

# **GPA Global Privacy and Data Protection Awards 2024**

# **Entry Form**

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to <u>secretariat@globalprivacyassembly.org</u> no later than 17 June 2024.

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	CNPD – Commission nationale pour la protection des	
Authority:	données (Luxembourg)	
	Marc	Lemmer
Person completing this form:		
	First name	Last name
	Commissioner	
Job title:		
	Marc.Lemmer@cnpd.lu	
Email address:		

## 2. ELIGIBILITY

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

- In 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

<sup>&</sup>lt;sup>1</sup> <u>GPA Rules and Procedures</u>, 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)

DAAZ, **"Data Accountability from A to Zen"** is an innovative multilingual eLearning tool addressing the challenges faced by entrepreneurs, start-ups, and SMEs to comply with the GDPR.

DAAZ has been developed by the CNPD in collaboration with the Luxembourg House of Cybersecurity and the National Cybersecurity Competence Centre and co-funded by the EU as part of the ALTO project submitted in the call for proposals "Citizens, Equality, Rights and Values" Programme of the European Commission.

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

The CNPD launched the ALTO project (« dAta Protection compLiance supporT tOolkit ») in 2022 based on the following observations.

Despite many initiatives launched by the CNPD during the preparation and launch phase of the GDPR in 2018, awareness of small organisations regarding basic data protection principles and compliance obligations is considered still poor thus calling for a new approach in awareness raising and training.

SMEs and very small entrepreneur businesses are still much immature regarding personal data protection challenges whereas they represent in Luxembourg (and on average in the EU economy) more than 90% of the employment and of the GDP.

In addition, SMEs are often at disadvantage compared to large organisations in terms of resources and expertise.

Finally, these small players operate in complex economic environments, characterised by a strong increase of data processing across all business processes (B2B, B2C, B2G), the rise of artificial intelligence and evolving legal frameworks on data governance, data sharing, social media and cybersecurity.

Based on this, the CNPD, with the support of the Luxembourg House of Cybersecurity, submitted the ALTO proposal in the call "Citizens, Equality, Rights and Values Programme (CERV)" of the European Commission (DG JUST) which was selected as a project to be cofounded.

DAAZ is a simple, intuitive, anonymous, and free online tool to push education of small economic actors regarding personal data protection principles, to increase their awareness and understanding of their obligations towards GDPR and to help them assessing and improving their measures for GDPR compliance in their daily business activities.

The **platform application is multilingual** (French, English from July 2024 on, German from September 2024 on) and can be translated into other languages.

The platform was created in two main steps. First, the identification of the real needs of SMEs through an **anonymous online survey** with the assistance of all major professional business associations of SMEs in Luxembourg, Second, the development of the

**pedagogical goals to be achieved** and the **specific format and platform technology** for implementation. This second step was done in an **agile development** mode based on constant feedback loops with SMEs test users.

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

- DAAZ is the result of an **innovative approach to help SMEs** (the predominant type of companies in the national and European economic landscape) being accountable with regards their GDPR obligations.
- As GDPR principles and obligations are often seen by those actors as too legalistic and difficult to implement in their daily business, DAAZ makes privacy and GDPR accessible in a **non-legal language**, with **concrete examples** that address SME's typical issues.
- DAAZ is a **multilingual** online tool potentially **adaptable for an international use** beyond Luxembourg and its Greater region borders.
- DAAZ was developed as the main deliverable of a **project selected in a competitive call for proposals of the EC** specifically aimed towards awareness raising activities of DPAs.
- DAAZ was designed and developed in collaboration with the national cybersecurity competence centre NC3 providing strong competence and expertise for building a robust, reliable, and secured platform.
- The use of DAAZ is completely free and truly anonymous and secured.
- As a **modular tool designed for use on tablet, desktop or mobile**, it offers flexibility and scalability, promotes accessibility and inclusivity and allow for expansion with diverse themes and technologies.
- **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*)

https://daaz-gdpr.lu/

News report on the official launch of DAAZ on 4 June 2024 (English version with video presentation of the tool):

https://cnpd.public.lu/en/actualites/national/2024/06/lancement-daaz.html

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):

#### **Press reports:**

In English:

https://www.siliconluxembourg.lu/daaz-launches-to-support-smes-with-gdpr-compliance/ https://gdprbuzz.com/news/luxembourg-launches-data-accountability-from-a-to-zen-tool/ https://delano.lu/article/foster-meaningful-conversation

In French:

https://paperjam.lu/article/daaz-outil-ludique-apprendre-a https://www.cc.lu/en/all-information/news/detail/aide-a-la-mise-en-conformite-rgpdlancement-de-loutil-daaz

In Luxembourgish:

https://www.rtl.lu/news/national/a/2201699.html