Message from the President

Dear CIPL Members,

It was wonderful seeing so many of you last month in Washington, DC at CIPL’s joint Reception with Hunton Andrews Kurth and in the margins of the IAPP Global Privacy Summit. I always enjoy opportunities to hear your input in shaping our work priorities as we continue to address complex issues in data privacy. With your support, we’ve been able to engage with key stakeholders on important data privacy developments such as the US privacy framework, the impact of Brexit on data protection in the UK and EU, the concept of regulatory sandboxes, Latin American privacy developments, difficult privacy issues in AI and other emerging technologies, and India’s nascent privacy law.

We’re also delighted to share that Hielke Hijmans, who has been CIPL’s Senior Policy Advisor for nearly three years, has been appointed as Director of the Litigation Chamber at the Belgian Data Protection Authority. We’re so proud to have a CIPL alumnus appointed to such a senior position, and the Belgian DPA is lucky to have a thoughtful expert of his caliber.

I. CIPL/UK Department for Digital, Culture, Media & Sport (DCMS) Roundtable on “Brexit Impact and Readiness” in London, UK

On January 25, 2019, CIPL held a joint roundtable with the UK Department for Digital, Culture, Media & Sport (DCMS) to discuss “Brexit Impact and Readiness”. During the roundtable, the DCMS presented the results of their survey on Brexit readiness for businesses, and participants discussed the legal impact of Brexit on data protection, risks companies will face in a “no-deal” Brexit scenario and steps companies are taking to mitigate against any restrictions and the transfers of personal data between the UK and the European economic area.

For more details on the roundtable, please see the agenda and slide deck.

II. CIPL Roundtable on the "Regulatory Sandbox" Concept with the UK Information Commissioner’s Office (ICO) in London, UK

On 19 February 2019, CIPL held a small, deep-dive roundtable with the UK Information Commissioner’s Office (ICO) to discuss their plans and proposals for the regulatory sandbox and hear input from CIPL members, including willingness to participate in a regulatory sandbox pilot program. During the roundtable, participants discussed the scope, process, potential benefits and expectations for participation in the regulatory
sandbox. The discussion was shaped primarily by the ICO’s sandbox beta phase discussion paper and CIPL’s response to the ICO’s call for views on creating a “Regulatory Sandbox”. Feedback from this roundtable contributed to finalizing CIPL’s white paper on “Regulatory Sandboxes in Data Protection: Constructive Engagement and Innovative Regulation in Practice”.

For more details on the roundtable, please see the roundtable agenda and slide deck.

Participants discuss key questions around the operation and function of the Regulatory Sandbox during CIPL’s joint Roundtable with the ICO.

### III. CIPL Workshop on “Key Building Blocks for Effective Data Protection and Innovation in the Data Driven Society” during APEC’s Privacy Meetings in Santiago, Chile

During the week of 25 February 2019, CIPL participated in the meetings of the APEC Data Privacy Subgroup (DPS) and Electronic Commerce Steering Group (ECSG) in Santiago, Chile. CIPL enjoys formal guest status and a seat at the table at these bi-annual APEC privacy meetings.

In connection with these meetings, CIPL was asked by the General Directorate of International Economic Relations of Chile’s Ministry of Foreign Affairs to organize an official workshop for the APEC DPS and ECSG delegates from the participating APEC-based governments and data protection authorities, as well as for local Chilean government and industry stakeholders and other international industry and academic stakeholders. The purpose of this workshop was to support APEC’s privacy and data protection work and provide a forum to exchange experiences and global perspectives on key issues relating to data protection in an era of rapid technological change.

CIPL’s workshop was the first official APEC ECSG/DPS event in Santiago, kicking off a weeklong series of meetings by these groups on the further implementation of the APEC Cross-Border Privacy Rules (CBPR) and other privacy and data protection related issues of interest, including, the intersection between privacy laws and emerging technologies, potential updates to the APEC Privacy Framework, data portability, cross-border enforcement cooperation and privacy law and policy developments in the 21 APEC member-economies. A portion of the meetings also concerned possible future work on interoperability between the APEC CBPR and EU cross-border transfer mechanisms.

Chilean Senator Felipe Harboe discusses key elements and progress of Chile’s Data Protection Bill during CIPL’s Privacy Workshop at the APEC SOM1 Meetings in Chile.
IV. CIPL Roundtable on “Difficult Data Protection Issues in AI” in London, UK

On 12 March 2019, CIPL held a small, informal roundtable on “Difficult Data Protection Issues in AI”, gathering experienced regulators, industry leaders and other experts to work substantively and collaboratively to identify solutions. During the roundtable, participants discussed difficult issues around fairness, transparency/explainability, use limitations, data minimization and automated decision-making to identify workable solutions and collect examples of hypothetical and currently implemented best practices.

This roundtable was the first of a series of AI and data protection roundtables to be sponsored by CIPL in Europe, North America, and Asia.

V. CIPL Breakfast Roundtable on India’s Draft Data Protection Law in London, UK

On 14 March 2019, CIPL held a breakfast roundtable on India’s draft data protection law in collaboration with Ms. Rama Vedashree, CEO of the Data Security Council of India. During this breakfast briefing, Rama Vedashree presented key elements of the draft law and its status in the legislative process. The presentation was followed by interactive discussions with Belson Devarajan (Legal Counsel for Data Privacy at Accenture) and Riccardo Masucci (Global Director of Privacy Policy at Intel). Participants discussed the potential impact of the future law on organizations, the main provisions of the law and the role and functioning of the forthcoming Indian data protection authority. The projected impact on international transfers and the free flow of data and India’s potential for leadership on data protection domestically, throughout Asia and globally was also discussed.

