



# PRIVACY ROADMAP 2020

# Privacy Roadmap 2020

With increased enforcement action from authorities, new challenges posed by digital platforms and emerging technologies, and the ongoing debate on digital ethics, among many other issues, data protection and privacy took a central position on the global regulatory stage in 2019. Considering this, OneTrust DataGuidance's in-house Privacy Analyst team looks ahead to 2020 and outlines the key global developments to watch this year in a Privacy Roadmap.

## About the authors

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# Asia-Pacific & CIS



## Key takeaways

- Data protection bills lead legislative agendas
- Regulator focus: data subject rights, accountability, and digital platforms
- Cross-sectoral approaches gaining momentum

## Data protection bills on the horizon

### New data protection laws

As the importance of data protection grows globally, several jurisdictions have introduced, or announced their intention to introduce, their first general data protection legislation.

India's long-awaited Personal Data Protection Bill, 2019<sup>1</sup> was introduced to the lower house of the Indian Parliament ('Lok Sabha') in December 2019, and is currently being reviewed by a Joint Parliamentary Committee ('JPC'). On 24 January 2020, the Lok Sabha Secretariat announced that the JPC is seeking comments on the bill. We will likely see this bill progress quickly through the Indian legislative process in 2020.

Furthermore, Michael Tan, Partner at Taylor Wessing LLP, told OneTrust DataGuidance that "a Personal Information Protection Law and the Data Security Law have now been included into the legislative planning of the National People's Congress ('NPC') of the People's Republic of China's Standing Committee. Both laws are classified as first category which means they are more or less ready to be submitted to the NPC for review within its current term (i.e. latest by 2023). However, an NPC spokesperson has indicated that the two laws may be enacted as early as 2020."

Moreover, Indonesia is prioritising the bill for the Personal Data Protection Act<sup>2</sup> in their 2020 National Legislative Programme which is part of the Government's data sovereignty roadmap. To this end, on 28 January 2020, the Ministry of Communication and Informatics ('Kominfo') announced it had officially submitted the draft bill to the President of Indonesia. Kominfo has also stated that the bill's enactment is envisaged for October 2020.

In addition, Sri Lanka released the final draft of the Framework for the Proposed Personal Data Protection Bill<sup>3</sup> in September 2019. After a review by an Independent Review Committee, this bill will be published in the Government Gazette as a 'Bill' and will be implemented in stages, with full operation envisaged within a period of three years from the date that it is ratified by Parliament.

Giles T. Cooper, Co-Director at Duane Morris Vietnam LLC, told OneTrust DataGuidance that the Ministry of Public Security of the Socialist Republic of Vietnam has started to draft a decree on personal data protection. Cooper also noted that implementing decree(s) for the Cybersecurity Law are yet to be issued.

Belarus' draft Law on Personal Data was passed by the lower chamber of the Belarusian Parliament in June 2019, which could potentially progress in 2020.

### Amendments of laws in place

Similarly, some jurisdictions with existing data protection legislation are revisiting their laws.

Following Japan's Personal Information Protection Commission's Committee's three-year review and subsequent preliminary



revisions to the Protection of Personal Information Act (Act No. 57 of 2003 as amended in 2016)<sup>4</sup> ('APPI'), the Committee will compile an outline after a public consultation and submit a revised bill in 2020. In addition, Malaysia's data protection legislation is being reviewed with a view for a new bill to be proposed between March and May 2020. Furthermore, public discussions on Kazakhstan's draft Law on Regulation of Digital Technologies, which would amend its personal data protection law<sup>5</sup>, are ongoing.

In South Korea, the Data 3 Act<sup>6</sup> was passed by the National Assembly of the Republic of Korea on 9 January 2020 and will be promulgated in the next months. Following this, the Ministry of Science and ICT ('MSIT') released its 2020 business plan<sup>7</sup> which outlines MSIT's projects on smart cities, blockchain technology, facial recognition, and cybersecurity, among others. Moreover, MSIT intends to promote secure use of and convergence of data in order to realise the benefits of the Data 3 Act, as well as strengthen cooperation with other states, and has created three task forces, including one on the 'data economy,' which will be focusing on the Data 3 Act.

Moreover, Hong Kong's Legislative Council announced, on 20 January 2020, that the Government, along with the Office of the Privacy Commissioner for Personal Data ('PCPD') is reviewing the Personal Data (Privacy) Ordinance 1996 as amended in 2013 (Cap. 486) to strengthen personal data protection, and is looking towards the EU and the General Data Protection Regulation (Regulation (EU) 2016/679) ('GDPR') for guidance.

