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Instituto Brasiliense de Direito Público

Centre for Information Policy Leadership & Centro de Direito, Internet e Sociedade do  
Instituto Brasiliense de Direito Público (CEDIS/IDP)

# **Global Data Privacy Dialogue**

## ***Diálogo Global sobre Proteção de Dados***

Brasília  
6-7 October 2015



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# Welcome Remarks/Boas-vindas

**Atalá Correa**

Academic Coordinator, Instituto Brasiliense de Direito Publico  
(IDP)

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# Welcome Remarks/Boas-vindas

**Bojana Bellamy**

President

Centre for Information Policy Leadership



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## **Introductory Keynotes/ Conferências de Abertura**

*Why Privacy Matters in our Global, Digital and Interconnected World*

*Por que a privacidade é importante no nosso mundo global, digital e interconectado*

### **Virgilio Almeida**

Secretary for Information Technology Policy  
Ministry of Science, Technology and Innovation



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# Why Privacy matters in our Global, Digital, and Interconnected World: Brazil perspective

Virgilio A. F. Almeida

National Secretary for Information Technology Policies  
Ministry of Science, Technology and Innovation

Brasilia, October 2015

# Talk Outline

- **Digital world**
  - Impact on social, industrial and political issues
  - quick and disruptive changes
  - Privacy related challenges
- **Digital Brazil**
  - Facts and figures
  - Legal & regulatory aspects
- **Opportunities in the digital world**

# Privacy Regulation:

*Culturally universal or Culturally specific*

*Irwin Altman, Journal of Social Issues, 1977*

- Mehinacu Indians, a tribal group who reside in central Brazil. They seem to have little privacy. In one village, five communal houses were located around a small circular plaza, so that everyone could be seen as they moved about. Furthermore, paths leading into the plaza were long and straight so that people could be observed at great distances. Also, living arrangements were non-private because housing was communal, people entered their dwellings without announcing themselves, and the thatched walls of the structures had little sound reducing quality. But, they had mechanisms to regulate social interaction, there were strong norms against exposing others' misconduct, people did not ask embarrassing questions of one another, and lying was a regular practice used to avoid revealing information.

# Your Face Tomorrow

Javier Marias, 2002

- The online world intensifies people's capacity of talking, telling and gossiping as pointed out by Deza's reflections:

*“...what most defines and unites us: talking, telling, saying, commenting, gossiping, passing on information, criticizing, exchanging news, tittle-tattling, defaming, slandering and spreading rumours, describing and relating events, keeping up to date and putting others in the picture, and, of course, joking and lying. That is the wheel that moves the world Jacobo, more than anything else, that is the engine of life...”*

**Digital technologies are key for the future agenda of social, industrial, economic, and political issues.**



# European Parliamentary Research Service

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## 21% GDP Productivity Growth – Why The Digital Economy Is Important!

Posted By [EPRSLibrary](#) · November 11, 2013 · [3 Comments](#)

**FILED UNDER** [Digital Agenda](#), [Digital Economy](#), [Economics And Monetary Issues](#), [In Focus](#), [INFORMATION TECHNOLOGY](#), [Research And Information Society](#)

# Internet Plus set to push China's economy to higher level: Premier



English.news.cn | 2015-03-15 11:48:28 | Editor: huaxi

WWW.NEWS.CN



This past Thursday at the 12th National People's Congress, Premier Li Keqiang announced the government work report, which included the "Internet Plus" policy, a strategy the Chinese government is moving toward, in hopes that it will revitalize the country's economic growth in withering sectors. According to [\*Want China Times\*](#), the Internet Plus policy is intended to, "integrate mobile internet, cloud computing, big data and the Internet with modern manufacturing, to encourage the healthy development of e-commerce, industrial networks, and internet banking." The government not only believes that it can reinvigorate more grounded sectors by giving them access to cloud computing and e-commerce strategies, but it also hopes to help already internet-based companies "increase their international presence".

## Policy

07:56 AM: Satya Nadella, Tom Enders, Cyrus Mistry, Mukesh Amban...

07:48 AM: How US healthcare law impels insurance merger talks

07:40 AM: Lalit Modi row: Congress drags Attorney General of In...

# It's time for a 'Digital India': Prime Minister Narendra Modi

Friday, 15 August 2014 - 10:51am IST | Place: New Delhi | Agency: ANI

43

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0 Comments



Prime Minister [Narendra Modi](#) on Friday said that India is no longer known as the land of [black magic](#) and snake charmers as it has come a long way and added that that it is now time for a 'digital India'.

"'Digital India' is not an elite concept anymore. We have to use this idea to revolutionize health and education in India. Use [broadband](#) for education for rural areas, and telemedicine for the

YOGA TEACH  
TRAINING[india-yoga.com/](http://india-yoga.com/)

Yoga Alliance Certified Co

Tulasidalam Yoga Ashr

**RECOMMENDED CONTENT**

Yashwant Sinha takes swine at PM

Success

# Pope Francis announces Scholas.Labs, A Vatican startup accelerator

News

0 1617

## Novo - Tableau 8.2

Conte uma história com seus dados. Baixe a avaliação gratuita hoje!



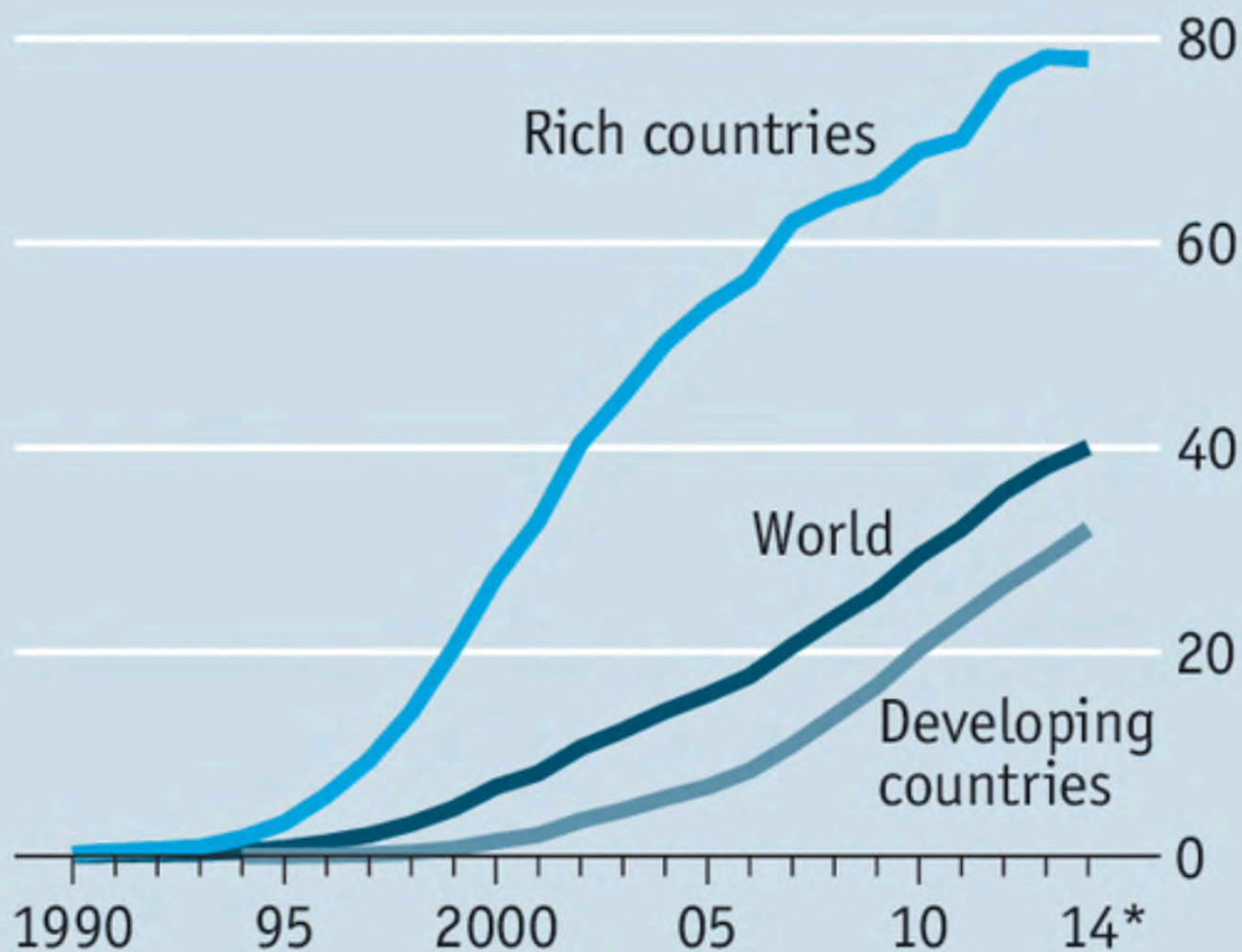
Yesterday (4), Pope Francis surprised everyone again at an event on education and announced the creation of an accelerator of startups within the Vatican.

## Supermercado Moderno

## Digital economy: quick and disruptive changes

# Wider world web

Individuals using the internet, %

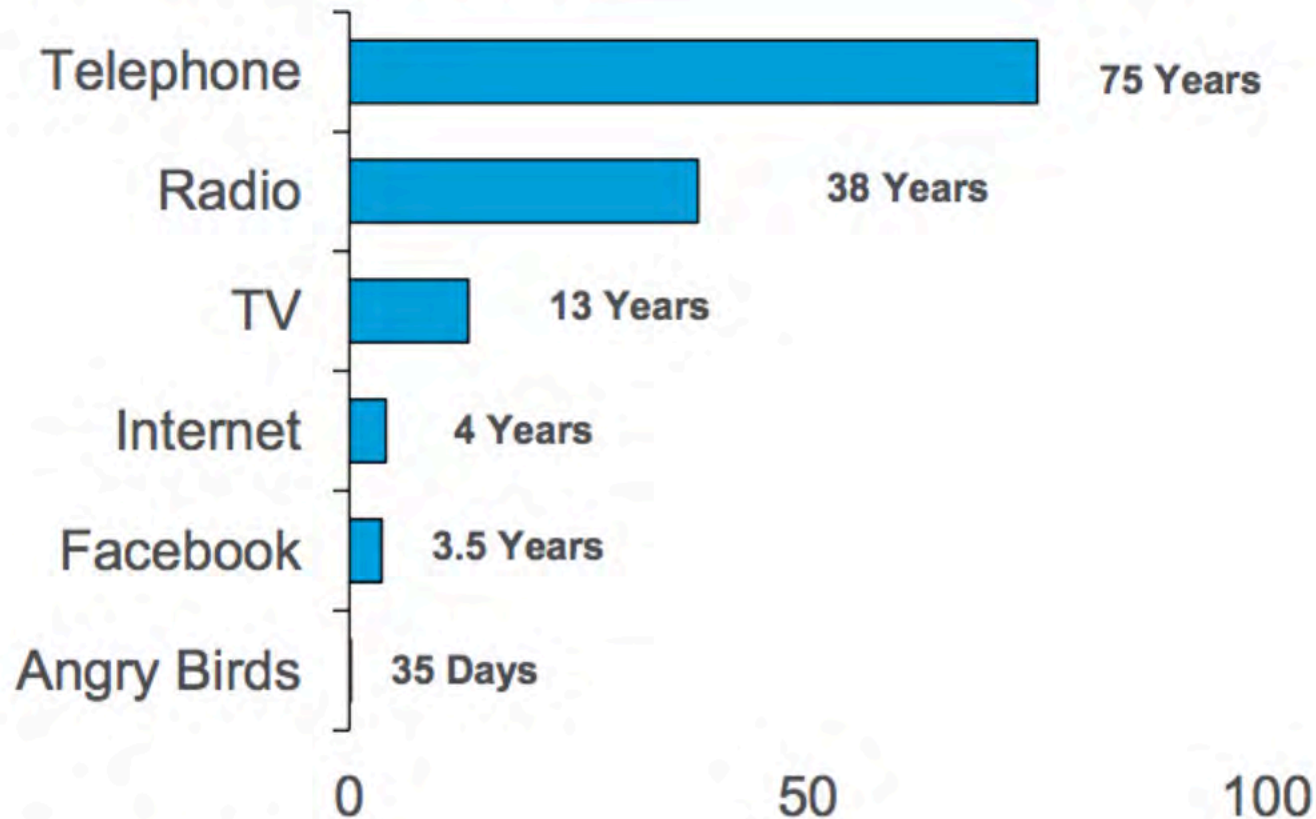


Sources: World Bank; ITU

\* Estimate

# It Took the Telephone 75 Years To Do What Angry Birds Did in 35 Days. But What Does That Mean?

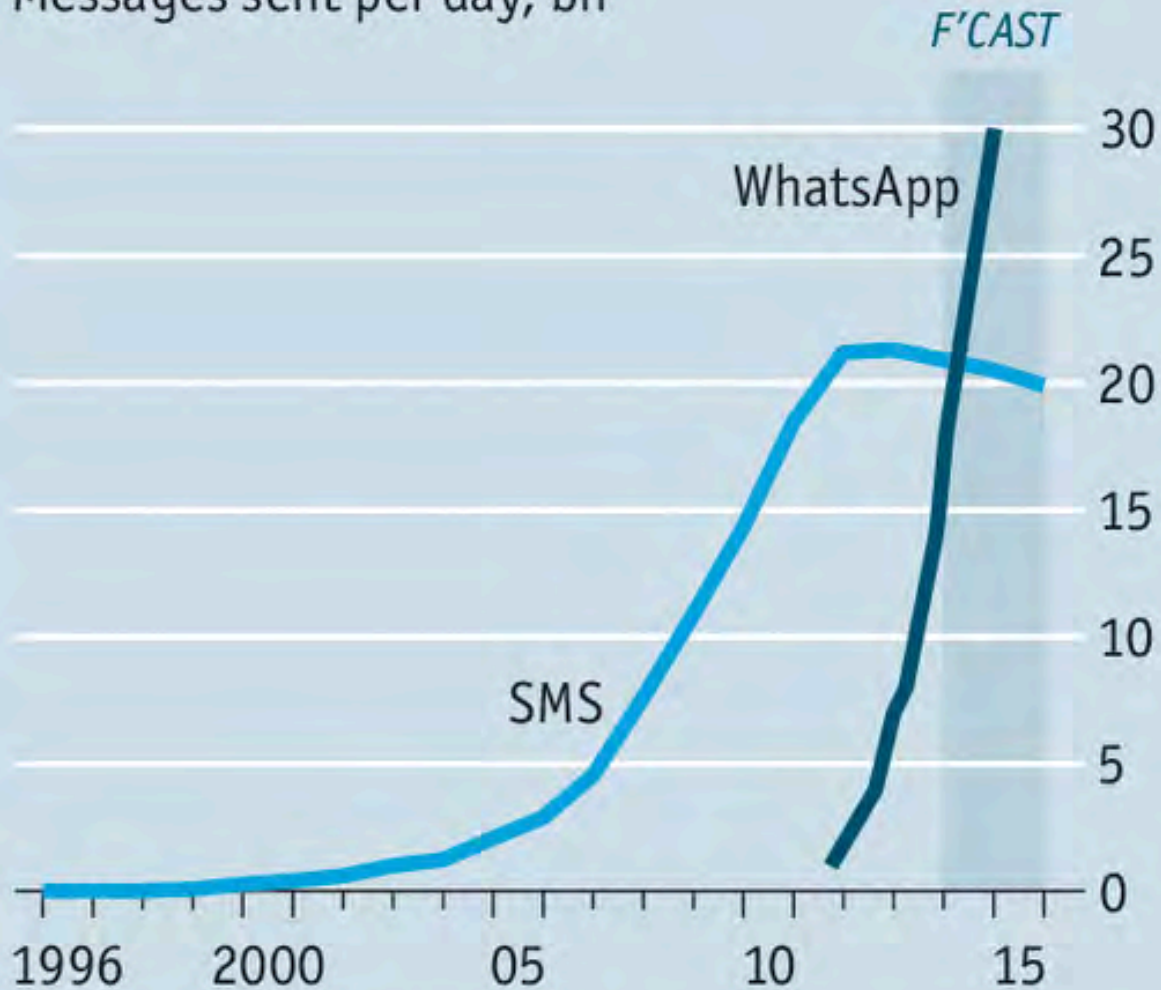
Figure 5. Time to reach 50 million users