For more details on the roundtable, please see the roundtable slide deck.

VI. CIPL Responses, Public Comments, Articles and Other Events

Between January – March 2019, CIPL prepared the following public comments, published the following papers/articles and held, or spoke at, the following events:

- 10 January – CIPL held its India Working Group Call
- 15 January – CIPL held a webinar on “Anonymized Data and How Trūata got its Privacy Program to Perform for the GDPR Age”
- 17 January – CIPL Vice President Markus Heyder spoke at a Breakfast Briefing with the New York Privacy Officers Forum (NYPOF) on “A New Privacy Framework for the US? A Look at US Proposals in the Wake of the GDPR” (New York City)
- 18 January – Bojana Bellamy spoke on “Opportunities, but for whom? Balancing the interests of business, state and civil society in the new world of data” at Datum Future’s Breakfast Debate (Paris)
• 18 January – CIPL submitted its Comments on the EDPB's Territorial Scope Guidelines
• 21 January – Bojana Bellamy moderated a panel at Microsoft’s event on "Technology & Democratic Freedoms: moving forward with new laws" (Brussels)
• 22 January – CIPL held its Latin America Working Group Call
• 25 January – CIPL held a joint roundtable with the UK DCMS on “Brexit Impact and Readiness” (London)
• 25 January – CIPL’s Director of Privacy Policy Nathalie Laneret spoke at Impact AI’s Roundtable (Paris)
• 25 January – CIPL submitted its response to the ICDPPC’s Declaration on Ethics and Data Protection in Artificial Intelligence
• 25 January – CIPL published its white paper on “Learning from the GDPR: What Elements Should the US Adopt?”
• 29 January – CIPL published its Comparison Chart of US Proposed Legislation and Principles for a Federal Privacy Law
• 30 January – Bojana Bellamy spoke at a panel on "How the Adequacy Mechanism Works: Progress in the EU's Governance of Cross-Border Data Flows" at the 2019 Computers, Privacy & Data Protection Conference (Brussels)
• 31 January – Bojana Bellamy spoke at a panel on "The GDPR and Freedom of Expression - a Rocky Relationship" at the 2019 Computers, Privacy & Data Protection Conference (Brussels)
• 31 January – CIPL submitted its Comments on Annex 1 of the EDPB's Guidelines of the Accreditation of Certification Bodies under the GDPR
• 1 February – Markus Heyder spoke on “Global Privacy and Data Protection” at Northrop Grumman’s Privacy Team Gathering (Washington, DC)
• 19 February – CIPL held a roundtable on the "Regulatory Sandbox" concept with the UK ICO (London)
• 25 February – CIPL held a workshop on “Key Building Blocks for Effective Privacy and Data Protection in the Global Digital Economy” during the 2019 APEC Privacy Meetings (Santiago)
• 25 February – CIPL held a post-workshop dinner with Facebook (Santiago)
• 27 February – Nathalie Laneret spoke on "Transfers of Personal Data Across Borders and Data Localization Rules" at the 2019 GSMA Mobile World Congress (Barcelona)
• 27 February – Nathalie Laneret spoke on "Privacy in the Era of Intelligent Machines - Designing AI Solutions that Protect People's Privacy and Data" at the 2019 GSMA Mobile World Congress (Barcelona)
• 8 March – Bojana Bellamy spoke at GlaxoSmithKline’s Global Privacy Meeting (London)
• 8 March – CIPL published its white paper on “Regulatory Sandboxes in Data Protection - Constructive Engagement & Innovative Regulation in Practice”
• 12 March – CIPL held a roundtable on “Difficult Data Protection Issues in AI” (London)
• 13 March – Bojana Bellamy spoke at a panel on "Innovative and Regulatory Oversight" at the 2019 IAPP UK Data
Protection Intensive (London)

- 13 March – Bojana Bellamy was interviewed for the IAPP’s “Thought Leaders in Privacy” series during the 2019 IAPP UK Data Protection Intensive (London)
- 14 March – CIPL held a breakfast roundtable on India’s draft data protection law (London)
- 14 March – Nathalie Laneret spoke at a panel on "The Indian Data Protection Law: Key Elements and Potential Impact" at the 2019 IAPP UK Data Protection Intensive (London)
- 19 March – Nathalie Laneret spoke at POLITICO’s 2019 AI Summit (Brussels)
- 21 March – Nathalie Laneret spoke at L'Etente’s Debates on Competition Law and Data Protection (Brussels)
- 21 March – CIPL published its white paper on “Ten Principles for a Revised US Privacy Framework”
- 26 March – Bojana Bellamy spoke at the US Federal Trade Commission's Consumer and Competition Hearings (Washington, DC)
- 26 March – Bojana Bellamy spoke at the European Data Protection Days (EDPD) Webinar on "The GDPR and Beyond"
- 29 March – Bojana Bellamy spoke at a panel on "When Digital Becomes Human" at the 2019 Teleperformance Leadership Insight's Forum (Barcelona)
- 29 March – CIPL submitted its response to the EDPB’s Guidelines on Codes of Conduct and Monitoring Bodies under the GDPR

