



GPA Global Privacy and Data Protection Awards 2025

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 16 June 2025**.

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:	Information Commissioner's Office (UK) and Office of the Privacy Commissioner (Canada)	
	Keith	Turner
Person completing this form (ICO):		
	<i>First name</i>	<i>Last name</i>
	Principal Cyber Specialist	
Job title:		
Email address:	keith.turner@ico.org.uk / gpa@ico.org.uk (please use both addresses for all correspondence about this entry).	

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 before 16 June 2025.
- ☒ 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

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.

- ☐ Innovation
- ☐ People's Choice

4. DESCRIPTION OF THE INITIATIVE

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

A joint investigation between the Information Commissioner's Office (ICO) and the Office of the Privacy Commissioner of Canada (OPC) into the global personal data breach at the US-based direct to consumer genetic testing company 23andMe, Inc ('23andMe'). The scope of the investigation included:

1. Whether 23andMe had appropriate safeguards in place to adequately protect the personal information under its control; and
2. Whether 23andMe adequately notified the OPC and the ICO and affected individuals about the data breach.

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

In October 2023, 23andMe suffered a data breach that affected almost 7 million of its customers worldwide. Given the scale of the breach, the sensitivity of the personal information involved, and the international service provided by 23andMe, OPC and ICO decided to jointly investigate 23andMe's privacy practices and compliance with Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"), the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA 2018).

The joint investigation featured investigators, legal services, communications teams and executive team members from both agencies and involved collaboration at every level of each partner organisation. Our Offices worked together on all aspects of the investigation, from initial enquiries, to conducting interviews, to analysis of data and report drafting.

- Utilised compatible technology to set up shared workspaces for live time collaboration on documents;
- Investigative processes were mapped out and aligned;
- Legal review conducted to assess the alignment between respective legislative frameworks;
- Information was shared between both Offices, reducing repeated requests to 23andMe for the same information;
- Information already independently supplied to both agencies was examined to identify inconsistencies and irregularities;

- Investigative enquiries were jointly drafted between both organisations;
- Responses were independently examined by both Offices, providing a level of challenge and robustness to the resulting conclusions;
- New elements were incorporated into existing processes from the partner Office (e.g. ICO participating in interviews hosted by OPC and the OPC attending an ICO oral hearing as observers);
- Joint report produced with extensive alignment on findings and presenting a unified response to the incident and our investigation.

Via the above, our Offices were able to demonstrate the compatibility of their investigative approaches and also their respective legislative frameworks. The joint report features almost complete alignment in our findings of contraventions of both UK GDPR and PIPEDA, showing that the standards required by both sets of legislation are compatible and consistent.

Our offices' approach presented a unified front to 23andMe, demonstrating the seriousness of the incident and our commitment to act together as partner regulators. We proved that multi-national companies can be subject to collaborative investigations from multiple regulators, and showed the value of enforcement cooperation to amplify impact.

