2FINK

Reorganisation in the Dark?

Data Protection and Cybersecurity in Large-Scale Transformations

European Privacy KnowledgeNet 2026 Munich

THE WAY ORGANISATIONS BREATHE

⚡ Insolvencies at a record high	Over 24.000 corporate insolvencies in 2025 (+10.3%); 12.800 already in 2026 → the highest half-year figure since 2013 Sources: IfM Bonn, Statistics May 2026; Destatis, press release 9. Oct 2026
⚡ recovering M&A	42% of decision-makers expect more deal activity in 2026 Sources: Bain & Company, Bain-report 2 Feb 2026; KPMG, press release Dec 2025
⚡ Automotive is the epicentre of transformation	Germany accounts for roughly two-thirds of all job-cut announcements in the EU automotive sector (VW plans up to 100.000 job cuts worldwide | ZF 14.000 | Continental >10.000 | Bosch 22.000 in its mobility business) Source: Eurofound (ERM), survey EF202615
⚡ Steel and chemicals are shrinking structurally	Thyssenkrupp Steel: 11.000 jobs affected (~40% of the workforce); BASF: below 30.000 full-time positions for the first time since 1954 Sources: Miningscout, 30 Sep 2026; WirtschaftsWoche, rtr, 29 Jul 2026
⚡ Upcoming business successions by 2030	More than 185.000 companies are due for handover in 2026 - 2030 Sources: IHK Stuttgart; IfM Bonn 2025

European Restructuring Monitor (ERM)

Country	Announcement date	Company	Type	Change	
Finland	7 October 2026	Nokia	Internal restructuring	-253 jobs	View
Finland	5 October 2026	Apotti	Internal restructuring	-65 jobs	View
Finland	5 October 2026	OP-Pohjola	Internal restructuring	+ 277 jobs	View
Austria	2 October 2026	Raiffeisen-Lagerhäuser	Closure	-100 jobs	View
Germany	2 October 2026	Aaronia	Business expansion	+ 150 jobs	View
Germany	2 October 2026	Breyden	Closure	-290 jobs	View
Germany	1 October 2026	Aldi Süd	Internal restructuring	-150 jobs	View
Finland	1 October 2026	F-Secure	Internal restructuring	-58 jobs	View
Germany	30 September 2026	Paul Köster	Internal restructuring	-90 jobs	View
Spain	29 September 2026	Sareb	Closure	-247 jobs	View

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Screenshot: 11 Octobre 2026

→ employment impact of large-scale restructuring events

Regulatory Pressure



Reorganisations | Carve-outs | Transfers

The recurring pattern

Employee data is pulled from HR systems, consolidated, compared, allocated, transferred across entities and borders, usually before **GOVERNANCE** arrives.

What's actually missing:

Did you get a rehearsal?

