



Centre for Information Policy Leadership

HUNTON

# **Navigating Data Flows: A Multilateral Approach to Cross- Border Data Transfers**

14 November 2025

Privacy + Security Forum – Fall Academy

# Speakers



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- **Welcome & Introductions**
- **Overview of Global CBPR and Global PRP**
  - What are they and why are they needed?
- **How Certification Works**
  - Who are the players and what are their roles?
- **Benefits of Certification**
  - For jurisdictions, businesses, and individuals
- **Open Discussion**

BRIDGING PRIVACY AND DATA-DRIVEN INNOVATION | BRIDGING INDUSTRY & REGULATORS | BRIDGING REGIONS

85+

Member  
companies

30+

Papers, projects  
and initiatives

50+

Events annually

20+

Years of trusted  
experience

We  
**INFORM**

via publications, member  
events, and public fora

We  
**CONNECT**

global industry and  
government leaders

We  
**SHAPE**

the future of data policy  
and strategy

We  
**CREATE**

innovative solutions and  
elevate best practices

## ABOUT US

Trusted partners and digital diplomats:

- Anticipating policy and regulatory challenges and opportunities
- Advancing accountability and best practices for strategic and innovative use of data
- Facilitating knowledge sharing and dialogue among stakeholders since 2001
- Based in London, Brussels and Washington, DC
- Founded by industry leaders and Hunton



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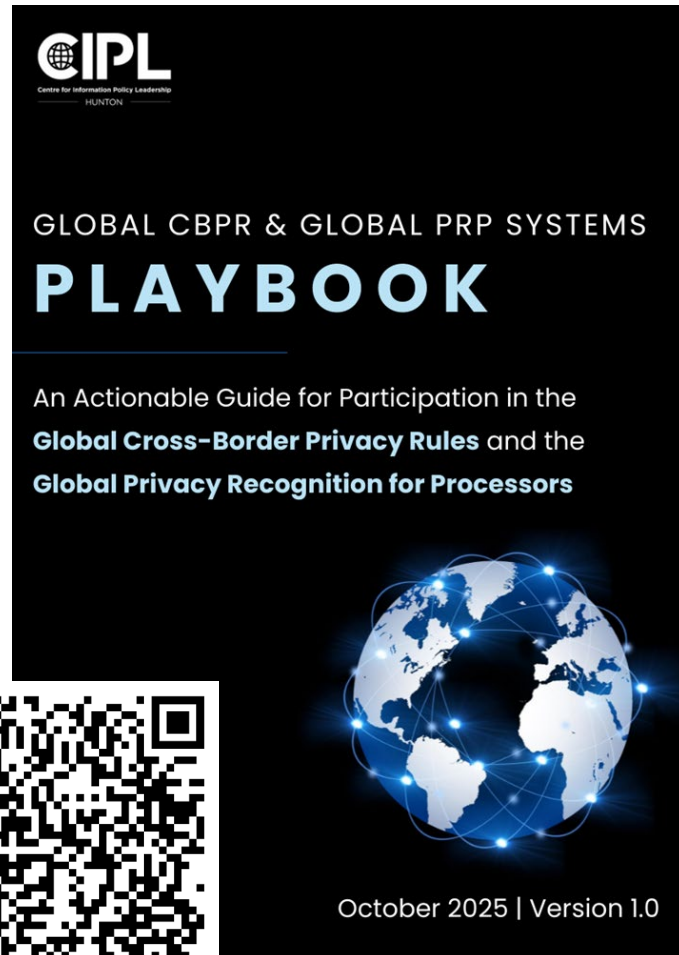


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## Actionable Guide for Participation in Global CBPR and Global PRP Systems

- Basics
- Checklists
- Benefits
- Glossary
- Application Process
- At A Glance



# The Need for a Multilateral Solution

- **Data flows are essential to the global marketplace**
- **Data flows have become globally complex**
- **Global CBPR & Global PRP provide a multilateral solution**

# Characteristics of Global CBPR & PRP



- **Voluntary**
- **Enforceable**
- **Flexible**
- **Multilateral**
- **Accountability-based**
- **Co-exist with other transfer mechanisms**

# What are Global CBPR & Global PRP?

## DATA TRANSFER MECHANISMS AND PRIVACY COMPLIANCE PROGRAMS



**Asia-Pacific  
Economic Cooperation**

- ✓ **CROSS-BORDER PRIVACY RULES (CBPR)**
- ✓ **PRIVACY RECOGNITION FOR PROCESSORS (PRP)**
  - Developed by APEC in 2011 (CBPR) and 2015 (PRP)
  - Operationalize Privacy Principles



