

Centre for Information Policy Leadership (CIPL) Workshop in collaboration with AXA

## **Accountability under the GDPR – How to Implement, Demonstrate and Incentivise it**

AXA

25 Avenue Matignon

Paris, France

5 October 2018 | 9:00 – 16:30

8:30            **Registration**

9:00            **Opening Remarks**

- ❖ Emmanuel Touzeau, Group Communication and Brand Director – GDPR Sponsor, AXA
- ❖ Bojana Bellamy, President, CIPL

9:15            **Introductory Scene-Setting Remarks**

- ❖ **An eyewitness account of accountability** -- Peter Hustinx, Former EDPS
- ❖ Patrick Rowe, Deputy General Counsel, Accenture

10:00          **Session I: Accountability under the GDPR**

*In this session, DPA and industry provocateurs will lead workshop participants in a wide-ranging discussion on the important role of organisational accountability in data protection. We will start with an introduction into the meaning of accountability, its role in enabling effective privacy protections for individuals and beneficial data use and innovation by organisations. We will also provide an overview over the key elements of accountability (as shown in CIPL's "accountability wheel") and touch on the various ways in which accountability can be implemented within an organisation. As part of the introduction, we will also clarify how the specific requirements of the GDPR map to the core elements of accountability. Together with all workshop participants, we will then discuss the following specific issues in greater detail:*

- *The role of risk assessment and the risk-based approach as a key feature of accountability*
- *The importance of scalable accountability and its role in small and large scale processing operations*
- *How can organisations assess the the potential risks and harms to individuals?*
- *How do the notions of scale, risk and harm apply in the context of GDPR Article 83 relating to fines?*
- *Because organisational accountability measures may range from basic measures required by law to measures that may go well above what is required, what are the relevant factors for organisations to decide where to aim on this accountability spectrum?*

- *What are some specific examples of scalable and risk-based accountability measures?*

- ❖ Moderator: Bojana Bellamy, President, CIPL
- ❖ John O’Dwyer, Deputy Commissioner, Irish Office of the Data Protection Commissioner
- ❖ Elizabeth Denham, Information Commissioner, UK ICO
- ❖ Denise Farnsworth, Deputy DPO, Facebook
- ❖ William Malcolm, Director, Privacy Legal, Google
- ❖ Geff Brown, Associate General Counsel, Microsoft

11:15 **Break**

11:30 **Session I (continued)**

*The moderator and provocateurs will continue in leading the discussion on Accountability under the GDPR.*

12:30 **Lunch**

13:45 **Session II: How to Demonstrate Accountability Internally and Externally**

*Accountability has two main elements: ensuring compliance and demonstrating compliance. This session will exclusively focus on how accountability can be demonstrated within organisations and, externally, to the DPAs. It will also discuss how accountability could be demonstrated by participation in accountability schemes such as Binding Corporate Rules and future GDPR certifications and codes of conduct. The panelists will provide brief remarks and assist the moderator in leading a discussion amongst all participants.*

- ❖ Moderator: Nathalie Laneret, Director of Privacy Policy, CIPL
- ❖ Sophie Nerbonne, Director of Compliance and Accountability, CNIL
- ❖ Piotr Drobek, Deputy Director, Polish DPA
- ❖ Alex Cebulsky, Senior Legal Counsel, Global Data Privacy, Accenture
- ❖ Igor Babic, Group Data Protection Officer, AXA Group
- ❖ Paul Breitbarth, Director of Strategic Research and Regulator Outreach, Nymity
- ❖ Mikko Niva, Group Privacy Officer, Vodafone

15:00 **Break**

15:15 **Session III: Best Practices: How are DPAs Incentivising Accountability?**

*Given its many benefits, accountability (particularly “heightened accountability”) should be specifically incentivised by DPAs (and law makers). Using several DPAs as examples, this session will consider how DPAs are incentivising accountability under the GDPR in practice. It will explore a wide range of possible additional incentives that could be used to encourage organisations to implement strong accountability measures. The panelists will provide brief remarks and assist the moderator in leading a discussion amongst all participants.*

- ❖ Moderator: Chris Docksey, Honorary Director General, EDPS
- ❖ Cecile Schut, Director System Supervisory, Security and Technology, Dutch DPA
- ❖ Wojciech Wiewiorowski, Assistant Supervisor, EDPS
- ❖ Dieter Kugelmann, State Commissioner, German State Commissioner for Data Protection & Freedom of Information, Rhineland-Palatinate
- ❖ Emmanuelle Bartoli, Group Data Protection Officer, Capgemini
- ❖ Michelle Denedy, Vice President and Chief Privacy Officer, Cisco

16:30

**End of Workshop**