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2019 Upcoming Events

*Click here to see the Calendar of Events*

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<td>CIPL/Hunton Andrews Kurth Meeting on EU Model Clauses (Brussels)</td>
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<td>OneTrust PrivacyTech Global User Conference with Bojana Bellamy (London)</td>
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<td>CIPL/New York Privacy Officers Forum (NYPOF) Breakfast Briefing on “The Future of AI – How Artificial Intelligence is Upending the World of Data Protection” with Bojana Bellamy (New York City)</td>
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<td>Panel on Data Privacy and Ethics with Bojana Bellamy at British Standards Institution’s (BSI) “Privacy – Raising the Standard” Conference (London)</td>
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<td>CIPL AI Roundtable with EU Commission on Piloting Process on High Level Expert Group (HLEG) Guidelines (Brussels)</td>
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<td>28-29 June</td>
<td>2019 G20 Summit &amp; Ministerial Meetings (Osaka)</td>
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<tr>
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**Member Spotlight**

We welcome and thank our newest members:

- Christian Dior Couture
- Crownpeak
- Intuit
- MUFG
- Uber

Visit our website [Centre for Information Policy Leadership](http://www.informationpolicycentre.com)

Visit the Hunton Andrews Kurth [Privacy and Information Security Law Blog](http://www.huntonik.com/)

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Dear CIPL Members,

As summer scorches on, CIPL has been continuing our work to develop solutions for privacy and responsible data use. With your support in this past quarter, we have been able to engage with relevant stakeholders on the US privacy law development process, on modernizing the EU standard contractual clauses for international data transfers, advancing our work on responsible AI and implementing the APEC Cross-Border Privacy Rules system, among many other initiatives. Following Brazil’s enactment of its first comprehensive data protection law, CIPL is launching a new project with the Brazilian Institute of Public Policy (IDP) on the implementation of this law, which will commence with our first workshop on this topic in Brasilia in September. For now, I wish you all a restful summer, and thank you for your continued support in helping to make all the items you see in this report a success.

SAVE THE DATES

CIPL/Crownpeak Webinar on Consent Models
12 September 2019

CIPL/UK Information Commissioner’s Office (ICO) Roundtable on the ICO’s AI Auditing Framework
18 September 2019
London

CIPL/Brazilian Institute of Public Policy (IDP) Joint Workshop on Brazilian Data Protection Implementation and Effective Regulation
25 September 2019 (TBC)
Brasilia

CIPL Side Event on Accountability at the 41st International Conference of Data Protection & Privacy Commissioners (ICDPPC)
24 October 2019
Tirana

The first week of April, CIPL held its annual two-day executive retreat in Washington, DC. The first day, April 2, 2019, consisted of a full-day working session on “Privacy Laws and Evolving Technologies and A New US Privacy Framework” at Hunton Andrews Kurth’s Washington, DC office. Over 100 invited guests attended the working session, including CIPL members and US regulators and policy makers. Following opening remarks by CIPL President Bojana Bellamy, the Retreat commenced with a panel on privacy laws and evolving technologies, moderated by CIPL Senior Policy Advisor, Fred Cate. The second session shifted to a discussion about a new US privacy framework. Specifically, this session, entitled “Learning from the GDPR – does it contain elements that should be included in a US privacy law?” focused on the GDPR experience of companies over the past year. The final session, entitled “What should a US Privacy Law Look Like?”, was split into two segments – a discussion with US government and regulatory representatives, moderated by CIPL Vice President and Senior Policy Counselor Markus Heyder, and an industry panel featuring a discussion by private sector representatives, moderated by CIPL Advisor Russell Schrader.

Participants discuss elements of a potential privacy law that may support or hamper the effective deployment of evolving technologies, e.g. AI, Blockchain and IoT
II. CIPL/Brazilian Institute of Public Policy (IDP) Roundtable on Brazil’s Data Protection Law in Brasilia

On 6 May 2019, CIPL held a joint expert roundtable with the OECD in Paris on organizational accountability. This roundtable was organized in conjunction with the 45th meeting of the Working Party on Security and Privacy in the Digital Economy (SPDE).

This roundtable sought to examine the ways in which accountability is being implemented and contributes to privacy and personal data protection through three thematic sessions. The first session focused on the state of play of organizational accountability, notably examples of its implementation in practice, its main elements, its benefits and drawbacks. The session also explored implications for accountability on transborder data flows. The second session focused on the impact of emerging technologies, such as AI, the Internet of Things and big data analytics, as well as current approaches to accountability, and the possible need to adapt them to take into account ethical and data governance considerations. The third and concluding roundtable highlighted the main takeaways from the previous sessions and discussed them in the context of the review of the OECD’s Privacy Guidelines. Participants agreed there is a need for a common understanding of accountability (the first theme), that enforcement and powerful regulators are integral to successful
accountability (the second theme), and that international guidance on both aspects is necessary.

IV. CIPL/Hunton Andrews Kurth Seminar on EU Standard Contractual Clauses for International Data Transfers in Brussels

On 12 June 2019, CIPL held a joint roundtable with Hunton Andrews Kurth in Brussels regarding the update of the EU Standard Contractual Clauses for international data transfers (SCCs). More than 30 privacy leaders joined together to discuss the challenges of the current SCCs and provide their insights on the updated versions. Hunton Andrews Kurth Partner David Dumont led the discussion, while CIPL President Bojana Bellamy illuminated CIPL’s work in this area. The session also featured Cristina Monti, Policy Officer in the International Data Flows and Protection Unit of the EU Commission DG Justice and Consumers.