Source: Citi Digital Strategy Team

# OMG, RIP txt

Messages sent per day, bn



Sources: Portio Research; a16z

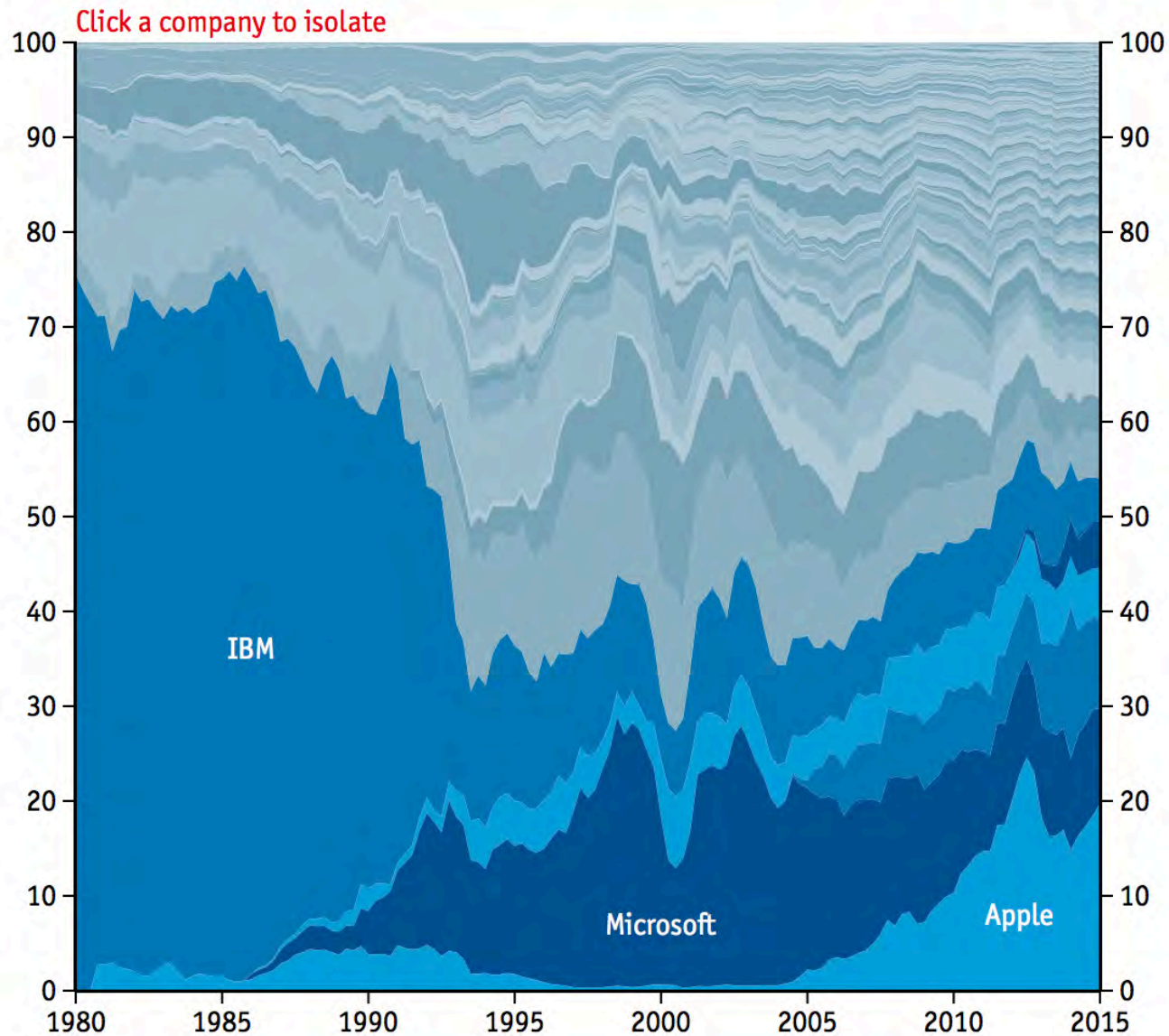
## The changing US technology sector

Market value, top 100 firms\*, % of total

% of total

Nominal

Real



Sources: Thomson Reuters; *The Economist*

\*As of Q1 2015

## Digital World: new challenges

# *The Ashley Madison Data Dump, Explained*

By DANIEL VICTOR AUG. 19, 2015

The release of stolen data from Ashley Madison, a dating website marketed



## Malfideleco

World wide distribution of AM users and male to female ratio (red: more than 85% of the users are men in that city). Use the layer switches to show or hide each visualization.

Visible layers

LESS





Bits

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## Using Algorithms to Determine Character



Paul Gu, co-founder of Upstart, at its Palo Alto, Calif., offices. His initial algorithms would have denied him a loan.  
JIM WILSON / THE NEW YORK TIMES

By **QUENTIN HARDY**

JULY 26, 2015



Follow

IF I HAD TO CHOOSE BETWEEN EXPOSING MY EMAIL OR MY GOOGLE SEARCH HISTORY, I'D PROBABLY HAND OVER MY INBOX. SEARCH IS THE PSYCHE LAID BARE.



RETWEETS

29

FAVORITES

40



1:44 PM - 27 Jan 2015

# When Algorithms Discriminate

JULY 9, 2015



**Claire Cain  
Miller**

 Email

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ONLY  
IN THEATRES  
OCTOBER 2015

The online world is shaped by forces beyond our control, determining the stories we read on Facebook, the people we meet on OkCupid and the search results we see on Google. Big data is used to make decisions about health care, employment, housing, education and policing.

But can computer programs be discriminatory?

There is a widespread belief that software and algorithms that rely on data [are objective](#). But software is not free of human influence. Algorithms are written and maintained by people, and machine learning algorithms adjust what they do based on people's behavior. As a result, say researchers in computer science, ethics and law, algorithms can [reinforce human prejudices](#).

Google's online advertising system, for instance, showed an ad for high-income jobs to men much more often than it showed the ad to women, [a new study](#) by Carnegie Mellon University researchers found.

[Research from Harvard University](#) found that ads for arrest records were significantly more likely to show up on searches for distinctively black names or a historically black fraternity. The [Federal Trade Commission](#) [said](#) advertisers are able to target people who live in low-income

## Single-crystal perovskite solar cells *pp. 519 & 522*

# Science

\$10  
30 JANUARY 2015  
sciencemag.org



SPECIAL ISSUE

# The End of

# PRIVACY



## Digital Brazil: facts and figures

## Half the World's Population Lives in 6 Countries



Note: 2014 Medium fertility variant estimates.

Source: UN Population Division's World Population Prospects: The 2012 Revision

# A tangled web

## Who goes online, and where

Nov 8th 2014 | From the print edition



3.1k



1,048

### The wider world web

Countries with highest Facebook traffic (*rank*), Q1 2014, according to:

**GlobalWebIndex**



**SimilarWeb**



Sources: GlobalWebIndex; SimilarWeb

THE internet looks like an adman's dream. Counting how many times an advert on a bus shelter has been viewed is impossible; counting clicks on a blinking banner ad is a doddle. But knowing where each click came from, and how many people are clicking, is harder than it appears.

Established 'Big' Internet Markets (China / USA / Japan / Brazil / Russia) =  
+7% Growth in 2013 vs. 8% Y/Y = Slowing, Past / Near 50% Penetration

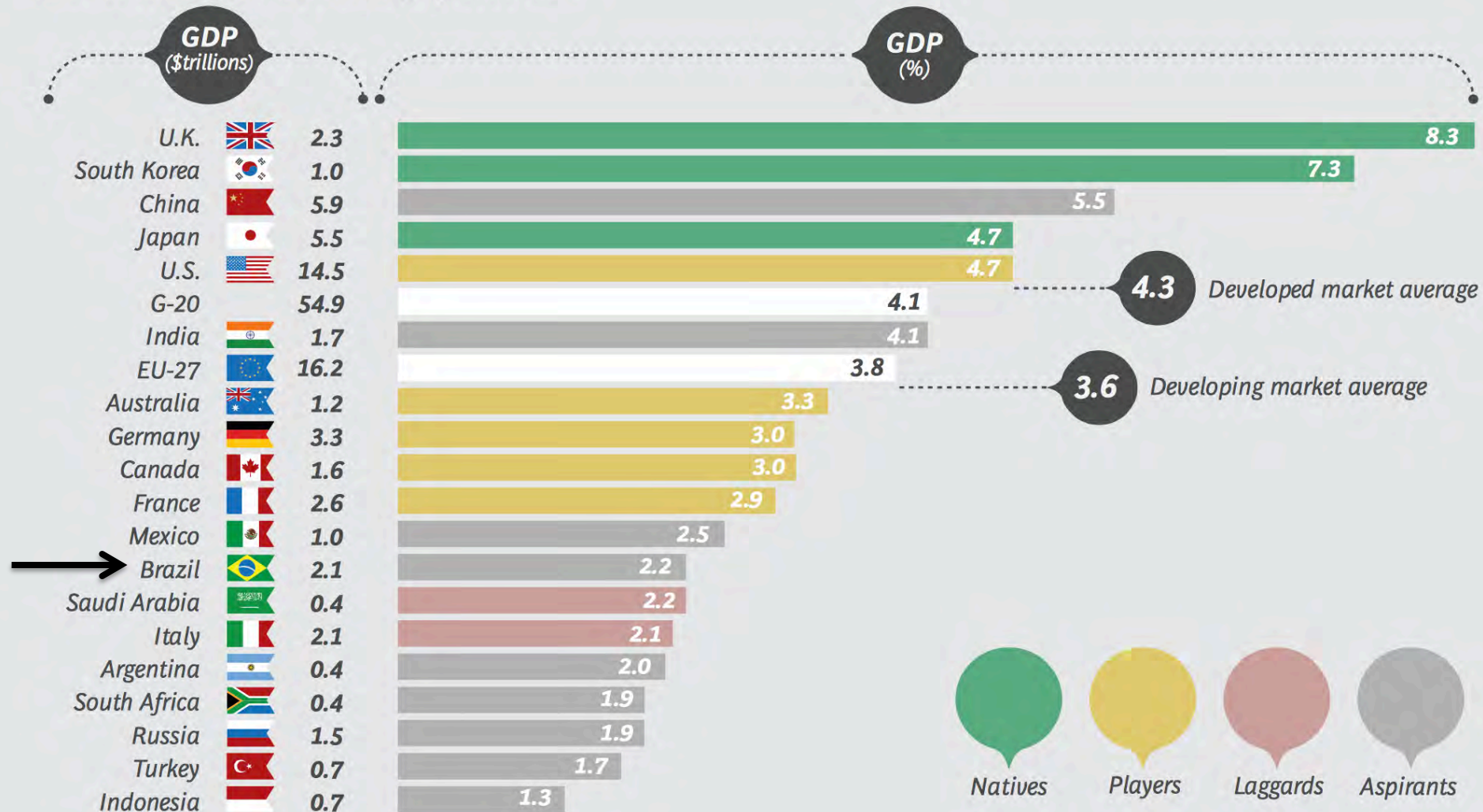
### Countries with Internet Penetration >45%, 2013

Rank	Country	2013 Internet Users (MMs)	2013 Internet User Growth	2012 Internet User Growth	Population Penetration	Total Population (MMs)
1	China	618	10%	10%	46%	1,350
2	USA	263	2	2	83	316
3	Japan	101	0	1	79	127
4	Brazil	100	12	12	50	201
5	Russia	76	9	14	53	143
6	Germany	68	1	1	84	81
7	United Kingdom	55	1	3	87	63
8	France	55	5	4	83	66
9	Iran	45	16	19	56	80
10	South Korea	41	1	0	84	49
11	Turkey	36	6	9	45	81
12	Italy	36	2	6	58	61
13	Spain	34	7	3	72	47
14	Canada	30	5	4	87	35
15	Poland	25	0	4	65	38
Top 15		1,583	6%	7%	58%	2,739
World		2,609	9%	11%	37%	7,098

# Internet - economy

## EXHIBIT 4 | The Internet Currently Accounts for 4.1% of GDP in the G-20 Countries

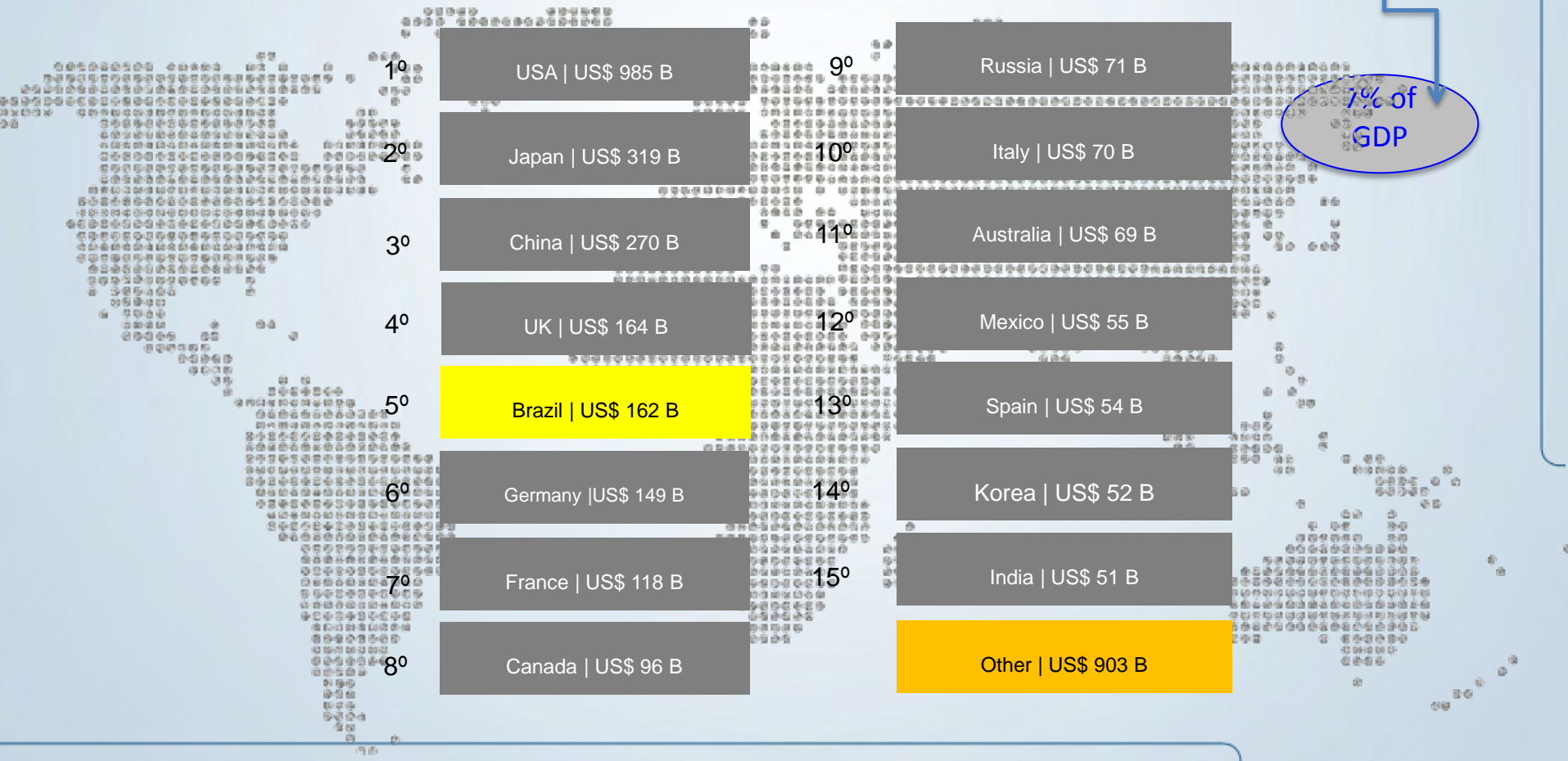
Internet economy as a percentage of 2010 GDP



Sources: Economist Intelligence Unit; Organisation for Economic Co-operation and Development (OECD); country statistical agencies; BCG analysis.