Finally, the Attorney-General of Australia proposed amendments to Australia's Privacy Act 1988 No. 199, 1988 ('Privacy Act') in March 2019. Whilst there has been no significant development on this matter since, the Government's response to the Digital Platforms Inquiry (see below) could add momentum to the proposed amendments to the Privacy Act in 2020. Similarly, New Zealand's Parliament passed the Privacy Bill at its second reading in August 2019. John Edwards, Privacy Commissioner at the Office of the Privacy Commissioner of New Zealand, told OneTrust DataGuidance, that his priority in 2020 and beyond is to "implement the new Privacy Act that [will be] in law by 1 July 2020<sup>8</sup>."

## Regulators' priorities in 2020

### *Roskomnadzor, Russia*

The Federal Service for Supervision of Communications, Information Technology, and Mass Media's ('Roskomnadzor') Advisory Council plans to release guidelines on personal data processing necessary for the exercise of the rights and legitimate interests of the controller or third parties, or to achieve socially significant goals; clarifications on obtaining data subjects' consent; and recommendations on the legal regime on publicly available personal data. Moreover, the Roskomnadzor has released its 2020 inspection plan<sup>9</sup> in the Central Federal District.

### *PCPD, Hong Kong*

Stephen Kai-yi Wong, Commissioner at the PCPD, told OneTrust DataGuidance that the 2020 priorities for the PCPD include "Enforcement, especially in the face of recent data breaches, education, and reforming the law." Wong noted "[...] in order to enforce law in a more effective way, [we'd like to] propose amendments to the existing law so that we have the right power, the requisite power, to enforce the law in a fair and impartial way. Other priorities include increasing our resources [and recruiting more talent to join the PCPD] in case our recommended reforms get passed in the legislature<sup>10</sup>."

### *NPC, Philippines*

Raymund Liboro, Privacy Commissioner at the National Privacy Commission of the Philippines ('NPC') told OneTrust DataGuidance, that in 2020, "The NPC will continue harnessing and promoting

compliance, accountability, and ethics in the practice of all our stakeholders. One thing for sure, is that enforcement will be felt. [...] We have a 500% increase of complaints compared with last year<sup>11</sup>."

### *OAIC, Australia*

The Office of the Australian Information Commissioner's ('OAIC') vision, in its 2019-2020 corporate plan<sup>12</sup>, is to increase public trust and confidence in the protection of personal information and access to government-held information. The OAIC's strategic priorities include advancing online privacy protection for Australians, influencing and upholding privacy and information access rights frameworks, encouraging and supporting the proactive release of government-held information, and taking a contemporary approach to regulation.

### *Consumer Data Right*

Another significant development to note is the implementation of the Consumer Data Right ('CDR') whose launch has been deferred to July 2020. The CDR is a data portability right which currently applies to the banking sector and is proposed to apply to the telecommunications and energy sectors soon. This will likely be a significant focus of the OAIC<sup>13</sup> and the Australian Competition and Consumer Commission ('ACCC') in 2020.

### *Digital Platforms Inquiry*

The Australian Government commissioned the ACCC to undertake an inquiry into the impact that digital platforms have had on competition in Australia's media and advertising markets. In December 2019, the Government issued its response<sup>14</sup> to the ACCC's report, in which the Government commits to establishing a special unit in the ACCC to monitor competition and consumer protection as well as take enforcement action in the digital platforms market. In addition, the Government has announced its intention to reform media regulation, increase penalties, and introduce a binding online privacy code through a review of the Privacy Act.

## Other developments to watch

### *Taiwan-EU adequacy*

Taiwan has planned to reform its Personal Data Protection Act 2010 (as amended in 2015) and the Personal Property Secured Transactions Act in its efforts to obtain an adequacy decision from the European Commission. The second round of consultations between the EU and Taiwan are planned for Spring 2020, which will focus on cross-border transfers, among other things.

### *US-Australia CLOUD Act negotiations*

Negotiations between the United States and Australia for an agreement under the US' Clarifying Lawful Overseas Use of Data Act 2018 ('CLOUD Act') began in October 2019, which could mean further progress on the same in 2020.

### *Other bills to watch*

China's draft anti-monopoly law<sup>15</sup>, which considers the ability to control and process data as a factor to determine dominant market position, was released for public consultation on 2 January 2020. In addition, the Australian Parliament's Joint Committee on Intelligence and Security has recommended the re-drafting of the Identity-matching Services Bill 2019 and the Australian Passports Amendment (Identity-matching Services) Bill 2019 to include privacy and transparency principles<sup>16</sup>. Finally, there are several Russian bills that are going through the legislative process that are interesting to note: namely, the bill on genetic data protection<sup>17</sup>, the bill on digital financial assets<sup>18</sup>, and the bill on the digital profile<sup>19</sup>.