The seminar attracted a range of privacy professionals who responded to a brief interactive survey regarding their preferred data transfer mechanisms and their experiences with SCCs. EU Commission representatives also shared the Commission’s work to update SCCs in light of the GDPR, and participants discussed the efficiency, workability and challenges of the current SCCs and expectations for the updated versions.

For more details, please see Hunton Andrews Kurth’s blog on the seminar.

V. CIPL AI Roundtable with the European Commission on their High Level Expert Group’s (HLEG) AI Ethics Guidelines in Brussels

On 27 June 2019, CIPL held a Roundtable with the EU Commission on the Commission’s Ethics Guidelines for Trustworthy AI. Over two dozen representatives from CIPL membership, the EU Commission and its High Level Expert Group participated to discuss the principles, requirements and assessment list of the Commission’s guidelines. More specifically, the EU Commission had the opportunity to hear industry feedback on the assessment list’s usefulness, relevance, ability to be implemented, and interoperability with other frameworks, as well as possibilities for improvement.

For more details, please see the roundtable agenda and slide deck.

VI. CIPL Responses, Public Comments, Articles and Other Events

Between April – June 2019, CIPL prepared the following public comments, published the following papers/articles and held, or spoke at, the following events:

- 25 April – CIPL President Bojana Bellamy spoke at AsiaDPO’s Roundtable on “Accountability and Interoperability: What does it mean for the Asia-Pacific Region?” (Singapore)
• 2 May – Bojana Bellamy spoke on “Constructive Engagement vs. Enforcement: Initial DPA Experiences under the GDPR” at the 2019 IAPP Global Privacy Summit (Washington, DC)

• 7 May – Bojana Bellamy spoke at Cisco’s GDPR Anniversary Event on “Valuing Privacy: What’s in it for Businesses and Citizens?” (Brussels)

• 16 May – Bojana Bellamy participated in Politico’s “State of Play” Roundtable (London)

• 17 May – CIPL submitted its response to the Office of the Privacy Commissioner of Canada’s (OPC) Consultation on Transborder Data Flows

• 21 May – CIPL’s Director of Privacy Policy Nathalie Laneret participated in PolitcoPro’s Roundtable (Brussels)

• 23 May – CIPL’s Vice President & Senior Policy Counselor Markus Heyder gave a keynote on “Asia-Pacific Privacy Principles: CBPR and GDPR” during the Philippine National Privacy Commissioner’s (NPC) 2019 Data Protection Officers’ Conference (Manila)

• 23 May – CIPL submitted its response to the EDPB’s Draft Guidelines on the Processing of Data on the basis of Contractual Necessity

• 25 May – CIPL’s Global Privacy Policy Analyst Sam Grogan spoke on "International Developments Impacting Canada” at the 2019 IAPP Canada Privacy Symposium (Toronto)

• 30 May – Bojana Bellamy spoke on “How to Establish the Free Data Flow World with Ensuring Security of Personal Information through Mutual Trust” at the 51st APPA Forum hosted by the Japan Personal Information Protection Commission (PPC) (Tokyo)

• 31 May – Bojana Bellamy spoke on “Current Frameworks for Cross-Border Data Transfers” at the American Chamber of Commerce in Japan’s (ACCJ) Privacy and Cross-Border Data Flows Workshop (Tokyo)

• 31 May – CIPL submitted its response to the European Commission’s Questionnaire on the Application of the GDPR

• 31 May – CIPL released its report on "GDPR One Year In: Practitioners Take Stock of the Benefits and Challenges"

• 31 May – CIPL submitted its response to the ICO’s Draft Code of Practice for Age Appropriate Design - A Code of Practice for Online Services

• 3 June – Bojana Bellamy spoke on “Mutual Trust among Stakeholders” during the G20 International Seminar on Personal Data (Tokyo)

• 7 June – Bojana Bellamy spoke at Datum Future’s Advisory Board Meeting (London)

• 13 June – Bojana Bellamy spoke at OneTrust’s 2019 PrivacyTech Global User Conference (London)

• 17 June – Markus Heyder spoke at APEC’s CBPR Workshop on "Fostering Accountability Agent Participation for Participants, Developing Economies, and MSMEs" (Honolulu)

• 24 June – Bojana Bellamy spoke at the London School of Economics (LSE) Even on "Children's Data and Privacy Online: Challenges & Solutions" (London)

• 25 June – Bojana Bellamy spoke on Data Privacy and Ethics at the British Standards Institution’s (BSI) “Privacy – Raising the Standard” Conference (London)
- 26 June – Sam Grogan participated in the Information Accountability Foundation’s (IAF) 2019 Summit (Washington, DC)
- 26 June – Nathalie Laneret participated in the European Commission’s AI Assembly (Brussels)

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<td>CIPL Workshop on the Role of the Data Protection Authority and Innovative Regulatory Policy (New Delhi)</td>
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<td>Week of 2 Decem-</td>
<td>CIPL Workshop in the margins of the APPA Forum with Philippines National Privacy Commission (Cebu)</td>
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Member Spotlight
We welcome and thank our newest member:

L’Oreal S.A.
Dear CIPL Members,

With 2020 already fast approaching, we at CIPL are continuing to work hard on developing solutions to pressing data protection issues, and our CIPL team is growing in order to better support your needs. This past September, we have hired two new privacy managers: Matthew Starr, who joins CIPL as Global Privacy and Public Policy Manager, and Giovanna Carloni, who joins as Global Privacy Policy Manager. We have also recently added former Virginia Governor Terry McAuliffe as a Global Strategy Advisor, and he will primarily help shape CIPL’s strategic initiatives in US privacy and drive visibility for our work.

