

Scan**RGPD**

The website: the blind spot that puts **your** name on the file

What the EDPB's 2026 coordinated action changes for DPOs and privacy firms, and how to turn it into a billable advantage.

WHERE A COMPLAINT STARTS

The website is the first thing anyone examines.

Not the records of processing. Not the CRM. The site.

PUBLIC Anyone can inspect it No access request, no notice period. A browser and thirty seconds are enough.	SCRUTINISED The first reflex of complainants Journalists, competitors and activist groups all start in the same place.	EXPOSED Failures are immediately visible A tracker firing before consent is observable from outside the organisation.
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WHAT AN INSPECTION FINDS FIRST

Four failures, four cases waiting to happen.

01

Tracker loaded before consent

Analytics and advertising pixels active from page load.

Art. 5 & 7 GDPR

02

No symmetric “Reject” button

Refusing takes more clicks than accepting, or is absent entirely.

Art. 7(3) GDPR

03

Third-country transfers without safeguards

Session replay and captcha services outside the EEA, no valid mechanism.

Chapter V GDPR

04

Incomplete information notices

Vague purposes, missing retention periods, rights not stated.

Art. 12-14 GDPR

YOUR STATUTORY DUTY

Article 39: monitoring compliance is your task.

“The data protection officer shall have **at least** the following tasks:
to monitor compliance with this Regulation.”

Article 39(1)(b) GDPR

Monitoring is not a statement of intent. When an authority asks what you check, how often, and what changed after you flagged it, the answer has to be documented. A timestamped technical record is that documentation.

THE MONEY HAS MOVED

Most of the fines ever issued under the GDPR are recent.

Thirty supervisory authorities apply the same regulation. The volume changed sharply after 2023.

€7.1bn¹

in GDPR fines issued across the EEA
since 2018

2,685²

documented enforcement cases
as of March 2026

€1.2bn¹

issued in 2025 alone

60%+¹

of all fine value imposed since
January 2023

A PUBLISHED PROGRAMME, NOT A FORECAST

Every year, EU authorities agree on what they will check together.

2024 Designation and position of the DPO How DPOs are appointed, resourced and involved in decisions.³	2025 Right to erasure 32 authorities took part, 764 controllers answered. Findings adopted 10 February 2026.⁴	2026 · RUNNING NOW Transparency and information, Art. 12-14 25 authorities are contacting controllers across sectors this year.⁵
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The 2026 topic is exactly what a technical audit can evidence: whether a privacy notice exists and is reachable, whether information is given at the point of collection, and whether what the banner claims matches what the browser does.

THE TURN

From obligation to argument.

The technical audit is the part of your work that does not scale with headcount. It is also the part a machine does better than a human reading page source.

FOUR EFFECTS, ONE TOOL

The weak point becomes the entry point.

Evidence for Article 39 A timestamped record per client file, showing what was checked and when. Your monitoring becomes demonstrable rather than asserted.	A billable deliverable A 20 to 30 page report under your own brand, with four pre-filled legal documents. It is sold as work, not absorbed as overhead.
A way in with prospects A finding on a prospect's own site opens a conversation that a capability deck never will.	Capacity without hiring Eighty client files a year, each audited in under ten minutes rather than half a day.

THREE PHASES PER CLIENT FILE

The same method whether the client has ten staff or ten thousand.

Phase 1**Establish the baseline**

Scan the site. Score, intercepted network trace after consent refusal, timestamped record.

Phase 2**Deliver and remediate**

Report under your brand, four legal documents, action plan at day 1, day 7 and day 30, developer tickets.

Phase 3**Re-scan and prove progress**

Unlimited iteration scans. You show the score moving instead of asserting the work was done.

FOUR STEPS, ZERO INSTALLATION

Nothing to deploy on the client's site.

01

Paste the URL

No tag, no plugin, no access to the client's systems.

02

Argus runs the scan

A real browser loads the page, refuses consent, and records what still leaves.

03

Report in under 10 minutes

Your logo, your details.
ScanRGPD appears nowhere.

04

Re-scan during remediation

Unlimited iterations until the score reflects the work done.

WHAT THE ENGINE CHECKS

The twelve-point technical checklist.

- ❑ **Consent Bypass Test** — trackers still firing after refusal
- ❑ **Server-side tracking** — GTM-SS containers and CAPI relays
- ❑ **CNAME resolution** — third parties disguised as first-party
- ❑ **Consent Mode v2** — gcd and gcs parameters under the DMA
- ❑ **Storage tracking** — localStorage, sessionStorage, IndexedDB
- ❑ **Session replay** — recording tools capturing form input
- ❑ **Third-country transfers** — endpoints outside the EEA
- ❑ **Embedded content** — video, maps and social widgets
- ❑ **Banner design** — asymmetric buttons and dark patterns
- ❑ **Information notices** — presence, reachability, completeness
- ❑ **Security headers** — HSTS, CSP, X-Frame-Options, nosniff
- ❑ **Contact forms** — consent checkbox and purpose statement

PRICING

One annual fee. No per-seat pricing.

Audits included per year	80
Cost per audit	€37.40
White label	Unlimited
Pre-signed Art. 28 processor agreement	Included
Internal compliance kit per client	Unlimited
Pilot programme	3 free audits

Start with three audits, before committing.

Run them on real client files. If the findings do not change a conversation you were already having, the tool is not for you.

2,990 €/year
scanrgpd.fr/en/partenaires/dpo

EVERY FIGURE IN THIS DOCUMENT

Where the numbers come from.

1. DLA Piper, *GDPR fines and data breach survey*, January 2026. Cumulative total across the EEA, 2025 volume, and share imposed since January 2023.
2. CMS, *GDPR Enforcement Tracker*, case count as of 1 March 2026. [enforcementtracker.com](https://www.enforcementtracker.com)
3. EDPB, *Coordinated Enforcement Framework*, 2024 action on the designation and position of Data Protection Officers.
4. EDPB, *Coordinated Enforcement Action on the implementation of the right to erasure by controllers*, 2025. Report adopted 10 February 2026.
5. EDPB, *CEF 2026: coordinated enforcement action on transparency and information obligations under the GDPR*. edpb.europa.eu

Totals differ between trackers because methodologies differ: some record only publicly disclosed decisions. Figures are reproduced as published.

Run it on one client file. That is the whole evaluation.

No SDRs, no ticket queue. ScanRGPD is built by one person, and that same person answers you, on GDPR strategy, on the Argus engine, on your specific case.

TRY IT

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DPO PRO PACK

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CONTACT

contact@scanrgpd.fr