



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)

When DIFC updated its 2007 data protection law in 2020, it built in added accountability measures to ensure that businesses processing personal data would implement robust compliance frameworks, and do so on a risk and outcomes based assessment. The DPO Annual Assessment (DPO AA), set out in Article 19 of the DP Law 2020 provides the automated framework to build such a framework, and provides a regulator-assessed risk register based on the DPO AA responses.

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

DIFC DP Law 2020 sets out principles of accountability, transparency and fairness to support individuals whose data is processed by DIFC licensed entities and certain third parties. While Data Protection Officer (DPO) appointment is only mandatory for DIFC Bodies or for licensed entities conducting High Risk Processing activities, any entity may voluntarily appoint a DPO. If an DIFC registered entity has done so, whether voluntarily appointed or not, the DPO is required to complete this Annual Assessment. It is not the same as the Article 14(7) Notification, which is more general and not as detailed.

The main objective of the Annual Assessment is to ensure that each DPO reviews, in detail, the compliance, processes and procedures required by the DP Law 2020.

The Annual Assessment is an automated form in the DIFC portal, comprised of 3 parts:

1. Assessment (to be completed by the entity DPO or similar representative);
2. Risk Review and Mitigation (pre-populated guidance / best practice); and
3. Summary

Please note that while the Annual Assessment is mandatory for organizations that must appoint a DPO, the multiple-choice responses and the risk assessment and mitigation measures that the responses produce are only possible answers or assumptions based on current market knowledge and information. As such, the responses and risk section contain non-binding guidance and suggested best practices. The DPO may leave them as is, as a sufficient response for the processing the organization does, or the DPO may elaborate on the risks in order to build further, detailed data protection compliance measures. If the pre-determined response option provided in the risk matrix does not sufficiently address your organization's data processing structure and requirements, text boxes are available in many places throughout the Annual Assessment form to provide such details, additional notes or supporting informational or policy documentation.

The first Annual Assessment form was implemented in July 2021, but is being updated for 2023 to include more multiple choice responses that enable additional fields for the risk matrix, providing a more robust risk register for DIFC entities on which to improve compliance framework and processes.

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

The DPO Annual Assessment inspires accountability in an organisation, while creating for them a risk register that can be used to mitigate any issues identified in the responses provided. It is automated, as well, so it not only make compliance clear and detailed in terms of the breakdown of questions and details to be provided, but it makes it easy and efficient. The result is that DPOs are appointed voluntarily even where high risk processing is not undertaken. As such, the DIFC Annual Assessment fosters a culture of compliance and accountability.

- 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)*

Please see DPO annual Assessment Checklist & FAQs and the Sample Submitted AA and Risk Matrix at this link

<https://www.difc.ae/business/operating/data-protection/guidance/#s15>

- 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):*

DIFC also has several assessment tools that help users understand complex topics such as whether to appoint a DPO and what constitutes high risk processing. They are available here:

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

<https://www.difc.ae/business/operating/data-protection/tools-and-templates/#s13>

<https://www.difc.ae/business/operating/data-protection/tools-and-templates/#s14>