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# Americas & Caribbean



## Key takeaways

- Reformation of federal laws a priority on legislative agendas
- Introduction of new data protection bills throughout region
- Cybersecurity initiatives on the rise

## Caribbean

### *Jurisdictions to watch*

Barbados is pushing to advance a digital development agenda. The Data Protection Bill 2019<sup>1</sup> was crafted to reflect heavy inspiration from both the European General Data Protection Regulation (Regulation (EU) 2016/679) ('GDPR') and the United Kingdom's Data Protection Act 2018. Additionally, the Jamaican Government recently stated that they were "moving rapidly" to complete the Data Protection Act, 2017<sup>2</sup>.

Jamaican citizens will be entitled to new rights under the Bill and Jamaica will most likely join countries across the globe that have already implemented personal data protection laws in 2020.

The Cayman Islands Data Protection Law, 2017 (Law 33 of 2017)<sup>3</sup> entered into effect on 30 September 2019, and includes, among other things, provisions related to the functions of the Information Commissioner and enforcement. As such, we could expect to see some enforcement action in 2020.

Moreover, Bermuda has appointed its first Privacy Commissioner, Alexander M. White, who will be responsible for implementing the Personal Information Protection Act 2016<sup>4</sup> ('PIPA'). This appointment marks an important step in making the provisions of PIPA fully operational. Moreover, the Department of ICT Policy and Innovation at the Government of Bermuda told OneTrust DataGuidance that the Privacy



Commissioner took office on 20 January 2020, and that PIPA will come into operation on a day to be appointed by the Minister who is responsible for ICT policy and innovation, in consultation with the Privacy Commissioner by way of notice published in the Gazette, and that the Minister may appoint different days for different provisions of PIPA.

## Canada

### *Amendments of laws in place*

The Government of Canada announced the establishment of its Digital Charter<sup>5</sup> with ten principles to guide the Government's work to harness the power of digital and data transformation, among other things. In particular, after calls from multiple stakeholders, including the Office of the Privacy Commissioner of Canada ('OPC'), which tabled its annual report in late 2019, the Government has stated its plan to modernise Canadian privacy laws. Look out for possible amendments to the Personal Information Protection and Electronic Documents Act, SC 2000 c 5<sup>6</sup> ('PIPEDA'), including increased enforcement powers of the OPC and additional transparency requirements for businesses.

### *Other developments*

The Canadian Radio-television and Telecommunications Commission ('CRTC') announced that telecommunications service providers providing voice telecommunications services in Canada must implement a new framework to authenticate and verify caller ID information for IP-based voice calls. The CRTC has given a deadline of 30 September 2020 to implement the Telephone Identify Revisited/Signature-based Handling of Asserted Information Using Tokens framework<sup>7</sup>.

Canada's new National Cyber Security Strategy for 2019 – 2024<sup>8</sup> will continue its implementation. The strategy introduces three main goals including fostering secure and resilient Canadian systems, supporting an innovative and adaptive cyber ecosystem and ensuring collaboration and effective leadership and governance.

For 2020, the Government plans to increase the number of cybersecurity exercises delivered to critical infrastructure stakeholders and develop technical ICS security training and awareness solutions. Furthermore, the government intends to launch a national standard for cybersecurity targeted towards small and medium-sized enterprises.

## Latin America

### *Data protection bills in motion*

The Chilean data protection bill<sup>9</sup> that was first introduced in 2017 is currently in committee stage in the Senate. At present, it is unclear as to when this bill will be passed.

In addition, in Ecuador, the bill on the protection of personal data<sup>10</sup> was presented to the National Assembly of Ecuador in September 2019,

Paraguay's draft personal data law<sup>11</sup> is currently in the Chamber of Senators, and the Honduras Law for the Protection of Confidential Personal Data, which is being discussed in the Honduran Congress and has been approved in part, was expected to be fully approved in 2019. As there was no progress in 2019, this law could see further discussion in 2020.

## Major developments

A significant development in 2020 will be the entry into force of Brazil's General Law on Protection of Personal Information ('LGPD')<sup>12</sup> on 16 August 2020. The LGPD applies to the processing of personal data, including by digital means, carried out by a natural person or legal entity governed by public or private law. Additionally, the LGPD establishes rights for data subjects such as the right of access, rectification, and data portability.

Mexico has seen significant developments in privacy and shows no signs of stopping in 2020. Of note, the Mexican data protection authority, the National Institute for Transparency, Access to Information and Personal Data Protection ('INAI') has called for reforms of Mexico's data protection law<sup>13</sup>. Furthermore, INAI presented a paper<sup>14</sup> to the government urging them to reform Mexico's employment laws and whistleblower protection<sup>15</sup> laws. Finally, the new Regulation to the Federal Consumer Protection Law was published on 19 December 2019. This reform defines consumers as data subjects and established rights of access, rectification, correction and opposition (ARCO rights).

