015
- Co-author, "Status Update on the EU Data Protection Regulation," *The WSGR Data Advisor*, July 2015
- Co-author, "The Proposed EU Data Protection Regulation Three Years Later: The Council Position," *Bloomberg BNA, Privacy & Security Law Report*, June 2015
- Co-author, "EU Reaches Milestone Towards the Adoption of Revised Data Protection Framework," *WSGR Alert*, June 2015
- Co-author, "French Data Protection Authority Unveils Its Inspection Program for 2015," *WSGR Alert*, May 2015
- Co-author, "EU Data Protection Regulators Issue Guidance on the Internet of Things and Device Fingerprinting," *Eye on Privacy*, February 2015
- Author, "Google Moves to Implement the 'Right to Be Forgotten,'" *Data Protection Law & Policy*, Volume 11, Issue 5, May 2014

Select Speaking Engagements

- Speaker, "Global Incident Response: Managing Incidents Impacting Global Enterprises," Incident Response Forum Europe 2024, October 17, 2024
- Speaker, "Managing the GDPR After a Data Breach," Incident Response Forum Europe 2023, December 7, 2023
- Speaker, "Key Trends in Antitrust, Privacy, Cybersecurity, Sanctions and Foreign Direct Investment – Hong Kong, E.U., UK and US Perspectives," Asian Academy of International Law and AAIL Foundation, June 5, 2023
- Panelist, "DMA, DSA, DA, DGA, AI Act: How to Navigate a Soup of new EU Data Regulations," IAPP Europe Data Protection Congress 2022, November 16, 2022
- Speaker, "How To Redline SaaS MSAs And DPAs For In-House Counsel," In-House Connect, October 12, 2022

- Panelist, “Managing the GDPR After a Data Breach,” Incident Response Forum Europe 2022, September 22, 2022
- Lecturer, “Data protection concerns in data-driven mergers and acquisitions,” VUB Summer School Academy, June 29, 2022
- Presenter, “EU’s Digital Services Act (DSA) final text’s data protection implications,” Future of Privacy Forum, June 22, 2022
- Panelist, “The EU Digital Single Market: implementation and implication,” GDR Connect: Regulation and Digital Strategy, May 11, 2022
- Panelist, “Schrems II: The Practical Implications,” International Association of Privacy Professionals LinkedIn Live, July 20, 2020
- Presenter, "WSGR Getting Ready for the GDPR Series - Session 5: Regulatory Aspects of the GDPR," WSGR Privacy & Data Protection Webcast, November 17, 2016
- Presenter, "WSGR Getting Ready for the GDPR Series - Session 4: The GDPR, Privacy Shield, and EU-U.S. Data Transfers - What to Do Now?," WSGR Privacy & Data Protection Webcast, September 13, 2016
- Presenter, "WSGR Getting Ready for the GDPR Series - Session 3: The GDPR for Service Providers," WSGR Privacy & Data Protection Webcast, July 12, 2016
- Presenter, "WSGR Getting Ready for the GDPR Series - Session 2: Enhanced Individuals Rights," WSGR Privacy & Data Protection Webcast, June 8, 2016
- Presenter, "Getting Ready for the GDPR," WSGR Privacy & Data Protection Webcast, May 2016
- Presenter, "The EU-U.S. Privacy Shield: A New Tool for Data Transfers to the U.S.?" WSGR Privacy & Data Protection Webcast, March 2016
- Panelist, "Transferts de données à caractère personnel intra-groupe et à l'international, quels risques encourus ? Comment être conforme ?" CREO Business Information & Seminars, Brussels, Belgium, February 2016
- Panelist, "General Data Protection Regulation," Brussels European Employee Relations Group (BEERG), Brussels, Belgium, February 2016
- Presenter, "Update on the EU-U.S. Safe Harbor Program," WSGR Privacy & Data Protection Webcast, October 2015
- Presenter, "An Update on the EU Data Protection Regulation," WSGR Privacy & Data Protection Webcast, July 2015
- Panelist, "EU Data Protection Reform and Data Localization Initiatives: Impacts and Strategies for Global Data Transfers," IAPP Europe Data Protection Congress 2014, Brussels, Belgium, November 2014
- Panelist, "Data-Driven Economy – How Can We Use the Full Potential of the Data-Driven Revolution?" TechAmerica Europe's Annual Plenary, November 2014
- Panelist, "Ethics, Fundamental Rights and Big Data," 36th International Conference of Data Protection and Privacy Commissioners, Balaclava, Mauritius, October 2014
- Panelist, "Privacy in mobility and location data" panel, 7th International Conference, Computers, Privacy & Data Protection, Reforming Data Protection: The Global Perspective, Brussels, Belgium, January 2014