

Message from the President



Bojana Bellamy

Dear CIPL Members,

It was wonderful to see so many of you several weeks ago in Washington, DC at our Hunton/CIPL reception and the IAPP Summit. It is these conversations with you in the various foyers, restaurants and in between different meetings around the globe that I find so extremely valuable. They help us shape our work, they give us insights on your priorities and they provide the intellectual stimulus for our further activities. Thank you so much for these precious moments, for your tremendous support and your rich inputs into our various work streams and papers over the past months. We have had a hugely productive first quarter and could not have done it without you and without our brilliant and growing team. While, together with you, we continued our focus on the all-consuming GDPR implementation, we also deepened our engagement in Asia and APEC, developed an upcoming workshop and side meetings in Tokyo, and pursued our ongoing dialogue on privacy law development in Brazil and South America. We are always on the move, and I know you all are, too. I hope to see you soon at one of our upcoming events in Japan, Berlin, Dublin and the Executive Retreat in DC.

SAVE THE DATES

CIPL Privacy Workshop on Japan's New Data Privacy Regime

10-11 May 2017
Tokyo, Japan

CIPL Side Event at European Data Protection Days

17 May 2017
Berlin, Germany

CIPL Delegation Meeting with the Singapore Personal Data Protection Commission

24 May 2017
London, UK

CIPL GDPR Project Senior Leaders Working Session on Smart Data Protection

14 June 2017
Dublin, Ireland

2017 CIPL Annual Executive Retreat

July 19-20, 2017
Washington, DC

CIPL Side Event at 39th International Privacy Commissioners Conference

25 September 2017
Hong Kong

I. CIPL Delegation Visit to Warsaw, Poland

On 20-22 February 2017, CIPL President Bojana Bellamy and CIPL Senior Policy Advisor Hielke Hijmans visited Warsaw with a small delegation of CIPL member companies. The visit included a meeting with Michal Boni, a member of the European Parliament and a former Polish minister, at the premises of Nielsen. The delegation also visited the Polish Data Protection Authority, GIODO, and the Polish Ministry of Administration and Digitization. The discussions covered a wide range of subjects relating to the implementation of the GDPR and the ePrivacy regulation.

From the delegation visit, CIPL learned that the 2017 Annual Conference of the European Parliament Civil Liberties, Justice and Home Affairs (LIBE) Committee and the national parliaments will be dedicated to the implementation of the GDPR. The delegation also addressed the need for the European Commission and the Article 29 Working Party (WP29) to issue timely guidance on GDPR implementation, as well as the possibility of asking the Commission for specific and regularly updated overviews of the legislative developments in all Member States.

The delegation also expressed concerns about the ePrivacy Regulation. Two ways forward were discussed: either postpone ePrivacy, and thereby enable companies to fully focus on the GDPR until 25 May 2018, or further develop awareness of any unintended effects of ePrivacy through a case-by-case analysis.

For more details on the delegation visit, please see the delegation [agendas](#).

II. APEC Data Privacy Subgroup/Electronic Commerce Steering Group meetings in Nha Trang, Vietnam

Markus Heyder represented CIPL at the Data Privacy Subgroup/Electronic Commerce Steering Group meetings in Nha Trang, Vietnam from 22-25 February 2017. As usual, the meetings focused primarily on the ongoing implementation and growth of the APEC Cross-Border Privacy Rules (CBPR) system.

The meetings were marked by many significant new CBPR-related developments and announcements, including the following: Japan, the fourth country to join the CBPR system, is now actively using the CBPR; Korea has formally announced its intent to join the CBPR system and intends its CBPR to become operational in 2018; the Chinese Taipei government has instructed its relevant agencies to prepare for joining the CBPR; the Philippines will join the CBPR within the next year or two; Malaysia is interested in joining the CBPR; Australia is undertaking domestic consultations on whether and how to join the CBPR this year and hopes to have a decision by November this year; Vietnam continues to work on its CBPR implementation; the US Department of Commerce has received additional applications for APEC Accountability Agents (AA); Canada is now formally seeking an AA for Canada; and the US has formally expressed its intent to join the APEC Privacy Recognition for Processors (PRP) system. In addition, Singapore and Hong Kong remain likely APEC countries that will also join the CBPR system sooner rather than later. Also, APEC remains keenly interested working with the EU to further explore building bridges between the CBPR system and EU counterparts, such as the BCR and the new GDPR certifications.