As part of our work on US privacy, CIPL held a roundtable on organizational accountability with US Senate staff members, and released both a Q&A paper on organizational accountability in data protection, along with a white paper on organizational accountability’s existence in US regulatory compliance and its relevance for a US Federal privacy law. We have also recently launched a project asking CIPL member companies with mature and resilient privacy management programs to map their privacy programs to CIPL’s accountability framework. Our goal in launching this project is to further promote accountability as an essential prerequisite of the modern digital economy and build global consensus between industry and regulators on the meaning and importance of the concept of organizational accountability.

We are also continuing to engage with regulators around the globe on other privacy topics. We have organized two joint events with the Singapore Personal Data Protection Commission (PDPC) on Cross-Border Privacy Rules and AI, collaborated with the UK Information Commissioner’s Office on their AI Auditing Framework, and gathered private and public sector stakeholders to discuss Brazil’s new data protection law in Brasilia.

I encourage you to read the details of CIPL’s ongoing work below, and I look forward to the next opportunity to see you all in person.

I. CIPL Roundtable on US Privacy Law - Why and How Organizational Accountability Should be Included in Federal Privacy Legislation in Washington, DC

On 12 July 2019, CIPL hosted an educational roundtable on including organizational accountability in Federal privacy legislation for US Senate staff working on privacy and consumer protection issues. During the roundtable, a panel of senior privacy executives and experts from US companies, including Mastercard, Qualcomm, LiveRamp and Accenture, shared their experiences in implementing accountable privacy compliance programs to date and how they would implement accountability under a new federal US privacy law for the
II. CIPL Industry Session with the Singapore Personal Data Protection Commission (PDPC) on “APEC Cross-Border Privacy Rules and Privacy Recognition for Processors” in the margins of the PDPC’s 2019 Personal Data Protection Seminar in Singapore

On 17 July 2019, CIPL held a joint industry session with the Singapore Personal Data Protection Commission (PDPC) on “APEC Cross-Border Privacy Rules (CBPR) and Privacy Recognition for Processors (PRP)” in the margins of the PDPC’s 2019 Personal Data Protection Seminar. During this session, APEC CBPR-certified companies and Accountability Agents shared their experiences on APEC CBPR certification, including the reasons for applying for CBPR, preparations for assessment, how the certification process works, and the benefits of certifying for organizations. Over sixty representatives from both local and global companies participated in the session.

For more details on the industry session, please see the agenda.

III. CIPL/PDPC Roundtable on “Personal Data Protection Challenges and Solutions in AI” in the margins of the PDPC’s 2019 Personal Data Protection Seminar in Singapore

Following the joint industry session, CIPL and the PDPC held a joint roundtable on “Personal Data Protection Challenges and Solutions in AI” on 18 July 2019. The roundtable began with a discussion of the challenges raised by the data protection requirements of transparency and explainability in AI along with possible solutions. This was followed by explanations of the role of human intervention and review in AI in accordance with prohibitions or restrictions found in some data protection laws. The roundtable concluded with a discussion of how organizations can build, deliver, monitor, assess and improve AI frameworks for compliance with data protection principles and to properly manage relevant risks. Over four dozen representatives from Asian data protection authorities, industry and academia participated in the roundtable.

For more details on the roundtable, please see the agenda.

IV. CIPL/ICO Roundtable on the ICO’s AI Auditing Framework in London

On 18 September 2019, CIPL held a roundtable organized alongside the UK Information Commissioner’s Office (ICO) on the ICO’s AI Auditing Framework in London. This roundtable was organized not only in the context of the ICO’s recent consultation on an auditing framework for AI, but also CIPL’s project on “Delivering Sustainable AI Accountability in Practice”. During the roundtable, CIPL members and ICO representatives discussed the risks and challenges of using third-party developed and trained AI applications and algorithms, supplier due diligence, how organizations can use
Data Protection Impact Assessments in AI projects and challenges around compliance with the principles of data minimization and purpose limitation.

For more details on the roundtable, please see the agenda and slide deck.

V. CIPL/Instituto Brasiliense de Direito Público (IDP) Joint Workshop on “The LGPD – Implementation and Harmonization with International Data Protection Regimes” in Brasilia

On 25 September 2019, CIPL and the Instituto Brasiliense de Direito Público (IDP) held the first of a series of workshops for its joint project on “Brazilian Data Protection Implementation and Effective Regulation.” This is an exclusive project that aims to contribute to the debates around the Brazilian Data Protection Law (Lei Geral de Proteção de Dados Pessoais (LGPD)), including the development of good practices for data governance and the implementation and enforcement of this new law. As part of this project, CIPL will organize additional multi-stakeholder workshops, webinars and training sessions, and prepare white papers on key topics relating to data protection in Brazil.

The first workshop, launching the project, gathered a variety of stakeholders including leading global and Brazilian companies, Brazilian and international policymakers, academics and civil society. Attendees had broad, intensive and pragmatic discussions concerning LGPD implementation and the establishment of a smart, efficient and technically skilled Brazilian Data Protection Authority. Conversations also touched on ensuring compatibility and interoperability between the LGPD and international data protection frameworks, as well as the need to ensure that economic and digital development in Brazil is complemented and supported by effective privacy protections for individuals.

