

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 <u>secretariat@globalprivacyassembly.org</u> 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: | Office of the Privacy Commissioner of Canada | |
| | Office of the Privacy Commissioner for Personal Data of | |
| | Hong Kong, China | |
| | Information Commissioner's Office, UK | |
| | | |
| Person completing this form: | Miguel | Bernal-Castillero |
| | First name | Last name |
| | | |
| Job title: | Director International, Domestic and Stakeholder | |
| | 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 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

¹ <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.

- □ Accountability
- ☑ Dispute Resolution and Enforcement
- □ Innovation
- People's Choice

4. DESCRIPTION OF THE INITIATIVE

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

The Office of the Privacy Commissioner of Canada, with support from the Global Privacy Enforcement Network (GPEN) Committee, coordinated and participated in the joint 2024 GPEN International Privacy Sweep, along with 25 privacy enforcement authorities from around the world. Done in partnership with the International Consumer Protection and Enforcement Network (ICPEN), this was the first cross-regulatory venture of its kind. The 2024 Sweep focused on "deceptive design practices" used by websites and mobile apps to influence individuals into giving away more of their personal information.

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

The Office of the Privacy Commissioner of Canada, with support from the members of the GPEN Committee – the U.S. Federal Trade Commission, the Information Commissioner's Office of the United Kingdom, the Office of the Privacy Commissioner for Personal Data of Hong Kong, China, and the Privacy Protection Authority of Israel – coordinated and participated in the 2024 GPEN Sweep on deceptive design patterns (DDPs) along with 25 other privacy enforcement authorities from around the world. DDPs are used on websites and mobile apps to influence, manipulate, or coerce users to make decisions that are not in their best interests. They can prevent users from making informed decisions about the collection, use, and disclosure of their personal information, and cause them to give up more privacy than they would like. Because of the relevance of DDPs to both privacy and consumer protection, and Enforcement Network (ICPEN).

OPC Canada was the 2024 "Sweep Coordinator" and developed, in collaboration with participating privacy enforcement authorities, the methodology to help identify DDPs while ensuring the evaluation of apps and websites was conducted according to similar standards. Questions focused on five indicators: (i) Complex and confusing language (ii) Interface interference (iii) Nagging (iv) Obstruction (v) Forced action.

During the process, sweepers reviewed over 1,000 websites and apps aiming to replicate the user experience. On July 9, 2024, the <u>2024 GPEN Sweep on DDPs Report</u> was released summarizing key observations of the Sweep that found that 97% of websites and apps examined were using DDPs.

In Canada, OPC Canada partnered with two of its provincial counterparts - Alberta and British Columbia - to review some of the platforms that were most popular among children in Canada. On July 9, 2024, OPC Canada released the <u>OPC Sweep Report</u> summarizing key observations that revealed that specific DDPs, such as false hierarchy, confirm shaming, and nagging, occurred significantly more often on children's websites and apps than on those aimed at the general population. Following the Sweep, some participating authorities have already followed up or plan to do so with organizations on the issues they have identified through the Sweep. OPC Canada sent letters to a number of organizations to share the results of the Sweep with most having committed to making positive changes to their websites and apps.

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

The Sweep was the first cross-regulatory venture of its kind, leading to successful "soft" enforcement actions in some jurisdictions. It is an example of how privacy enforcement authorities cannot only cooperate through formal joint or coordinated investigations but can also come together on soft enforcement actions to incite change. It demonstrates that by working together, privacy enforcement authorities can expand their capacity and amplify their impact for the protection of privacy and personal data.

Through panel engagements at global privacy events such as the 46th GPA in Jersey, APPA 62 Forum and the 2025 IAPP Global Summit, this initiative has raised awareness of this important issue for individuals to be aware of DDPs, so that they can better protect their privacy and personal information online. Ensuring that privacy is respected and protected by design will create a safer online environment for everyone, especially children, and increase individuals' trust in the global digital environment.

The Sweep also led to engagement with the industry. For instance, OPC Canada followed up with Canadian organizations to share the issues identified through the Sweep. This approach resulted in most organizations being contacted committing to making a positive change to their websites and apps.

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/about-the-opc/what-we-do/internationalcollaboration/international-privacy-networks/international-privacy-sweep/2024_sweep/

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):

Office of the Privacy Commissioner Sweep Report 2024: Deceptive Design Patterns GPEN Sweep 2024: "Deceptive Design Patterns" Report

Privacy Sweep finds majority of apps and websites use deceptive design to influence privacy choices, including sites targeting children

Privacy Commissioner Philippe Dufresne on the 2024 deceptive design privacy sweep