



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:	Spanish Data Protection Agency	
Person completing this form:	Julián	Prieto
	<i>First name</i>	<i>Last name</i>
Job title:	Deputy Director for Promotion & Authorizations	
Email address:	sgpromocion.autorizaciones@aeprd.es	

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)

The Spanish Data Protection Agency (AEPD) has set up a Priority Channel to deal with requests for urgent removal of sexual or violent online content (images, audios), when they include personal data without the consent of those affected.

It's an instrument for communicating the unlawful dissemination of sensitive content that causes serious harm and damage to those affected and to offer a rapid response to those affected in exceptional situations that stops its dissemination.

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

The Priority Channel is a free service offered by the AEPD to request the urgent removal from the Internet of sensitive information that makes it possible to identify individuals, generally audio-visual content (including their voice and/or physical image) of a sexual or violent nature, disseminated without their consent and which, in exceptionally serious situations, may harm them and put their physical or psychological integrity at risk.

After assessing the case, if deemed appropriate, the AEPD orders the corresponding service provider to remove the personal data. It will also initiate investigation proceedings to analyse the administrative liability of the author of the publication and of those involved in the dissemination.

If there are indications of a criminal offence, the facts will be brought to the attention of the criminal jurisdiction.

The Priority Channel can be used for online content on social networks and equivalent services (TikTok, Facebook, Twitter, Instagram, YouTube...), forums and blogs, and other Internet services.

Any person affected by the publication of sensitive content who holds Spanish nationality or is in Spanish territory may request the removal of content.

The Priority Channel accessible on the AEPD website has a specific and simplified channel for children between 14 and 17 years of age to request the removal of content. In the case of a request for removal of content referring to children under 14 years of age, it will generally be made by their parents or legal guardians.

For it to work, it requires information on the circumstances in which the content has been published; clear identification of the content to be removed (images -videos, photographs -audios, information) and the social profile through which, if applicable, it is being published, including the different web addresses for access ([http://. ...](http://.)); whether the removal has been previously requested from the social networks or service providers, and the response obtained; and any other information or documentation deemed relevant, for

example, a copy of the screen of the device or terminal, in which the content disseminated can be seen and the service or platform where it is being disseminated can be identified.

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

The Priority Channel has proven to be an effective instrument in situations where the physical and psychological integrity of the persons concerned is put at serious risk by the dissemination of videos, audios or other information that is posted and disseminated online and that constitutes digital violence, especially against women, children and vulnerable people. The Priority Channel aims to prevent as far as possible damage that is sometimes irreversible.

The year 2022 has been the year of consolidation of the Priority Channel after a continuous and laborious process of dissemination. During that year, the Priority Channel received 422 requests for removal which, once assessed, led to 60 urgent interventions for the removal of content with a 95% success rate. So far this year, 243 requests have been registered, confirming the importance that it has been acquiring since its implementation, as it has become known to society.

The purpose and effectiveness of the mechanism as a further guarantee of people's rights and freedoms to protect them in exceptional situations that cause serious damage and harm, especially to particularly vulnerable people.

- 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)

Priority channel to communicate the distribution of sensitive content and to request removal

The Spanish Data Protection Agency has created a Priority channel to allow citizens to communicate the illicit distribution of sensitive content. A system that aims to provide a rapid response in critical situations, such as those that include the distribution of sexual or violent content.

What can I do if images in which I appear are distributed online?

In general, those affected should contact the website editor requesting the removal of images that are being distributed without consent. The links to some of the main websites are detailed below:

[Bing](#) [Blogger](#) [Dailymotion](#) [Facebook](#)
[Flickr](#) [Google](#) [Instagram](#) [Snapchat](#)
[Tumblr](#) [Twitter](#) [Wordpress](#) [YouTube](#)

In case the website editor refuses the removal of the images, you can file a complaint at official site of the Spanish Data Protection Agency, accompanying the evidence that proves that you have previously asked the website to delete those images.

What if the images might be considered sensitive?

In exceptionally sensitive situations when images including sexual content or show acts of violence can put the rights and freedoms of those affected at high risk (i.e.: victims of gender-based violence or minors), the channels offered by online service providers may not be effective or quick enough to prevent the continued distribution of images.

The Priority Channel is designed to address these situations by allowing the analysis of complaints received through an urgent procedure. The Agency, as an independent authority, has the power to take urgent measures to limit the continuity of the processing of personal data, when necessary.



How can I communicate the Agency this distribution of sensitive images?

Through
www.aepd.es/canalprioritario

When filling in the complaint, you must describe the circumstances in which the non-consensual distribution of the images took place, indicating whether the victim is a victim of gender-based violence, sexual abuse or assault or harassment, or if it belongs to any other particularly vulnerable group (i.e.: minors, disable persons or with serious illness or persons at risk of social exclusion). You also need to communicate the website where the content was published.

What decision can the Agency make?

Following the analysis of the complaint, the Agency shall determine the adoption of urgent and extraordinary **precautionary measures** to prevent the processing of personal data. On the other hand, the Agency shall assess whether it is appropriate to start inquiry procedures against persons who have distributed this material.



SAY NO TO THE DISTRIBUTION OF SEXUAL OR VIOLENT CONTENT ONLINE

**IT IS NOT THE PHOTO OR THE
VIDEO, IT IS WHAT'S BEHIND IT**

THE SPANISH DATA PROTECTION AGENCY WORKS
TO STOP THE POSTING AND DISTRIBUTION OF
SEXUAL AND VIOLENT MATERIAL ONLINE
WITHOUT CONSENT.

DO NOT FORWARD IT. DO NOT SPREAD IT.



USE THE **PRIORITY CHANNEL**

To request **the removal of violent or sexual material** that is posted or distributed online **without consent**.

WHEN CAN I USE THIS CHANNEL?

Whenever you are aware of the posting or distribution online of content (pictures, videos or audios) of a sexual nature or which show acts of aggression, especially if there are children or victims of gender-based violence involved.



🖱 www.aepd.es/canalprioritario

🐦 twitter.com/AEPD_es

aepd agencia
española
protección
datos





Tú también
#PuedesPararlo
 con el
#CanalPrioritario

Si tienes conocimiento de la existencia de fotografías, vídeos o audios de **contenido sexual o violento** que circulan por Internet sin el consentimiento de las personas afectadas, solicita su retirada en el **Canal prioritario de la Agencia**.

MÁS INFORMACIÓN

- 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*)

<https://www.aepd.es/canalprioritario/>

<https://www.aepd.es/es/preguntas-frecuentes/15-redes-sociales-difusion-ilegitima-contenidos-sensibles>

- 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*):

<https://www.rtve.es/play/audios/protegemos-tu-privacidad/protegemos-privacidad-canal-prioritario-aepd-puede-ayudar/6888832/>

<https://www.aepd.es/es/prensa-y-comunicacion/notas-de-prensa/la-aepd-recibio-en-2022-mayor-numero-reclamaciones-de-su-historia#:~:text=Durante%20el%20a%C3%B1o%202022%20se,han%20tenido%20una%20tramitaci%C3%B3n%20urgente.>

<https://www.aepd.es/es/prensa-y-comunicacion/notas-de-prensa/violencia-digital-contra-mujeres-y-ninas-aglutina-70-casos-canal-prioritario>

<https://www.aepd.es/es/prensa-y-comunicacion/blog/difusion-de-videos-con-contenido-violento-en-redes-sociales-denunciar>