**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](mailto: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 6.2[[1]](#footnote-2) applies.

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| 1. **CONTACT DETAILS FOR THIS ENTRY** | | |
| Privacy/Data Protection Authority: | Commission Nationale de l’Informatique et des Libertés (CNIL) - France | |
| Person completing this form: | Najma Bichara |  |
|  | *First name* | *Last name* |
| Job title: | Legal officer | |
| Email address: | [nbichara@cnil.fr](mailto:nbichara@cnil.fr) | |

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| 1. **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. |

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| 1. **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. **DESCRIPTION OF THE INITIATIVE** | |

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| 1. **Please provide a brief summary of the initiative** *(no more than 75 words)* |
| This initiative consists in twelve “AI how-to-sheets” developed to provide concrete clarifications and recommendations for the development of artificial intelligence (AI) systems and the creation of datasets used for their training, when involving personal data. They aim at accompanying a large number of professionals with both legal and technical profiles (such as data protection officers, legal officers, legal professionals, AI practitioners, etc.). They are developed following a public consultation process. |

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| 1. **Please provide a full description of the initiative** *(no more than 350 words)* |
| The AI how-to-sheets concern only the development phase of AI systems, not their deployment, where this involves the processing of personal data. They are limited to the processing of data subject to the GDPR. They aim at accompanying a large number of professionals with both legal and technical profiles (such as data protection officers, legal officers, legal professionals, AI practitioners, etc.).  These AI how-to sheets, adopted following a public consultation, with some of them being finalised, provide a framework to help professionals with their compliance. They recall the obligations imposed by GDPR and make recommendations to comply with them. These recommendations are not binding: data controllers may deviate from it, under their responsibility and provided that they can justify their choices. Some recommendations are also made as good practices and allow one to go beyond GDPR obligations.  The CNIL’s AI how-to sheets concern the development of systems implementing artificial intelligence techniques involving the processing of personal data. These are referred to as “AI systems”. The definition of AI systems covered by these how-to sheets is aligned with the definition of the EU AI Act.  The AI how-to-sheets are dealing with the following topics:   * Sheet 1: Determining the applicable legal regime * Sheet 2: Defining a purpose * Sheet 3: Determining the legal qualification of AI system providers * Sheet 4 (1/2): Ensuring the lawfulness of the data processing – defining legal basis * Sheet 4 (2/2): Ensuring the lawfulness of the data processing – in case of re-use of data, carrying out the necessary additional test and verifications * Sheet 5: Carrying out a data protection impact assessment when necessary * Sheet 6: Taking into account data protection when designing the system * Sheet 7: Taking data protection into account in data collection and management * Sheet 8 (1/2): Relying on the legal basis of legitimate interest to develop an AI system * Focus 8 (2/2): The legal basis of legitimate interests: focus sheet on measures to implement in case of data collection by web scraping * Sheet 9: Informing data subjects * Sheet 10: Respect and facilitate the exercise of data subjects’ rights * Sheet 11: Annotating data * Sheet 12: Ensuring the security of an AI system’s development * Sheet 13: Analysing the status of an AI model |

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| 1. **Please explain why you think the initiative deserves to be recognised by an award***(no more than 200 words)* |
| This initiative is particularly noteworthy because it offers an accompaniment tool to a large number of professionals developing AI systems with both legal and technical profiles.  Moreover, these AI how-to-sheets are developed through an inclusive process, thanks to public consultation, which allows to produce concrete recommendations responding to AI stakeholders’ concerns and questions.  The AI how-to-sheets therefore contribute to improving accountability of organisations developing AI systems, and in achieving transition from law to practice. |

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| 1. **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)* |
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| 1. **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)* |
| * [AI how-to sheets | CNIL](https://www.cnil.fr/fr/ai-how-to-sheets) * [Les fiches pratiques IA | CNIL](https://www.cnil.fr/fr/les-fiches-pratiques-ia) * <https://www.cnil.fr/sites/cnil/files/2024-06/summary_of_contributions.pdf> |