## Strategic priorities

The Presidency of the Dominican Republic announced that the National Cybersecurity Council had approved plans to implement the National Cybersecurity Strategy 2018-2021<sup>16</sup>. The strategy would seek to strengthen the legal and institutional cybersecurity framework, enhance the protection of national critical infrastructure, promote education on security issues by using information and communication technologies, and establish and consolidate national and international alliances.

Moreover, the Peru Confidence Framework Decree<sup>17</sup> establishes the necessary measures to guarantee individuals' confidence in the digital services provided by public entities and private sector organisations, and focuses on the areas of data protection and transparency, consumer protection, and digital security. Furthermore, the Confidence Framework Decree outlines, among other things, measures to strengthen digital trust, as well as the ethical use of digital technologies and data.

## USA

### *Data protection bills on the horizon*

#### USA Federal

The Federal Trade Commission ('FTC') extended the deadline for comments to be submitted on the amendments<sup>18</sup> made to the Children's Online Privacy Protection Act Rule 1999 ('COPPA Rule') to 11 December 2019. In particular, the FTC was seeking comments on the 2013 amendments to the COPPA Rule regarding, among other things, changes in the way children use and access the internet, and expansion of the definition of children's personal information, as well as geolocation information, photos, videos, and audio recordings.

Moreover, the Consumer Online Privacy Rights Act<sup>19</sup> ('COPRA') is one of many federal privacy bills that were introduced in 2019<sup>20</sup>. COPRA provides a set of rights for individuals which include the rights of access and transparency, deletion, rectification, data portability, opt out of transfers, and outlines

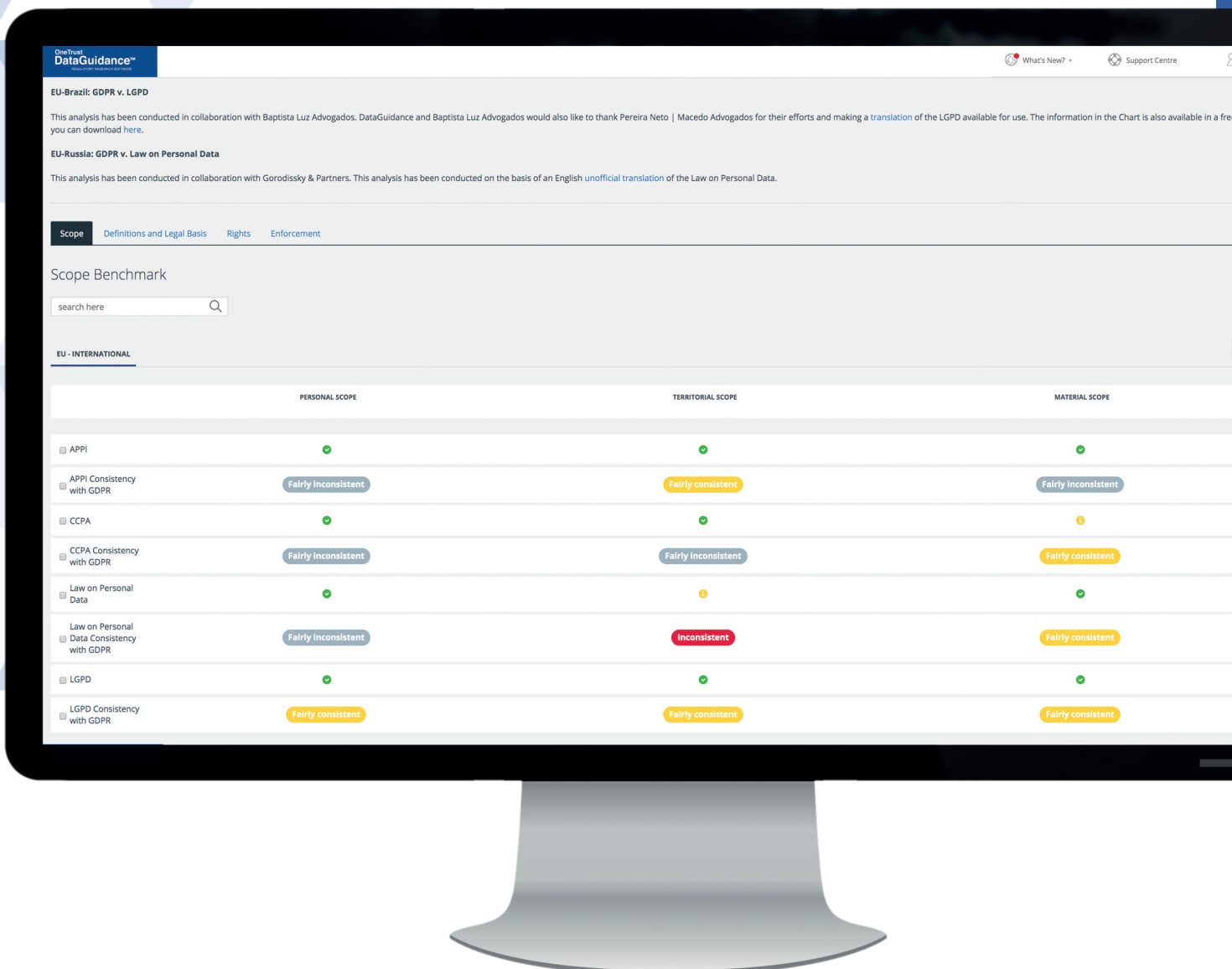
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principles such as data minimisation and data security. In addition, COPRA creates a requirement for executives of large data holders to annually certify to the FTC that the entity maintains adequate controls to comply with COPRA and reporting structures to ensure that the certifying officers are involved in, and are responsible for, decisions that impact the entity's compliance.

