



GPA

Global Privacy Assembly

Digital Citizen and Consumer Working Group

Report – July 2025

Submitted on behalf of the DCCWG by the Co-Chairs - Office of the Privacy Commissioner of Canada (OPC Canada) and Garante per la Protezione dei Dati Personali of Italy (GPDP Italy).



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Executive Summary

The impact of artificial intelligence on society, markets and democracies has accelerated the convergence between data protection requirements and consumer and competition protection requirements.

In this context, the work of the Digital Citizens and Consumers Working Group (DCCWG), established in 2017 and recognised as a permanent working group of the Global Privacy Assembly (GPA) in 2021, has become increasingly relevant and useful for data protection authorities around the world.

The establishment, organisation and work of the DCCWG, in this respect, are to be considered enlightened and visionary, having identified a need – that of exploring the interplay between different regulatory systems and the possible forms of collaboration and cooperation between the authorities responsible for their application – which is now evident, indisputable and indispensable.

In this context, and in line with strategic objective 2 of the GPA's Strategic Plan ^[1]— “Strategic alliances and impact” — during 2024, the DCCWG has intensified its activities and efforts both in supporting the personal data protection authorities of the GPA and in contributing to - and at times promoting - the international debate on the relationship between regulation and enforcement in the field of personal data protection, of consumer protection, and freedom of competition.

Among the many issues falling within the scope of the Group's work, its participants agreed on the importance of selecting two main priorities for the period from September 2024 to July 2025:

- the examination of the existing relationship between personal data protection rules and market rules in the field of artificial intelligence, with particular but not exclusive reference to new legislation recently enacted or pending on the governance of artificial intelligence;
- the development and deployment of age assurance or age verification solutions, which are increasingly being implemented in many of the jurisdictions where DCCWG members operate.

During the year, the Group also conducted a survey among its members to assess the current situation in each country and to identify, as a priority, the key areas to be addressed within the Group's mandate.

The growing importance of the group is probably also confirmed by the expansion of its network, which now includes numerous member agencies, organisations and observers, and by the active participation of its experts in conferences, roundtables and institutional meetings at national and international level.

¹ Global Privacy Assembly, [Strategic Plan 2023/2025](#), pp 10-11.



We are pleased to present this report to the 47th closed session of the GPA in Seoul, Korea, with the hope that it will serve as a meaningful resource for all members engaged in digital governance.

Introduction

The DCCWG was established in 2017 by resolution of the 39th *International Conference of Data Protection and Privacy Commissioners* (now the Global Privacy Assembly - GPA) and initially focused on examining the intersections between privacy and consumer protection ^[2].

In 2019, the GPA expanded the group's remit to include intersections involving competition and antitrust rules.

Recognising the growing importance of collaboration between regulators and the increasing relevance of the group's work, the GPA designated the DCCWG as a permanent working group in October 2021.

Under the GPA's current Strategic Plan (2023-2025) ^[3], the DCCWG has a mandate to:

- Collaborate with academic institutions and other stakeholders to deepen understanding of the risks and opportunities related to personal data protection (PDP) from the perspective of consumer protection, competition, antitrust and other intersecting regulatory areas identified by the group.
- Document and analyse cases where personal data protection intersects with competition, consumer protection, antitrust and other relevant regulatory areas.
- Identify existing obstacles to cooperation between regulators and develop or promote practical solutions to overcome these challenges.
- Promote bilateral and multilateral cooperation between data protection authorities (DPAs) and other regulatory bodies on common regulatory interests.

“Dialogue is the royal road to knowledge,” said Plato.

This is a belief that, more than five years after the start of its activities, continues to inspire the participants in the Digital Citizens and Consumers Working Group (DCCWG), who keep finding in opportunities for discussion and dialogue—both in person and remotely— a valuable means of exercising their responsibilities as data protection authorities in an increasingly global society, where

² [Resolution To Support And Facilitate Regulatory Co-Operation Between Data Protection Authorities And Consumer Protection And Competition Authorities To Achieve Clear And Consistently High Standards Of Data Protection In The Digital Economy](#), passed at the 41st International Conference of Data Protection and Privacy Commissioners.

³ [Strategic Plan 2023-2025](#).



a multidisciplinary approach to issues and questions related, particularly regarding the impact of new technologies on the lives of individuals, markets and democracies.

However, over the last year, as in previous years, the Group's activities have also provided a valuable opportunity for networking between representatives of national and international institutions and organisations involved in various capacities in the protection of personal data and the protection of users and consumers.

This represents a valuable added benefit of the Group's work, which produces significant positive externalities in the ordinary activities of data protection authorities and other entities involved.

