

# Data Protection Ireland

Volume 8, Issue 3

May / June 2015

## Headlines

- ODPC asks language school to remove data found in skip, p.17
- Latest leaked document shows three-tiered system of data protection fines, p.19
- Belgian Privacy Commission — ‘we do have competence to penalise Facebook’, p.20

## Contents

<i>Expert comment</i>	2
<i>Are you cyber secure?</i>	5
<i>Cross device profiling — ensuring compliance</i>	9
<i>The EU cookie compliance sweep — lessons to be learned</i>	13
<i>Portuguese investigation — a glimpse of what lies ahead?</i>	15
<i>News &amp; Views</i>	17

## ODPC investigates apps targeting children

The Office of the Data Protection Commissioner has participated in a global investigation organised through the Global Privacy Enforcement Network into apps and websites targeting children.

The targeted Sweep is the GPEN’s third, and it took place between 11th May and 15th May 2015.

The theme was selected after various regulators identified children as a key area of focus, given the proliferation of websites and mobile apps targeted at, or popular among, children — a ‘vulnerable demographic’.

The ODPC said: “We know from previous privacy sweeps that many mobile apps and websites collect a great deal of personal information. Apps and websites geared at young audiences raise privacy concerns related to the types of personal information being collected on these platforms.”

Sweepers assessed whether the apps and websites examined collected personal information from children and if so, whether protective controls existed to limit that collection.

They also looked at whether the websites and apps sought parental involvement, whether they allowed users to be redirected off the site, whether they made it easy to delete personal information and whether privacy communications are tailored to the age group through approaches such as simple language, large print, audio and animation.

The participating authorities had the discretion as to whether to focus on locally developed apps/websites, or those from

[\(Continued on page 17\)](#)

## Dixon’s Office doubles budget — just in time to regulate privacy of 240 million Tweeters

The ODPC has finally received its facelift, after the government announced an increased budget allocation earlier this year.

“We’re going to have more resources, so we’re going to be able to target more companies at the same time,” said Helen Dixon, who took office in September 2014. “If that signifies tougher to you, then yes, we will be tougher. We’ll

be doing more. We’ll be working faster.”

The ODPCs budget grows to EUR3.65 million and its staffing increases to 49, from 31.

The new funding is still relatively modest compared with some other European Data Protection Regulators.

Ms Dixon said that she doesn’t necessarily need the power to fine or pub-

licly release audits. “Enforcement doesn’t start and end with fines,” she said.

The bolstering of the Office’s enforcement capabilities comes just as Ireland become responsible for the privacy of 240 million Twitter users.

From 18th May 2015, the Office officially took

[\(Continued on page 17\)](#)