### California

California started 2020 with the entry into effect of the California Consumer Privacy Act of 2018<sup>21</sup> ('CCPA') following the signing of several amendment bills by the Governor in October 2019. In addition, the ballot initiative for the California Consumer Privacy Act of 2020<sup>22</sup> ('the 2020 Act') was submitted, on 25 September 2019, to the Office of the California Attorney General ('AG'). The 2020 Act would create new rights on the use and sale of sensitive personal information including, among other things, information related to health and financial status, racial or ethnic origin, and precise geolocation.

Furthermore, the AG's Proposed Regulations<sup>23</sup>, which were released for public comments until December 2019, and are yet to be approved by the AG, are intended to provide practical guidance to consumers and businesses subject to the CCPA, including in relation to: the personal information of minors; businesses offering financial incentives; the notices businesses must provide to consumers; and business practices for handling consumer requests and verifying the identity of the consumer making such requests.

### Reintroduction of state bills

Following the enactment of the CCPA in 2018, 2019 saw several other states introduce similar comprehensive laws, though few were passed. In January 2020, the New York Privacy Bill<sup>24</sup> was reintroduced and sent to the Senate Standing Committee on Consumer Protection. The New York Privacy Bill would, among other things, improve transparency, strengthen the protection of individuals' personal data, and provide for the creation of a private right of action for individuals to sue companies for violations.

Washington has also seen the introduction of Senate Bill 6281 for the Washington Privacy Act<sup>25</sup> which draws inspiration from the GDPR. Washington is amongst a growing number of U.S. States which are trying to follow California's recent legislative actions. In particular, the Washington Privacy Act would grant Washington residents the right to know who is using their personal data and why, the right to correct inaccurate data, the right to delete certain data, and the right to opt out of the processing of data in key areas, such as targeted advertising and profiling.

It is expected that several other states will introduce such bills over the course of the year.

### Other developments

On 16 January 2020, the National Institute of Standards and Technology ('NIST') published version 1.0 of its Privacy Framework<sup>26</sup>. The framework seeks to assist in the management of privacy operational risks by optimising beneficial uses of data and protecting the privacy of individuals. Furthermore, NIST outlined that the framework may help organisations comply with the CCPA

and GDPR, as it allows them to identify the privacy outcomes they want to achieve and then prioritise the actions needed to do so.

In addition, the U.S. Department of Health & Human Services announced, on 15 January 2020, that it had released its draft of the 2020-2025 Federal Health IT Strategic Plan<sup>27</sup> for public comment. The plan outlines federal health information technology goals and objectives to ensure that individuals have access to their electronic health information to enable them to manage their health and shop for care. The final version of the plan will serve as a roadmap for federal agencies and drive private sector alignment.

Finally, negotiations between the United States and Australia for an agreement under the US' Clarifying Lawful Overseas Use of Data Act 2018 ('CLOUD Act') began in October 2019, which could mean further progress on the same in 2020.

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# EMEA



## Key takeaways

- Further implementation and enforcement of the GDPR a priority on legislative agendas
- Rise in debate surrounding artificial intelligence ('AI')
- Recurring regulator priorities include digital privacy and cybersecurity

## Europe

### Data protection priorities in 2020

One of the key pieces of EU legislation that has been undergoing continued debate has been the proposed ePrivacy Regulation. The most recent draft of the ePrivacy Regulation was rejected by the Permanent Representatives

Committee of the Council of the European Union on 22 November 2019 and it is expected that a revised version will be discussed in 2020.