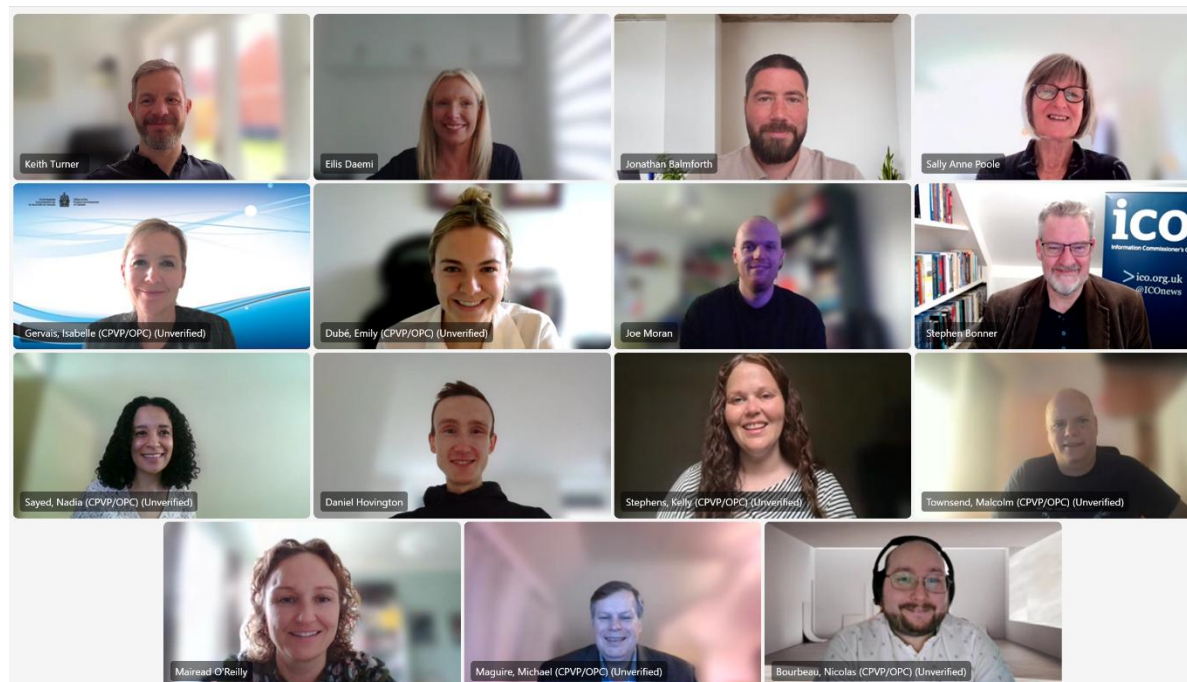
c. Please explain why you think the initiative deserves to be recognised by an award
(no more than 200 words)

- Both Commissioners were actively involved and committed to effective enforcement cooperation outcomes.
- We used technology to collaborate in real-time, dramatically improving efficiency and timeliness of responses.
- We addressed different legislative frameworks by thorough analysis of the respective requirements and careful enquiry drafting.
- We leveraged expertise across both organisations to streamline analysis and provide robust evidence.
- We leveraged the time difference with efficient handovers and shared responsibilities, enabling 24 hour case coverage.
- Using GPA's Enforcement Cooperation Handbook, we aligned investigatory processes and timelines to present a unified approach.

- We built capacity and learned new skills, e.g., conducting joint interviews – a novel approach for ICO.
- We were flexible, finding collaborative ways to overcome challenges, e.g., reacting quickly to 23andMe's bankruptcy by issuing documents ahead of schedule while respecting reporting restrictions.
- We produced innovative final products including a joint authored report.
- We demonstrated compatibility of legislation while supporting independent conclusions of each Office; retaining integrity of processes and compliance with local legislation.
- We avoided duplication of effort and amplified impact, improving both protections for people and the organisation's compliance, and setting clear global regulatory expectations for wider industry.
- Supporting GPA's vision to strengthen enforcement capacities, we are sharing lessons learned and advice with other DPAs for future joint investigations.

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)*

The ICO-OPC joint investigation team:



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)*

ICO - [23andMe fined £2.31 million for failing to protect UK users' genetic data | ICO](#)

OPC - [News release: Data breach at 23andMe is a reminder to all organizations to prioritize privacy, Privacy Commissioner of Canada cautions in wake of investigation - Office of the Privacy Commissioner of Canada](#)

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):*

ICO – Penalty Notice - [23andMe - Penalty Notice \(Redacted Non-Confidential\)](#)

OPC – Investigation summary - [Backgrounder: Summary of joint investigation into data breach at 23andMe by the Privacy Commissioner of Canada and the UK Information Commissioner - Office of the Privacy Commissioner of Canada](#)

OPC – Commissioner statement - [Statement by the Privacy Commissioner of Canada following an investigation into data breach at 23andMe - Office of the Privacy Commissioner of Canada](#)