# Impact of IT on the Brazilian Economy

	2013*
Information CommunicationTechnology (ICT)	US\$ 162 billion
Information Technology	US\$ 61.6 billion



# Brazil: society open to new technology



1.2 Million IT professionals

34 Brazilian companies ranked in the *Global Fortune 2000*

40.9 Million broadband access

2.4% of the IT world market share

3rd ranked in the world PC market

49.6% share in Latin America

218 Million mobiles

7th biggest internal market of ICT

5th world mobile market

81.5 Mn of Internet users

65 Million *Facebook* users – 2nd

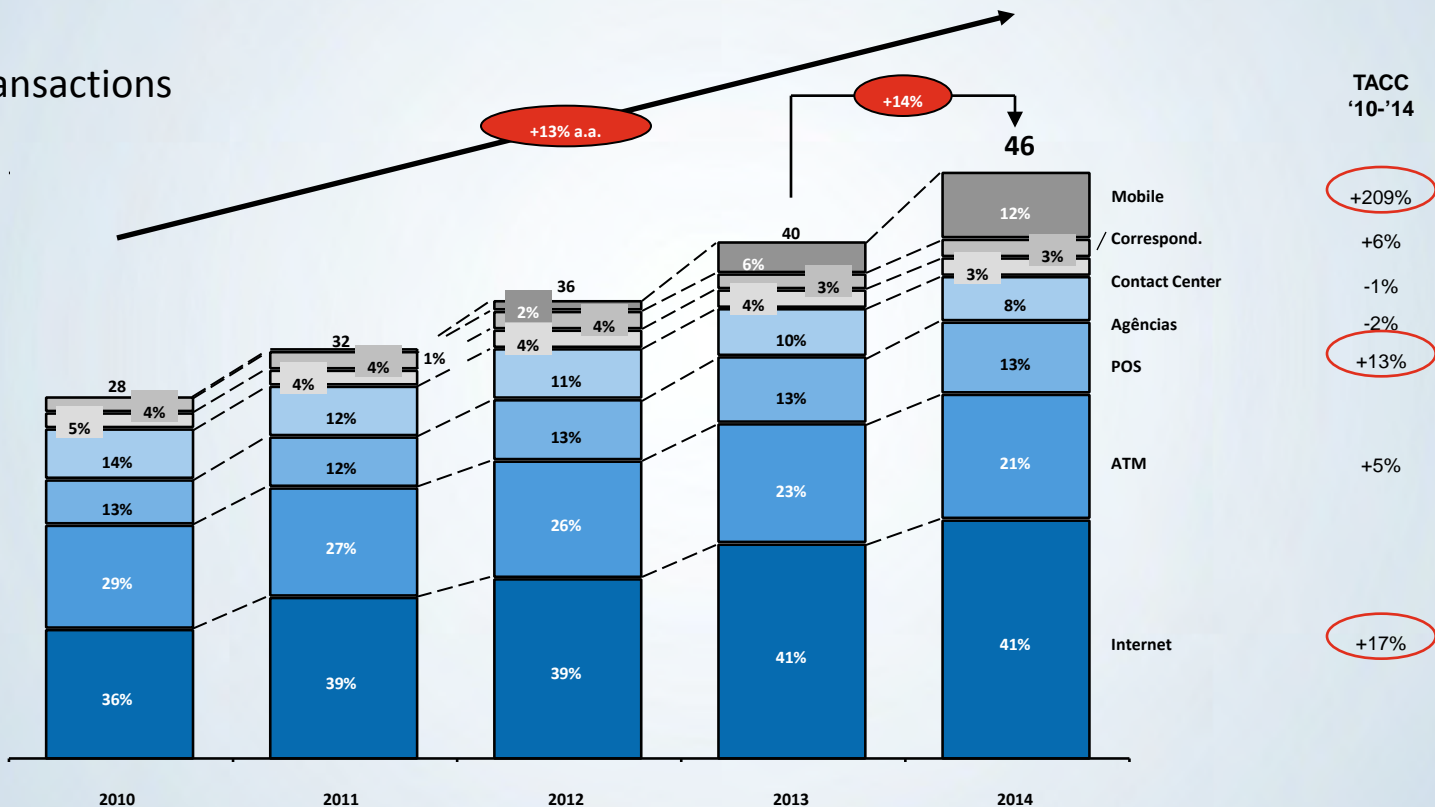
33.3 Mn *Twitter* users – 2nd

4 Million on *Flickr* - 2 Mn on *LinkedIn*

29 Million on *Orkut* - 5 Million on *Skype*

# Banking transactions in 2014: growth of mobile banking

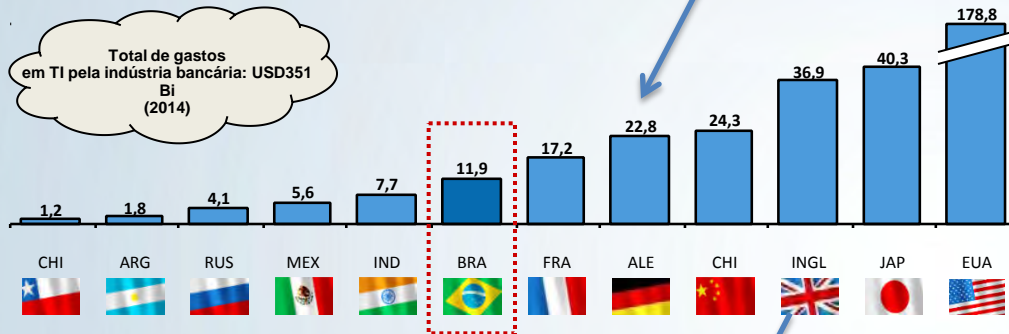
Billion of transactions



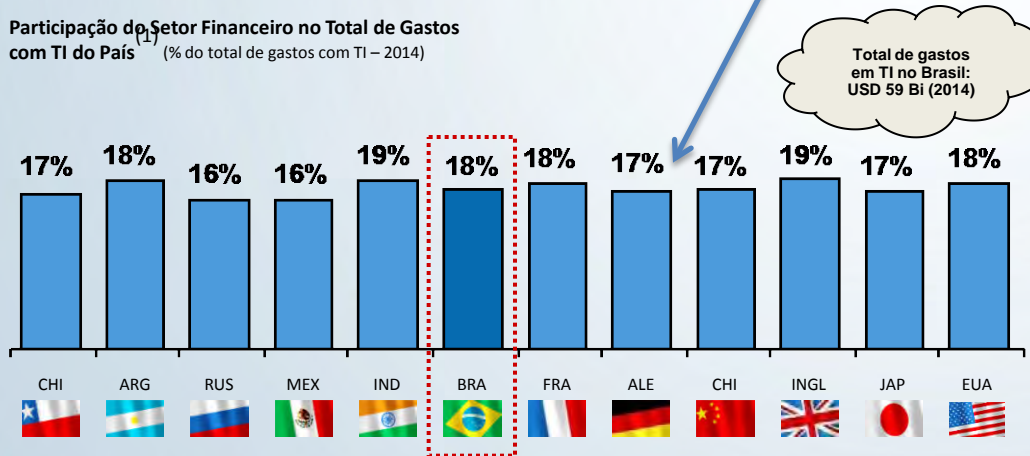
# Brazil: banking investments in IT in 2014 – 11.9 billion US\$

## Despesas e Investimentos em Tecnologia do Sistema

### Financeiro (em bilhões de USD - 2014)



### Participação do Setor Financeiro no Total de Gastos com TI do País (1) (% do total de gastos com TI – 2014)

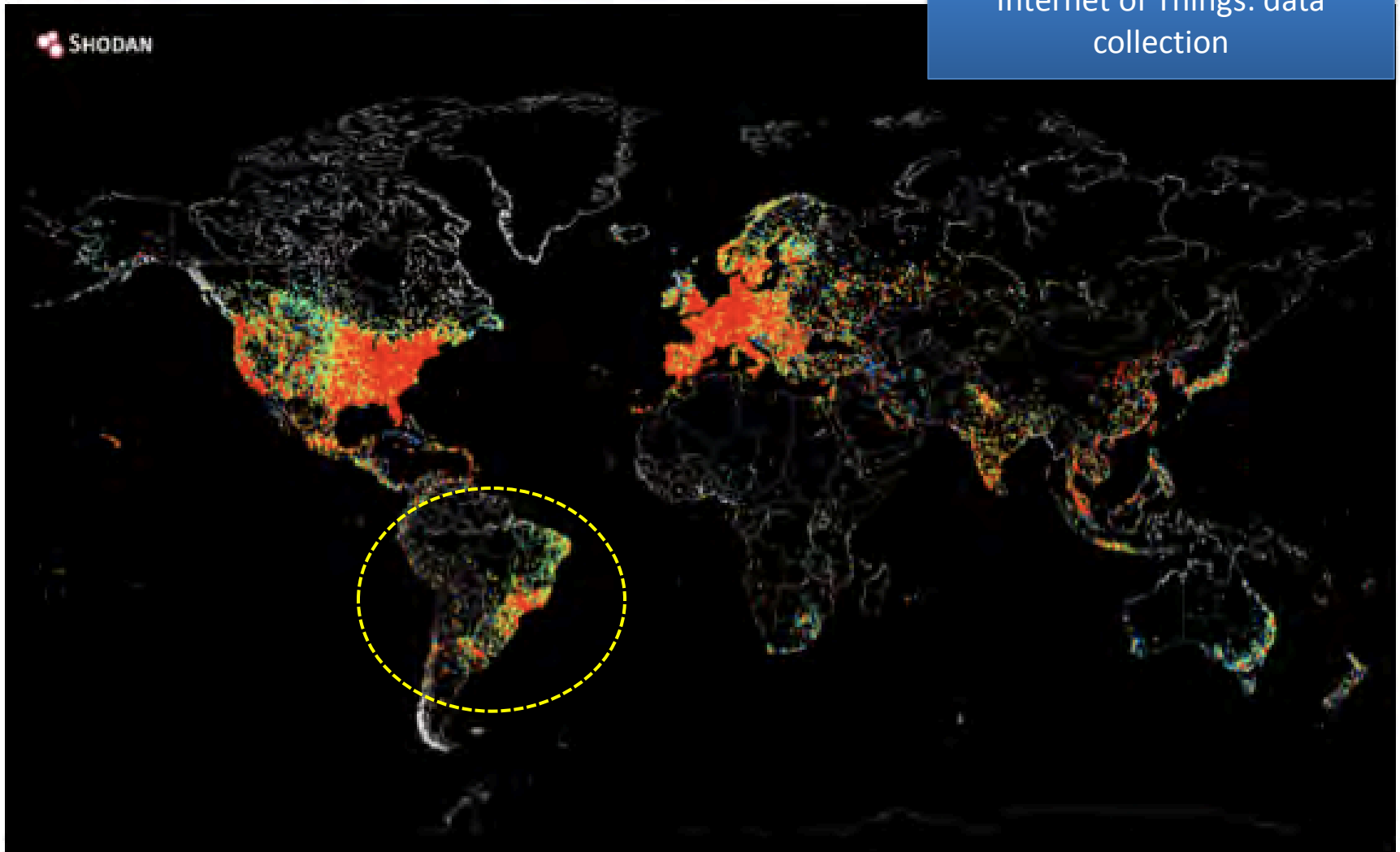


Nota: (1) Incluindo Bancos e Seguradoras; Fonte: Pesquisa FEBRABAN de Tecnologia Bancária 2014, Gartner, Análise Strategy&

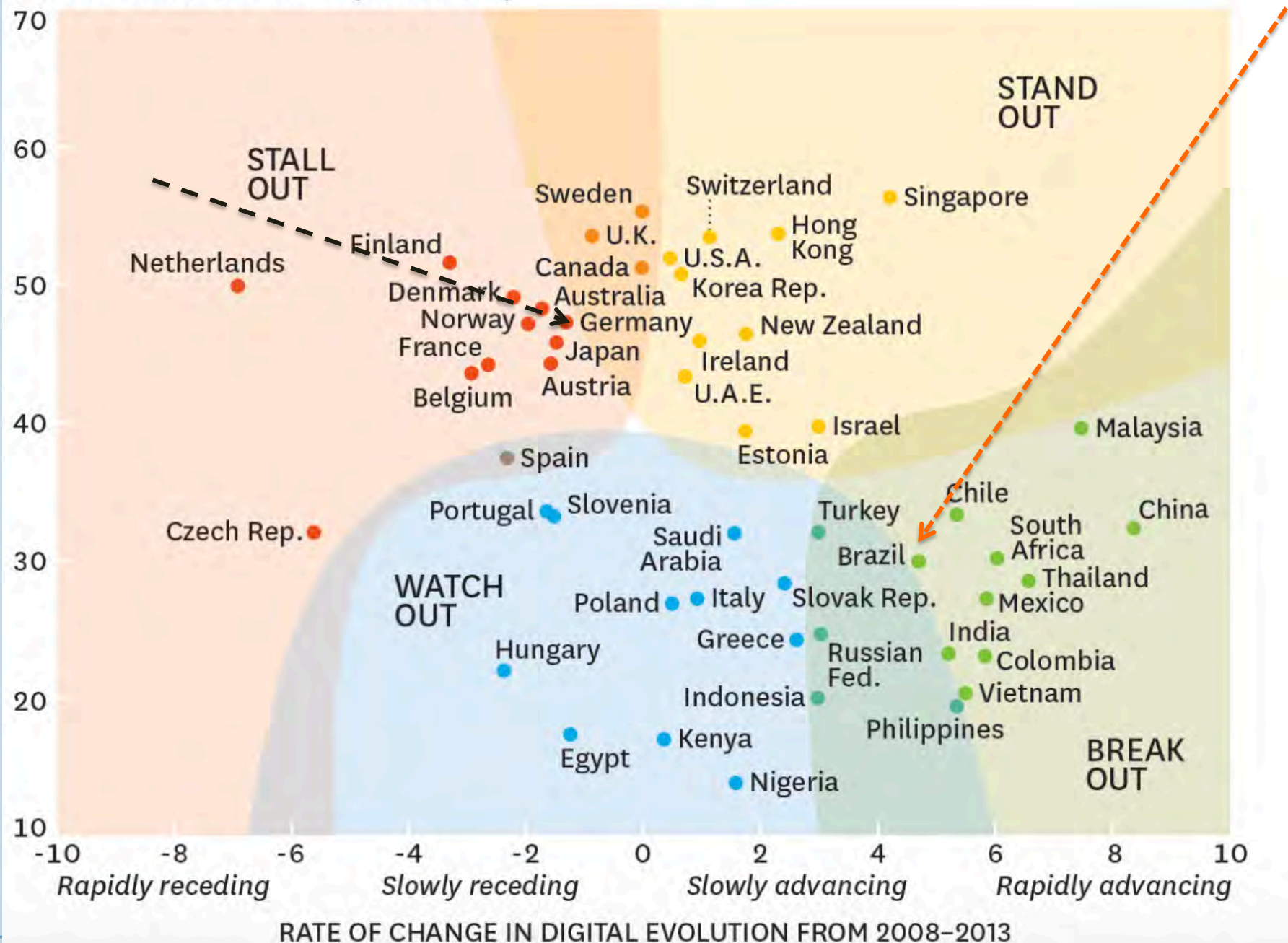
# Pinged all devices on the Internet, here's a map of where they're located :)

