

PRIVACY & INFORMATION SECURITY LAW BLOG

Global Privacy and Cybersecurity Law Updates and Analysis



September 2016

This Client Alert is a monthly update on privacy and cybersecurity developments as posted on Hunton & Williams' [Privacy and Information Security Law Blog](#). If you would like to receive email alerts when new posts are published, please visit our [blog](#) and enter your email address in the subscribe field.

Recent posts on the Privacy and Information Security Law blog include:

- [CNIL Publishes New Rules on Biometric Access Control in the Workplace](#)
- [The Arc of a Data Breach: A 3-Part Series to Make Sure You're Prepared](#)
- [CNIL Publishes Internet Sweep Results on Connected Devices](#)
- [Department of Transportation Issues Cyber Guidance for Autonomous Cars](#)
- [Belgian Privacy Commission Issues Priorities and Thematic Dossier to Prepare for GDPR](#)
- [The Arc of a Data Breach: A 3-Part Series to Make Sure You're Prepared](#)
- [New Jersey Moves Forward With Shopper Privacy Bill](#)
- [Final Rules for the Data Privacy Act Published in the Philippines](#)
- [Advocate General Advises Revision of PNR Agreement between EU and Canada](#)
- [Lisa Sotto Speaks on Cybersecurity: Supply and Demand \(Part 3\)](#)
- [FTC Seeks Input on GLB Safeguards Rule](#)

CNIL Publishes New Rules on Biometric Access Control in the Workplace September 30, 2016

On September 27, 2016, the French Data Protection Authority ("CNIL") [announced](#) the adoption of two new decisions, Single Authorizations [AU-052](#) and [AU-053](#), that will now cover all biometric access control systems in the workplace. These two new decisions repeal and replace the previous biometric decisions adopted by the CNIL and lay down the CNIL's new position on biometric systems used to control access to the premises, software applications and/or devices in the workplace. [Continue Reading...](#)

The Arc of a Data Breach: A 3-Part Series to Make Sure You're Prepared September 28, 2016

Episode 2: Response

In the [second segment](#) of our 3-part series with Lawline, [Lisa J. Sotto](#), head of our [Global Privacy and Cybersecurity](#) practice at Hunton & Williams LLP, discusses data breach notification obligations and actions to take to manage the regulatory onslaught in the aftermath of a breach. Sotto notes that "these investigations are challenging because the threat actors are enormously sophisticated, and in some circumstances we can never figure out what happened."

[View the second segment](#) and the [presentation materials](#).

CNIL Publishes Internet Sweep Results on Connected Devices September 27, 2016

On September 23, 2016, the French Data Protection Authority ("CNIL") [published](#) the results of the Internet sweep on connected devices. The sweep was conducted in May 2016 to assess the quality of the information provided to users of connected devices, the level of security of the data flows and the degree

of user empowerment (e.g., user's consent and ability to exercise data protection rights). [Continue Reading...](#)

Department of Transportation Issues Cyber Guidance for Autonomous Cars September 22, 2016

On September 20, 2016, the Department of Transportation, through the National Highway Traffic Safety Administration ("NHTSA"), released federal cyber guidance for autonomous cars entitled [Federal Automated Vehicles Policy](#) ("guidance"). [Continue Reading...](#)

Belgian Privacy Commission Issues Priorities and Thematic Dossier to Prepare for GDPR September 21, 2016

On September 16, 2016, the Belgian Data Protection Authority (the "Privacy Commission") published a 13-step guidance document (in [French](#) and [Dutch](#)) to help organizations prepare for the [EU General Data Protection Regulation](#) ("GDPR").

The 13 steps recommended by the Privacy Commission are summarized below. [Continue Reading...](#)

The Arc of a Data Breach: A 3-Part Series to Make Sure You're Prepared September 20, 2016

Episode 1: Identify & Mobilize

In the [first segment](#) of our 3-part series with Lawline, [Lisa J. Sotto](#), head of our [Global Privacy and Cybersecurity](#) practice at Hunton & Williams LLP, explains how to identify a cyber incident, mobilize your incident response team, coordinate with law enforcement and conduct an investigation.

[View the first segment](#) and the [presentation materials](#).

New Jersey Moves Forward With Shopper Privacy Bill September 19, 2016

On September 15, 2016, the New Jersey Senate unanimously approved a bill that seeks to limit retailers' ability to collect and use personal data contained on consumers' driver and non-driver identification cards. The bill, known as the [Personal Information and Privacy Protection Act](#), must now be approved by the New Jersey Assembly. [Continue Reading...](#)

Final Rules for the Data Privacy Act Published in the Philippines September 13, 2016

Recently, the National Privacy Commission (the "Commission") of the Philippines published the final text of its [Implementing Rules and Regulations of Republic Act No. 10173, known as the Data Privacy Act of 2012](#) (the "IRR"). The IRR has a promulgation date of August 24, 2016, and went into effect 15 days after the publication in the official *Gazette*. [Continue Reading...](#)

Advocate General Advises Revision of PNR Agreement between EU and Canada September 9, 2016

On September 8, 2016, Advocate General Paolo Mengozzi of the Court of Justice of the European Union (“CJEU”) issued his [Opinion](#) on the compatibility of the draft agreement between Canada and the European Union on the transfer of passenger name record data (“PNR Agreement”) with the [Charter of Fundamental Rights of the European Union](#) (“EU Charter”). This is the first time that the CJEU has been called upon to issue a ruling on the compatibility of a draft international agreement with the EU Charter. [Continue Reading...](#)

Lisa Sotto Speaks on Cybersecurity: Supply and Demand (Part 3) September 6, 2016

In [Part 3](#) of [Lisa J. Sotto's](#) discussion at Bloomberg Law's [Second Annual Big Law Business Summit](#), she speaks on supply and demand in the privacy and cybersecurity fields. Lisa, partner and head of Hunton & Williams LLP's [Global Privacy and Cybersecurity](#) practice group, points out that “demand very much outweighs supply.” To be a successful lawyer in this field, Lisa emphasizes the need for experience, recognizing that, “there is so much nuance, [and data privacy is] culturally based so you cannot just open a book and understand what to do.” In the next 10 years, Lisa hopes to see more lawyers in the field who are trained to “manage a breach that implicates [global] data breach notification laws.”

[View the third segment.](#)

Access [Part 1](#) and [Part 2](#) of the cybersecurity videos from the [Big Law Business Summit](#).

FTC Seeks Input on GLB Safeguards Rule September 1, 2016

On August 29, 2016, the Federal Trade Commission [announced](#) that it is seeking public comment on the Gramm-Leach-Bliley Act (“GLB”) Safeguards Rule. The GLB Safeguards Rule, which became effective in 2003, requires financial institutions to develop, implement and maintain a comprehensive information security program to safeguard customer information. [Continue Reading...](#)



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