Other APEC news include that the APEC Privacy Framework has been updated at the end of last year. The updates did not change the nine APEC privacy principles, but are limited to the Preamble, the Definitions and the sections containing guidance on domestic and international implementation. They address issues such as data breach, privacy management programs, cross-border transfer restrictions and global interoperability. They also acknowledge the development of the APEC Cross-Border Privacy Rules and APEC Privacy Recognition for Processors since the endorsement of the initial Framework in 2015. Finally, CIPL has joined the APEC Study Group on Data Portability, which will follow international trends on that subject and write a report and possible recommendations for the APEC DPS and ECSG.



Markus Heyder at ECSG-DPS Meeting

For more information, please see [the revised APEC Privacy Framework](#).

III. CIPL GDPR Workshop III in Madrid

On 6-7 March 2017, CIPL held its 3rd major workshop on the implementation of the GDPR, focusing on the issues of transparency, consent and legitimate interest processing. The workshop was held in the historic premises of Telefónica with more than 140 participants from industry, DPAs, national governments, the European Commission, the EDPS, and academia.

The meetings began with a closed, industry-only meeting to discuss key topics for the workshop (transparency, consent, legitimate interest and GDPR implementation challenges), as well as companies' internal GDPR implementation plans and status. Afterwards, CIPL held a special, multi-stakeholder session with Bruno Gencarelli, Head of Unit, International Data Flows and Protection, European Commission, to exchange views and provide feedback on the European Commission's Communication to European Parliament and the Council on "Exchanging and Protecting

Personal Data in a Globalized World.” This session was open to industry representatives, DPAs, the EDPS, the EU Commission and select National Ministries. This meeting was followed by a private tour and dinner at the Prado museum on the evening of 6 March.

During the workshop, DPAs provided updates on the status of GDPR implementation within their respective countries, and industry representatives provided updates on their status as well as overarching, substantive and operational challenges to implementing the GDPR. In the afternoon, workshop participants delved into the core principles of transparency, consent and legitimate interest by discussing the requirements, recommendations, and questions raised by each topic.

For more on the outcomes of the workshop, please see the workshop [agenda](#), as well as three papers prepared in connection with the workshop: [CIPL Madrid Workshop Key Takeaways](#), [GDPR Implementation Challenges: A Summary of CIPL GDPR Project Participants’ Feedback](#) and [CIPL Examples of Legitimate Interest Grounds for Processing of Personal Data](#).



Workshop attendees enjoy a private dinner at the Prado Museum in Madrid



Bojana Bellamy introduces the DPAs national implementation of the GDPR

IV. CIPL Delegation Visit to Brasilia

From 21-24 March 2017, CIPL and a small delegation of CIPL member companies visited Brasilia to meet with several Brazilian law and policy makers involved in developing a Brazilian privacy law as well as to participate in a privacy workshop organized by the Secretariat of IT Policy (SEPIN) and the Ministry of Science, Technology, Innovation and Communications (MCTIC). The goal for these meetings and workshop participation was to provide practical input based on the extensive international data protection experience of our member companies and CIPL leadership and to help bring a global perspective to a number key issues that likely will be relevant to the development of privacy legislation in Brazil.

Throughout the week, the delegation met with members and staff from the Brazilian Ministry of Justice and Brazilian

National Congress to discuss issues relating to Brazil's draft Ministry bill 5276/2016 and draft Senate bill 330/2013. For both bills, CIPL agreed that the new drafts include several significant improvements over earlier drafts, such as the inclusion of the "legitimate interest" ground of processing, the inclusion of risk assessment, and a broad range of cross-border transfer mechanisms, among other items. CIPL also provided suggestions for additional improvements and clarifications.



Bojana Bellamy presenting at SEPIN/MCTIC Workshop

On Thursday, 24 March, the delegation attended SEPIN and MCTIC's joint "Workshop on Protection of Rights and Personal Data Industry." CIPL President Bojana Bellamy gave a keynote on "Personal Data in the Digital Economy and Society: Interconnection, Innovation, Commercialization and International Transfers".

For more details on the delegation visit, please visit our website to find the delegation [agenda](#), as well as CIPL's comments on both the [Ministry bill](#) and [Senate bill](#).