As anticipated, the Group's activities in 2024 continued to directly support the GPA's strategic objective of promoting strategic alliances and maximising impact by creating and strengthening partnerships with relevant regulatory authorities, networks and organisations.

In this sense, it can be said that, while remaining faithful to its original approach, the Group is acquiring, year after year, a greater awareness of its potential and role, perhaps also by educating data protection authorities on forms of interdisciplinary and international cooperation and collaboration that are not always part of their history and tradition but are strategic in the governance of new technological phenomena, particularly artificial intelligence.

The purpose of this report is to share with the GPA the work carried out so far by the DCCWG, with particular reference to the last year, and to outline the priorities on which the Group has chosen to focus its activities.

These priorities, which are explained in more detail in the following paragraphs, concern the exploration of the interplay between personal data protection, consumer protection and competition, with specific reference to the new rules on artificial intelligence adopted and being adopted in various countries and those on age assurance or age verification.

This report also provides an opportunity to share with all GPA participants the results of a survey on these priorities, carried out among the members of the group but which may also be useful outside the group itself.

The DCCWG will, of course, continue to work closely with the Strategic Direction Sub-Committee (SDSC) to complete the work set out in the DCCWG's 2023-25 strategic plan.



Working Group Members

The current members and/or observers of the DCCWG are as follows:

- Office of the Privacy Commissioner of Canada (OPC) [co-chair]
- Garante per la Protezione dei Dati Personali of Italy (GPDP) [co-chair]
- Office of the Australian Information Commissioner (OAIC)
- Belgian Data Protection Authority, Belgium
- The Superintendence of Industry and Commerce, Colombia
- Datatilsynet, Denmark
- European Data Protection Supervisor, Europe
- Commission Nationale de l'Informatique et des Libertés (CNIL), France
- National Commission for the Protection of Personal Data, Gabon
- Office of the Personal Data Protection Service of Georgia
- Federal Commissioner for Data Protection and Freedom of Information, Germany
- Office of the Data Protection Authority, Bailiwick of Guernsey
- Office of the Privacy Commissioner for Personal Data, Hong Kong
- National Institute for Transparency, Access to Information and Personal Data Protection (INAI), Mexico
- Datatilsynet, Norway
- National Privacy Commission, the Philippines
- Commissioner of Personal Data Protection, Senegal
- Information Commissioner's Office (ICO), the United Kingdom
- Federal Trade Commission, the United States of America
- The European Consumer Organisation [observer]
- Authority for Consumer & Markets, Netherlands [observer]
- Office of the Privacy and Civil Liberties, the United States of America [observer]



- Working Party on Data Governance and Privacy in the Digital Economy, Organisation for Economic Co-operation and Development [observer]

New Working Group Members

- Personal Information Protection Commission, Japan

Working Group Activities

- **Summary of Meetings and Key Discussions**

It is always difficult to evaluate the results of a working group such as the DCCWG because it is always true that more could have been done, and acknowledging this is key to achieving better outcomes in the future. However, during the period covered by this report, several indicators suggest a fruitful level of activity—despite the inherent limitations of this type of work, particularly the challenge of coordinating the agendas of leading representatives from authorities and organisations with limited resources relative to their goals and ambitions.

During the reporting period from September 2024 to July 2025, however, the DCCWG held four remote meetings and one in-person meeting with those members who took part in the 46th GPA in Jersey and carried out, as detailed in the following paragraph and as already mentioned, a survey on certain aspects within its remit.

The remote meetings were held in a standard format with the first part dedicated to an introduction by the Co-Chairs, a session dedicated to discussion with an expert or representative of a third-party organisation, a session dedicated to sharing among members, when necessary behind closed doors with regard to any observers, the main regulatory and case law developments in the various countries, and a final session for conclusions and communications and/or commitments in view of the next meeting or subsequent activities.

The following is a summary of the work of the individual meetings:

During the first meeting, held on 19 September 2024, the group mainly discussed the growing need for cooperation between privacy authorities and consumer and competition protection authorities, mainly due to the increasing role of personal data in market dynamics, with the consequent multiplication of cases in which the same issues are increasingly the subject of investigations under personal data protection and unfair commercial practices, misleading advertising or competition law.



During the meeting, particular attention was paid to the memorandum of understanding signed in France between the CNIL (the French data protection authority) and the Autorité de la concurrence, which certainly represents an important step towards regulating and institutionalising cooperation that is increasingly necessary, first at national level and then at international level.

The next meeting took place on 6 February 2025.

This meeting focused on a different interplay, namely that between personal data protection rules and the authorities responsible for their enforcement, and media, communication and information rules and the authorities responsible for their enforcement, with a particular focus on issues related to the protection of minors.