## EDPB

Following on from an active 2019, where we saw the European Data Protection Board ('EDPB') issue guidelines on processing personal data in the context of online services, guidelines on the territorial scope of the General Data Protection Regulation (Regulation (EU) 2016/679) ('GDPR'), and the third annual review on the EU-US Privacy Shield, among many other initiatives, the EDPB is set to continue its Work Program 2019/2020 this year. The Work Program prioritises an EDPB Enforcement strategy, as well as guidelines on media, children, data protection by default and by design, and the notion of legitimate interests of the data controller<sup>1</sup>.



## EDPS

Following on from the late Giovanni Buttarelli, the newly confirmed European Data Protection Supervisor ('EDPS'), Wojciech Wiewiórowski will serve a mandate from 2019-2024. The EDPS announced that it aims to ensure a smart and innovative European administration, by providing the EU with objective and informed advice on how it should respond to challenges such as the development and deployment of AI systems, biometrics and facial recognition, blockchain and quantum computing and encryption techniques, which will all be a focus of his work. The five-year strategy will be published in March 2020<sup>2</sup>.

## ENISA

Following the entry into force of the Cybersecurity Act (Regulation 2019/881) in 2019, the European Union Agency for Cybersecurity ('ENISA') has as its mandate to prepare 'European cybersecurity certification schemes' that serve as the basis for certification of products, processes and services that support the delivery of the Digital Single Market. ENISA announced in its Programming Document 2020-2022 that it aims to anticipate and support Europe's knowledge in facing emerging cybersecurity challenges, to promote network and information security as an EU policy priority and to support Europe in maintaining network and information security capacities as well as to develop cybersecurity certification schemes for digital products, services and processes<sup>3</sup>.

### *Europe and beyond*

Moreover, jurisdictions around the world are working to obtain an adequacy decision from the European Commission. Two jurisdictions to note are Switzerland and Taiwan.

The Swiss Revised Federal Act on Data Protection 1992 ('Revised FADP') was adopted by the Federal Assembly in September 2019<sup>4</sup>. Further to this, the Council of States adopted the improvements proposed by its State Political Commission in December 2019, and as Switzerland prepares itself to obtain an adequacy decision, we expect to see further progress on the Revised FADP in 2020.

In addition, Taiwan has planned to reform its Personal Data Protection Act 2010 (as amended in 2015) and the Personal Property Secured Transactions Act in its ongoing efforts to obtain an adequacy decision. The second round of consultations between the EU and Taiwan are planned for Spring 2020, which will focus on cross-border transfers of data, among other things.

## National jurisdictions

### *Data protection bills on the horizon*

Georgia is currently prioritising a draft law on data protection as the Office of the Personal Data Protection Inspector has submitted a draft data protection law to the Parliament of Georgia which aims at aligning Georgian personal data protection legislation to EU law, and to observe the commitments under the EU-Georgia Association Agreement. The draft data protection law was submitted in May, and although we haven't seen any significant development since, there could be some progress in 2020<sup>5</sup>.

Considering that Slovenia remains the final EU Member State to have yet implemented the GDPR, we will be awaiting a

final version of the draft Personal Data Protection Act, which is currently being worked on. Most recently, the Information Commissioner has highlighted that there are ambiguities regarding the procedure and content of the exercise of the rights of individuals in the context of the processing of personal data, and the Commissioner's powers to the access premises and documentation for investigations<sup>6</sup>.

In Germany, the Digital Providence Law entered into force on 19 December 2019 and aims at increasing the digitalisation of the healthcare sector through digital prescriptions, digital patient files, and the creation of an obligatory secure telematics infrastructure, which is a digital network connecting pharmacies, hospitals, and other stakeholders. A specific regulation on electronic patient data files, regulating the processing of sensitive health data is expected to be passed in 2020<sup>7</sup>.

### *Regulators' priorities*

#### **AP, The Netherlands**

The Dutch data protection authority ('AP') aims, in its plan for 2020-2023 to focus on data trading, digital government, AI, and algorithms. In addition, the Plan outlines that the AP functions on the basis of risk-based supervision, and as such the AP considers how much data is involved and how sensitive the data is to decide whether to use one or more of its supervisory instruments, including the interpretation of standards, legislative advice, information, and enforcement<sup>8</sup>.

#### **AZLP, Bosnia and Herzegovina**

The Agency for Personal Data Protection in Bosnia and Herzegovina ('AZLP') stated in its 2020 activity plan that it aims to ensure the harmonisation of domestic regulations with international regulations, specifically with the GDPR. Furthermore, the AZLP will carry out regular inspections and, if necessary, audits<sup>9</sup>.