↩ Reply ↻ Retweet ★ Favorite ⋮ More

Internet of Things: data collection

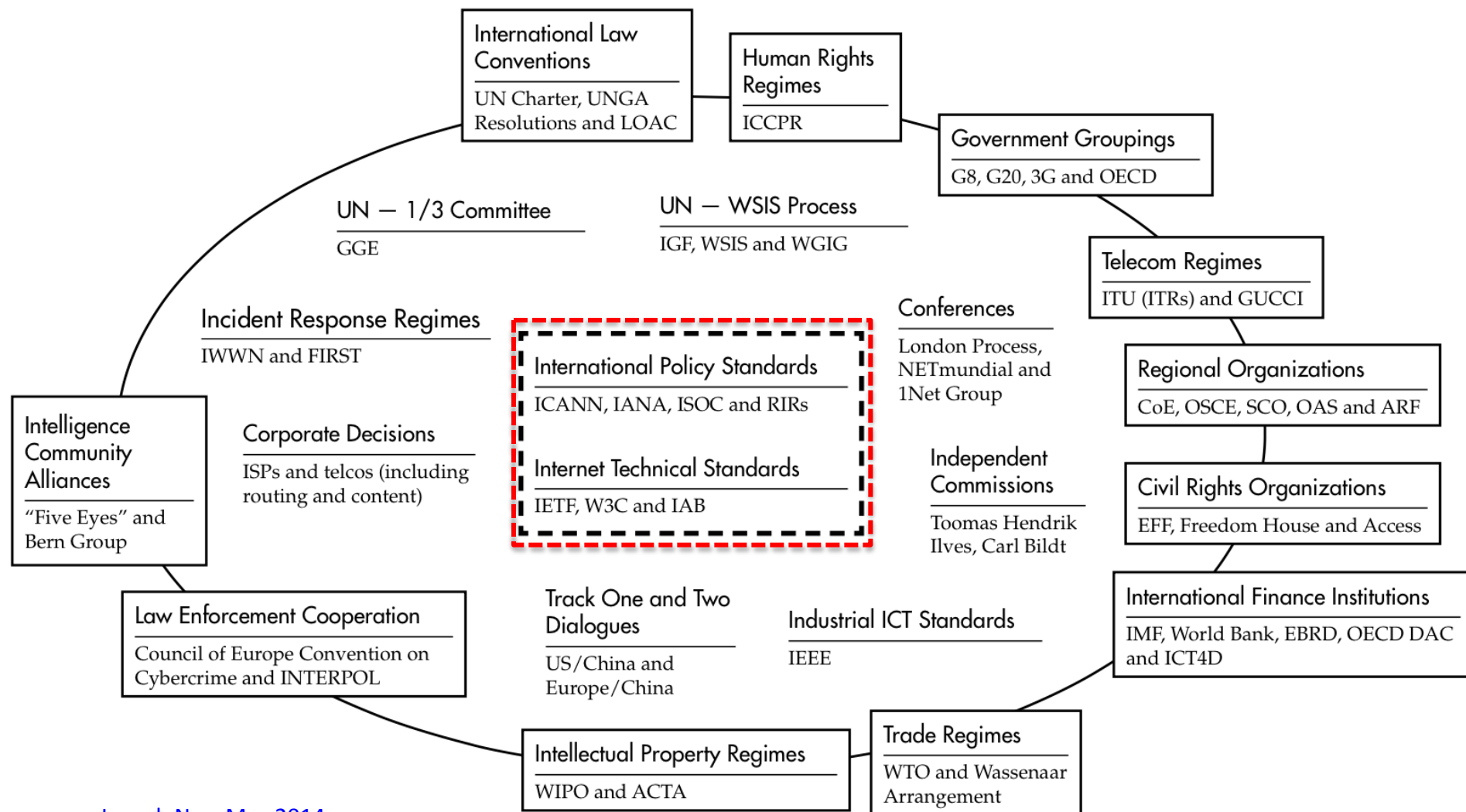


# HOW COUNTRIES SCORED ACROSS FOUR FACTORS ON THE DIGITAL EVOLUTION INDEX (OUT OF 100)



## Digital World: legal and regulatory aspects

# Global Cyberspace Governance



Joseph Nye, May 2014

# Cyberspace Governance governing actors

Level	Technology	International Documents	Regulation & Laws
Global	Critical Resources	Privacy	
	Names and Number	Access	
	Encryption	Ethics	
Regional	Numbers (IP)	Access	
		Ethics	
National			Freedom of Expression
			Privacy
			Access
			Ethics

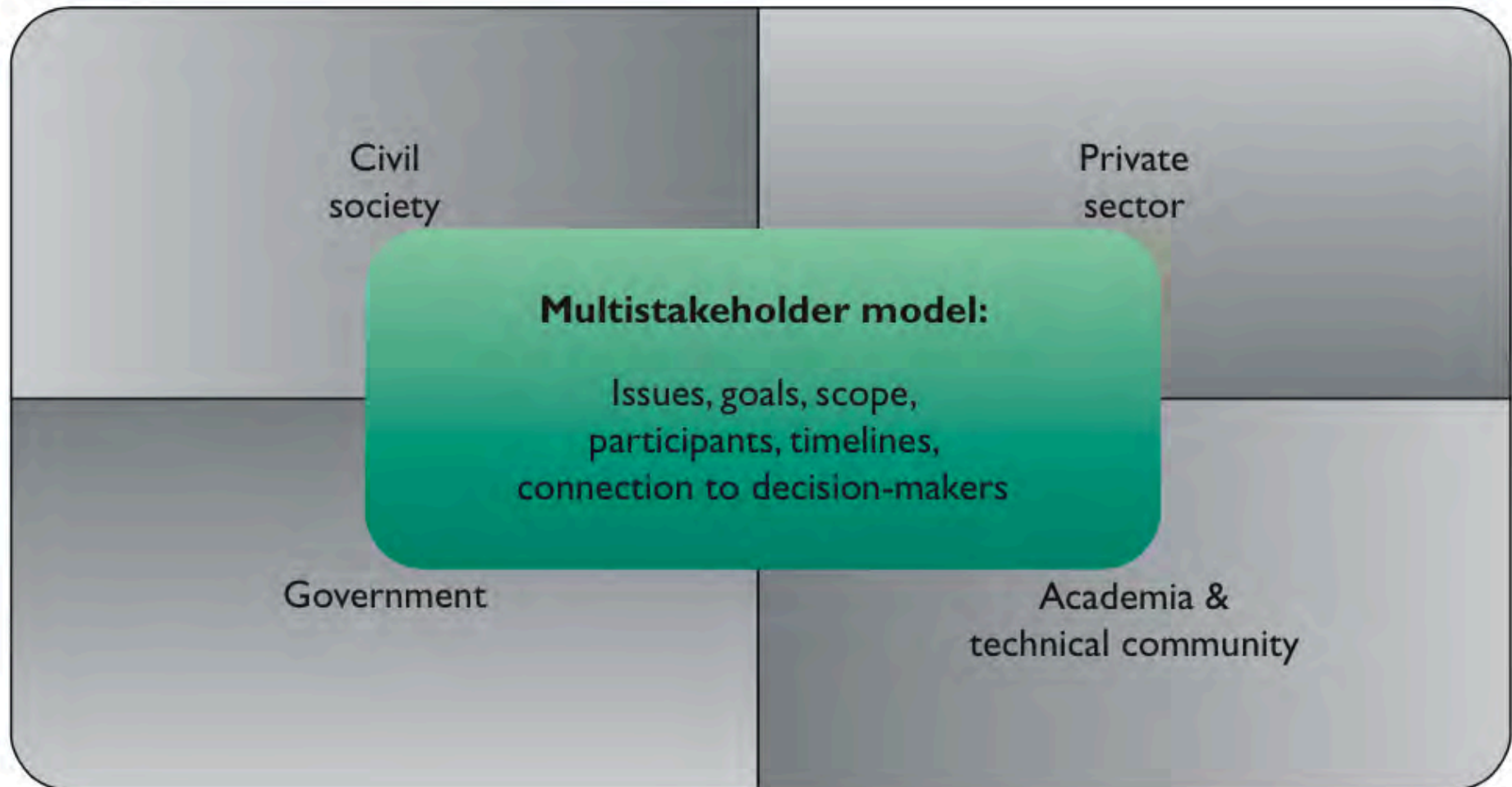
# Brazilian Internet Regulatory Framework

- 1995: The Internet Steering Committee – CGI.br
- 2009: Principles for Internet use and governance
- 2011: Marco Civil – The Civil Rights Framework for the Internet, approved by Congress in 2014.
- 2014: NETmundial
- **Brazil's Draft Privacy Law: Personal Data Protection**

# About cgi.br

- Created in 1995, the Brazilian Internet Steering Committee - CGI.br coordinates and integrates Internet services in Brazil, promoting technical quality, innovation and dissemination of the use of Internet services.
  - Propose policies and procedures related to the regulation of Internet activities;
  - Recommend standards for technical and operational procedures;
  - Establish strategic directives for the use and development of the Internet;
  - Promote studies and technical standards for network and Internet security;
  - Coordinate the allocation of Internet addresses (IPs) and registration of domain names under the ccTLD “.br”;
  - Promote specialized research on the use of ICTs;
  - Collect, organize and disseminate information on Internet services, including the production of indicators and statistics.

## Multistakeholder model for Internet Governance



# History of CGI.br

Brazilian Internet  
Steering Committee



- |   |                                       |
|---|---------------------------------------|
| 1 – Ministry of Science and Technology                            | 11 – Access and content providers     |
| 2 – Ministry of Communications                                    | 12 – Telecom infrastructure providers |
| 3 – Presidential Cabinet  | 13 – ICTs and software companies      |
| 4 – Ministry of Planning, Budget and Management                   | 14 – User companies                   |
| 5 – Ministry of Development, Industry and Foreign Trade           | 15 – Third Sector                     |
| 6 – Ministry of Defense   | 16 – Third Sector                     |
| 7 – National Telecommunications Agency                            | 17 – Third Sector                     |
| 8 – National Council for Scientific and Technological Development | 18 – Third Sector                     |
| 9 – National Forum of Estate Science and Technology Secretaries   | 19 – Academia                         |
| 10 – Internet expert  | 20 – Academia                         |
|   | 21 – Academia                         |



## Multistakeholder model

1995

2003

- ☐ 9 representatives from the **government**
- ☐ 4 representatives from the **private sector**
- ☐ 4 representatives from the **non-profit sector**
- ☐ 3 representatives from the **scientific and academic community**

# Marco Civil:

## The Civil Rights Framework for the Internet

- Defines principles, rights and responsibilities for citizens, companies and government agencies.
- It articulates the interconnection of technological and legal codes
- Process:
  - Participatory
  - Bill proposed by Ministry of Justice, inspired by CGI Charter of Principles
  - 2009: online consultation process and public debate on the internet
  - Open source platform created by Ministry of Culture: Digital Culture, received 2000 suggestions from institutions (eg.: Globo, Federal Police, etc) and citizens.
- Law sanctioned by the President on April 23, 2014: No. 12.965/2014

# Brazilian Roadmap to Internet Governance

## multistakeholder-based approach

### **Multistakeholder model of CGI**

Business, civil society, govs., academia;

Stakeholder's interests, conflicts;

Best practices;

Standards, Policies.

### **CONGRESS**

Laws that combine technical code and political rights:

Internet Civil Rights: Marco Civil Law

Personal Data Protection Law

### **Global Internet Governance**

Netmundial

As a member of Global South and BRICS, Brazil could offer a bridge between Western/Eastern countries or developed/developin

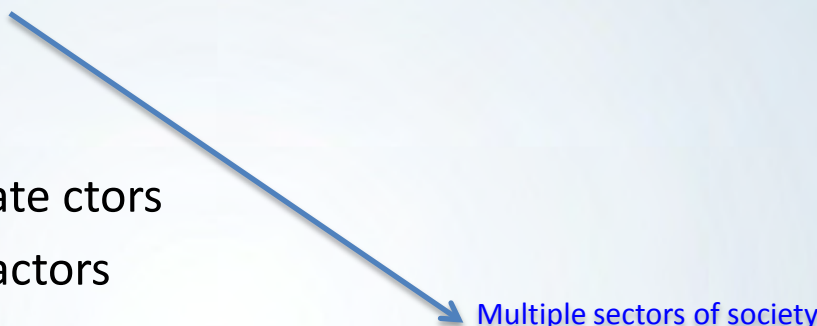
g.

## Opportunities in the digital world

# Brazil: exploring possibilities of collaboration

- Premise: some characteristics of the Digital Brazil are useful for a Global Dialogue on privacy
  - Size of the Internet market in Brazil
  - **Modern Internet governance system in Brazil**
  - Diversity of the Brazilian Internet sector
  - Geopolitical role of Brazil in the Global South
  - Western mindset of the Brazilian culture
  - Real experience with multistakeholder governance bodies can be useful for leveraging collaboration on privacy and cybersecurity issues

# Can international negotiations leverage international cooperation on privacy and security?

- Privacy rules and norms
  - Cyber Threats
    - Cyber war: state actors
    - Economic espionage: state ctors
    - Cyber crime: non-state actors
    - Cyber terrorism: non-state actors
  - Evolution
    - As alliances, tactics and technology of cyber threats evolve, the categories will increasingly overlap -> multistakeholder organizations
  - Examples:
    - Sony attack;
    - Fighting Spam the in Multistakeholder Way – A Case Study on the Port 25/TCP Management in the Brazilian Internet;
  - Cyberspace governance initiatives lag behind the evolution of the digital world.
- 
- Multiple sectors of society

# Agenda for Digital Brazil: 2015-2018

Main Areas

Digital  
Society

**Competitiveness**

Government as Platform

**Crosscutting Initiatives:**  
**Cybersecurity,**  
**privacy**

Technological and Digital Sovereignty

## Conclusion

- Cyberspace governance is a process under construction;
- Need of innovation solutions for global governance processes for a connected world;
- Privacy is a key dimension of the Cyberspace;
- Cybersecurity initiatives and privacy regulation require the participation of all sectors of the society;
- Multistakeholder approaches can contribute to improve governance of global cyberspace.



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## **Introductory Keynotes/ Conferências de Abertura**

*Why Privacy Matters in our Global, Digital and Interconnected World*

*Por que a privacidade é importante no nosso mundo global, digital e interconectado*

**Peter Hustinx**

Former European Data Protection Supervisor  
(EDPS)



#Brazilprivacy

## The Modern Data Landscape

This panel will set the factual scene for this workshop and place privacy regulation and information management into context by raising awareness and taking stock of the technological and business realities of the current information-based economy. What are the technological and business facts that modern privacy laws need to account for? The panel will consider Big Data, the Internet of Things, cloud computing, wearables, and global data flows. It will also consider what other technological developments can we expect in the foreseeable future and address the risks and benefits to the individual associated with these developments.

- ❖ ***Moderator: Marcel Leonardi, Senior Public Policy and Government Relations Counsel, Google Brazil***
- ❖ *Demi Getschko, Board Member, Brazilian Internet Steering Committee/CGI.br*
- ❖ *Enylson Camolesi, Director of Corporate Affairs, Telefónica Brazil*
- ❖ *Daniel Korn, Director of Corporate Affairs, Microsoft Latin America*
- ❖ *Francisco Soares, Senior Director, Government Affairs, Qualcomm*
- ❖ *Woodrow Hartzog, Associate Professor, Cumberland School of Law, Samford University*





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# Session I: The Modern Data Landscape

**Daniel Korn**

Director of Corporate Affairs  
Microsoft Latin America



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# Benefits of the Cloud

Job  
Creation



CEPAL

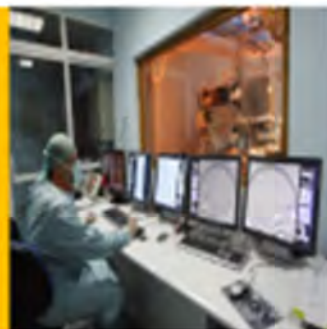
Cost  
Savings



Democratization  
of Computing



Social  
Inclusion



Increased  
Agility



Security



Public Safety

Privacy and free  
expression

National  
Sovereignty

Global network



# The power of transparency





#Empowering



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# Session I: The Modern Data Landscape

## *Privacy and the Internet of Things*

**Francisco Giacomini Soares**

Senior Director, Government Affairs

Qualcomm



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THE INTERNET  
25 BILLION  
connected devices by 2020



# Range of IoT Use Cases and Sensitivities

No “one-size-fits-all”

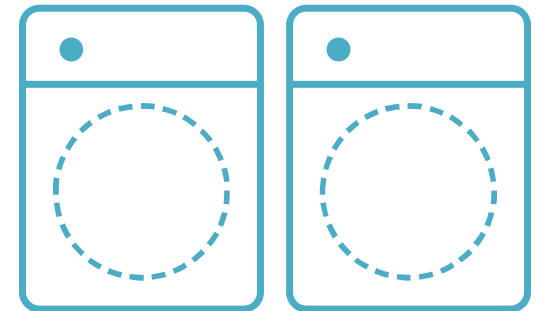


# Hypothetical

## Internet connected home appliance

- *What data might the appliance manufacturer want to collect?*
  - Usage statistics
  - Maintenance alerts/error messages
  - City/state/region
  - Unique ID that someone could theoretically tie back to the user?
- *For what purpose?*
  - Product improvement
  - Maintenance support
  - Improve sales operations
- *To whom may the data go?*
  - Appliance manufacturer
  - Component suppliers
  - Service providers

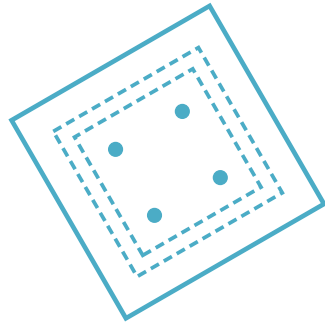
In multiple  
countries



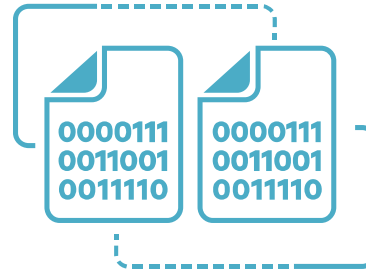
# Some of the key IoT privacy challenges



Many data types  
and uses other  
than “monetizing  
the data subject”



Many  
companies do  
not have direct-  
to-consumer  
relationships



Varying  
sensitivities of  
data types and  
uses



Cross-border  
data transfer  
often critical for  
success



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**Keynote Speaker:**

**Juliana Pereira da Silva**

Secretary of the National Consumer Protection  
Secretariat  
Ministry of Justice



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## Brazil's Draft Privacy Law

This panel will discuss the status of the draft Brazilian privacy law as well as the key outstanding issues that need to be resolved.

