

ICDPPC Global Privacy and Data Protection Awards 2018

New Audit Mechanism for Effective Enforcement

a. Name and email address of person completing this form:

b. Name of Data Protection or Privacy Authority:

Israeli Privacy Protection Authority (PPA)

2. Eligibility:

By submitting this entry I confirm that: a. The Authority is a member of the International Conference of Data Protection and Privacy Commissioners.

b. The initiative described in this entry was undertaken since the last edition.

c. I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the ICDPPC Secretariat.

The PPA is a member of the International Conference of Data Protection and Privacy Commissioners, and we confirm sections b and c.

3. Please indicate which category or categories you wish to enter (delete those that do not apply; you can enter multiple categories):

The entry belongs to the "Dispute resolution and enforcement" category.

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

Innovative auditing mechanism which will identify and narrow the gaps between data protection legislation/regulations, and their application by organizations across

the economy. The audits will create awareness and incentivize organizations to comply.

The audits will be carried out amongst pre-identified sectors across the economy.

Audits will be based on questionnaires distributed to hundreds of organizations and will be carried out by IT audit and data security experts.

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

The Israeli Privacy Protection Authority (PPA) is using its enforcement powers to significantly influence privacy perception across the economy. Until recently the PPA enforced the provisions of the law by criminal investigations and administrative oversight. In order to increase its influence, the PPA established a new proactive enforcement tool, through which gap analysis surveys will be carried out, maximizing enforcement and regulatory benefits while using minimum resources.

The PPA established an innovative auditing mechanism as part of the Enforcement Department, that will be carried out by outsourced audit professionals, which will identify and narrow the gaps between data protection legislation/regulations, and their actual implementation and application by organizations across the economy. The audits are expected to create awareness and incentivize organizations to comply. The more audits will be conducted, awareness will increase and this will lead to self-regulation and implementation of accepted privacy protection standards.

The audits are thematic and are carried out amongst pre-identified sectors (in which relevant controllers or processors are identified) across the economy.

Audits will be completed in 3 months, based on questionnaires distributed to hundreds of enforcement subjects and will examine organizational control and governance with regards to data management and protection, data transfers, data security and more. The outsourced teams on which the audit mechanism relies are

leading accounting firms, including experts in the area of IT audit and information security, which distribute questionnaires, analyze the findings and submit them to the PPA which will draw conclusions from the findings.

The goals of the audit system are divided into four main objectives:

1. Promoting and Implementing PPA's policy amongst data controllers and processors;
2. Reducing gaps between privacy regulation and its implementation in the economy, by identifying them through the audits, correcting deficiencies by guidelines, and enforcing guidelines and corrections by follow up and repeat audits.
3. Increasing awareness- by broad media exposure of findings to the public (aggregated results by sectors)
4. Findings and Conclusions will lead to:
 - Regulatory adjustments and guidance when needed
 - Initiating administrative or criminal investigations following the audits (when required)
 - Producing Sectorial privacy compliance key performance indicator

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

The new audit mechanism will enable the PPA to significantly increase compliance and awareness across the economy.

The mechanism is unique due to its effectiveness. It is designed to reach a huge amount of organizations across the economy, and to create an in depth gap analysis between legislation and its implementation, maximizing compliance and other regulatory benefits on the one hand while using minimum resources on the other.

The mechanism is a significant tool to promote and implement the PPA's policies amongst data controllers and processors; reduce gaps between privacy regulation and its implementation in the economy, by identifying them through the audits, correcting deficiencies by guidelines, and enforcing guidelines and corrections by follow up and repeat audits.

The audits will increase awareness, by broad exposure of the findings to the public (aggregated results by sectors) by the media.

The findings of the audits will enable regulatory adjustments and guidance, and may lead to initiating administrative or criminal investigations, (when required). In addition, the findings will enable to produce sectorial privacy compliance key performance indicators.