



GPA Global Privacy and Data Protection Awards 2023

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 **no later than 9 June 2023**.

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 6.2¹ applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection

Authority: Dubai International Financial Centre

Person completing this form: Lori Baker
First name Last name

Job title: Director of Data Protection

Email address: lori.baker@difc.ae

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 2022.
- 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

¹ [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.

4. DESCRIPTION OF THE INITIATIVE

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

In an attempt to creatively address several issues that DIFC entities would face with implementing model clauses, the Commissioner's Office has:

1. Compared / combined EU SCCs modules EU SCCs and blend with UK IDTA obligations, to eliminate risk and redundancy.
2. Created a link to the DIFC, EU and UK SCCs as the primary options for DIFC exporters and importers.
3. Prepared Article 24 suggested clauses and updating regulations to enforce them.

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

Due to the importance of ensuring data flows with trust out of the DIFC and for onward transfers, and to assist DIFC entities in applying the requirements of Articles 26 and 27 of the DIFC DP Law 2020 correctly, over the course of the year between February 2022 and May 2023, the Commissioner's Office has:

1. Compared and combined the modules of the EU SCCs, to eliminate the need and risk of choosing from 4 different modules up to 10 times per document. These are the "Combined DIFC SCCs". A comparison table is available with the information at this [link](#) to see how this work was completed. The SCCs with combined modules cover all aspects of risk that each individual module attempts to cover. They are available at the [link](#) above as well.
2. Created a link to the primary text of the DIFC, EU and UK SCCs as the primary options for DIFC exporters and importers, and included each in the SCCs template as a link with a tick box selection. These are the "Abbreviated DIFC SCCs". The benefits here are that they cannot be altered or inadvertently made less effective, and only the Annexes need to be completed. There are also tick boxes under the Annex form section to make the selection process faster and to contain risks of getting it wrong or not understanding the requirement if for example somebody inexperienced is using them.
3. Prepared Article 24 suggested clauses, with guidance around using them and the abbreviated SCCs. The [DIFC Export and Sharing Handbook](#) and other guidance will reflect these changes, and DIFC DP Regulations are being updated to enforce them.

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

The initiative is worthy of an award because it is yet another part of a holistic, multi-faceted supervisory function undertaken by the DIFC DP Commissioner's Office.

Making the use of the SCCs simpler and more effective, while containing risk and helping individuals learn at the same time why these clauses are important and required meets the primary objectives of the DIFC Commissioner's Office. The feedback on the combined SCCs

- 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*)



- 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*)

DIFC DP Export and Sharing menu:

<https://www.difc.ae/business/operating/data-protection/data-export-and-sharing/#s2>

- 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*):

Linked In post from a Tuesdays Talks participant based outside the UAE. Reaching far and wide!

<https://www.difc.ae/business/operating/data-protection>

<https://www.difc.ae/business/operating/data-protection/guidance/#s16>

<https://www.difc.ae/business/operating/data-protection/guidance/#s11>

https://www.linkedin.com/posts/graziella-%D8%AC%D8%B1%D8%A7%D8%B2%D9%8A%D9%84%D8%A7-marin%C3%B2_certificate-activity-7060236367141699584-gJT3?utm_source=share&utm_medium=member_desktop