48th Closed Session of the Global Privacy Assembly

November 2026

Resolution on Responsible Data Sharing for AML/CFT and the Protection of Personal Data

This Resolution is submitted by the Dubai International Financial Centre Authority, in its capacity as Chair of the Working Group on Data Sharing for the Public Good, on behalf of the Working Group.

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- Dubai International Financial Centre Authority

CO-SPONSORS:

- Argentina - Agency for Access to Public Information (AAIP)
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SUPPORTING AUTHORITIES / PARTICIPANTS IN DATA SHARING WORKING GROUP:

- Abu Dhabi Global Market
- Canada - Office of the Privacy Commissioner of Canada
- Ecuador - Superintendencia de Proteccion de Datos Personales
- Gibraltar Regulatory Authority
- Guernsey Office of the Data Protection Authority
- Isle of Man Information Commissioner
- Israel - Privacy Protection Authority
- Kenya - Office of the Data Protection Commissioner
- Nigeria Data Protection Commissioner
- Organisation for Economic Co-operation and Development
- Uruguay - Unidad Reguladora y de Control de Datos Personales
- Zimbabwe - Postal & Telecommunications Regulatory Authority of Zimbabwe

The 48th Global Privacy Assembly 2026:

Recalling the Global Privacy Assembly's role in providing international leadership on privacy and data protection, promoting cooperation among privacy and data protection authorities, and contributing to high-level global frameworks and standards;

Recognising the jurisdictions of various GPA Members and Observers have different legal/constitutional frameworks and those need to be respected;

Recognising that the prevention, detection, investigation and disruption of money laundering, terrorist financing and other forms of financial crime are important public-interest objectives that support the integrity, stability and security of financial systems and societies;

Reaffirming that measures intended to advance those objectives must respect applicable human rights, privacy and data protection requirements, including the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, security, accountability, necessity and proportionality;

Acknowledging that anti-money laundering and counter-terrorist financing (AML/CFT) legal frameworks might require or enable the collection, use, analysis and sharing of sensitive / special category and general personal data among public authorities, regulated entities and other participants in financial crime prevention systems;

Recognising that responsible and well-governed data sharing can assist relevant actors to improve the quality and accuracy of analysis, reduce unnecessary or duplicative processing, and strengthen action against financial crime, provided that appropriate safeguards for individuals' rights are in place;

Noting the distinct benefits that cooperation and consistency in the approach to, and interpretation of, data protection and AML/CFT data-sharing requirements bring in supporting responsible AML/CFT data sharing, more objective and detailed reporting, and the prevention of unnecessary retention, duplication or disclosure of personal data;

Emphasising that data protection and financial integrity are not competing objectives, and that effective data governance can support both the protection of individuals and the efficient prevention of financial crime;

Recognising that the increasing use of advanced analytics, network analysis, artificial intelligence and other data-driven tools in AML/CFT contexts presents significant opportunities, while also introducing significant risks relating to opacity, bias, inaccuracy, mistakes, excessive data use, security, accountability and effective redress;

Stressing that such uses of technology should be subject to appropriate legal, contractual, technical and organisational safeguards and good governance measures across the data lifecycle, including necessity and proportionality assessments, data quality controls, privacy and data protection by design and by default, security measures, effective human oversight where appropriate, and mechanisms for review and challenge;

Acknowledging that financial crime and related data processing frequently cross institutional and jurisdictional boundaries, making international cooperation, regulatory dialogue and consistency particularly important;

Recognising the distinct but complementary mandates of privacy and data protection authorities, AML/CFT supervisors, financial intelligence units, law-enforcement authorities, financial-sector regulators, standard-setting bodies, regulated entities, academia and civil society;

Welcoming the establishment by the Working Group on Data Sharing for the Public Good of the *Privacy and Integrity in Partnership: Data Protection and AML/CFT for the Public Good* initiative and its dedicated sub-working group, drawing together privacy and data protection authorities and other participating organisations from multiple regions;

Noting that the initiative is a project of the Working Group on Data Sharing for the Public Good, carried out through a dedicated sub-working group open to GPA members and observers, and that the Working Group has provided information on its objectives, scope and programme of work to GPA members to inform their consideration of this resolution;