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| 1. **Please provide any other relevant links that help explain the initiative or its impact or success***(e.g. links to news reports or articles):* |
| *News press:*   * [*https://www.itforbusiness.fr/la-cnil-publie-7-nouvelles-fiches-pour-rendre-lia-conforme-rgpd-75377*](https://www.itforbusiness.fr/la-cnil-publie-7-nouvelles-fiches-pour-rendre-lia-conforme-rgpd-75377) * [*https://siecledigital.fr/2024/06/11/la-cnil-consulte-les-acteurs-du-secteur-sur-lapplication-du-rgpd-aux-modeles-dia/*](https://siecledigital.fr/2024/06/11/la-cnil-consulte-les-acteurs-du-secteur-sur-lapplication-du-rgpd-aux-modeles-dia/) * [*https://www.zdnet.fr/actualites/crawlers-et-ia-la-cnil-clarifie-les-bonnes-pratiques-477689.htm*](https://www.zdnet.fr/actualites/crawlers-et-ia-la-cnil-clarifie-les-bonnes-pratiques-477689.htm) * [*https://www.village-justice.com/articles/construire-une-respectueuse-des-donnees-personnelles-regard-cnil,48482.html*](https://www.village-justice.com/articles/construire-une-respectueuse-des-donnees-personnelles-regard-cnil,48482.html) * [*https://dsih.fr/articles/5497/premieres-recommandations-de-la-cnil-en-matiere-dia-quels-exemples-appliques-au-secteur-de-la-sante*](https://dsih.fr/articles/5497/premieres-recommandations-de-la-cnil-en-matiere-dia-quels-exemples-appliques-au-secteur-de-la-sante)   *Law firms/practices:*   * [*https://www.bclplaw.com/print/v2/content/1534639/cnil-publishes-ai-how-to-sheets-on-aligning-artificial-intelligence-systems-with-gdpr.pdf*](https://www.bclplaw.com/print/v2/content/1534639/cnil-publishes-ai-how-to-sheets-on-aligning-artificial-intelligence-systems-with-gdpr.pdf) * [*https://www.clearyiptechinsights.com/2024/07/french-data-protection-authority-launches-new-public-consultation-on-the-development-of-ai-systems/*](https://www.clearyiptechinsights.com/2024/07/french-data-protection-authority-launches-new-public-consultation-on-the-development-of-ai-systems/) * [*https://www.advant-altana.com/en/news/fil-rouge-cnil-recommendations-on-the-development-of-ai-systems*](https://www.advant-altana.com/en/news/fil-rouge-cnil-recommendations-on-the-development-of-ai-systems) * [*https://wp.nyu.edu/compliance\_enforcement/2024/07/01/cnil-publishes-new-guidelines-on-the-development-of-ai-systems/*](https://wp.nyu.edu/compliance_enforcement/2024/07/01/cnil-publishes-new-guidelines-on-the-development-of-ai-systems/) * [*https://www.emarketerz.fr/ia-traitement-donnees-personnelles-recommandations-cnil/*](https://www.emarketerz.fr/ia-traitement-donnees-personnelles-recommandations-cnil/) * [*https://www.dataguidance.com/opinion/france-cnils-ai-how-sheets-overview*](https://www.dataguidance.com/opinion/france-cnils-ai-how-sheets-overview) * [*https://www.hunton.com/privacy-and-information-security-law/cnil-publishes-a-new-set-of-guidelines-on-the-development-of-ai-systems*](https://www.hunton.com/privacy-and-information-security-law/cnil-publishes-a-new-set-of-guidelines-on-the-development-of-ai-systems) * [*https://www.hunton.com/privacy-and-information-security-law/french-dpa-issues-guidelines-on-data-protection-and-ai*](https://www.hunton.com/privacy-and-information-security-law/french-dpa-issues-guidelines-on-data-protection-and-ai)   *Professional social networks:*   * [*https://www.linkedin.com/posts/dr-gabriela-zanfir-fortuna-3234b239\_ia-mobiliser-la-base-l%C3%A9gale-de-lint%C3%A9r%C3%AAt-activity-7345400608985649152-dazT?utm\_source=share&utm\_medium=member\_desktop&rcm=ACoAABc\_-8ABCFzexYolFO5UP42Twh\_-DYmMQRU*](https://www.linkedin.com/posts/dr-gabriela-zanfir-fortuna-3234b239_ia-mobiliser-la-base-l%C3%A9gale-de-lint%C3%A9r%C3%AAt-activity-7345400608985649152-dazT?utm_source=share&utm_medium=member_desktop&rcm=ACoAABc_-8ABCFzexYolFO5UP42Twh_-DYmMQRU) |

1. [GPA Rules and Procedures](https://globalprivacyassembly.org/wp-content/uploads/2020/10/GPA-Rules-and-Procedures-October-2020.pdf), 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. [↑](#footnote-ref-2)