The partnership between CIPL and IDP through this 14 month-long project combines global and local data protection perspectives, experience and expertise that will drive benefits to both Brazilian and international participants and stakeholders in this project. CIPL invites privacy professionals, law firms, private organizations and public institutions to engage in the debates and take part in this project.

For more details on the workshop, please see the agenda and slide deck.

Participants discuss operationalizing accountability and compliance through comprehensive privacy management programs at CIPL and IDP’s joint workshop on the LGPD.
VI. CIPL Responses, Public Comments, Articles and Other Events

Between July – September 2019, CIPL prepared the following public comments, published the following papers/articles and held, or spoke at, the following events:

- 3 July – CIPL released its Q&A on Organizational Accountability Data Protection
- 3 July – CIPL released its white paper on Organizational Accountability – Existence in US Regulatory Compliance and its Relevance for a US Federal Privacy Law
- 3 July – CIPL submitted its response to the UK Committee on Standards in Public Life’s (CSPL) Review of Artificial Intelligence and Public Standards
- 16 July – CIPL President Bojana Bellamy spoke on “Implementing Accountability: Privacy Governance Approaches for Today and Tomorrow” at the 2019 IAPP Asia Privacy Forum (Singapore)
- 24 July – CIPL Vice President and Senior Policy Counselor Markus participated in a Data Protection Discussion organized by The National Association of Software and Services Companies (NASSCOM) (Washington, DC)
- 25 July – CIPL submitted its response to the EU Commission’s 2019 Questionnaire for the Annual Review of the Privacy Shield
- 5 August – CIPL submitted its response to the Office of the Privacy Commissioner of Canada’s (OPC) Reframed Consultation on Transfers for Processing
- 7 August – CIPL released its white paper on Model Clauses for International Transfers under the GDPR
- 21 August – CIPL submitted its response to the Canadian Department of Justice’s Technical Engagement with Experts on the Modernization of Canada’s Federal Privacy Act
- 28 August – CIPL held an India Working Group call
- 6 September – CIPL submitted its response to the EDPB’s Guidelines on the Processing of Personal Data through Video Devices
- 9 September – CIPL hosted briefing with lawyers from the Middle East through LexisNexis’ Rule of Law Project to discuss Global Data Protection Laws, Cross-Border Data Flows, Organizational Accountability and AI (Washington, DC)
- 13 September – CIPL held its September First Friday call
- 17 September – Bojana Bellamy spoke on a panel on “International Data Flows and EU-wide GDPR Interpretation” at Bitkom’s 2019 Privacy Conference (Berlin)
- 19 September - Bojana Bellamy spoke on “Expectations of Organizations and Regulators in the New Data World” at the 2019 European Data Privacy Forum (Dublin)
- 20 September – Bojana Bellamy participated in the Ireland Department of the Taoiseach’s 2019 Digital Summit
2019-2020 Upcoming Events

Click here to see the Calendar of Events

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<td>CIPL Side Event on AI Explainability in the margins of the 52nd APPA Forum (Cebu)</td>
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<td>4 December 2019</td>
<td>Panel on “Data Privacy and Protection Enforcement, Challenges and Milestone from the West” at the Philippines National Privacy Commission’s 2020 Global Privacy Forum (Cebu)</td>
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<td>6 December 2019</td>
<td>CIPL First Friday Call</td>
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<td>11 December 2019</td>
<td>CIPL Advisory Council Teleconference Call</td>
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<td>5 February 2020</td>
<td>CIPL/Datum Future Roundtable on Data Portability (London)</td>
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<td>11 or 12 February 2020</td>
<td>CIPL/ICO Roundtable on the ICO’s Accountability Toolkit (London)</td>
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<tr>
<td>6 April 2020</td>
<td>CIPL Side Event on US Privacy in the margins of 2020 IAPP Global Privacy Summit (Washington, DC)</td>
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Member Spotlight
We welcome and thank our newest project member:

Experian

Visit our website Centre for Information Policy Leadership
Visit the Hunton Andrews Kurth Privacy and Information Security Law Blog

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Message from the President

Dear CIPL Members,

Although the start of a new decade represents a new beginning for many, the unprecedented transformation we have seen in privacy and data protection towards the end of the last decade is set to continue for many years. Amidst the changes, CIPL is continuing to work hard to develop global solutions for privacy and the responsible use of data around the globe. One of our primary focus areas continues to be the promulgation of the importance of organizational accountability, and to that end we have gathered key stakeholders to discuss accountability both in Albania during the 41st International Conference of Data Protection & Privacy Commissioners (ICDPPC), and in the US in the context of the Federal Trade Commission’s (FTC) recent consent decrees, which formed the basis of a CIPL white paper entitled “Organizational Accountability in Light of FTC Consent Orders”. As part of our commitment to engaging in global legislative efforts in privacy, CIPL has held a workshop with key stakeholders in New Delhi on India’s Proposed Personal Data Protection Law. We are also continuing to work on accountable AI, and held a design jam on AI explainability in December during the 52nd Asia-Pacific Privacy Authorities (APPA) Forum in the Philippines.

I encourage you to read the details of CIPL’s ongoing work below, and I hope to see many of you at our upcoming events.