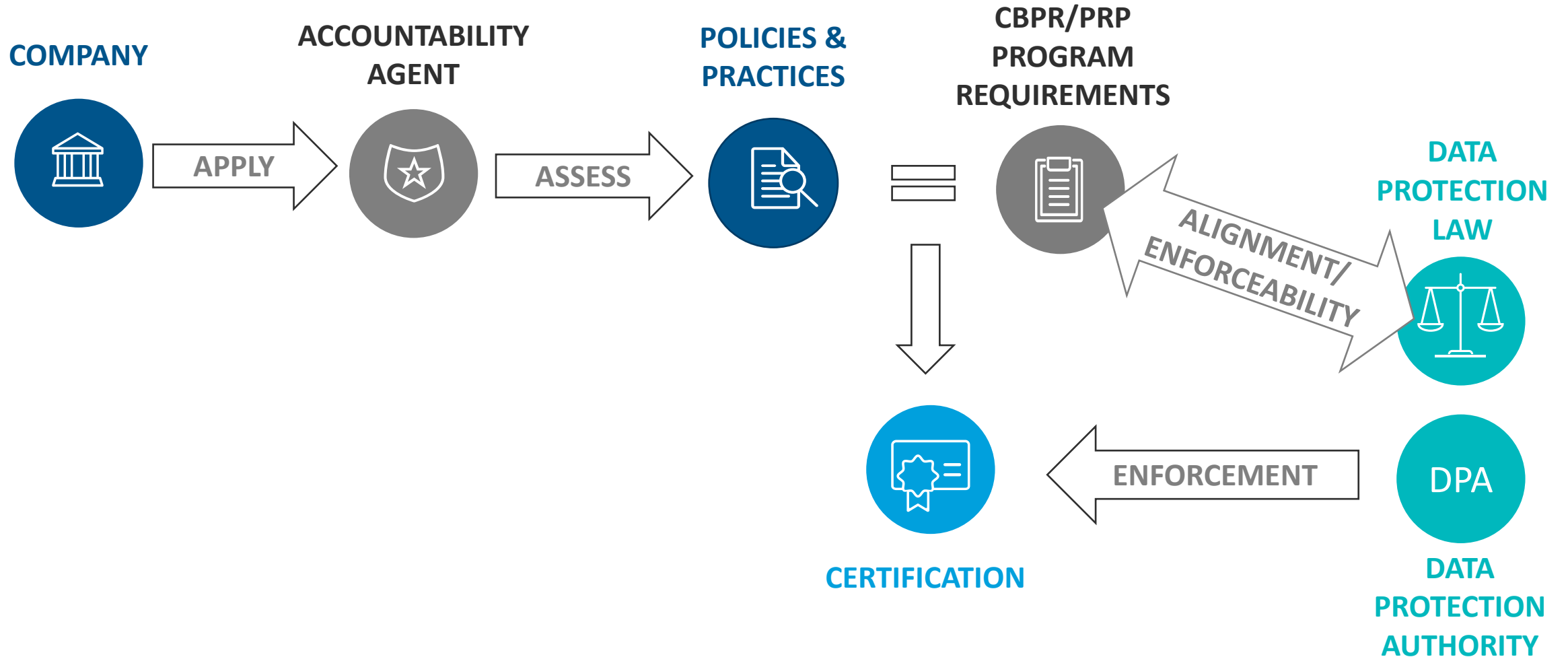
**Global  
CBPR  
Forum**

- 
- Established in 2022
  - Includes all nine members of the APEC CBPR System:
    - Australia, Canada, Japan, Republic of Korea, Mexico, Philippines, Singapore, Chinese Taipei, United States
  - Enables other, non-APEC countries to join
    - ASSOCIATE MEMBERS: Bermuda, Dubai International Financial Centre, Mauritius, and the United Kingdom
    - APPLICATIONS FORTHCOMING: Nigeria, Thailand, Malaysia



# How do the Global CBPR/Global PRP Systems work?

## CERTIFICATION PROCESS



# Global CBPR as an Accountability & Compliance Mechanism

**Enables companies to build a systematic privacy management program, verify and demonstrate compliance through third-party certifications**

**Accountability and  
compliance with  
local law**



**Including with  
data transfer requirements**

### Map Global CBPR to other privacy laws / frameworks

Joining the Global CBPR (or bridging data transfer mechanisms to the Global CBPR) requires the ability to enforce or recognize the Global CBPR under one's own law or transfer regime

Requires comparing/mapping the Global CBPR requirements to one's own law or transfer regime

### Identify gaps

Identify any specific substantive requirements not included in the Global CBPR or counterpart law

### Consider bridging mechanisms

Consider whether bridging mechanisms for gaps are needed

Consider whether Global CBPR are enforceable via authority to enforce public promises (misrepresentation/deception)

Several options exist to bridge Global CBPR requirements and other privacy laws and frameworks

# Global CBPR & Global PRP

## ROLES OF PRINCIPAL STAKEHOLDERS

### Applicant Jurisdictions

Identify relevant laws and regulations to enforce the Program Requirements

Identify DPA to provide backstop enforcement

(mapping exercise as part of membership application)

### Certified Organizations

Ensure that their data protection and privacy programs comply with the Program Requirements

(e.g., intake questionnaire as part of certification process)

### Accountability Agents

Certify that applicant's privacy policies and practices align with Global CBPR/Global PRP Program Requirements