#### **DPA, Belgium**

The Belgian Data Protection Authority ('DPA') issued its draft strategic plan 2019-2025, which closed for public comment, on 7 January 2020. The draft plan aims to inform about and enforce the data protection provisions, and particularly focuses on the telecommunications and media sectors, public authorities, direct marketing, education, and small and medium-sized enterprises. Thematic priorities shall be the role of the data protection officer, legal processing, and data subject rights as well as photos<sup>10</sup>.

#### **DPC, Ireland**

The Data Protection Commission ('DPC') launched a public consultation on its Regulatory Strategy 2020-2025. In particular, the DPC outlined its regulatory priorities, which will assist companies in identifying their compliance with Ireland's legal obligations, in respect of European data protection regulations, and will serve as a guide on how the DPC delivers on its obligations<sup>11</sup>.

#### **CNIL, France**

The French data protection authority ('CNIL') stated that its priorities for 2019-2021, as part of its strategic roadmap are: enforcement of the GDPR; the promotion of diplomacy of data protection; and the provision of high-quality cybersecurity

expertise<sup>12</sup>. CNIL continues to focus heavily on cookies. Following from its 2019-2020 targeted advertising plan, in addition to which CNIL held workshops with the online advertising sector to develop modalities for consent, it has most recently launched a public consultation in relation to its recommendations on cookies and other trackers intended to supplement the Guidelines issued by CNIL, on 4 July 2019, in relation to cookies and online trackers<sup>13</sup>.

#### **BfDI, Germany**

The Federal Commissioner for Data Protection and Freedom of Information's ('BfDI') focus for 2020 will be the enforcement of the GDPR, in particular on an EU level and with regards to big IT companies. Moreover, the BfDI aims to continue its efforts in protection the right to self-determination of data subjects in the light of developments regarding Big Data and AI<sup>14</sup>.

#### **Garante, Italy**

The Italian data protection authority ('Garante') published its objectives and priorities for 2020. In particular, Garante outlined that its 2020 activity will be focused on, among other things, the production of measures related to the processing of biometric, genetic, and health data, in accordance with Article 2-*septies* of the Personal Data Protection Code, Legislative Decree No. 196/2003.

In addition, Garante highlighted that it will also focus on the improvement of data breach reporting procedures, the approval of Binding Corporate Rules, processing activities in the employment context, data transfers, and telemarketing activities<sup>15</sup>.

#### **ICO, United Kingdom**

The ICO has several ongoing strategies and plans, e.g. Openness by Design 2019-2022<sup>16</sup>, Information Rights Strategic Plan 2017-2021<sup>17</sup>, Technology Strategy 2018-2021<sup>18</sup>, and the International Strategy 2017-2021<sup>19</sup>, which broadly focus on implementation of the GDPR, exploring innovative ways to protect privacy, and strengthening transparency and accountability. Additionally, the ICO has launched a public consultation on the draft Direct Marketing Code of Practice<sup>20</sup>, which is open until 4 March 2020. Moreover, the ICO continues to focus on ad-tech and in particular real time bidding, continuing its examination into the proportionality of the mass processing of personal data in the industry<sup>21</sup>.

#### **ODPA, Guernsey**

The Office of the Data Protection Authority ('ODPA') in Guernsey, in its strategic plan for 2019-2022, has clarified that it will seek to predict and prevent harms to individuals from poor personal data handling, and empower individuals to exercise their rights and to support organisations in delivering their obligations. In addition, the ODPA aims to ensure that its detection and enforcement activities are proportionate and effective and will develop capabilities in delivering its enhanced statutory duties.

#### **UODO, Poland**

The Polish data protection authority ('UODO') has confirmed its sectoral inspection plan for 2020<sup>22</sup>. In particular, the UODO noted that inspections will be carried out, this year, on banks

which copy identity documents, organisations which use smart metre systems and bodies processing personal data in the Schengen Information System and Visa Information System, such as consulates and tax administrations.

#### **Middle East**

##### *Data protection bills on horizon*

The Jordanian Ministry of Information and Communications Technology ('MoICT') has extended its fourth public consultation on the draft data protection law which was updated further to comments received from the third consultation and sector representatives' workshops.

OneTrust DataGuidance confirmed with Dino Wilkinson, Partner at Clyde & Co, that no major changes from the Dubai International Financial Center's ('DIFC') draft law on data protection are expected. Wilkinson further notes, "The version that was issued for consultation was based on European principles and international best practice; it is unlikely that the DIFC will depart from anything that is substantively different."