- ❖ ***Moderator: Rafael Dubeux, Deputy Chief for Legal Affairs, Casa Civil da Presidência da República***
- ❖ *Danilo Doneda, Advisor, National Consumer Protection Secretariat, Ministry of Justice*
- ❖ *Dennys Antonialli, Director-President, InternetLab*
- ❖ *Leonardo Palhares, Partner, Almeida Advogados and Vice President of Strategy, Camara-e.net*
- ❖ *Vanessa Araujo Lopes Butalla, Legal Manager, Serasa Experian*
- ❖ *Murillo Laranjeira, Head of Public Policy and Government Relations, MercadoLivre*
- ❖ *Bruno Magrani, Head of Public Policy, Facebook Brazil*





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# **Session II: Brazil's Draft Privacy Law**

**Leonardo Palhares**

Parnter, Almeida Advogados

Vice President of Strategy, Camara-e.net



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# COMPARATIVE

Matter	Ministry of Justice proposed Bill ("APL")	Bills	Legal Guidance
Definitions	Personal Data are data related with the natural person, known or identifiable, including from identifying numbers, location data or electronic identification.	PL No. 4,060/2012	Any information that allow the exact and precise identification of a determined person. (The law does not determine if electronic identification is a personal data).
		PLS No. 330/2013	Any information subject to be stored, processed or transmitted, related to a known or identifiable person.
		PLS No. 181/2014	Any information that allows the identification, direct or indirectly, including information such as the IP number.
Exceptions	The law is not applicable to the data treatment performed by the person with a personal or journalistic purpose.	PL No. 4,060/2012	The application of the law is <b>restricted</b> . Besides the journalistic purpose, the law is also not applicable to professional data, data banks containing information to historical or scientific research and public information.
		PLS No. 330/2013	The law is not applicable to the data treatment performed by the <b>person with personal purposes</b> .
		PLS No. 181/2014	The law is not applicable to data banks maintained by the State with <b>security reasons</b> or data banks <b>exclusively to the journalistic activity</b> and to the data treatment performed by the <b>person with personal purposes</b> .
Consent	Consent must be free, express, specific and informed.	PL No. 4,060/2012	Consent/Authorization <b>only</b> required in cases of sensitive data treatment and child's data.
		PLS No. 330/2013	Consent <b>only</b> required in cases of sensitive data treatment and international interconnection of data.
		PLS No. 181/2014	Consent must be <b>express</b> regarding all collection, storage and personal data treatment matter.

# COMPARATIVE

Matter	Ministry of Justice proposed Bill ("APL")	Bills	Legal Guidance
Sensitive Data	<p>Definition: Personal data that reveal racial or ethnic origins, philosophic convictions and data related with healthcare or genetic, among others.</p> <p>Prohibition to treat sensitive data for a period longer than 10 years.</p>	PL No. 4,060/2012	The Bill <b>does not</b> mention as sensitive the data containing information regarding healthcare or genetic.
		PLS No. 330/2013	Proposal follow similar terms when compared to the APL. The storage is only allowed with <b>minimum security conditions</b> .
		PLS No. 181/2014	Proposal follow similar terms when compared to the APL. The consent must be obtained in a <b>separated manifestation</b> .
Competent Body	<p>It is not defined in this APL who will be in charge of the competent body.</p> <p>Among its competences it is the evaluation of the security level of some countries, establishment of some complementary rules and the responsibility with the application of administrative sanctions.</p>	PL No. 4,060/2012	It is established in the Bill that the violators must be sanctioned <b>according with the Consumer Protection Code</b> .
		PLS No. 330/2013	The competent body must be a <b>federal authority</b> .
		PLS No. 181/2014	As well as in the APL, <b>it is not defined</b> who will be in charge of the competent body.
International Data Transfer	With a few exceptions, it is only allowed transfers with countries that have the same level of security.	PL No. 4,060/2012	This matter was not addressed at PL No. 4,060/2012.
		PLS No. 330/2013	The previous consent is required in this case. Also, the transfer must be <b>appropriate with the legitimate legal purposes</b> and <b>respectful with the interest of the data owner</b> . The security system of the other country must avoid any violation.
		PLS No. 181/2014	The specific consent is required in this case. As well as in the APL, the receiver country must have the <b>same level of data protection</b> .

## Developments in the Americas and Europe

This panel will discuss other legislative and other significant privacy developments in other jurisdictions.

- ❖ ***Moderator: Sérgio Alves Jr., Executive Secretary and Researcher, Centro de Direito, Internet e Sociedade do Instituto Brasileiro de Direito Público (CEDIS/IDP)***
- ❖ *Woodrow Hartzog, Associate Professor, Cumberland School of Law, Samford University*
- ❖ *Frederico Ceroy, President, Instituto Brasileiro de Direito Digital (IBDDIG), Promotor, Ministerio Publico do Distrito Federal*
- ❖ *Laura Nahabetián Brunet, Data Protection Unit Representative, Unidad Reguladora y de Control de Datos Personales (URCDP) and Manager of Citizens Rights Division, AGESIC, Uruguay*
- ❖ *Laura Juanes Micas, Senior Legal Director, International Privacy & Policy, Yahoo! Inc.*
- ❖ *Peter Hustinx, Former European Data Protection Supervisor (EDPS)*
- ❖ *Sóstenes Cavalcante, Deputy, Câmara dos Deputados*



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# **Session III: Developments in the Americas and Europe**

**Laura Juanes Micas**

Senior Legal Director, International Privacy & Policy  
Yahoo!



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# Privacy in Latin America

- 1. Regulatory Overview*
- 2. Main Trends*
- 3. RTBF. An expansion?*

# Latin America Regulatory Overview

## "habeas data"

AR, BR, BOL, CH, CO, CR, DR, EC,  
HON, MX, PAN, PAR, UR, VE

## comprehensive privacy laws

AR, ARU, BAH, CO, CR, CUR, DR, MX, NI, PE,  
T&T, St. Lu, UR



## *OAS Principles on Privacy and Data Protection*

## projects in process

BR, CAY, CH, EC



# Trends (I)

## *1) EU inspired norms (in search for adequacy?)*

- *Yet only Argentina and Uruguay have been deemed adequate*

## *2) Predominance of (express) consent as the sole legal basis*

- *The outlier: Mexico*
- *Some countries contemplate other legitimate bases (public interest, contract, legal obligation)*

## *3) The concept of “legitimate interest” is completely absent*

## *4) Foreign data transfers are heavily restricted (unless express consent or adequacy)*

- *But no adequacy list(s)*
- *The outliers: Mexico and Colombia*

## *5) Accountability incentives: Only in Mexico and Colombia*

## *6) Extensive Access/Correction/Deletion rights*

## *7) Registration, DPO, data breach requirements vary significantly*

## *8) Varied degree of enforcement*

# Trends (II)



## Argentina (Ley 25.326 - 2000)

[http://www.jus.gob.ar/media/33481/ley\\_25326.pdf](http://www.jus.gob.ar/media/33481/ley_25326.pdf)

- Free, express and informed consent (“consentimiento libre, expreso e informado”)



## Mexico (LFPDPPP – 2010)

<http://inicio.ifai.org.mx/LFPDPPP/LFPDPPP.pdf>

- Implicit consent (“consentimiento tácito”)
- Sensitive data: express consent (“consentimiento expreso”)
- Exception for de-identified data (“datos disociados”)



## Perú (Ley nº 29733 – 2011)

<http://www.educacionenred.pe/noticia/?portada=8167>

- Prior, informed, express and unambiguous consent (“previo, informado, expreso e inequívoco”)
- Sensitive data: in writing
- Exception for de-identified data (“datos disociados”)



## Costa Rica (Ley nº 89698 – 2011)

[http://www.archivonacional.go.cr/pdf/ley\\_8968\\_proteccion\\_datos\\_personales.pdf](http://www.archivonacional.go.cr/pdf/ley_8968_proteccion_datos_personales.pdf)

- References to both express and informed consent



## Nicaragua (Ley nº 787 – 2012)

<http://legislacion.asamblea.gob.ni/normaweb.nsf/9e314815a08d4a6206257265005d21f9/e5d37e9b4827fc06062579ed0076ce1d>

- Consent is the general rule, through written or electronic means
- Exception for de-identified data (“datos disociados”)



## Colombia (Ley No. 1581 de 2012)

[http://www.sic.gov.co/documents/10157/0/Ley\\_1581\\_2012.pdf/](http://www.sic.gov.co/documents/10157/0/Ley_1581_2012.pdf/)

- Previous & informed authorization (“autorización previa e informada”)



## Brazil (Marco Civil de Internet No. 12965 – 2014)

[http://www.planalto.gov.br/CCIVIL\\_03/Ato2011-2014/2014/Lei/L12965.htm](http://www.planalto.gov.br/CCIVIL_03/Ato2011-2014/2014/Lei/L12965.htm)

- Express consent (“consentimento expreso”)

# RTBF...



## RTBF Request

## Decide

# RTBF Expansion?



## ***Argentina***

- Supreme Court Decision, October 2014 (Rodriguez vs. search engines) – court order, competent authority
- Congressional & City of Buenos Aires initiatives



## ***Brazil***

- PL. 7881/2014 (Eduardo Cunha) – irrelevant information
- PL. 1676/2015 (Veneziano Vital do Rego) – information not in the public interest/ obligation to create RTBF call centers
- PL 215/2015 ( Juscelino Filho) – criminal records



## ***Chile***

- RTBF is absent from the reform proposal
- Senate Proposal to modify existing Law 19.628 – specifically mentioning search engines



## ***Colombia***

- Constitutional Court Decision – putting the onus on the publisher



## ***Mexico***

- INAI investigations – focused on the right to erasure

# **Session III: Developments in the Americas and Europe**

**Sóstenes Cavalcante**

Deputy,  
Chamber of Deputies



**Deputado Federal Sóstenes Cavalcante**

**Brasília (DF), Outubro de 2015**

# Nova Lei de Proteção de Dados

## HISTÓRICO

A proteção de dados pessoais é um tema derivado do direito à privacidade esculpido no artigo 12 da Declaração Universal dos Direitos do Homem da ONU, recepcionado pelo comando constitucional disposto no artigo 5º incisos X e XII, de nossa Carta Magna.

Nos dias atuais, vários painéis e debates com experts em privacidade e criptografia e *policy makers* do mundo todo, vêm ocorrendo nos fóruns da ONU e em reuniões especializadas, justamente para tentar contornar os desafios que as novas tecnologias trazem para a proteção do direito à privacidade. **Em nenhuma outra época da história humana houve a atual capacidade de coletar e processar dados pessoais em volumes extraordinários.**

Ao serem processados, nossos dados pessoais se tornam preciosas fontes de informação a diversos segmentos econômicos e sociais, eis que informação é poder na intrínseca relação da proteção à privacidade com os valores da democracia, face à necessidade de sigilo do titular do dado pessoal enquanto elo mais fraco da corrente.

# Nova Lei de Proteção de Dados

## DESAFIOS À REGULAÇÃO DA MATÉRIA

- Apresentar princípios, direitos e sanções capazes de garantir proteções básicas ao titular dos dados pessoais; ;fornecer ao cidadão instrumentos de controle ou estabelecer para a parte que realiza o tratamento de dados obrigações de informação, transparência e contraprestação;
- Estar em conformidade com os debates e padrões internacionais de proteção de dados pessoais, como a Diretiva Europeia sobre o tema e até mesmo os posicionamentos da FTC (Federal Trade Commission) dos Estados Unidos, que soltou um relatório pedindo limites para a atuação dos databrokers;
- Flexibilidade para se adequar a evolução das tecnologias de coleta, processamento e compartilhamento de dados pessoais, coibindo a utilização de nossos dados sem nosso consentimento ou mesmo sem nosso conhecimento;
- Transparência; livre acesso; qualidade dos dados; e finalidades legítimas, específicas, explícitas e consentidas.

# Nova Lei de Proteção de Dados

## CENÁRIOS

- Apesar da aprovação do Marco Civil da Internet (Lei 12965/2014) no contexto da necessidade de proteção no âmbito digital, o Brasil, em comparação ao mundo e aos nossos vizinhos da América Latina, está muito atrasado na aprovação de uma lei de proteção de dados pessoais (exs: EUA - 1974; União Européia - 1995; Chile – 1999; Argentina, Uruguai, Paraguai e México – 2000; Japão - 2005; Colômbia – 2010; etc);
- Existem três iniciativas legislativas concorrentes, atualmente em trâmite nos Poderes Executivo e Legislativo:
  - a) **Anteprojeto de Lei de Proteção de Dados Pessoais** do Ministério da Justiça (duas consultas públicas e várias audiências já realizadas desde janeiro);
  - b) **PL 4060/2012** da Câmara dos Deputados (uma audiência pública já realizada. Relatorias de mérito na CCTI (Dep Sóstenes Cavalcante) e constitucionalidade na CCJC);
  - c) **Substitutivo ao PLS 330/2013** (englobou dois PLS, o **131/2014** fruto da CPI da Espionagem, e o **181/2014** do Sen Vital do Rêgo, todos do Senado Federal. Relatorias de mérito na CCTI (Sen. Aloysio Nunes) e constitucionalidade na CCJC. Uma audiência pública realizada.

# Nova Lei de Proteção de Dados

## PONTOS CHAVE

- Escopo e aplicação;
- Definições e Princípios;
- Consentimento e legítimo interesse;
- Dados pessoais, anônimos e sensíveis;
- Compartilhamento;
- Direitos do titular dos dados;
- Fiscalização e controle.

## RISCOS

- Tratamento compatível entre os fins e a expectativa do titular;
- Limitação do tratamento ao mínimo necessário às finalidades;
- Medidas eficazes para evitar danos no tratamento de dados;
- Atualização constante das medidas de segurança na proteção de dados.

# Concluding Remarks

**Bojana Bellamy**

President

Centre for Information Policy Leadership

**Laura Schertel Mendes**

Researcher

Centro de Direito, Internet e Sociedade do Instituto Brasileiro de  
Direito Público (CEDIS/IDP)



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# Closing Remarks

**Gilmar Ferreira Mendes**

Justice

Supremo Tribunal Federal (STF)



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## How to Effectively Protect Privacy within the Context of Cross-border Data Flows

This panel will consider the reality of modern data flows across jurisdictional boundaries and the implications for data protection and privacy. The panel will consider the implications of cross-border transfer restrictions and data localisation initiatives and discuss various solutions for governing cross-border data flows, including codes of conduct, cross-border privacy rules, seals marks and similar mechanisms that create interoperability between different legal regimes and ensure continuous privacy protections as data moves around the globe.

