



## 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 [secretariat@globalprivacyassembly.org](mailto:secretariat@globalprivacyassembly.org) **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 Authority:	Office of the Privacy Commissioner (OPC) of Canada	
Person completing this form:	Miguel	Bernal-Castillero
	<i>First name</i>	<i>Last name</i>
Job title:	Director International, Provincial and Territorial Relations	
Email address:	Miguel.bernal-castillero@priv.gc.ca	

#### 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

<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.

#### 4. DESCRIPTION OF THE INITIATIVE

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

In August 2023, the GPA's International Enforcement Cooperation Working Group drafted a joint statement on data scraping and the protection of privacy. The statement calls upon the world's largest social media companies and other websites hosting publicly accessible personal information to ensure that individuals are protected from unlawful data scraping. The statement facilitated proactive engagement with industry to expand participants understanding, including regarding the use of scraping to develop large language models.

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

Unlawful data scraping can result in a broad spectrum of privacy risks to affected individuals, from the receipt of unwanted marketing and identity theft, to unauthorized mass surveillance and cyber-attacks. It is integral to the digital economy and society that individuals feel confident and safe engaging online without fear that the information they post will be used in ways they hadn't intended and that may cause them harm.

In the face of such risks and reports of numerous incidents of mass data scraping affecting millions of individuals worldwide, the IEWG undertook an initiative to better protect the vast amounts of personal data accessible online.

The IEWG data scraping sub-group drafted and published the joint statement in August 2023, highlighting several key messages:

- publicly accessible personal data is subject to data protection laws in most jurisdictions;
- social media companies and the operators of websites that host publicly accessible personal data have obligations to protect that information from unlawful data scraping (the statement also suggested a non-exhaustive list of potential safeguards);
- mass data scraping incidents can constitute reportable data breaches in many jurisdictions; and
- individuals can also take steps to protect their personal information from data scraping.

The co-signatories forwarded the joint statement to six of the world's largest social media companies, seeking their feedback. This, in turn, resulted in fruitful dialogue with five of those companies, as well as other key industry players, allowing the group to expand its understanding of data scraping, including in relation to: new and innovative privacy-protective practices to combat ever-evolving data scraping threats; the use of AI against data scraping, as well as the use of data scraping to feed AI; and mechanisms for granting controlled access to publicly accessible personal data for potentially socially beneficial purposes.

The joint statement on data scraping was endorsed by 14 privacy enforcement authorities from all six continents. Ultimately, the IEWG data scraping sub-group looks forward to sharing further takeaways in a final statement to be issued in advance of the upcoming GPA Conference.

The Joint Statement Signatories are as follows:

- Agency for Access to Public Information, Argentina
- Office of the Australian Information Commissioner, Australia
- Office of the Privacy Commissioner of Canada, Canada
- Superintendencia de Industria y Comercio, Colombia
- Office of the Data Protection Authority, Guernsey
- Office of the Privacy Commissioner for Personal Data, Hong Kong, China
- Office of the Information Commissioner, Jersey
- Office of the Privacy Commissioner, New Zealand
- Datatilsynet, Norway
- National Institute for Transparency, Access to Information and Personal Data Protection, Mexico
- Commission Nationale de contrôle de la protection des Données à caractère Personnel, Morocco
- Agencia Española de Protección de Datos, Spain
- Federal Data Protection and Information Commissioner, Switzerland
- Information Commissioner's Office, United Kingdom

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

The [Joint statement on data scraping and the protection of privacy](#) is the latest in a series of successful collaborative compliance initiatives of the IEWG, demonstrating that by working together the privacy enforcement authorities can expand their capacity and amplify their impact for protection of privacy and personal data.

The initiative is also an example of how data protection authorities can not only cooperate through formal and thorough joint or coordinated investigations but can also alternatively cooperate on less resource-intensive soft enforcement actions such as this one.

This initiative has served to raise awareness of this important issue, through panel engagements at global privacy events such as the IAPP Global Summit and the Venice Privacy Symposium. It has also allowed co-signatories to amplify their common message that companies must implement appropriate measures to protect the personal data that they make publicly accessible on their platforms, and it has demonstrated the value of informal compliance actions and proactive engagement with industry towards improving privacy protection for global citizens.

- 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://www.priv.gc.ca/en/opc-news/speeches/2023/js-dc\\_20230824/](https://www.priv.gc.ca/en/opc-news/speeches/2023/js-dc_20230824/)

- 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.priv.gc.ca/en/opc-news/news-and-announcements/2023/nr-c\\_20230824/](https://www.priv.gc.ca/en/opc-news/news-and-announcements/2023/nr-c_20230824/)

[https://globalprivacyassembly.org/wp-content/uploads/2024/06/Newsletter\\_May.pdf](https://globalprivacyassembly.org/wp-content/uploads/2024/06/Newsletter_May.pdf)  
(May GPA Newsletter featuring article on the IEWG Joint Statement)