Monitor and assist with enforcement of the Program Requirements

# Global CBPR & Global PRP

## ACCOUNTABILITY AGENTS

**Nominated by  
country in  
which AA is to  
serve;  
approved by  
Forum  
members**

**Must meet  
recognition  
criteria  
established by  
Forum  
members**

**Subject to  
jurisdiction of  
the privacy  
enforcement  
authority**

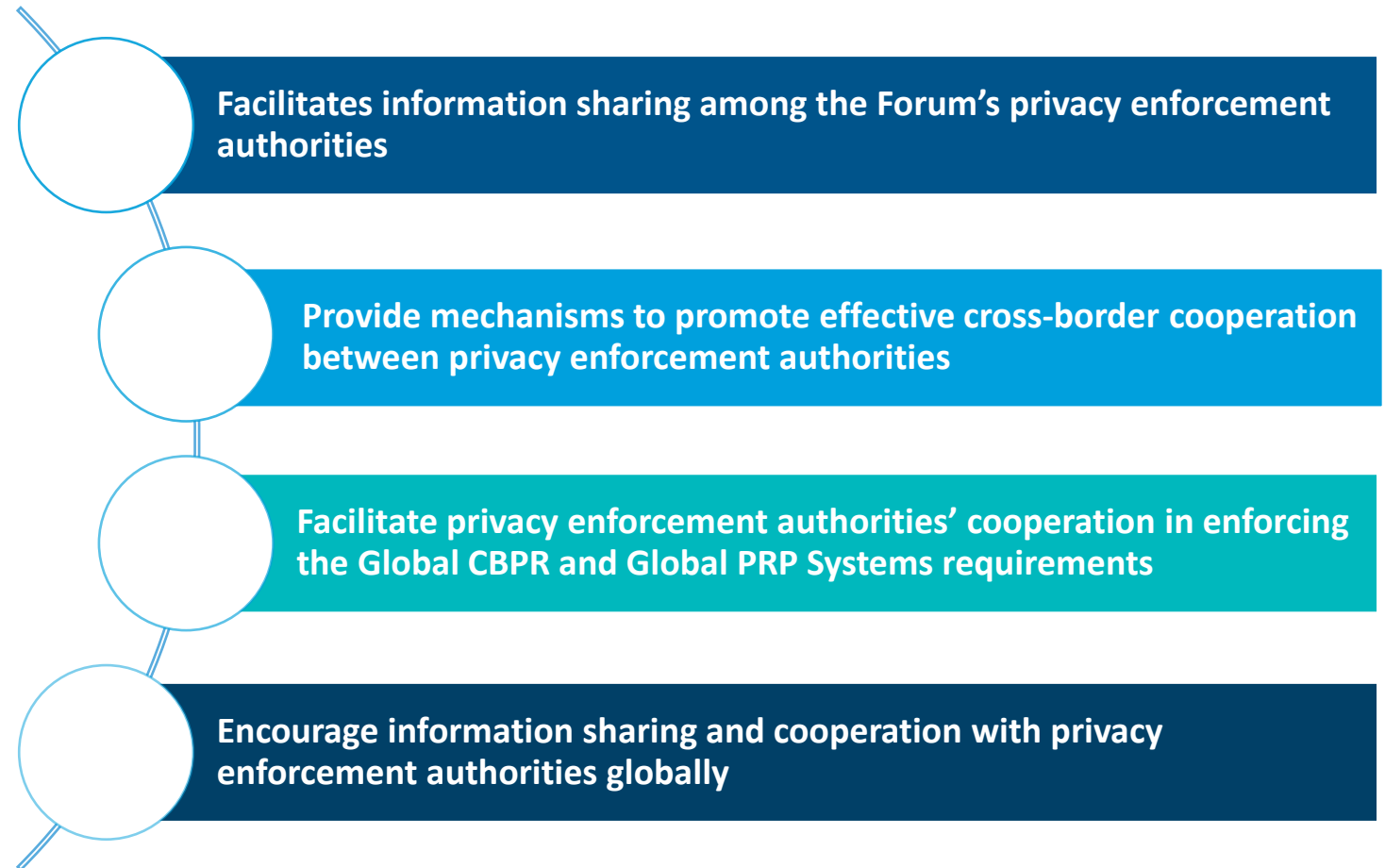
**Certify and  
monitor  
participating  
organizations'  
privacy policies  
and practices to  
ensure  
compliance**

**Handle frontline  
dispute  
resolution  
between  
individuals and  
certified firms**

## Global Cooperation Arrangement for Privacy Enforcement (CAPE)

An arrangement where privacy enforcement authorities cooperate on cross-border data protection and privacy enforcement

*April 2024:  
Bermuda, Dubai, and the  
UK joined the Global CAPE*



# Global CBPR & Global PRP

## BENEFITS FOR JURISDICTIONS



Enables commerce and attracts new business



Permits participation in shaping Program Requirements



Helps streamline investigations & enforcement actions

## BENEFITS FOR BUSINESSES



Facilitates data transfers



Enables compliance



Assists SMEs



Promotes due diligence



Demonstrates accountability



Serves as mitigating factor in enforcement



Enhances prep for other certifications



# Global CBPR & Global PRP

## BENEFITS FOR INDIVIDUALS



High privacy standards



More effective and consistent protections



Increased trust



Complaint & dispute resolution mechanisms



## Open Discussion



## Mark Smith

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