

**Trilateral
Research &
Consulting**



PHAEDRA survey results

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at the PHAEDRA workshop

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PHAEDRA outputs

- Report on “Co-ordination and co-operation between Data Protection Authorities”
- “A Compass towards best elements for cooperation between data protection authorities”
- “Legal reflections for further improving cooperation between data protection authorities”
- Comments on the draft international arrangement + participating in workshops and conferences
- Findings and recommendations

PHAEDRA remaining objectives

- D4.1 – How do DPAs, PCs and PEAs become informed of investigation and enforcement actions in which they might collaborate
- D4.2 – Prepare a final report of our findings and recommendations
- Convene the final conference (Kraków, 12 Dec 2014)

How do DPAs, PCs and PEAs become informed of enforcement actions?

- Article 29 Working Party contacts
- the Global Privacy Enforcement Network (GPEN)
- Asia-Pacific Economic Co-operation (APEC)
- informal contacts with other DPAs
- through press releases issued by other DPAs
- through contacts at conferences or workshops
- through stories in news media (including the IAPP newsletters)
- other means

Becoming informed

- Some or all of the ways
- Other ways:
 - Convention 108 Consultative Committee
 - Association francophone des autorités de protection des données
 - IWGDPT (“the Berlin Group”)
 - Case Handling Workshop within the Spring Conference
- Principal finding: Informal, ad hoc, unstructured ways are important

Comments

- Most of the time DPAs are not aware of enforcement actions carried out by others, because there is no report system in place for such actions, at least, not on a regular basis or widely enough.
- Not all investigations and enforcement actions are worth “sharing”.
- Timeliness
- Confidentiality – some PEAs may not be able to inform other PEAs that they are conducting an investigation until the investigation is completed

Question 1

- Do you think it would help you to know about the investigations and/or enforcement actions undertaken by others?

Question 2

- Would you be able to participate in investigations or enforcement actions led by others?

Question 3

- Given your existing resource constraints and domestic priorities, do you think you would benefit in collaborating with others in investigations or enforcement actions?

Question 4

- If someone expressed an interest in collaborating with you on an investigation or enforcement action, would you be willing or able (legislatively) to involve them?

Question 5

- Do DPAs think they ought to be co-ordinating investigations and enforcement actions more regularly?

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Thank you

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