I. CIPL/Google Joint Breakfast Meeting on “Advancing Compliance and Promoting Privacy through Constructive Engagement between Regulators and Industry” in Tirana

On 24 October 2019, CIPL hosted an exclusive breakfast discussion with Google in the margins of the 41st International Conference of Data Protection and Privacy Commissioners (ICDPPC). This meeting brought together a small group of regulators and industry thought leaders to engage in an interactive dialogue on the benefits of constructive engagement between regulators and industry.

Representatives from CIPL member companies and data protection authorities discuss the benefits of constructive engagement between regulators and industry.
II. CIPL/IAF/OECD Side Events on Accountability at the 41st International Conference of Data Protection & Privacy Commissioners (ICDPPC) in Tirana

On 24 October 2019, CIPL held two side events during the 41st ICDPPC with the Information Accountability Foundation (IAF) and the Organization for Economic Cooperation and Development (OECD). The first session, entitled “What is Accountability? Addressing the Confusion, Finding Consensus”, focused on clarifying the meaning of organizational accountability. Organizational accountability has become a key building block of data protection globally through legislation, regulatory guidance, global standards and privacy management programs. If properly understood and implemented, it has enormous potential for maximizing both privacy protections for individuals and the effective and beneficial use of personal data. Yet, as noted in a recent OECD-CIPL workshop, the concept of accountability is still being questioned as lacking a commonly agreed meaning, as well as generally accepted ways of measurement, effective enforcement, scalability and auditability. This session sought to address these concerns in order to reinforce the relevance of accountability in the digital era. It also explored ways to increase and incentivize the uptake of organizational accountability by organizations.

This first session formed the foundation for the subsequent session on “Accountability 2.0 - Data Stewardship and Beneficial AI”, which focused on updated guidance, new legal frameworks, and corporate implementation of stakeholder focused data stewardship, specifically in the context of advanced analytics and artificial intelligence.

For more details on the ICDPPC side events, please see the agendas for both the first and second session.

III. CIPL Roundtable on Accountability in Light of FTC Consent Orders in Washington, DC

Traditionally, the FTC has spelled out many of accountability’s key features through its past consent orders. Following the FTC’s recent record settlement with Facebook, CIPL organized a roundtable in Washington, DC to brainstorm with senior privacy leaders from CIPL member organizations on how the recent FTC consent decree may change the expectations of regulators, the shape of accountability and privacy management programs, both within an organization and across the ecosystem.

During the Roundtable, CIPL member Facebook presented on the impact of the FTC’s consent order on Facebook and its partners. The roundtable then transitioned to an open discussion among all participants on the global impact of the FTC’s recent settlement with Facebook and what this means for organizations’ internal privacy management programs and business-to-business relationships. Other key discussion topics included the relevance of FTC consent orders to organizational accountability more generally and whether the obligations laid out in the Facebook settlement are instructive for SMEs and other industries. Participants also explored the relevance of this consent order to a potential accountability requirement in a future US federal privacy law. This roundtable informed CIPL’s recent white paper on “Organizational Accountability in Light of FTC Consent Orders”.

Hunton Andrews Kurth Partner Lisa Sotto speaks on the relevance of approaches to accountability in other areas of US law to data protection and privacy.
IV. CIPL/Trilegal Joint Global Dialogue on Best Practices in Implementing India’s Proposed Personal Data Protection Law in the Context of the Data Driven Economy in New Delhi

On 14 November 2019, CIPL held a joint workshop with Trilegal on India’s proposed data protection law. Over 70 representatives from CIPL member companies, regulators and local Indian organizations participated in this workshop.

The all-day event consisted of four main sessions. Following opening remarks by CIPL’s Bojana Bellamy and Trilegal Partner Rahul Matthan, the event commenced with a keynote on the promises of India’s data protection law. The first session focused on the various DPA tasks under the new privacy law and how to best implement them in light of globally recognized characteristics and experiences of established international data protection authorities. The second session explored how key elements of this law will interact with the demands of the modern digital economy, including AI and machine learning, the Internet of Things, blockchain and other emerging technologies. The third session shifted to a discussion around enabling cross-border data flows. The final session of the event focused on India’s Digital Empowerment and Protection Architecture (DEPA) and similar frameworks from across the world.

For more details on the workshop, please see the agenda and slide deck.

V. CIPL/TTC Labs Joint Design Jam on AI Explainability in the margins of the 52nd APPA Forum in Cebu

In connection with its broader project on the data protection implications of artificial intelligence (AI) and machine learning, CIPL has been organizing a series of events and workshops to bring together industry, policymakers, regulators, academics and civil society to discuss accountable solutions and best practices to address the challenges that AI technology presents to data protection.

As part of this series, CIPL held a fast-paced, output-oriented workshop called a Design Jam focused on AI Explainability with TTC Labs, a cross-industry effort initiated by Facebook that focuses on research, thought leadership and prototype design patterns related to improving user experiences for privacy and data. This event was held in Cebu, Philippines on 3 December 2019 around the 52nd Asia-Pacific Privacy Authorities (APPA) Forum. During the Design Jam, multidisciplinary experts shared ideas and prototypes that aim to facilitate AI explainability through providing transparency and controls to people around algorithmically-driven services. This event built on TTC Labs’ first Design Jam on the subject of AI explainability for startups in May 2019 in Singapore.

