

Global Forum Assembly (GFA) Chair

Annual Report

April 2024-2025

Per Section 4.2(i)(d) of the Global Cross-Border Privacy Rules (CBPR) Forum Terms of Reference, the GFA Chair drafts an annual report on the GFA's accomplishments and progress for endorsement by the GFA.

On May 14, 2024, the GFA endorsed an Annual Work Program which set forth three strategic goals: 1) operationalize the Global CBPR and Global Privacy Recognition for Processor (PRP) Systems; 2) update the Global CBPR and PRP System Program Requirements; and 3) promote participation in the Global CBPR Forum. The following is a report on the GFA's accomplishments and progress on each of the three goals.

1. Operationalize the Global CBPR and Global Privacy Recognition for Processor (PRP) Systems

Throughout the year, the Forum developed the necessary components to operationalize the Global CBPR and PRP Systems, primarily building the Compliance Directory where certified organizations are listed on the Forum website, and developing, registering and licensing the certification marks for the Global CBPR and PRP Systems.

On May 28, the Forum announced that it would launch the Systems on June 2, 2025, with approximately 100 companies, including over 2000 subsidiaries and affiliates.

2. Update the Global CBPR and PRP System Program Requirements

Upon establishing the Global CBPR and PRP Systems in April 2024, the Chair developed and implemented a multi-phase plan to review and update the Global CBPR and PRP System Program Requirements, specifically:

- Engaging a third party organization to develop an independent report with recommendations for proposed updates to the Global CBPR System Program Requirements;
- Surveying Members and Associates to agree on proposed topics and identify which ones are enforceable among all Members and Associates;
- Leading a drafting group to develop text proposals on the proposed topics to be included in the Program Requirements; and
- Consulting with stakeholders, including Accountability Agents and APEC CBPR-certified companies, on draft proposals.

As of the date of this annual report, the GFA is considering new and enhanced Global CBPR System Program Requirements on the following topics:

- Sensitive Personal Information
- Direct Marketing Choice

- Breach Notification to Individuals
- Qualified Privacy Personnel
- Risk Assessment
- Withdrawal of Consent
- Records of Processing and Consent
- Children's Personal Information

Once the GFA endorses updates to the Global CBPR System Program Requirements, the GFA intends to develop a process and timeline for implementing the new Program Requirements into the Global CBPR System. The GFA has not considered updates to the Global PRP System Program Requirements.

3. Promote participation in the Global CBPR Forum

On July 11, 2024, the Forum welcomed the Mauritius and Dubai International Financial Centre as Associates in the Forum. The following month, on August 1, 2024, the Forum welcomed Bermuda as an Associate in the Forum.

In May and November 2024, the Forum hosted two multilateral Global CBPR Forum workshops, which included participation by representatives from 36 jurisdictions from all regions.

The Forum's Membership Committee also consulted individually with five jurisdictions from the Asia-Pacific, Africa, and the Americas interested in joining the Forum.

Members jointly and independently promoted the Forum in various other privacy and trade-related events. For example, Members participated in a September 2024 Global CBPR Forum Workshop hosted by India's Ministry of Electronics and Information Technology and Ministry of External Affairs, Nasscom, and the Data Security Council of India.