



## GPA Global Privacy and Data Protection Awards 2021

### Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to [secretariat@globalprivacyassembly.org](mailto:secretariat@globalprivacyassembly.org) no later than **14 June 2021**.

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2<sup>1</sup> applies.

#### 1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection  
Authority:

**Office of the Privacy Commissioner of Canada (on behalf  
of the Privacy/Data protection authorities listed below)**

#### 2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm*):

- The Authority is a member of the Global Privacy Assembly
- The initiative described in this entry was undertaken since January 2020.
- I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

#### 3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one**; please use a separate form for each category you wish to enter:*

- Education and Public Awareness
- Accountability
- Dispute Resolution and Enforcement
- Innovation
- People's Choice

#### 4. DESCRIPTION OF THE INITIATIVE

**a. Please provide a brief summary of the initiative (no more than 75 words)**

Submission on the Video teleconferencing (VTC) Global Compliance Initiative.

<sup>1</sup> [GPA Rules and Procedures](#), Rule 6.2 'Assembly documents':

Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

By:

- The U.K. Information Commissioner’s Office
- The Office of the Australian Information Commissioner
- The Gibraltar Regulatory Authority
- The Office of the Privacy Commissioner for Personal Data, Hong Kong, China
- The Federal Data Protection and Information Commissioner of Switzerland
- The Office of the Privacy Commissioner of Canada

This submission relates to a cooperative compliance initiative on global privacy expectations of Video Conferencing companies (VTC).

**b. Please provide a full description of the initiative (no more than 350 words)**

On July 21, 2020, six data protection and privacy authorities, brought together through the Global Privacy Assembly’s International Enforcement Cooperation Working Group (IEWG), and a dedicated “safe space” session on VTC, published an open letter to video conferencing companies reminding them of their obligations to comply with the law and handle individuals’ personal information responsibly.

This joint statement was directly related to the sharp uptake in use of VTC services during the pandemic, and the new and exacerbated privacy and security risks that this raised. Key areas of concerns identified in the open letter included (i) security, (ii) privacy-by-design and default, (iii) importance for VTC platforms to know their audience, (iv) transparency and fairness, and (v) end-user control.

The open letter was intended for all VTC companies, but was also sent directly to Microsoft, Cisco, Zoom, Google and House Party. With the exception of the latter, these companies replied to the letter to demonstrate the steps taken to comply with data protection and privacy requirements. They highlighted various privacy and security best practices, measures and tools implemented or built into their video conferencing services.

In May 2021, joint signatories further engaged with each of these companies, fittingly through virtual meetings on VTC platforms, to illicit further detail on the privacy and security safeguards built into the VTC platforms, and to clarify certain areas of residual concern. This follow-up engagement gave these companies the opportunity to demonstrate their commitment to user security and privacy, and to explain how they implemented the measures set out in their responses.

This global Compliance initiative is expected to be finalized in July 2021, with the publication of a final statement on findings, lessons learned, enhancements made (owing to this engagement) and expectations to encourage broad-based compliance and best practices across the industry.

Participant authorities:

The U.K. Information Commissioner’s Office (ICO)

The Office of the Australian Information Commissioner (OAIC)

The Gibraltar Regulatory Authority (GRA)  
The Office of the Privacy Commissioner for Personal Data, Hong Kong, China (PCPD)  
The Federal Data Protection and Information Commissioner of Switzerland (FDPIC)  
The Office of the Privacy Commissioner of Canada (OPC)

**c. Please explain why you think the initiative deserves to be recognised by an award**  
*(no more than 200 words)*

**Efficient**

Participant authorities demonstrated agility and efficiency in addressing an important and emerging privacy issue in the context of the pandemic. They reached consensus on the implemented compliance approach during a one-hour safe space meeting!

The non-formal compliance approach allowed us to gather substantial intelligence on the VTC industry without duplicative, resource-intensive investigations. Extremely high returns on collaborative enforcement investment.

