

## CCES Submission to 2027 International Standard for Data Protection Review Second Consultation Phase

In response to WADA's request for comments as part of Phase 2 of the 2027 International Standard for Data Protection consultation process, the CCES submitted the following comments.

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### **General comments:**

In the Table of Contents, the Page number for Article 12 has an error.

### **Article 6 – Processing Relevant and Proportionate Personal Information for Limited Purposes**

**Article 6.2:** Examples should be provided to clarify what certain contexts would be considered appropriate and necessary for ADOS to collect additional personal information.

### **Article 8 – Ensuring Appropriate Information is Furnished to Individuals**

**Comment to Article 8.3:** Consider removing the last sentence of the comment as it is repetitive in re-stating the factors of age and mental capacity that are already stated in the article.

### **Article 10 – Maintaining the Security of Personal Information**

**Article 10.1:** The article is quite vague, particularly the reference to “All necessary security safeguards,” leading the reader to believe there is a comprehensive list to reference to ensure that appropriate security is in place. Could the Guideline for Privacy be updated to include a descriptive list of known security safeguards that should be considered.