- ❖ *Moderator: Markus Heyder, Vice President and Senior Policy Counselor, CIPL*
- ❖ *Carlos Affonso Pereira de Souza, Director, Instituto de Tecnologia & Sociedade do Rio (ITS Rio)*
- ❖ *Bruno Bioni, Master in Law, University of São Paulo and Researcher, Fundação de Amparo à Pesquisa do Estado de São Paulo*
- ❖ *Michael Rose, Policy Advisor, International Trade Administration, US Department of Commerce*
- ❖ *Anick Fortin-Cousens, Programme Director, Corporate Privacy Office and Privacy Officer for Canada, Latin America, Middle East and Africa, IBM*
- ❖ *Florian Thoma, Senior Director of Global Data Privacy, Accenture*





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# **Session IV: How to Effectively Protect Privacy within the Context of Cross-border Data Flows**

**Michael Rose**

Policy Advisor

International trade Administration, US Department of  
Commerce



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# International Data Transfer Mechanisms

## **U.S.-EU and U.S. Swiss Safe Harbor Frameworks**

- System first developed between the EU, Swiss, and U.S. Department of Commerce/Federal Trade Commission (FTC). Designed to allow U.S. companies to transfer data from Europe after meeting requirements of the Framework and making an attestation of compliance publicly and through a certification with the Department of Commerce

## **APEC Cross-border Privacy Rules (CBPR)**

- Accountability-based transfer model built around 9 foundational principles which are verified by private sector accountability agents with government backstop authority (ie FTC, Office of the Canadian Privacy Commissioner)

## **EU Binding Corporate Rules**

- A stringing, intra-corporate data transfer mechanism which requires approval from EU Data Protection Authorities

## **Standard Contracts (used in many legal frameworks)**

- Used in many jurisdictions around the world, and are designed to be inflexible. Generally used for single transactions and not the basis for large and long-term corporate transfer requirements



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# **Session IV: How to Effectively Protect Privacy within the Context of Cross-border Data Flows**

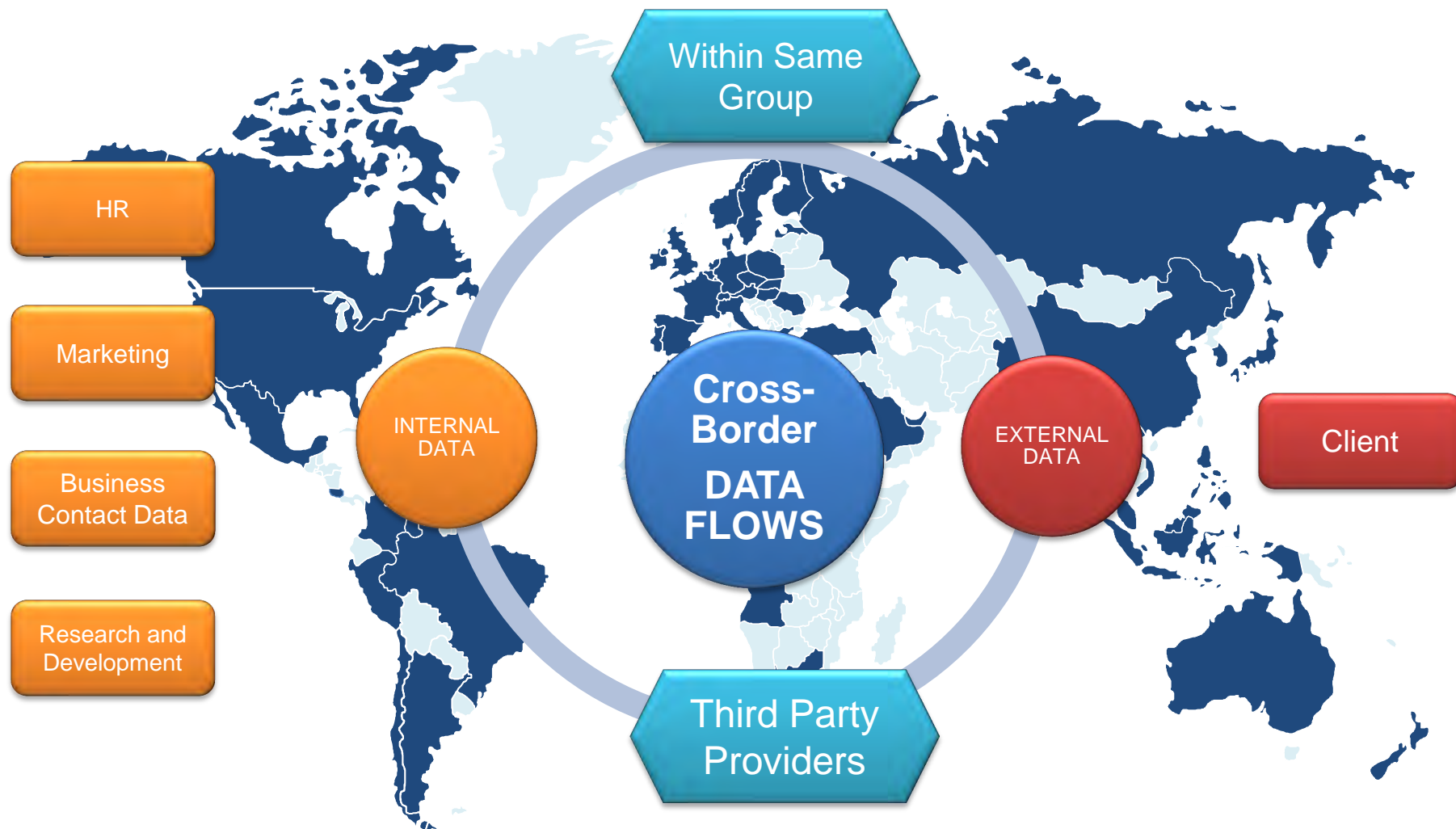
**Florian Thoma**

Senior Director of Global Data Privacy  
Accenture

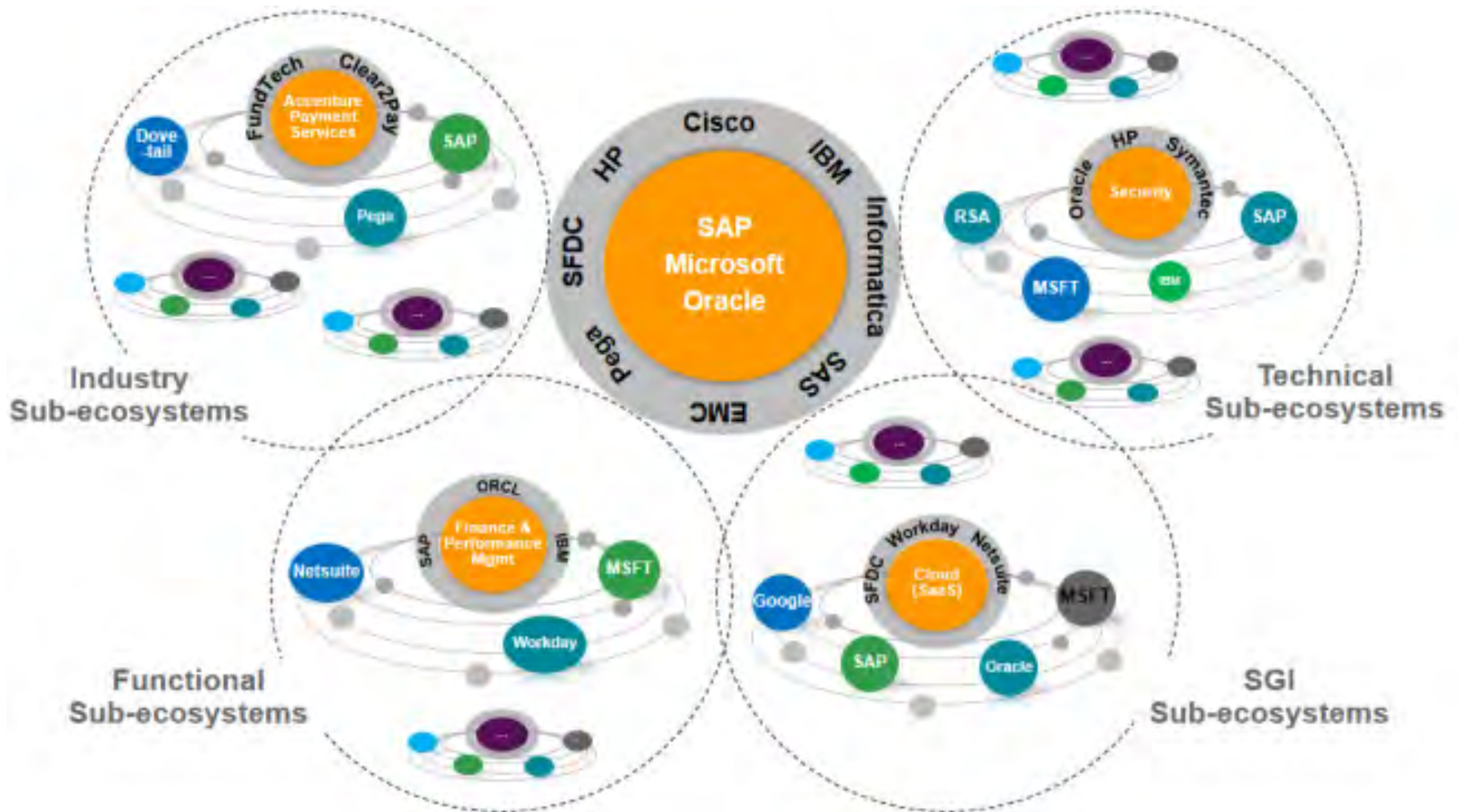


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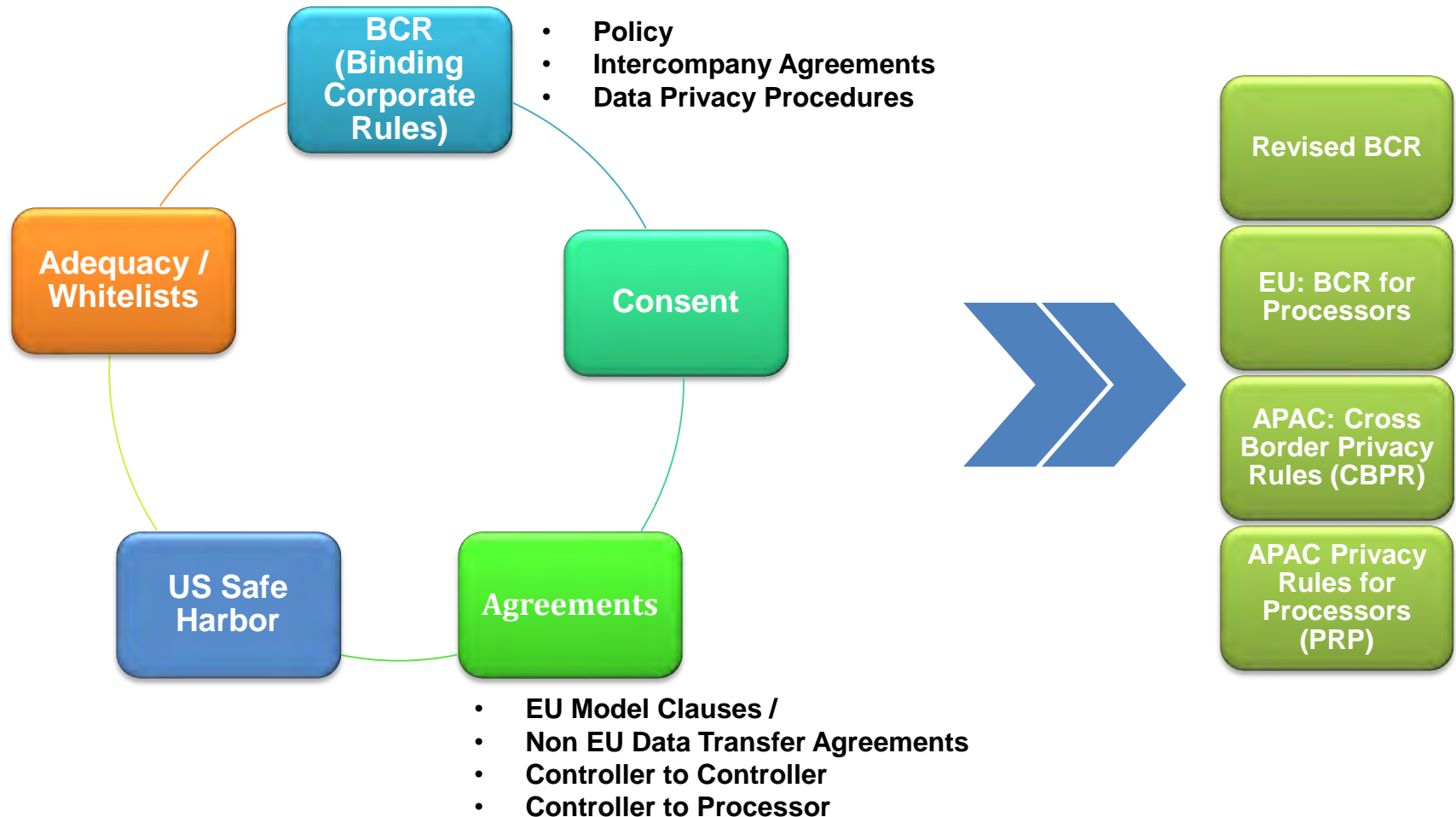
# Cross border data flows resulting from broad global footprint



# Companies are not monolithic but exist in ecosystems



# Data Transfer Mechanisms



## How to Effectively Protect Privacy in the Modern Information Age

This panel will discuss the role of key data protection and privacy principles and concepts such as notice, consent, purpose limitation, and de-identified data in the context of modern information uses, as well as the available alternatives and exceptions to consent where consent is not feasible or appropriate.

- ❖ *Moderator: Danilo Doneda, Advisor, National Consumer Protection Secretariat, Ministry of Justice*
- ❖ *Steven Emmert, Senior Director, Government & Industry Affairs, RELX Group*
- ❖ *Juan Jung Lusiardo, Coordinator, Regulatory Affairs and Studies, Asociación Interamericana de Empresas de Telecomunicaciones (ASIET)*
- ❖ *Laura Schertel Mendes, Researcher, Centro de Direito, Internet e Sociedade do Instituto Brasileiro de Direito Público (CEDIS/IDP)*
- ❖ *Paulo Rená da Silva Santarém, Director, IBIDEM*
- ❖ *David Smith, Deputy Commissioner and Director of Data Protection, UK Information Commissioner's Office*
- ❖ *Jonny Shipp, Head of Digital Confidence, Telefonica*





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# **Session V: How to Effectively Protect Privacy in the Modern Information Age**

**David Smith**

Deputy Commissioner and Director of Data Protection  
UK Information Commissioner's Office



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# Criteria For Processing Under EU Law

- Consent
- Performance of contract
- Compliance with legal obligation
- Protection of vital interests
- Performance of a task in the public interest
- Legitimate interests unless overridden

# Modernising Protection Under EU Law

- Explicit/unambiguous consent
- Layered privacy notices
- Privacy by design/default
- Data minimisation
- Breach notification
- Accountability of data controllers
- Enhanced rights for individuals



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# **Session V: How to Effectively Protect Privacy in the Modern Information Age**