TODAY

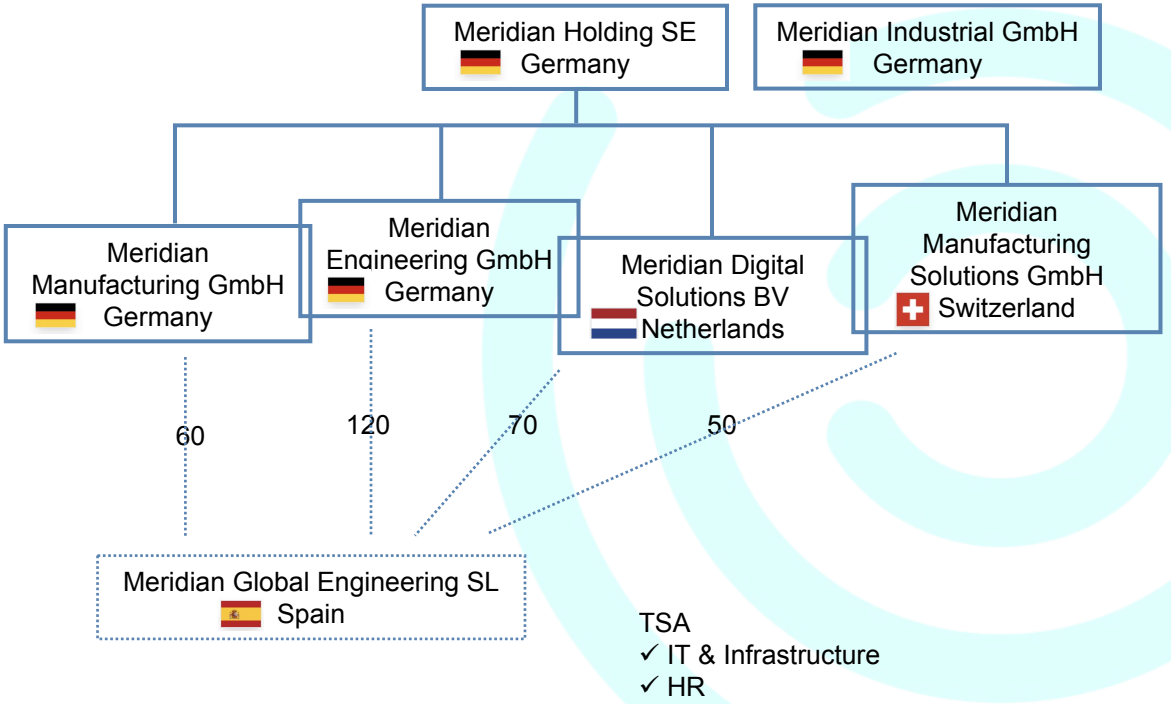
one realistic week of a transformation, played through in only 45 minutes. :)

So the next one finds you prepared.

MERIDIAN GROUP

A composite case. Fictional organisation, assembled from recurring real-world patterns.

MERIDIAN GROUP structure



Employees: ~ 4.000

UP NEXT: **Project Meridian**

- Transformation: Merger + Partial Carve-out
- Target: **Meridian Global Engineering SL**
- Movement: ~300 employees transferring across DE, NL, CH → ES
- **Status**: HR pulling data from 5 systems. InfoSec & DP not involved. **Yet**.

Organisation (on paper)

Role:	Responsibility:
→ **Group leadership**	✓ C-Suite, Compliance and Legal sets policies
→ **Group Data Protection Officer**	✓ Must be involved "properly and in a timely manner" in all data protection relevant matters
→ **CISO/ Group IT & InfoSec**	✓ Security of group information and data assets
→ **Entity Managements**	✓ Responsible for Compliance within entity
→ **Process and Business Owners**	✓ Own individual processing activities

IN PRACTICE:

- PMO reports to **CFO**
- Legal and Compliance chairs its legal workstream (**also the DPO's disciplinary boss**); DPO **not** in the PMO set-up
- Entity HR teams largely unaware they are **controllers** (the Group decides)
- CISO and DPO are on friendly terms (lunch **twice a year)**

HR systems landscape (fragmented)

→ **6 systems run by legal entity**

→ **4 jurisdictions**

→ no group-wide HR system model

→ Art. 13 GDPR information tells employees: data used "for personnel administration and development purposes"

Poject Meridian → New purpose? cross-unit redeployment/ allocation matrix

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HR now: filter all 4.000 employees who reports to whom, and whose HR system they move to

Correspondence

Day 1

From: HR Transformation Lead
To: DPO

Hi,

quick heads up, leadership just announced we're transforming and restructuring across the group.

We've been asked to move fast. We need to pull employee data from all the separate HR systems (core HR, performance, time & absence, internal applicant tracking) into one central matrix so we can compare people across units and figure out placements. We haven't looped in IT yet, didn't want to create noise before we know what we need. Can you confirm data protection is fine with this so we can get started? Steering committee wants read-out next week.

DPO: HR has just asked you to simply confirm that this is fine. What do you say, and what do you ask? What's already wrong here?

Day 4

From: New Divisional Manager
To: HR Transformation Lead
cc: DPO

I've just been told I'll be leading the new combined unit.

I need visibility into everyone's full personnel file to decide who joins my team. Including performance history, sick leave patterns, disciplinary records, internal mobility notes. The more information I have, the better decision I can make.

