

## Message from the President



*Bojana Bellamy*

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.

### SAVE THE DATES

#### CIPL Side Event on AI Explainability in the margins of the 52nd APPA Forum

3 December 2019  
Cebu

#### CIPL/Datum Future Roundtable on Data Portability

5 February 2020  
London

#### CIPL/ICO Roundtable on the ICO's Accountability Toolkit

11 or 12 February 2020  
London

#### CIPL Side Event on US Privacy in the margins of 2020 IAPP Global Privacy Summit

6 April 2020  
Washington, DC

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## 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

benefit of consumers, regulators and wider society.

The roundtable began with a brief discussion on what accountability means in the context of privacy and data protection and how the Senate can draw on its existence in other parts of US regulation in crafting draft privacy legislation. Participants then explored why and how organizational accountability should be included in any new federal privacy law, and US Senate staff were afforded the opportunity to share their views, ask questions and seek clarification on all aspects of accountability.

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## **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](#).

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## **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](#).

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## **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](#).

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## 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 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.

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## 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
- 25 July – CIPL held its July First Friday Call
- 25 July – Bojana Bellamy participated in the Women’s Equality Party’s event entitled, “An Unconference: Harnessing technology to advance gender equality” (London)
- 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

(Dublin)

- 26 September – CIPL held a Delegation Visit with members of the Brazilian Congress and Ministry of Justice (Brasilia)
- 27 September – CIPL submitted its [response to Innovation, Science and Economic Development \(ISED\) Canada’s Proposals to Modernize the Personal Information Protection and Electronic Documents Act \(PIPEDA\)](#)

## 2019-2020 Upcoming Events

[Click here to see the Calendar of Events](#)

3 December 2019	CIPL Side Event on AI Explainability in the margins of the 52 <sup>nd</sup> APPA Forum (Cebu)
4 December 2019	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)
6 December 2019	CIPL First Friday Call
11 December 2019	CIPL Advisory Council Teleconference Call
5 February 2020	CIPL/Datum Future Roundtable on Data Portability (London)
11 or 12 February 2020	CIPL/ICO Roundtable on the ICO’s Accountability Toolkit (London)
6 April 2020	CIPL Side Event on US Privacy in the margins of 2020 IAPP Global Privacy Summit (Washington, DC)

## Member Spotlight

We welcome and thank our newest project member:

**Experian**



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