



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:	Irish Data Protection Commission (DPC)				
Person completing this form:	Gráinne Hawkes				
	<table><tr><td>First name</td><td>Last name</td></tr><tr><td colspan="2">Deputy Commissioner, Head of International Affairs</td></tr></table>	First name	Last name	Deputy Commissioner, Head of International Affairs	
First name	Last name				
Deputy Commissioner, Head of International Affairs					
Job title:					
Email address:	gxhawkes@dataprotection.ie				

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
- ☒ Innovation
- ☐ People's Choice

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.

4. DESCRIPTION OF THE INITIATIVE

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

The DPC has facilitated responsible, data protection focussed, innovation through its engagement driven strategy on AI since 2023. The DPC recognised the opportunity to support innovation by delivering greater legal certainty on the use of personal data to train Large Language Models in the EU. This approach is ensuring safeguards and privacy enhancing measures are present in AI products ahead of EU wide roll out, demonstrating that effective data protection and innovation are interdependent and complementary.

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

The DPC took an innovative approach to AI through placing a focus on establishing consensus among data protection authorities on matters central to the training and operation of AI models at an early stage of AI deployment in Europe, and following up with companies deploying AI to ensure that they knew the requirements for such processing under the GDPR.

First, the DPC engaged the European Data Protection Board (EDPB) to provide a formal GDPR Opinion, to achieve Europe-wide regulatory harmonisation and clarity on a number of key AI model training and deployment related questions. The AI Opinion, which was issued in December 2024, provided general criteria that the DPC and all other EU DPAs would take into account when assessing compliance of the processing of personal data for the development and the deployment of AI models.

Secondly, the EU wide harmonised approach achieved through the AI Opinion allowed the DPC to provide clear, consistent advice to companies deploying AI models in Ireland and across Europe, which enabled innovation. The DPC's goal at pre-processing stage was to ensure that companies innovate responsibly, mitigate identified harms and risk to individuals and appropriately consider individuals' rights by balancing their interests against the companies' interests. DPC engagement resulted in numerous companies implementing improvements and additional safeguards e.g. DPC provided 97 recommendations for pre-processing improvements to multiple controllers including Pinterest, Google, Apple, OpenAI, Microsoft, Meta, LinkedIn, Airbnb, TikTok, and Riot.

The engagement approach meant that DPC could encourage responsible innovation in AI. Notably, the DPC used its full range of regulatory functions as part of this engagement, ranging from a recommendation to pause roll out to obtaining court orders to cease processing relating to AI. The fact that the DPC had obtained the AI Opinion as a first step meant that companies, knew that the advice provided was an agreed and harmonised approach across Europe.

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

Through positive engagement with peer regulators and companies, the DPC considers we have demonstrated how innovation and privacy can work hand in hand. We consider this approach should be recognised by the GPA in a context where data protection and privacy are often incorrectly characterised by some as being responsible for stifling innovation.

The DPC approach seeks to ensure a new product or service (at high level) meets data protection requirements before it goes live to avoid difficulties after product launch. As previously mentioned the DPC has engaged intensively with many of the leading technology companies at the forefront of AI developments in particular concerning the use of personal data to train Large Language Models in the EU/EEA for the past few years.

Whilst acknowledging that aspects of the application of GDPR to this fast changing technology remain complex, through engagement with peer supervisory authorities and companies, the DPC has ensured that companies understand that innovation and technological developments can work simultaneously with reducing the risk of harm to individuals. We consider this is a very positive example and a blueprint for how data protection authorities can work to deliver their mandate while faced with new 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)*

NA

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.dataprotection.ie/en/irish-data-protection-commission-welcomes-edpb-opinion-use-personal-data-development-and-deployment>

[DPC statement on Meta AI | 21/05/2025 | Data Protection Commission](#)

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://iapp.org/news/a/edpb-opinion-sheds-light-on-lawful-ai-training-dpa-discretion>

<https://www.dataprotection.ie/en/news-media/latest-news/dpcs-engagement-meta-ai>

[Data Protection Commission launches inquiry into Google AI model | 12/09/2024 | Data Protection Commission](#)

[The DPC welcomes X's agreement to suspend its processing of personal data for the purpose of training AI tool 'Grok'. | 08/08/2024 | Data Protection Commission](#)

[Data Protection Commission welcomes conclusion of proceedings relating to X's AI tool 'Grok' | 04/09/2024 | Data Protection Commission](#)

<https://www.dataprotection.ie/en/news-media/latest-news/data-protection-commission-announces-commencement-inquiry-x-internet-unlimited-company-xiuc>