Also I'd like to have a say before HR finalises anyone's placement. Can I have access by Friday?

HR: Argue the manager's case. The new manager is senior, impatient and has a point as he will be accountable for this team. How do you give him a voice, but maybe without giving him the personnel files?

Day 6

From: Works Council Chair
To: HR Director
forwarded to DPO

We've heard HR is compiling some kind of master list comparing all employees ahead of the reorganisation. No one has approached us. We expect full information under our co-determination rights before this goes any further, and we want to know exactly what is being compared and on what basis. We remind on the last time this company introduced a tool without involving us, it cost a year and an arbitration.

Works Council: You heard about this by chance, and the employees you represent do not know their data is being compared. What do you ask for, and what do you insist on?

Day 7: Support ticket forwarded by an IT staff member

From: IT Service Desk analyst
To: DPO (informal, "just so you know")
cc: CISO

FYI - someone in HR asked me last week to help export data from three different systems into one shared spreadsheet stored on a general team drive so 'management' could review it. I helped because I was asked to, but nobody from IT signed off on this, and I don't know who now has access to that file.

CISO: The IT analyst has just told that a spreadsheet with employee data from three systems sits on a shared drive. You have no idea who has opened it. What are your first moves? What should happen in the next 24 hours?

Day 8

From: DPO
To: Cross-functional Data Protection Management & Cybersecurity Response Team

All, given what's landed on my desk this week, I need you to:
(1) assess the data protection and cybersecurity issues in what's happening so far;
(2) advise on the legal basis that should apply;
(3) build a governance model or a roadmap so this doesn't happen again in future reorganisations; and
(4) prepare a 15-minute management presentation for the steering committee, plus a one-page briefing for the works council liaison.

Please flag clearly anywhere you're missing information.

Next up: Steering Committee prep

Steering Committee prep

Recurring Tensions

→ speed vs. assessment
→ access vs. control
→ tool output vs. judgement
→ org interest vs. fairness
→ perceived vs. actual co-determination

Q: how do we make sure this never happens again? One rule per role.



Steering Committee

Read-Out

Chair: CFO | CEO attending the first ten minutes

"So, are we good to proceed with the matrix and the data migration?"

1. Bottom Line: Yes, No, Conditions?
2. Top Risk: What is the one thing that must be fixed first?
3. Dependencies: Who must agree for this to happen?
4. Unknowns: What do you admit you don‘t know yet?

Go: 5 minutes to agree on one position

Monday Decisions

The question was never whether Project Meridian gets built.

different mandates, partial information, one deadline

→ GOVERNANCE



Orchestrate the clash or the clash orchestrates you.

Noticed something? Nobody quoted the GDPR to victory tonight because that was never the exercise. ;)

Governance Toolkit (Example)

Item	Fail	Instrument
HR → DPO to „just confirm“.	× Informal and retroactive DPO involvement; × purpose limitation; × no transparency	✓ Intake process & Transformation Governance Charter (trigger: any request to combine employee data) ✓ Legal Check (run before kick-off and whenever scope changes)
New manager → „wants everything“	× need-to-know; × no legal basis, data minimisation; data protection by design; × special cat data exposed	✓ Manager input on capability ✓ Data Tiering Model (owned by HR with DPO office)
Works council → hears via the grapevine	× Late, unstructured information; × (mis)trust	✓ Co-determination Map per jurisdiction (forcible co-determination, information rights, voluntary agreements)
Shared spreadsheet	× InfoSec not included; × Shadow IT; × Unkown access	✓ Access Control ✓ Incident Playbook (first 24h after shadow-IT discovery)
Top-down order	× No owner, no gates, no accountabilty	✓ RACI (owned by PMO) ✓ Decision Gates (must be in place to proceed)

Thanks! See you next time.



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Data Protection · Cyber Security · Governance

„Early on in my career, I worked in contexts where law, governance and technology intersect. These ranged from e-government and social data protection in the public sector to international corporate contexts. For over 12 years, I have worked almost exclusively in data protection and cyber security, with roles in public administration, law firms, medium-sized businesses and global corporations.“