



Centre for Information Policy Leadership (CIPL)

CIPL Members Only Industry Roundtable on

Accountability in Light of FTC Consent Orders

Hunton Andrews Kurth LLP, Room 941 "Foggy Bottom"
2200 Pennsylvania Ave NW,
Washington, DC 20037

Wednesday, October 30, 2019 | 10:00 AM – 2:00 PM

AGENDA

- 9:30 AM Registration**
- 10:00 AM Welcome and Introduction into Accountability and Privacy Management Programs**
 - ❖ **Bojana Bellamy**, President, CIPL
- 10:15 AM Reflections on the Impact of the FTC’s Consent Order on Facebook and its Partners**
 - ❖ **Rob Sherman**, Vice President & Deputy Chief Privacy Officer, Facebook
- 10:30 AM Roundtable Discussion**
- 12:00 PM Lunch**
- 12:30 PM Roundtable Discussion resumes**
- 2:00 PM End of Roundtable**

Questions for Discussion:

Impact of the FTC’s Facebook Consent Order on other companies’ privacy programs

- What are the wider impacts of the FTC’s Facebook Consent Order beyond Facebook?
- What does the Facebook Consent Order mean for the privacy management programs of other organizations engaged in US business operations?
- Can the structure and requirements of the mandated privacy management program outlined in the Facebook Consent Order be instructive to other organizations?
- Does the mandated privacy program outlined in the Facebook Consent Order symbolize the new US standard for such programs, bearing in mind that a similar structure and set of requirements were imposed by the FTC in the recent Equifax settlement? In what sense can it be considered the new standard? In what sense can it not be considered the new standard?

The scalability of the structure and requirements of the FTC's recent privacy consent orders

- Is the approach outlined by the FTC scalable to organizations of different sizes, business models and complexities?
- What should SMEs take from it?
- What is the potential for codes of conduct and certifications in helping organizations of all sizes, but particularly SME's, implement comprehensive privacy management programs?

How FTC order inspired privacy programs will impact and proliferate throughout the ecosystem

- What do recent FTC consent orders mean for B2B relationships and the digital ecosystem?

Relevance and impact on multinational companies

- What can we infer from these FTC orders about the importance of organizational accountability in data protection and privacy generally and globally?
- How do they compare with the requirements of the GDPR?

Impact on US federal privacy law development

- What is the relevance of the recent FTC consent orders to an accountability requirement in a future US federal privacy law?
- Can and should the accountability model set out in the recent FTC consent orders serve as a model for a legislative accountability requirement?

Next steps for CIPL

- Are there any action items for CIPL related to FTC consent orders, particularly within the context of its ongoing work streams on organizational accountability and accountable AI?