Understanding the term "public good", in the context of this resolution and the initiative, to refer to the shared public-interest objectives of protecting individuals' privacy and personal data and safeguarding the integrity of financial systems through the prevention, detection and disruption of financial crime;

Further noting that the initiative examines the intersection of data protection and AML/CFT frameworks, with a focus on data sharing, and seeks to promote clarity, consistency and trusted practices that uphold individuals' rights while strengthening action against financial crime;

Welcoming the initiative's programme of research, expert engagement, internal deliberation, external consultation and guidance development;

Recognising the value of collaborative engagement with relevant international organisations, standard-setters, research institutions, academia and civil society, while preserving the independence and mandates of all participants;

Anticipating Outcomes of the Privacy and Integrity in Partnership initiative that are practical and internationally relevant, including enhanced legal and operational clarity at the intersection of data protection and AML/CFT frameworks; improved regulatory coherence and institutional capacity; the identification of responsible data-sharing practices and safeguards, including in the use of advanced analytics and emerging technologies; strengthened cross-regulatory collaboration and, where appropriate, collaboration between regulators, regulated entities, academia and civil society; and reinforced trust through the demonstration that robust data protection and effective financial crime prevention are mutually reinforcing public-interest objectives.

The 48th Global Privacy Assembly therefore resolves to:

1. **Endorse** the *Privacy and Integrity in Partnership: Data Protection and AML/CFT for the Public Good* initiative of the Working Group on Data Sharing for the Public Good.
2. **Affirm** that AML/CFT-related responsible processing and data sharing should be conducted in accordance with applicable laws and with data protection principles, in particular the

principles of necessity, proportionality, fairness, transparency, purpose limitation, data minimisation, accuracy, security and accountability.

3. **Support** the development of internationally relevant, practical and principles-based guidance addressing responsible data sharing at the intersection of data protection and AML/CFT frameworks.
4. **Invite** GPA members and observers to contribute to the guidance initiative by sharing relevant legal materials, regulatory guidance, decisions, research, operational experience and good practices, and by participating in consultations and Working Group activities.
5. **Encourage** privacy and data protection authorities, within their respective mandates, to engage constructively with AML/CFT policymakers, academia and civil society, supervisors, financial intelligence units, law-enforcement bodies and regulated entities on frameworks, technologies and data-sharing arrangements involving personal data.
6. **Mandate** the Working Group on Data Sharing for the Public Good to engage, as appropriate and in accordance with the GPA Rules and Procedures, with relevant external organisations and expert bodies, including organisations representing non-governmental interests, as well as academia and civil society, for example through invitations to Working Group meetings, consultations and expert sessions.
7. **Request** that such engagement support mutual understanding, promote coherence and legal certainty, examine the risks and benefits of emerging technologies, and avoid unnecessary duplication of existing work.
8. **Request** that any guidance developed under the initiative be submitted to the Global Privacy Assembly for consideration, in accordance with the GPA Rules and Procedures, before any publication in the name of the Assembly, and that such guidance:
    - be informed by evidence and meaningful stakeholder consultation;
    - respect differences in legal and institutional frameworks;
    - preserve the independence and mandates of participating authorities;
    - promote privacy and data protection by design and by default; and
    - address accountability, data quality, security and effective safeguards for individuals.
9. **Invite** the Working Group on Data Sharing for the Public Good to consider complementary outputs or activities in addition to the guidance, including case studies, issue-mapping, a repository of good-practice examples or capacity-building materials, and an evaluation exercise to assess the continuity of the sub-working group, the impact of its initiatives and its future work.
10. **Request** that the Working Group on Data Sharing for the Public Good report to the Global Privacy Assembly on progress at its next annual meeting, and submit its principal outputs, including any draft guidance and complementary outputs, for the Assembly's consideration in accordance with the GPA Rules and Procedures.
11. **Note** the anticipated outcomes of the initiative set out in the preamble of this resolution and encourage the Working Group on Data Sharing for the Public Good, without prejudging the

outcome of consultations, to have regard to those outcomes in the development of its guidance and related outputs.

The United States Federal Trade Commission abstains from the adoption of this resolution.