**Jonny Shipp**

Head of Digital Confidence  
Telefonica



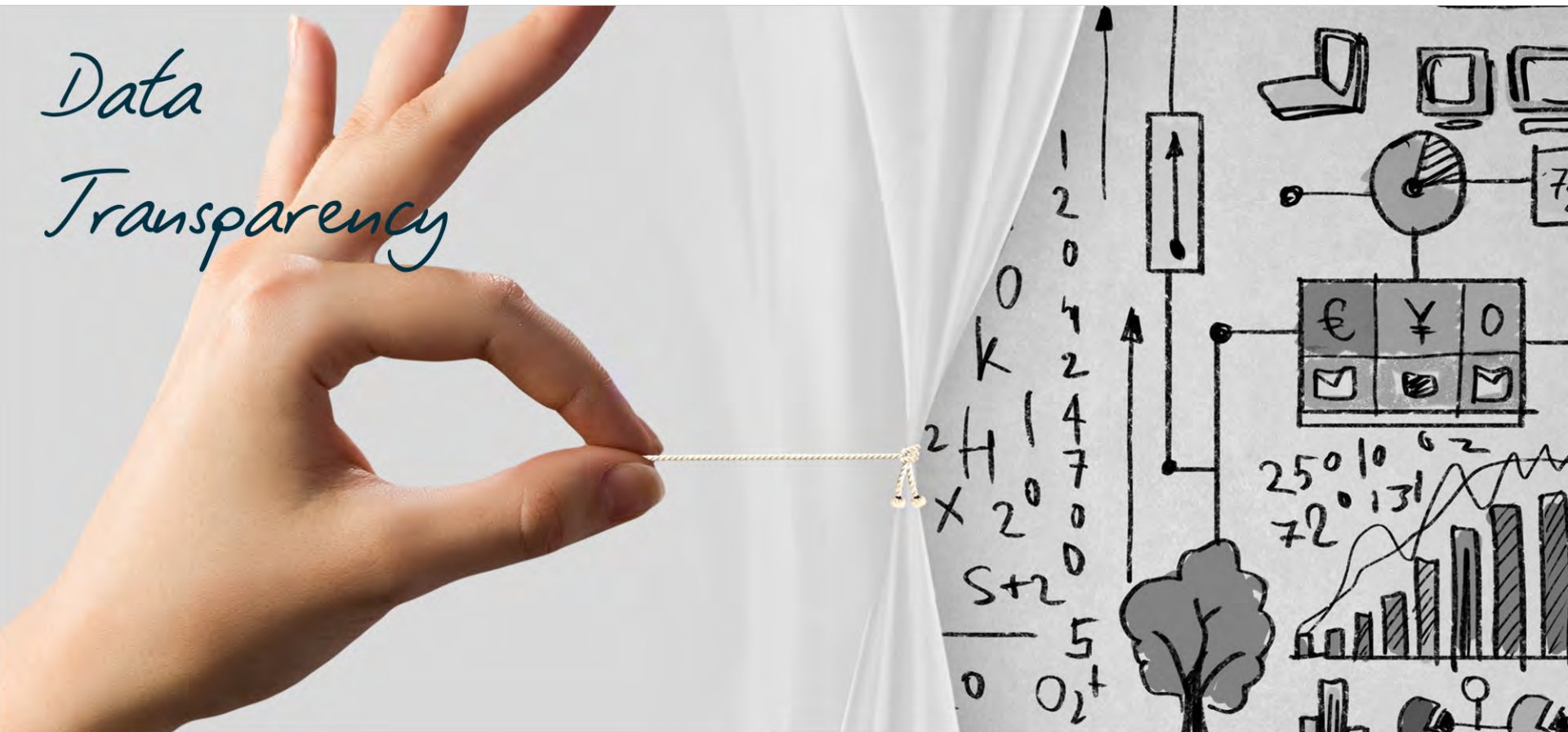
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# *The People's Perspective*

<http://bit.ly/telefonicapeoplesperspective>



Data  
Transparency





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**Keynote Speaker:**

**Maximiliano Martinhão**

Secretary of Telecommunications  
Ministry of Communication



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## How to Design Effective Organisational Compliance and Information Management Programs

This panel will discuss how to design effective organisational privacy compliance and privacy risk and information management programs as well as the role of the Data Protection Officer (DPO) within an organisation. The panel will consider such programs in the context of both public and private sector organisations, large, medium-sized and small businesses, and consumer and employee data. Finally, the panelists will outline the global trend towards “organisational accountability” and “global digital responsibility” as fundamental cornerstones of data protection and privacy.

- ❖ *Moderator: Bojana Bellamy, President, Centre for Information Policy Leadership (CIPL)*
- ❖ *Anick Fortin-Cousens, Programme Director, Corporate Privacy Office and Privacy Officer for Canada, Latin America, Middle East and Africa, IBM*
- ❖ *Florian Thoma, Senior Director of Global Data Privacy, Accenture*
- ❖ *Steve Wright, Chief Privacy Officer, Unilever*
- ❖ *Peter Hustinx, Former European Data Protection Supervisor (EDPS)*
- ❖ *Vitor Morais de Andrade, President, Associação Brasileira das Relações Empresa Cliente (ABRAREC)*



# Rise and Proliferation of Accountability

Corporate  
Privacy  
Programs

Binding  
Corporate  
Rules  
(BCR)

APEC  
Cross  
Border  
Privacy  
Rules  
(CBPR)

Safe  
Harbour

Codes of  
Conduct

Certifications  
&  
Seals

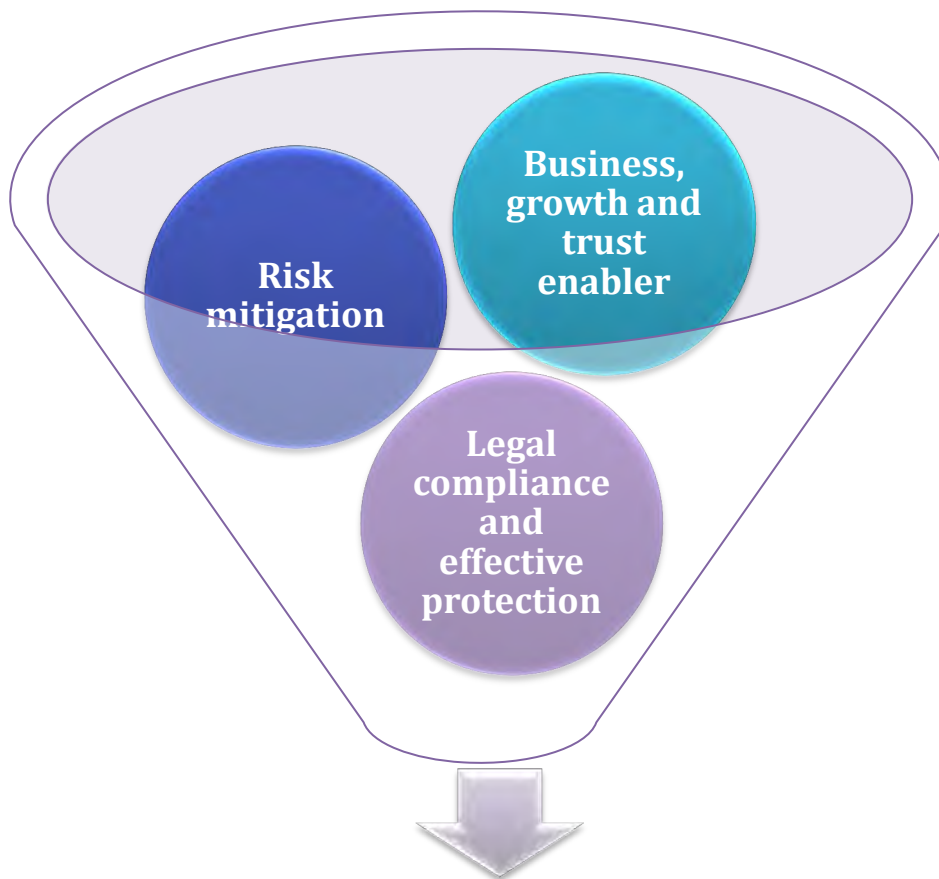
ISO  
Standards

## Accountability requires:

- Following substantive privacy rules
- Implementation infrastructure
  - Verification
- Ability to demonstrate



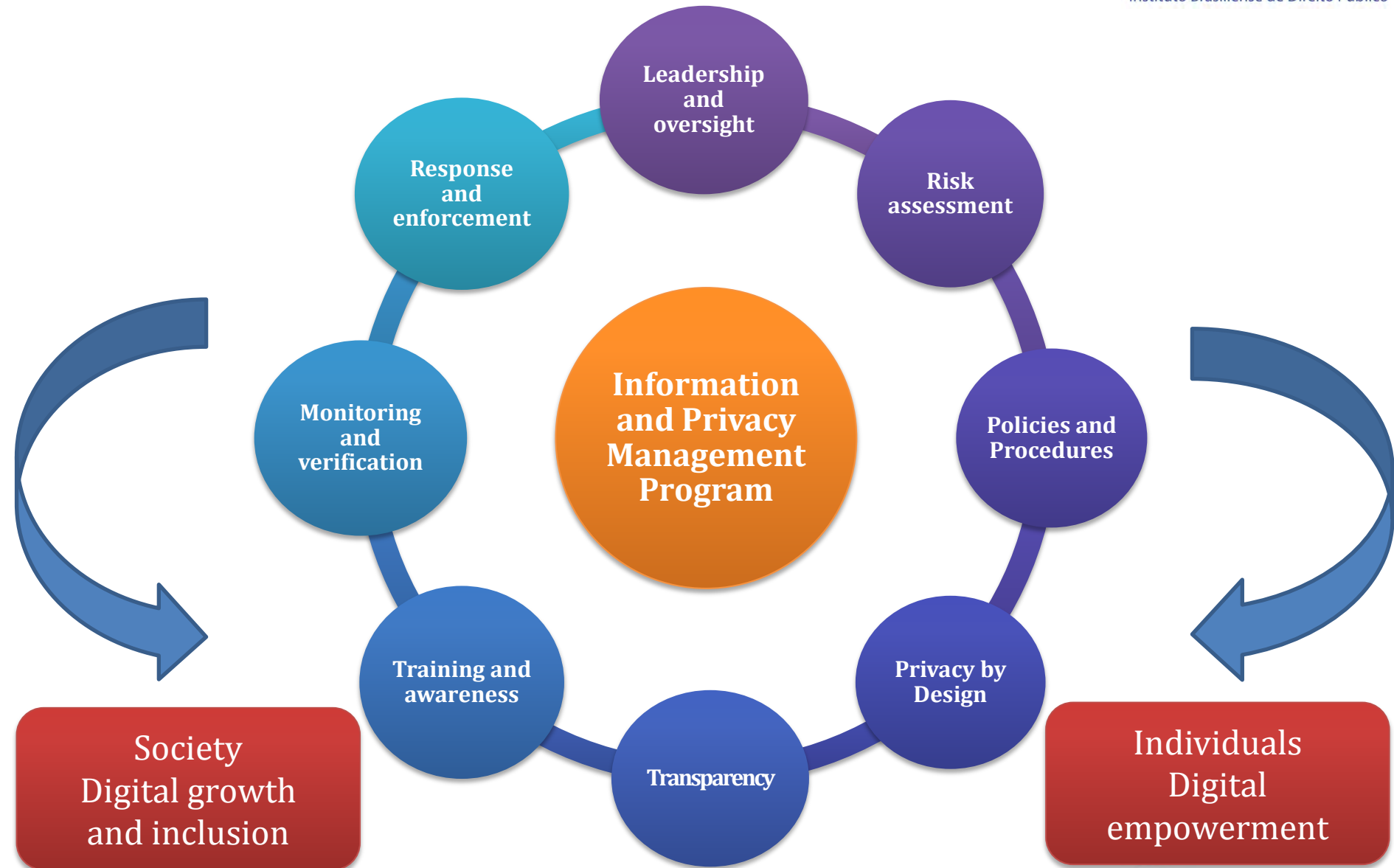
# Accountability – Enlightened Self-Interest for Organisations



**Proactive information management that embeds privacy into corporate DNA is a business issue**

**Accountability > legal compliance**

# Evolving Accountability into Digital Corporate Responsibility





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# **Session VI: How to Design Effective Organisational Compliance and Information Management Programs**

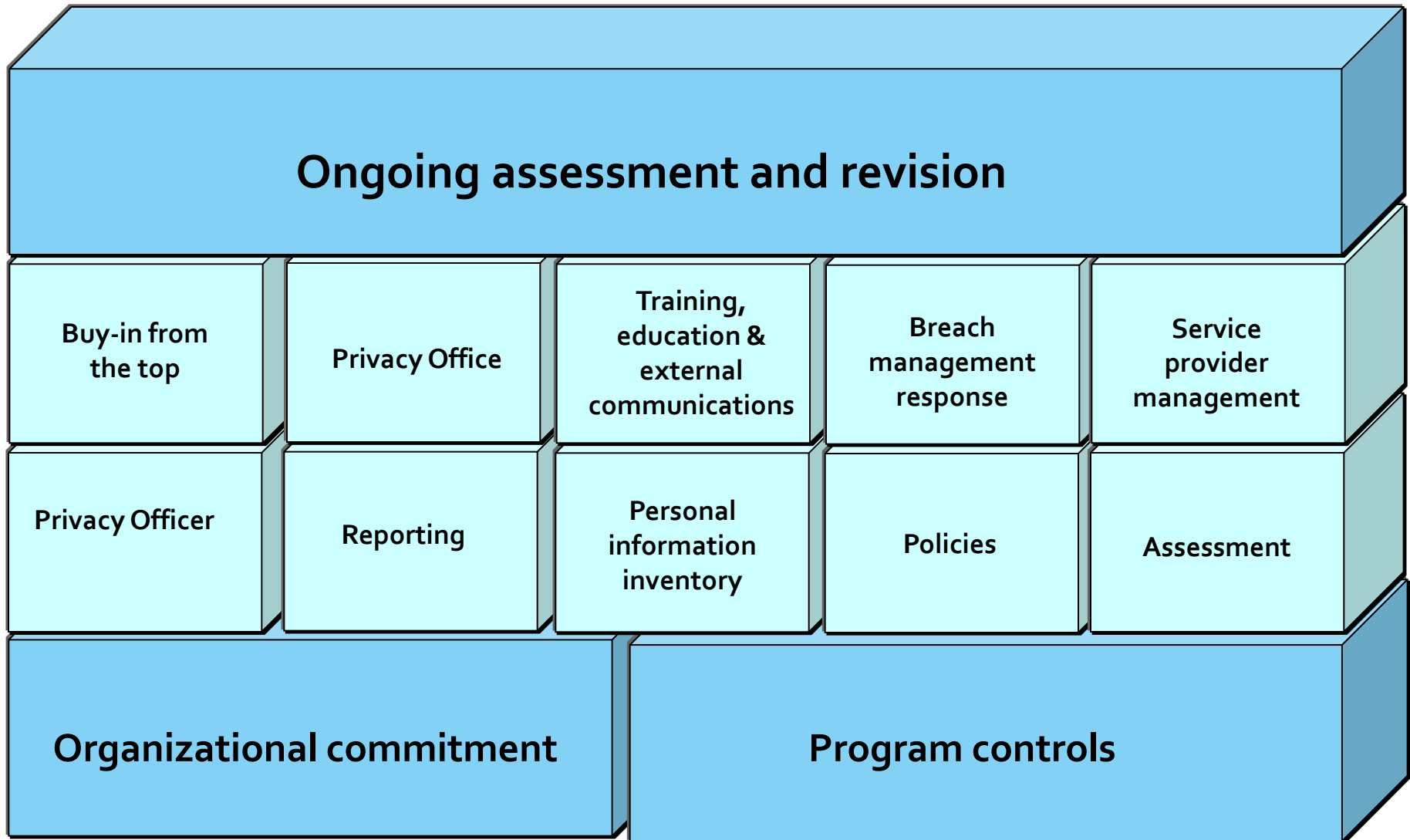
**Anick Fortin-Cousens**

Programme Director, Corporate Privacy Office  
Privacy Officer for Canada, Latin America, Middle East and  
Africa  
IBM



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## Accountability on a global scale



[https://www.priv.gc.ca/information/guide/2012/gl\\_acc\\_201204\\_e.asp#m](https://www.priv.gc.ca/information/guide/2012/gl_acc_201204_e.asp#m)



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# **Session VI: How to Design Effective Organisational Compliance and Information Management Programs**

**Florian Thoma**


Senior Director of Global Data Privacy  
Accenture



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# Today's Challenges

- Technology develops at high speed – and this speed is accelerating further
- Disruptive potential: Technology meets Law
  - Time to spot challenges
  - Time to regulate
  - Traditional principles broken?  
(e.g., notice and consent, data minimization, purpose limitation)
  - Territorial limitations
  - Controller and Processor
- Businesses and Data become flexible and volatile – they move easily to the “best environment”. Smart regulation needed
- Companies need to find smart answers, too



IoT – Big Data –  
Drones – Connected  
Vehicles  
....

# What is risk? Various perspectives

- The individual

- harm, reputation, identity theft, time, financial loss...

