# EUROPEAN AND INTERNATIONAL STRATEGY

2025-2028





#### Introduction

The European and international strategy of the *Commission nationale de l'informatique et des libertés* (CNIL) is an extension of a long-standing commitment to take into account international and European issues relating to the protection of personal data.<sup>1</sup> The CNIL wishes to play an active role ensuring the protection of personal data in France, Europe and the rest of the world. This strategy complements the <u>CNIL's Strategic plan.</u>

The main European and international key priorities of the CNIL are:

**Pillar 1** – Streamlining European cooperation to strengthen personal data protection in the new European digital regulatory environment

**Pillar 2** – Promoting high international standards of personal data protection while supporting innovation and data flow

**Pillar 3** – Consolidating the European and international influence of the CNIL by endorsing a personal data protection model that balances innovation and the protection of individuals

# Pillar 1 - Streamlining European cooperation to strengthen personal data protection in the new European digital regulatory environment

The primary mission of the CNIL is to ensure the protection of personal data of individuals in France and Europe. In order to better grasp the challenges associated with personal data and the international data protection concerns, the CNIL must demonstrate leadership at European level to improve the effectiveness of French and European law on personal data.

To this end, the CNIL should be involved in improving European cooperation, particularly in the context of the renewal of digital legislations (European Digital Package) and the rise of new technologies (in particular artificial intelligence, digital identity and cybersecurity).

#### **Expected impacts:**

- European cooperation procedures are streamlined and allow for the adoption of common positions within the European Data Protection Board (EDPB) in an accelerated manner: opinions, guidelines or penalties;
- The new European governance of the digital package benefits from the cooperation experiences of the GDPR; and
- The European level of protection of personal data continues to be high in the face of digital developments (practical, legal and technological).

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<sup>&</sup>lt;sup>1</sup> Article 1, §1, Law N° 78-17 of 6 January 1978 on computing, files and freedoms ("Loi Informatique et Libertés"): "Computing must be at the service of every citizen. Its development must take place within the framework of international cooperation. It must not undermine human identity, human rights, privacy or individual or public freedoms" (unchanged since 1978).

### Objective 1 - Streamlining European cooperation to enhance the efficiency of the European collective

The CNIL is an important player within the EDPB. It wants to develop a leading role to contribute streamlining the procedures allowing a proper implementation of the GDPR. This focuses in particular on the cooperation and coherence mechanisms.

### **Objective 2 - Strengthening investigations and enforcement actions at European level on high-stakes cases**

Investigations and enforcement actions are the second building block of European cooperation. They make it possible to sanction breaches of the GDPR obligations. The CNIL wants to strengthen its role in joint operations prioritised at European level as lead authority or as the authority concerned.

## Pillar 2 – Promoting high international standards of personal data protection while supporting innovation and data flow

The CNIL takes part in the work of several international intergovernmental bodies, sometime in coordination with the French Government, in particular the Council of Europe, which coordinates the application of Convention 108 and its additional protocols, or the Organisation for Economic Cooperation and Development (OECD). The CNIL is also a member of various international data protection authorities networks, such as the *Global Privacy Assembly* (GPA), the French-speaking Association of Personal Data Protection Authorities (AFAPDP) and the Group of 7 (G7) round table of data protection authorities.

The CNIL must maintain its involvement within these organisations. It needs to consider engaging with other international data protection bodies in which it does not participate, such as *the Global Cross-Border Privacy Rules Forum* (Global CBPR Forum), the *Association of Southeast Asian Nations (ASEAN)*, the *Asia-Pacific Economic Cooperation* (APEC) or the Ibero-American Data Protection Network (RIPD).

#### **Expected impacts:**

- The European model defended by the CNIL is disseminated internationally and international data protection standards are strengthened;
- The government coordinates with the CNIL when it has to take a position on international standards for the protection of personal data; and
- The government is convinced by the CNIL's advocacy on international standards for the protection of personal data.

## Objective 3 - Disseminating the digital regulation model based on the rights and freedoms of individuals

The CNIL wants to spread the European personal data protection model through the international fora and bodies in which it participates. The CNIL's values could thus inspire the personal data protection international standards.



## Objective 4 - Advise the French government on its international commitments regarding the protection of personal data and digital regulation

The CNIL wants to maintain a close link with the French government on international issues relating to the protection of personal data. Its counseling action should allow the government to take into account a position on digital issues, in accordance with the requirements of the GDPR and the French Data Protection Law.

# Pillar 3 – Consolidating the European and international influence of the CNIL by endorsing a personal data protection model that balances innovation and the protection of individuals

This is a support pillar for the first two pillars of this strategy. Maintaining strong relations with other authorities, either directly or through international fora, makes it easier for other stakeholders to share or support our views. The CNIL's doctrine needs to be strengthened on the major international issues of personal data protection in order to attract support.

#### **Expected impacts:**

- The CNIL remains at the forefront of personal data topics while integrating technological and regulatory developments;
- The CNIL remains a key and influential player in the European and international data protection scene;
- Cooperation and coordination with other data protection authorities is facilitated; and
- The European and international debates on the protection of personal data take into account the concerns and standards of the CNIL.

## Objective 5 - Foster and strengthen the CNIL's network to affirm the European model

The CNIL wants to maintain and consolidate its position as a key and influential player in the field of data protection at European and international level. This is to facilitate stakeholders' support.

### Objective 6 - Monitor and anticipate the impact of practices at global level

In order to maintain a relevant position on the international scene, the CNIL wants to remain at the forefront of legal, technological and economic developments related to the protection of personal data.

### Objective 7 - Consolidate the CNIL's doctrine on transfers and international issues of personal data protection

The CNIL wants to be able to respond immediately to the impact of globalisation, technological developments and personal data flow. In this sense, the CNIL must consolidate its doctrine on data transfers. It must anticipate international challenges related to cross-border flows of personal data.