Regarding the United Arab Emirates' draft data protection law, OneTrust DataGuidance confirmed with Dr. Lena El-Malak, Senior Associate at Bird & Bird, "We have heard that an earlier draft contained criminal provisions similar to the ones in the Bahraini data protection law. We know that the regulator has been advised to remove them, but the draft law has not been made available for public consultation."

##### *Regulators' priorities*

The Dubai Financial Service Authority ('DFSA') announced that it will launch a Cyber Threat Intelligence Platform to assist companies in implementing appropriate safeguards to detect and mitigate against cyber risks which shall go live in January 2020<sup>23</sup>.

#### **Africa**

##### *Data protection bills on horizon*

The Parliament of Botswana had assented the Data Protection Act, 2018 in August 2018. However, its commencement date remains on notice and as such the Data Protection Commission is not yet established<sup>24</sup>.

Since December 2019, the Senegalese data protection authority has been awaiting the receipt of final observations on the draft law amending Law No. 2008-12 of 25 January 2008 Concerning Personal Data Protection before it can be transmitted to the competent authorities for its adoption<sup>25</sup>.

Moreover, OneTrust DataGuidance confirmed with Mohamed Hashish, Partner at Soliman, Hashish & Partners, that Egypt's draft data protection law is in its final discussions. In particular, Hashish notes that "the draft law has not yet been finally approved by the Parliament and there is still an ongoing discussion between the Parliament, Central Bank of Egypt and the National Telecommunication Regulatory Authority in this regard." As such, we could expect to see some progress in 2020. Furthermore, it is understood that a Tanzanian draft data protection bill will soon be released<sup>26</sup>.

##### *Amendments of laws in place*

Currently, a reform of the Access to Information and Protection of Privacy Act ('AIPPA') is being discussed in the Zimbabwean

Parliament. The following bills have been proposed to replace the AIPPA: the Data Protection Bill; the Freedom of Information Bill; and the Zimbabwe Media Commission Bill. Following these developments, it is possible that a new act repealing the AIPPA might be announced in 2020, especially following the Media Institute of Southern Africa Zimbabwe's statement calling for the fine-tuning of the Freedom of Information Bill in January 2020<sup>27</sup>.

OneTrust DataGuidance confirmed, on 25 March 2019, with Kuda Hove, Legal and ICT Policy Officer of Media Institute of Southern Africa ('MISA') Zimbabwe, that the Laws on Data Protection and on Freedom to Access Information are expected to appear at some point in the near future, following the Minister of Information, Publicity, and Broadcasting Services' announcement that the current AIPPA would be replaced.

In Tunisia, the Bill to amend Organic Act No. 2004-63 of 27 July 2004 on the Protection of Personal Data was published in 2018. More recently, the Ministry of Justice is expected to propose a review of the data protection framework to bring it in line with the GDPR<sup>28</sup>.

#### *Jurisdictions to watch*

Given the recent passing into law of various data protection legislation across the African continent, there are several jurisdictions to watch for further developments in the data privacy sphere, such as Togo and the Republic of Congo, who both passed their data protection laws in 2019<sup>29</sup>. Furthermore, as the Angolan Data Protection Agency became operational in October 2019, we could expect to see action in 2020.

Moreover, Ridwan Oloyede, Partner at Tech Hive Advisory, told OneTrust DataGuidance that the Nigerian draft Data Protection Implementation Framework "remains a draft" and is "yet to be signed by the Director-General and published by the National Information Technology Development Agency ('NITDA')." This Draft Framework includes the NITDA's approach to compliance, proposals on digital consent, and cross-border transfers, among other things.

Furthermore, Oloyede highlighted, "The Data Commission Bill [establishing the Data Commission] has not been signed, nor rejected, unlike the Digital Right and Freedom Bill [...]. However, it appears the President has refused to sign the Data Commission Bill because of its strict provisions on data localisation and the attendant sanction. The projection is that there will be another renewed effort to initiate another data protection bill that would address the inadequacy of the failed one."

#### *Other developments to watch*

In South Africa, the Protection of Personal Information Act, 2013 (Act 4 of 2013) ('POPIA') remains to be partially in force. In particular, the Information Regulator's public consultation on the Amended Guidelines to Develop Codes of Conduct in Terms of Chapter 7 of POPIA will finish by 17 January 2020. Therefore, it is possible that new recommendations or guidelines will be adopted on code of conducts in relation to POPIA, such as recommendations on the processing of personal information<sup>30</sup>. Furthermore, the Information Regulator anticipates that POPIA

will move into Phase 2 of promulgation in the early part of this year, which will constitute the advertisement of job posts at the Regulator. Once staff has been appointed, the Information Regulator will look to approach the President to promulgate, although the timeline for this is unclear<sup>31</sup>.

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