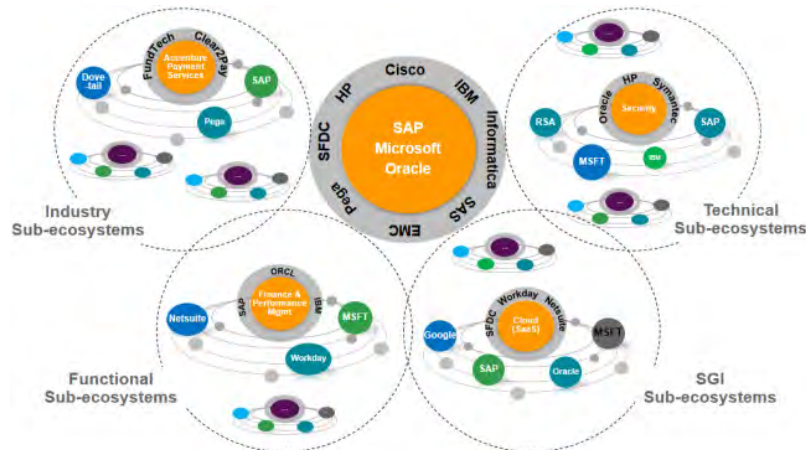
- The company

- monetary damage, fines, brand, client/customer trust, loss of business, management (time and career)

- Other parties

- operating in an ecosystem - various expectations around the globe

Interests can be conflicting, but aren't necessarily – e.g., Big Data “Retention Model”



Client and consumer expectations

Example:  
Talent  
Recruiting –  
matching  
people to roles

# Organizational Accountability

Provide orientation through a comprehensive, risk based, effective and validated Privacy Program

Area		
Organization	Governance and Policy	Tone from the Top
Risk Management	Client Data Protection	Audit and Monitoring
Privacy by Design	Employee Data	Marketing
Training, Communication and Awareness	IT Security – Technical Measures	Cross Border Framework
Subject Access Requests; Complaint Handling	Supplier Management	Government Relations Authorities

# An example: DP Program Risk Assessment

**Five element framework:** to evaluate and organize our compliance programs to achieve rigor and consistency globally. Leadership, Risk Assessment, Standards and Controls, Training and Communication, and Monitoring, Audit and Response.

**Risk Assessment:** Conducting annual and periodic risk assessments for the global compliance programs, and assessing emerging areas of risk. → FY15: 16 topics, 12 countries

A common understanding of the data privacy legal and regulatory landscape that affects the company

An assessment of the effectiveness of the Global Data Privacy Program

Benchmarking to validate the way the Program is structured (including resources)

Identification of areas for enhancement



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# **Session VI: How to Design Effective Organisational Compliance and Information Management Programs**

**Steve Wright**

Chief Privacy Officer  
Unilever



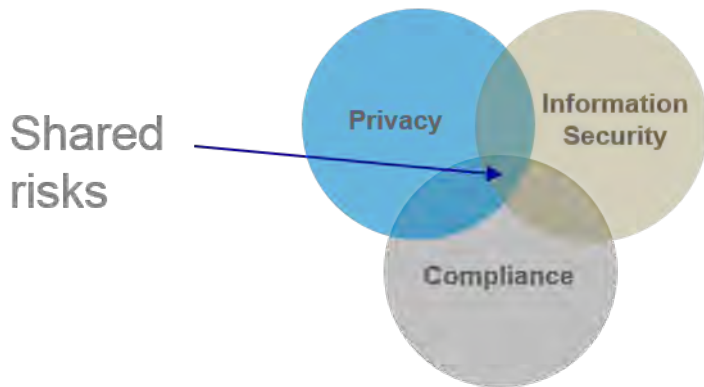
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# Privacy in motion

Global Privacy team aims at ensuring practical privacy policy adoption across all the business.



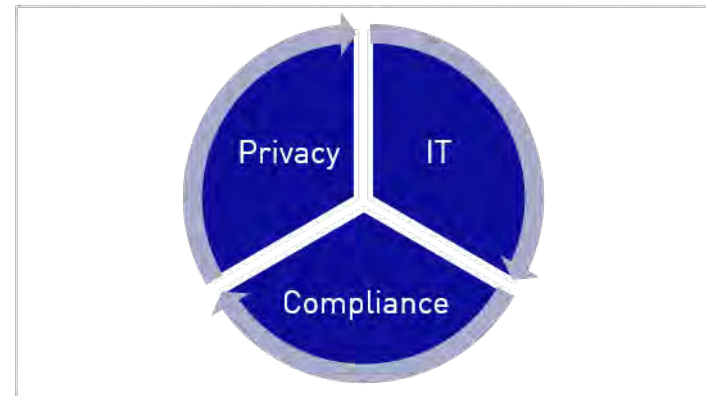
Privacy, Compliance and Information Security will work together to ensure effective risk management across our digital ecosystem.



Managing privacy across our business requires careful balance:



Privacy, IT & Compliance will work together to ensuring adequate risk management is continually managed across our IT landscape.



# Privacy in the organisation

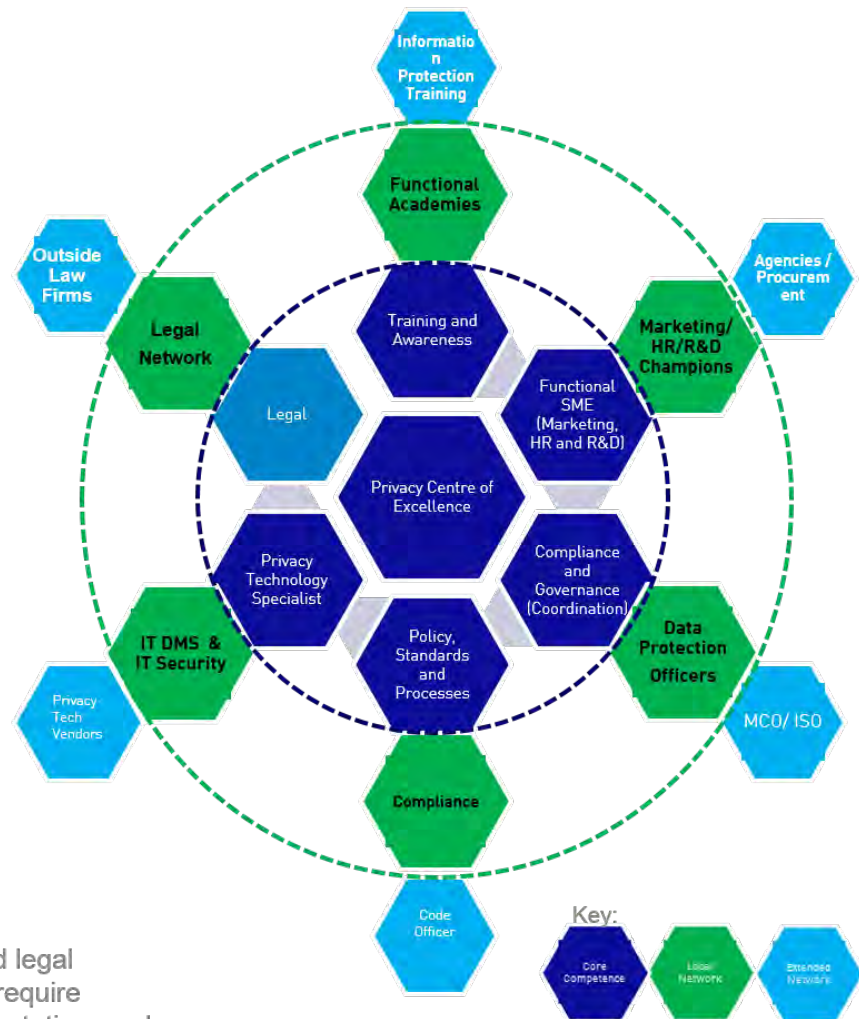
## PRIVACY NETWORK

Privacy can not be managed centrally or locally in isolation, it requires a layered approach to be effective. This model demonstrates how these layers interact:

- Dark blue centre - The Global Privacy team will be responsible to drive standardisation, harmonisation and monitor privacy compliance across the globe.
- Green Layer - The centre will be supported by a network of legally trained lawyers, Data Protection Officers and privacy champions.
- Light blue layer – There are multiple stakeholders who can influence and support our privacy agenda. Including help from outside 'Panel' law firms.



Our DPO and legal Network will require continued effort, time and focus to become a credible force to help land privacy across the business.



# Privacy role today

## Data Protection Officer

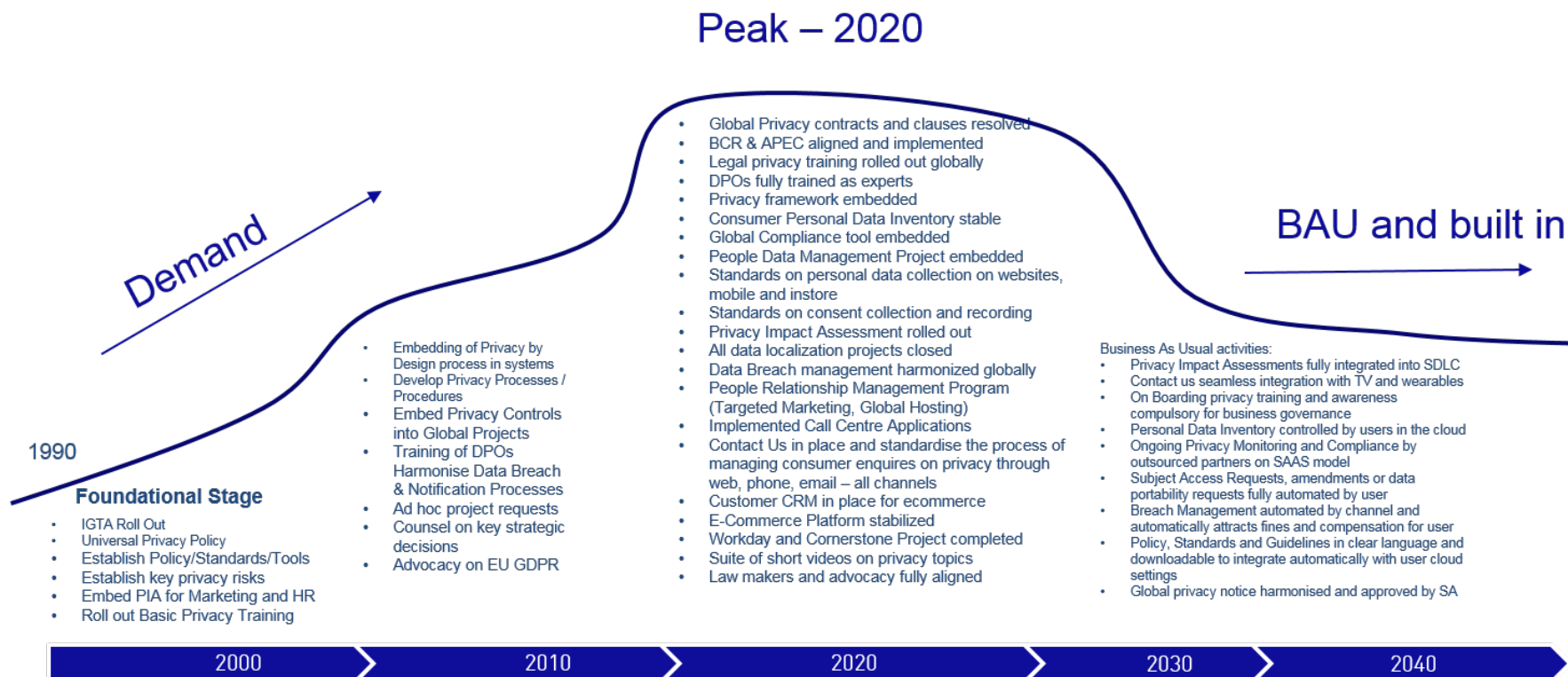
- Must be in the role for 4 years, and have expert privacy and data protection law knowledge.
- Must be prepared to have contact details on local websites and be contact point for local enquiries and complaints by data subjects and the local supervisory authority.
- Must operate independently and not take instructions from the business also exercise his or her duties.
- Monitor the implementation of privacy by design and Privacy Impact Assessments, provide input and advice to the business on suitable privacy controls.



# What does the future hold?

- The role and demands of privacy will continue to evolve, lets take a look at the future...

# Privacy role – Evolution 1990 to 2040



# Put it another way...

1990



2000

2010

2020

2030

2040

The role of the CPO / DPO will continue to evolve...until

## The Role of the Data Protection Authority

This panel will consider the critical role of the data protection authority in ensuring (a) consistent interpretation and enforcement of privacy laws, (b) effective cross-border cooperation with counterpart authorities in other jurisdictions, (c) competent national representation in international data protection networks and the global privacy policy dialogue and (d) authority/enforcement over public/government data/agents.

- ❖ *Moderator: Laura Schertel Mendes, Researcher, Centro de Direito, Internet e Sociedade do Instituto Brasileiro de Direito Público (CEDIS/IDP)*
- ❖ *Hugh Stevenson, Deputy Director, Office of International Affairs, US Federal Trade Commission (via pre-recorded video)*
- ❖ *David Smith, Deputy Commissioner and Director of Data Protection, UK Information Commissioner's Office*
- ❖ *Laura Nahabetián Brunet, Data Protection Unit Representative, Unidad Reguladora y de Control de Datos Personales (URCDP) and Manager of Citizens Rights Division, AGESIC, Uruguay*
- ❖ *Jose Alejandro Bermudez, Managing Director, Latin America, Nymity & former Colombian Superintendent for Data Protection*
- ❖ *Woodrow Hartzog, Associate Professor, Cumberland School of Law, Samford University*



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# **Session VII: The Role of the Data Protection Authority**

**David Smith**

Deputy Commissioner and Director of Data Protection  
UK Information Commissioner's Office



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# Key Features

- Delivering a good level of compliance
- Supporting and helping individual data subjects
- Independent
- Properly resourced
- Focused on risks and results
- Accountable

# Key Functions

- Education and awareness
- Advice and guidance
- Enforcement
- Complaints handling
- Inspection and audit
- Promoting good practice



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# **Session VII: The Role of the Data Protection Authority**

**Jose Alejandro Bermudez**

Managing Director, Latin America

Nymity

Former Superintendent for Data Protection, Colombia



#Brazilprivacy



# The role of the Colombian DPA and its impact on the effective protection of data subjects

*José A. Bermúdez, Managing Director – Latin America*

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## A Data Privacy Research Company

**Focus:** Dedicated to global data privacy compliance research

**Established:** 2002

**Headquarters:** Toronto, Canada

**Research:** Inventor of several compliance methodologies & frameworks

**Funding:** Partially funded by government R&D grants.

## Supporting The Privacy Office

- Extensive range of **global solutions and products**
- Effectively communicate Privacy, **increase efficiency and save time**
- All solutions are based on ongoing, **empirical research**
- A **dedicated research team** provides up-to-date information, **analysis and best practices**
- Enables you to **comply with confidence**



# Choosing an Agency:

## Institutional challenges

- Under the institutional framework created by the 1991 Constitution, the incorporation of an Independent DPA involved a constitutional reform
- Existing human rights agencies (i.e. Defensoría del Pueblo offered challenges for efficient enforcement)
- Fiscal austerity prevented the creation of a single standing DPA

## Using a credited agency: SIC as DPA

- SIC had a long and proved history as consumer protection, patents and trademarks and competition agency
- L. 1266 assigned functions for credit reporting violations which gave a taste of its capacity as DPA
- Experience handling complaints and enforcement actions in consumer and competition
- Good perception by the public as an efficient agency
- Back-office resources allowed to set up a special data protection unit without major costs

# Colombian DPA (SIC) Special projects, education and Public Policy work:

## Colombian Accountability Guidelines

- Launched in may 2015 to develop accountability principle included in 2013 secondary regulations
- Borrowed from Canadian and Hong Kong accountability guidelines. Input from “Essential elements of Accountability (CIPL Project) and Nymity’s Privacy Management Framework ®.

## SISI and RNBD

- RNBD will launch 2015 as per legal mandate
- Integrated with SISI (supervision model based on RNBD input)

## Education, awareness and training

- 4000 people attended training events in 14 different cities
- 16 SIC MOVIL
- 3 Latin American conferences (2013, 2014, 2015)
- 2 Online courses for the general public
- Government agencies training and awareness program projected for 2016

## Going forward...

- SIC has positioned itself as a credited LatAm DPA which efficiently addresses the safeguard of the fundamental right to Data Protection.
- Guidance to stakeholders on how to implement and maintain an effective privacy program will be key to advance in the implementation of an accountability based approach and further the protection of individuals
- Recent reforms regarding independence in appointment of Superintendent will positively influence the DPA's role
- International cooperation will play an increasingly important role in the protection of individuals



# Concluding Remarks

**Bojana Bellamy**

President

Centre for Information Policy Leadership

**Sérgio Alves Jr.**

Executive Secretary and Researcher

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# Closing Remarks

**Ricardo Morishita**

Director

Research and Projects

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