In this context, Dr. Tobias Schmid, Director of the Media Authority of North Rhine-Westphalia, participated in the meeting and presented the German model of media regulation, emphasising the complexity and importance of cooperation, including international cooperation in general and with specific reference to issues related to the first application of the European Digital Services Act.

At the same meeting, during the session dedicated to regulatory and case law updates, the new provisions introduced into Australian law on the minimum age for access to social networks by minors and the “Digital Clearinghouse 2.0”, aimed at ensuring consistent application of digital regulations across Europe, published by the EDPS, were discussed.

Subsequently, during the meeting on 8 May 2025, the group had the opportunity to explore issues related to cross-border data flows, thanks to the intervention of Javier Ruiz Diaz, who is a Digital Policy Consultant and was the former Senior Advisor on Digital Rights at Consumers International and the former Policy Director of the UK-based Open Rights Group.

The expert presented a detailed report on consumer trust and redress mechanisms in the event of misuse of personal data in international transfers.

The summary of the debate following Javier Ruiz Diaz's report suggests that much work remains to be done in this area and that the international community of data protection authorities as a whole should probably invest more resources in ensuring that, in a global society, the right to privacy of everyone can be considered effectively guaranteed regardless of the country in which personal data are processed.

In other words, since it is impossible to impose effective barriers to the circulation of data, rules and instruments for enforcing those rules must at least be consistent so as to ensure that data, including personal data, can circulate freely everywhere without compromising the fundamental rights of data subjects.



On October 29, 2024, during the GPA in Jersey, the DCCWG, or rather its members present in Jersey, met in person with the main aim of getting to know each other and thus being able to work more effectively at a distance in the following months.

The last meeting of the period covered by this report was held on 23 July 2025 and was devoted, on the one hand, to examining the possibility and usefulness of organising a new face-to-face meeting in Seoul on the occasion of the next GPA and, on the other hand, to hearing the report by Kate Jones, CEO of Digital Regulation Cooperation Forum, which currently represents one of the most successful experiences in terms of national cooperation between protection and regulatory authorities in converging sectors such as privacy, the market and telecommunications.

- **Survey on intersections with AI regulations and age verification.**

During the period covered by this report, the DCCWG conducted a survey among its members to map the interplay between personal data protection, consumer protection and competition law in different countries, with a specific focus on two areas: the impact of artificial intelligence on society, markets and democracies, and rules on age verification.

The survey confirmed a widespread similarity in the problems and issues that several countries are facing at around the same time, as well as the existence of some approaches that are more common than others.

The survey saw broad participation from countries whose data protection authorities are represented in the DCCWG: Australia, Canada, Guernsey, Hong Kong, the Philippines, Germany, the United Kingdom, Italy and the United States.

Each participating authority provided valuable information on its existing rules and those being enacted or even simply under discussion in the two areas covered by the research.

Believing that the results of the survey could also be useful outside the DCCWG for the entire GPA community, we report below a schematic and non-exhaustive summary of some of the most significant elements that emerged. Since the survey was sent out in August of 2024, it is important to note that the information provided below is subject to change and is updated based on the inputs received from the DPAs.

Regarding the regulation of artificial intelligence (AI):



- Australia does not have specific legislation on AI, but has published a discussion paper entitled “Safe and responsible AI in Australia” and is considering the adoption of voluntary safety standards and labelling options for AI-generated content;
- Canada recently had its elections which meant the demise of all pending bills including Bill C-27 (which was an Act to enact the Consumer Privacy Protection Act, the Personal Information and Data Protection Tribunal Act and the Artificial Intelligence and Data Act and to make consequential and related amendments to other Acts) which may now allow a reassessment of legislative and regulatory approaches to AI within Canada.- Guernsey does not have specific regulations for AI but, like many common law countries, relies for the time being on the decisions and guidance of the data protection authority adopted on the basis of existing legislation;
- Hong Kong similarly relies on existing legislation and sector-specific guidelines issued by the relevant regulatory authorities;
- In the Philippines, several bills relating to AI are pending, aimed at ensuring its ethical use, in particular by the government.
- Germany's approach is based on the European approach and, therefore, on the so-called AI Act.
- The United Kingdom does not have specific legislation on AI, but plans to introduce targeted rules for the most powerful AI models. The UK Information Commissioner's Office (ICO) continues to actively participate in regulatory discussions on AI. The Digital Regulation Cooperation Forum (DRCF) also plays a key role in facilitating collaboration between UK regulators on AI governance.
- Italy adopted an “Italian Strategy for Artificial Intelligence 2024-2026” and, at the time of the survey, a draft law on the comprehensive regulation of the subject was pending, which has since been definitively approved;
- In the United States, an executive order was issued to provide guidelines for the use of AI and encourage collaboration between agencies, but the order was subsequently revoked on 20 January 2025.