For more details on the workshop, please see the agenda.
VI. CIPL Responses, Public Comments, Articles and Other Events

Between October – December 2019, CIPL prepared the following public comments, published the following papers/articles and held, or spoke at, the following events:

- 3 October – CIPL’s Director of Privacy Policy Nathalie Laneret spoke on the LGPD, cross-border data transfer mechanisms, and interoperability with international privacy regimes at the French-Brazilian Chamber of Commerce (Paris)


- 4 October – CIPL held its October First Friday Call

- 8 October – CIPL held joint delegation meeting with the Instituto de Tecnologia e Sociedade (ITS-Rio) (London)

- 9 October – CIPL President Bojana Bellamy spoke on “Artificial Intelligence and machine learning – policy & regulatory approaches” at the International Institute of Communications’ (IIC) 50th Annual Communications Policy & Regulation Conference (London)

- 10 October – Nathalie Laneret spoke on accountability in a digital connected world and its relevance for Latin America at Schneider Electric’s Innovation Day (Paris)

- 10 October – Bojana Bellamy spoke at Datum Future’s Roundtable on “Data Portability – Turning a Right into a Reality” (London)

- 11 October – Bojana Bellamy participated in the IIC’s Roundtable on “The Cross-Cutting Issues of Privacy and (Personal) Data Protection as they Impact the Telecoms, Media and Technology (TMT) Sector” (London)

- 15 October – CIPL/Hunton Andrews Kurth Joint Networking Lunch on “Addressing GDPR Challenges: An Interactive Session on Handling Data Breaches” (Brussels)

- 16 October – Bojana Bellamy spoke on the future of privacy and security in Europe at Google’s Privacy & Security Tech Talk (Brussels)

- 22 October – CIPL held an Advisory Council Lunch (Tirana)

- 24 October – CIPL/Google Joint Breakfast Meeting on “Advancing Compliance and Promoting Privacy through Constructive Engagement between Regulators and Industry” (Tirana)

- 24 October – CIPL/IAF/OECD Side Events on Accountability at the 41st ICDPPC (Tirana)

- 30 October – CIPL released its White Paper on Organizational Accountability – Past, Present and Future

- 31 October – CIPL Roundtable on Accountability in Light of FTC Consent Orders (Washington, DC)

- 5 November – CIPL held its first Verification of Children Online (VoCO) Roundtable with Jonathan E. Shipp Ltd. (London)

- 8 November – CIPL held its November First Friday Call

- 12 November – Nathalie Laneret spoke on the benefits of accountability during the Euroconsumers International Forum Panel on “Innovation vs. Regulation: How can we Guarantee Safety without Killing Innovation?” (Brussels)
• 13 November – Nathalie Laneret spoke on CIPL’s accountability framework and how it’s fit for Europe during the Internet Commission’s Roundtable on “Corporate Accountability and Europe’s Digital Age” (Brussels)

• 13 November – CIPL released its White Paper on Organizational Accountability in Light of FTC Consent Orders

• 14 November – CIPL/Trilegal Joint Global Dialogue on Best Practices in Implementing India’s Proposed Personal Data Protection Law in the Context of the Data Driven Economy (New Delhi)

• 15 November – Bojana Bellamy spoke at the US-India Business Council’s International Privacy Forum on “Creating an Effective Data Protection Authority” (New Delhi)

• 18 November – Bojana Bellamy spoke at the OECD’s Accountability Roundtable (Paris)

• 20 November – Nathalie Laneret spoke on “Demonstrating Accountability: How Can Certification, Code of Conduct and BCR Help?” at the 2020 IAPP Europe Data Protection Congress (Brussels)

• 20 November – Nathalie Laneret spoke on “GDPR Territorial Scope in a Global Connected World” at the 2020 IAPP Europe Data Protection Congress (Brussels)

• 21 November – Nathalie Laneret spoke on “Artificial Intelligence: From Principles to Practice” at the 2020 IAPP Europe Data Protection Congress (Brussels)

• 26 November – Bojana Bellamy spoke on approaches to addressing the challenges posed by balancing transparency with security and privacy at Datum Future’s “Beyond Regulation” Roundtable (London)

• 26 November – Bojana Bellamy testified by video conference at the Brazilian Congress’ Congressional Hearing (Brasilia)

• 27 November – CIPL submitted its Response to the UK ICO’s Accountability Toolkit Consultation

• 3 December – CIPL/TTC Labs Joint Design Jam on AI Explainability in the margins of the 52nd APPA Forum (Cebu)

• 4 December – Bojana Bellamy spoke at the Philippines National Privacy Commission’s Global Privacy Forum entitled “Bridging East and West” (Cebu)

• 6 December – CIPL held its December First Friday Call

• 10 December – CIPL’s Vice President and Senior Policy Counselor Markus Heyder presented on “National Privacy Agendas Post GDPR; Data Protection Regulation – Objectives, Effectiveness and Impacts” at the IIC Annual DC Telecommunications and Media Forum (Washington DC)

• 11 December – CIPL held its Advisory Council Call

• 11 December – CIPL submitted its Response to the US FTC’s Review of COPPA Rule

• 13 December – CIPL held a US privacy discussion call with CIPL members

• 18 December – CIPL held a call with the Steering Committee of its LGPD Implementation Project
2020 Upcoming Events

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<td>27-28 May</td>
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Member Spotlight

We welcome and thank our newest member:

Crypto

Visit our website [Centre for Information Policy Leadership](https://www.informationpolicycentre.com)


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