**Collaborative**

We leveraged cooperation to:

- achieve high-level engagement from four key global players;
- benefit from the expertise of six authorities in developing communications, questions and analysis;
- carry out scalable enforcement action allowing regulators of various sizes and resource limitations to benefit from a global coordinated action for promoting an industry-wide compliance effect;
- allocate tasks (e.g., dividing interviews with VTCs according to time zones) to minimize the load on each authority; and
- amplify compliance messaging through unified communications.

**Impactful**

We generated powerful communications to share compliance expectations vis-à-vis VTC platforms (open letter), and then identify best practices (in upcoming release) to encourage broad-based compliance and improve industry-wide privacy protection on a global scale. Given the growing number of digital services that operate across the world, this initiative will have a significant impact on the protection of VTC consumer's privacy worldwide.

**d. Please include a photograph or image, if you wish** *(This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)*

N/A

**e. Please provide the most relevant link on the authority's website to the initiative, if applicable** (*The website content does not need to be in English*)

ICO:
<ul style="list-style-type: none"><li>• July 21, 2020: <a href="#">Press release</a></li><li>• July 21, 2020: <a href="#">Joint statement on global privacy expectations of Video Teleconferencing companies</a></li><li>• Dec 23, 2020: <a href="#">Announcement</a> providing an update on the VTC compliance action and related next steps</li></ul>
OAIC
<ul style="list-style-type: none"><li>• July 21, 2020: <a href="#">Press release and joint statement on global privacy expectations of video teleconference providers</a></li><li>• Dec 23, 2020: <a href="#">Update to the joint statement on global privacy expectations of video teleconferencing companies</a></li><li>• July publication: [to be provided once released]</li></ul>
GRA:
<ul style="list-style-type: none"><li>• July 21, 2020 <a href="#">press release</a> and <a href="#">social media post</a></li><li>• January 06, 2021 <a href="#">press release</a></li></ul>
PCPD:
<ul style="list-style-type: none"><li>• July 21, 2020: <a href="#">Media statement</a></li><li>• Dec 23, 2020: <a href="#">What's New</a></li></ul>
FDPIC:
<ul style="list-style-type: none"><li>• July 21, 2020 and January 06, 2021 <a href="#">press releases</a></li></ul>
OPC:
<ul style="list-style-type: none"><li>• July 21, 2020: <a href="#">Press release</a></li><li>• July 21, 2020: <a href="#">Joint statement on global privacy expectations of Video Teleconferencing companies</a></li><li>• Dec 23, 2020: <a href="#">Announcement</a> providing an update on the VTC compliance action and related next steps.</li><li>• July publication: [to be provided once released]</li></ul>

**f. Please provide any other relevant links that help explain the initiative or its impact or success** (*e.g. links to news reports or articles*):

ICO:
<ul style="list-style-type: none"><li>• <a href="https://www.uctoday.com/collaboration/video-conferencing/microsoft-cisco-zoom-and-google-respond-to-concerns-of-privacy-watchdogs/">https://www.uctoday.com/collaboration/video-conferencing/microsoft-cisco-zoom-and-google-respond-to-concerns-of-privacy-watchdogs/</a></li><li>• <a href="https://iapp.org/news/a/data-protection-privacy-authorities-set-video-teleconferencing-expectations/">https://iapp.org/news/a/data-protection-privacy-authorities-set-video-teleconferencing-expectations/</a></li></ul>
OAIC:

- <https://www.zdnet.com/article/global-authorities-ask-video-conferencing-platforms-to-revisit-privacy-obligations/>
- <https://www.mondaq.com/australia/privacy-protection/974116/privacy-obligations-of-video-teleconference-providers>

GRA:

- In regard to impact - the initiative led to other work in a local/national context, highlighting the importance of international action and efforts, as a catalyst for national/local action. The GRA published a [guidance note](#) alongside a [short clip](#) on the topic.

FDPIC:

- On May 1, 2020, the FDPIC published a [press release](#) referring to possible measures for the safe use of audio and video conferencing systems.

OPC:

- <https://news.bloomberglaw.com/privacy-and-data-security/video-service-companies-must-protect-data-privacy-watchdogs-say>
- <https://mobilesyrup.com/2020/07/21/canadian-and-global-privacy-watchdogs-pen-letter-to-video-conferencing-giants/>