Here in relation to age verification legislation:

The survey also revealed a global trend towards stricter age verification measures aimed at protecting minors from harmful online content.

Here is a non-exhaustive list:

- Australia is actively testing age verification technologies and has implemented the Online Safety Act, which requires service providers to take "reasonable steps" to prevent children under 16 from



accessing social media. This act, specifically the Online Safety Amendment (Social Media Minimum Age) Act 2024, mandates age verification measures to restrict underage access.

- In Canada, the federal elections have established a new government and with the Parliament sitting again, the previously demised Bill S-210 which aimed to use age assurance to restrict young persons' online access to pornographic material, was reintroduced with revisions as Bill S-209. The Bill has passed 2nd reading in the Senate and will be studied in Committee.

- In Hong Kong, the current regulation on the control of obscene and indecent articles indirectly imposes age verification mechanisms for certain content;

- In the Philippines, Law No. 11930 has been passed, which includes provisions on age verification aimed at combating the online exploitation of children, and further legislative proposals on this subject are pending;

- Germany already has legislation restricting minors' access to harmful content, but there are no specific provisions on age verification;

- The UK's Online Safety Act (OSA) 2023 explicitly requires the adoption of age verification and estimation solutions to protect minors online;

- In Italy, there is a law requiring providers of pornographic content to verify the age of users through a technological solution that meets the requirements set by the Communications Regulatory Authority and the Data Protection Authority.

- The United States Congress is discussing several bills on this subject, including COPPA 2.0 and the Kids Online Safety Act (KOSA), which explicitly focus on strengthening the protection of minors online.

Forward looking plan 2025-2026

For the 2025–2026 term, the DCCWG will continue to focus on fostering cross-regulatory cooperation, with particular attention to two emerging areas of intersection: Artificial Intelligence (AI) and Age Assurance. Recognizing the growing regulatory challenges posed by Generative AI and digital age verification systems, the Working Group aims to deepen the understanding of how privacy principles interact with consumer protection, competition, copyright, and online safety frameworks.

To support this objective, last year the Co-Chairs have launched a survey among DCCWG members to gather information on current and upcoming legislative developments related to AI and Age Assurance



in their respective jurisdictions. The survey results will serve as a foundation for mapping the regulatory landscape, identifying opportunities for cross-sectoral collaboration, and highlighting best practices and emerging conflicts. The survey will be periodically updated to reflect the evolving regulatory environment.

Going forward, the DCCWG will continue to promote information exchange through periodic meetings, inviting representatives from authorities, agencies, the private sector, academia, and civil society to share experiences, regulatory models, and enforcement practices. These interventions will enable participants to stay informed and reflect collectively on the various national approaches, fostering mutual learning and improved coordination.

A key ambition for the next two years is to identify and encourage new forms of collaboration—formal or informal—between authorities responsible for AI governance and Age Assurance implementation. This includes engaging with sister networks, organizing joint events, and developing case studies on successful cross-regulatory cooperation.

Finally, the DCCWG will facilitate targeted workshops to discuss shared challenges and practical strategies for regulatory alignment, with the ultimate goal of supporting the GPA's mission to strengthen global privacy protection through cooperation, transparency, and a shared understanding of complex regulatory environments.

Conclusion

The activities carried out over the last year have also confirmed the growing centrality of the topics and issues addressed by the DCCWG in the international public debate and, above all, in the fulfilment of the institutional tasks of data protection authorities.

The interplay between personal data protection, consumer protection and competition, which was the exception to the rule in 2017 when the DCCWG was established, has now become the rule, the system, the inevitable approach, and probably the only one capable of enabling personal data protection authorities to continue to carry out their activities effectively.

This is a direct and immediate consequence of market convergence and the central role that personal data has acquired in those markets.

This situation underscores the need for cooperation, first and foremost at national level, between the various authorities and agencies responsible for enforcing the different regulatory systems.



This circumstance also explains the DCCWG's growing interest in exploring new forms of interinstitutional collaboration and cooperation.

The two areas identified by the DCCWG over the last year represent only areas in which the dynamics of this interplay between regulatory systems and the institutions responsible for their application can be tested in practice.

In light of the above considerations, between 2025 and 2026, the DCCWG will continue its activities in accordance with the guidelines set out in this report, seeking to respond more effectively to the real needs of the participating authorities.

With this ambition, the DCCWG will ensure that the results of the survey mentioned above are updated and continue to promote opportunities for discussion with representatives of authorities operating in the media, consumer protection and competition sectors, as well as public and private entities that stimulate and promote forms of international cooperation and collaboration, and the sharing among its members of best practices and new case law and regulations in areas that intersect with its activities.