



## 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<sup>1</sup> applies.

#### 1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection Authority:	Privacy Protection Authority of Israel				
Person completing this form:	Sharon Shemesh Azarya				
	<table><tr><td>First name</td><td>Last name</td></tr><tr><td colspan="2">Head of International Affairs</td></tr></table>	First name	Last name	Head of International Affairs	
First name	Last name				
Head of International Affairs					
Job title:					
Email address:	sharonaz@justice.gov.il				

#### 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

<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)**

Privacy Protection Authority Guidance on the Role of the Board of Directors in Carrying out Corporate Obligations under the Privacy Protection Regulations (Data Security)

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

The Israeli Privacy Protection Regulations (Data Security), 5777-2017 stipulate obligations and actions that a database controller, its processor and its manager are required to perform in order to fulfill their responsibility under Israel's Privacy Protection Law, 5741-1981, regarding the security of personal data in the database.

These detailed Regulations are Israel's main data security legislation. They are promulgated under the Privacy Protection Law and are enforceable by the Privacy Protection Authority. While the regulations specify the company's duties regarding data security, they do not explicitly determine which corporate organ is responsible for carrying them out.

In September 2024, the Privacy Protection Authority ("PPA") issued its "Guidance on the Role of the Board of Directors in Carrying out Corporate Obligations under the Privacy Protection Regulations (Data Security)".

According to the Guidance, in companies in which the processing of personal data is at the core of their activity or their activity creates an increased risk to privacy, the board of directors should be significantly involved in carrying out the following obligations, and conduct a discussion regarding the following matters:

- The database definitions document that the company is required to prepare.
- The main principles of the company's data security procedure.
- The results of the risk evaluation, penetration tests, and the periodic audit reports on compliance with the regulations, which must be held according to the security level of the database under the Regulations, and regarding data breaches that occurred in the company.

Moreover, in companies for which the guidance applies, the board is obligated to oversee the company's compliance with the Privacy Protection Law and its regulations. As part of this duty of care, the board is required to ensure the existence of a policy addressing the effective monitoring, control, and compliance procedures, such as an internal compliance program, and the use and management of personal data on material matters.

As set forth in the Guidance, a company in which the board does not fulfill this duty of care, or is not sufficiently involved in carrying out the specific obligations prescribed in the Guidance is allegedly in violation of the Privacy Protection Law and the Data Security Regulations. As such, it may be exposed to sanctions under the Privacy Protection Law,

including significant fines introduced in Amendment No. 13 of the Privacy Protection Law, that was enacted in August 2024, and will enter into force in August 2025.

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

The Guidance issued by the Israeli Privacy Protection Authority (PPA) in 2024 sets a ground breaking precedent by embedding data protection accountability at the highest level of corporate governance—the board of directors. This aligns with global trends emphasizing top-down responsibility in privacy governance, but goes further by formalizing the role of the board in overseeing compliance with privacy and data security obligations.

**1. Elevating Accountability to the Board**

The Guidance is a milestone in transforming data protection accountability into a concrete and enforceable governance duty, explicitly placing responsibility for data protection oversight on the board.

**2. Promoting Proactive and Measurable Oversight**

The Guidance sets out specific issues the board must engage with, including:

- Reviewing the Database Definitions Document,
- Overseeing the Data Security Procedure,
- Discussing results of risk assessments, penetration tests, and audits,
- Discussing data breaches,
- Ensuring an internal compliance program is in place.

By mandating deliberations by the board on these defined items, the Guidance provides a clear accountability framework with traceable, auditable steps.

**3. Risk-Based and Role-Based Approach**

Recognizing that not all companies pose the same privacy risk, the Guidance applies these obligations to companies whose core activity involves processing personal data or whose activities generate an increased risk to privacy. This scalable application reflects a nuanced and risk-based approach to the board's accountability.

**4. Encouraging Internal Culture of Data Protection Compliance**

In a landscape where ambiguity around corporate privacy obligations can lead to inaction, the Guidance offers operational direction. By making board-level involvement an explicit expectation, it enhances internal compliance cultures and strengthens the connection between corporate governance, data protection and data security principles.

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- 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.gov.il/BlobFolder/legalinfo/the\\_board\\_role/en/Role\\_of\\_the\\_Board.pdf](https://www.gov.il/BlobFolder/legalinfo/the_board_role/en/Role_of_the_Board.pdf)

- 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):*