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

Over the past three months, CIPL prepared the following public comments, published the following articles and held, or spoke at, the following events:

- 12 January – Bojana Bellamy spoke at The London School of Economics and Political Science "Ethics in Data Science" event alongside Stephen Deadman, Global Deputy Chief Privacy Officer, Facebook (London)
- 24 January – Bojana Bellamy spoke at ICO Workshop on International Strategy (London)
- 25 January – CIPL submitted [comments to the Article 29 Working Party on the Proposed DPO Guidelines](#)
- 26 January – Bojana Bellamy moderated a panel on "[Demonstrating Compliance as the Basis for Certification](#)" as part of the 2017 Computers, Privacy & Data Protection (CPDP) Conference (Brussels)
- 3 February – CIPL First Friday Call
- 14 February – Bojana Bellamy spoke at Alma Talent Company's [DPO Training Program](#) to explore the role of the Data Protection Officer (Helsinki)
- 15 February – CIPL submitted [comments to the Article 29 Working Party on the Proposed Lead Supervisory Authority Guidelines](#)
- 15 February – CIPL submitted [comments to the Article 29 Working Party on the Proposed Data Portability Guidelines](#)
- 21-22 February – CIPL held a [delegation visit](#) to Poland to meet with MEP Michal Boni, GIODO and the Polish Ministry of Administration and Digitization (Warsaw)
- 22-25 February – Markus Heyder participated in APEC's Data Privacy Subgroup and Electronic Commerce Steering Group Meetings (Nha Trang)

- 6-7 March – CIPL held its [3rd GDPR Implementation workshop](#) on Status, Key Challenges and Understanding the Core Principles of Transparency, Consent and Legitimate Interest (Madrid)
- 10-12 March – Bojana Bellamy spoke at the 2017 Trust Transparency and Control Design Jam (Berlin)
- 15 March – Bojana Bellamy moderated panel on “[Women Leading Privacy](#)” as part of the 2017 Europe Data Protection Intensive. She was joined by Vivienne Artz, Managing Director & General Counsel, Citi, Karishma Brahmhatt, Senior Associate, Allen & Overy, and Sophie Louveaux, Head of Policy and Consultation, EDPS (London)
- 21-24 March – CIPL conducted a [delegation visit](#) to Brazil (Brasilia)
- 30 March – Bojana Bellamy spoke at Microsoft’s “[A Consistent Implementation of the GDPR for all Stakeholders? Advancing Gender Diversity and Diverse Solutions!](#)”

2017 Upcoming Events

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

10-11 May	CIPL Privacy Workshop on Japan’s New Data Privacy Regime (Tokyo)
15-18 May	IAPP Canada Privacy Symposium (Toronto)
15-16 May	7th European Data Protection Days 2017 (Berlin)
17 May	CIPL Side Event at 7th European Data Protection Days (Berlin)
24 May	CIPL Delegation Meeting with the Singapore Personal Data Protection Commission (London)
2 June	First Friday Call
14 June	CIPL GDPR Project Senior Leaders Working Session on Smart Data Protection (Dublin)
15-16 June	Irish Government Data Forum (Dublin)
7 July	First Friday Call
10-11 July	47th APPA Forum (Sydney)
19-20 July	CIPL Annual Executive Retreat (Washington, DC)
24-25 July	IAPP Asia Privacy Forum 2017 (Singapore)
Late Aug./Early Sept.	APEC Data Privacy Subgroup/Electronic Commerce Steering Group meetings
15 September	First Friday Call
25 September	CIPL Side Event at 39 th International Privacy Commissioners Conference (Hong Kong)

26-29 September	39 th International Privacy Commissioners Conference (Hong Kong)
6 October	First Friday Call
15- 18 October	Privacy Academy and CSA Congress (San Diego)
Date TBD	CIPL Side Event in the margins of Privacy Academy and CSA Congress (San Diego)
23 October	Nordic Privacy Arena (Stockholm)
24 October	CIPL Nordic DPA Roundtable (Stockholm)
3 November	First Friday Call
15-17 November	48 th APPA Forum (Vancouver)
1 December	First Friday Call
4-7 December	IAPP Data Protection Congress (Brussels)
Date TBD	CIPL GDPR Working Session in the margins of IAPP Data Protection Congress (Brussels)

Member Spotlight

We welcome and thank our newest members:

Privo
Snap, Inc.



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